



EXTRAORDINARY RENDITION IN THE JURISPRUDENCE OF THE EUROPEAN COURT OF HUMAN RIGHTS: CASE AL-HAWSAWI V. LITUANIA

On 16 January 2024, the European Court of Human Rights issued a judgement in the case of *Al-Hawsawi v. Lithuania*. This is the latest judgement in which the Court has ruled on the extraordinary renditions operated by CIA agents on the territory of cooperative States. As a part of the post 9/11 war on terror, the extraordinary renditions became part of the CIA *High-Value Detainees Program*, aimed at the detention and interrogation of suspected terrorists in the so-called “black sites”, through the use of Enhanced Interrogation Techniques. Starting from 2014, different individual complaints have been brought to the Court concerning the responsibility of the States of the Council of Europe under whose jurisdiction the black sites were established. This contribution wants to describe the conclusions of the Court concerning the case *Al-Hawsawi v. Lithuania* to ascertain the possible evolution from, or consistency with, its previous case law on the responsibility of these States for the violation of Articles 1, 2, 3, 5, 6, 8, 13 of the Convention. Particular attention will be given to the violation of Article 3, highlighting both the elements of continuity and those of innovation in relation to the Court’s previous case law on the extraordinary rendition in the black sites.