

Examining the Legality of the Use of Force in International Law

Amanya Johnmary

School of Law, Kampala International University, Uganda

ABSTRACT

This article examines the legality of the use of force in international law. The article revealed that faith in the UN may weaken when it fails to act in contexts where its Charter requires or implies it should, or when its actions fail to achieve the intended results. As a result, it is critical for the UN's integrity and vitality that it is willing and able to act in circumstances that warrant its intervention. If there was a successful alternative to meeting global aims, it would deter states from taking matters into their own hands. This leads to the conclusion that we can welcome illegal but clearly justified action, or what we might call 'legitimate' action, under certain specified circumstances. The article proposes several broad areas where the UN could rationally undergo reform. As the maintainer of peace and security, it would be unwise for the UN to engage 'with incomplete and incremental change.' The UNSC needs 'greater credibility, legitimacy, representation, effectiveness, and enhanced capacity and willingness to act in defense of the common peace.' Therefore, the article advocates for the development of a legal doctrine of humanitarian intervention. A suggested criterion is the existence of a supreme humanitarian emergency, the use of force as a last resort, and the achievement of a positive humanitarian outcome. If the UNSC can identify these criteria for lawful humanitarian intervention, it would be wiser to authorize force. The use of force would then be under central control, as opposed to unilateral state action with a potentially undefined mandate.

Keywords: International law, Justification, Legitimacy, UN Charters, Use of force.

INTRODUCTION

Legitimacy would imply that specific uses of force are justifiable under specific conditions. It is therefore a concept that shares a realist perspective. Legitimacy in the international sphere is arguably concerned with what states regard as appropriate conduct. This is a subjective test based on states' views and attitudes. It is States' value patterns influence their subsequent actions. [1] write and adhere to international treaty law, and established state practice also produces customary international law. There is no separation of the powers. Thus only states can provide "legitimacy" for a breach of international law. The issue of "legitimacy" was discussed in terms of the claimed need for armed intervention when current international law is insufficient and, as such, cannot provide an excuse for the action. Such a discussion is vital because, as Wheeler claims, 'there are few works that explicitly interrogate the idea of legitimacy at the international level. This neglect stems from the widespread belief that power, not legitimacy, governs the international realm. At this point, it is important to note that legitimacy is based on what the majority views as legitimate or justifiable behavior [2]. It would not always be possible to gain a unanimous consensus. This is especially true if the aggressor state does not consider retaliation fair. For example, in 1990, when Iraq invaded Kuwait believing that Kuwait had stolen petroleum and, furthermore, that Kuwait was actually a province of Iraq, Iraq would be unlikely to consider the use of force justifiable in repelling their troops [3]. The imbalance of state power was addressed in the opening chapter through a discussion of the different schools of thought in international law. Realists, for example, consider 'power politics' to be at the forefront of international relations. On the other hand, strict positivists questioned the relevance and role of 'power politics' within strictly legal analysis and dictated that the law is only as stated [4]. This article examines the legality of the use of force in international law.

Interpreting the use of force in Iraq as an illustration of the implications of divergent perspectives

The legality and legitimacy issues surrounding the use of force against Iraq (but also in general) form an important debate, as 'the fabric of orderly relations between nations, the health of the human rights norm, and the struggle for a better world are built on respect for international law.' Therefore, as in all legal systems, there must be adherence to international law. If there isn't, then those relationships will break down [5]. In March 2003,

when the United States and the UK took further military action against Iraq, the two governments relied on one main legal rationale: Iraq's failure to implement certain UN Security Council resolutions and the coalition's continuing authority to use force based in particular on Resolutions 678, 687, and 1441 [6]. Roberts finds the use of force to be legal in this aspect; he believes that the revival of previous resolutions is acceptable if the use of force aims to achieve the goals outlined in those resolutions. Roberts is certainly practical in his outlook; he does not follow the strict legality route, but rather finds legality in the *wider context* of the resolutions. He assumes, in the Iraqi context, that the use of force was necessary to rectify Iraq's non-compliance with cease-fire agreements [7]. In contrast, Brunnee and Toope suggest that the Council had decided that the use of force was not required. 'The Council had already determined that Iraq had violated peace and security (Resolution 1441) and was therefore within its power to take action.' Given that the UNSC has not taken any further action beyond requesting states to provide support to UNMOVIC and deciding to remain "seized of the matter," Brunnee and Toope's argument [8] holds credibility. These authors have a legalistic approach. They suggest that 'the Council's refusal to adopt an authorising resolution actually demonstrated the Council members' adherence to legal criteria, even in the face of extreme pressure from some of its most powerful members.' Accordingly, if the UNSC wanted states to use force, they would have authorised it. White's approach to the use of force is also legalistic. He believes that the use of force cannot justify itself without clear UN authorization. He is particularly strict in his view of states using force, and he would not find legitimacy without indisputable legality [9]. Lobel and Ratner argue that for states to take military action, there must be a clear and unambiguous mandate in the form of an authorisation to use force. The resurrection of previous resolutions did not achieve this. These authors follow a strict legalist interpretation of international law. They believe that a legalistic approach to the law is absolute. They assume that the UNSC will authorize the use of force if necessary. However, a contrary argument would suggest that with the threat of the veto, UNSC authorisation may not be as straightforward a task as they assume. The UNSC intended Resolution 1441 as a final opportunity, stipulating serious consequences for Iraq's non-compliance. The UNSC did confirm that Iraq's failure to comply with Resolution 687 was a threat to international peace and security. Nevertheless, whether this amounts to a justification in international law for the UK and US to use force in the face of the opposition of other Security Council members remains controversial [10]. Members of George W. Bush's administration variously suggested that military action was necessary and justified. This was due to the urgent need for an end to the Iraqi people's repression, regime change, preventive war to stop a possible future threat, and anticipatory self-defense against an imminent threat. Despite that, legalists would argue that none of the reasons listed are in fact strictly legal. In 2003, the UN lacked a clear mandate, but could the aforementioned aims justify the use of force? If UNSC action was unforthcoming, do the ends justify the means? The US claimed the military intervention had the purpose of ensuring implementation of previous UN Security Council resolutions [11]. As illustrated here, using any interpretation other than legalism can lead to controversy. This thesis seeks to address whether any justification other than pure legalism can be acceptable, in particular the realist attitude towards the use of force and the morality of humanitarian intervention. Importantly, member states do not determine the Council's mandate goal. According to Berman, this must remain within the UNSC's exclusive jurisdiction. Therefore, one should only question the interpretation of the mandate, not the mandate itself, even if one is not a strict legalist. Berman assumes that the problems concerning force stem from the 'authorisation model.' That is, the Council authorized states to use force through resolutions rather than the model envisaged in Article 43. This 'authorisation' model enables states to interpret the resolution to their own benefit. Even if states have other non-UNSC issues on their agendas, it is crucial to meet the main aims and objectives of the UNSC. What could pose a problem is when the 'other' goal overrides the primary one. It is arguable that this has been the case with Iraq's prolonged use of force [12]. Brunnee and Toope consider the war in Iraq to have led to one of the biggest mass protests in history. They suggest that the underlying reason for this was a belief that the planned invasion violated international law. From this perspective, they would criticise political realism. 'The constant abuse of [international] law suggests that international law is fundamentally flawed and can never be more than a mask for power relationships,' they state. Here, they assume that states only use force for their own political gain. Thakur elaborates by saying, 'No one disputed the abhorrent nature of Saddam Hussein's regime, but many questioned the circumstances governing the use of force [13]. Nevertheless, if Saddam Hussein's regime can be described as 'abhorrent', then there is an argument to suggest that the repression of this kind of regime, if it needs to be through the use of force, should at least be legitimate. This underscores the distinction between legalism, liberal cosmopolitanism, and natural law approaches.

The use of force in Afghanistan and Libya as a Second illustration of divergent perspectives

There is a dearth of academic international law literature on the use of force in Afghanistan and Libya, primarily because these are more recent examples of states using force. Resolution 1368 in Afghanistan did not explicitly authorise the use of force, even though it is not a prerequisite for initiating a self-defense action [14]. However, by recognising the right of self-defense in this context, the UN helped to clarify that there was an international legal basis for the subsequent US-led intervention in Afghanistan. The initial action was clearly in response to

aggression; the UNSC Resolution was welcomed but not essential; nevertheless, this Resolution adds nothing to the prolonged action against Afghanistan. The initial response to aggression was against a terrorist group, not a state. However, it would seem that this is within the boundaries of international self-defense law [15]. "There is no reason to limit a state's right to defend itself from an attack by another. Self-defense is the right to use force to avert an attack. The attack's source, whether a state or a non-state actor, is irrelevant to the existence of the right." Therefore, this response is legalistic. The problematic aspect lies in 'the right to take action against the presumed source of such attacks, given that an attack on a non-state actor within a state will inevitably result in the use of force on the territorial state.' This action would fall foul of a legalistic interpretation; however, realists and cosmopolitans alike would be able to justify the use of force as within the spirit of self-defense. If the terrorists inhabit a state, then to use the doctrine of self-defense, a defendant state must be permitted to enter another state that is harbouring terrorists [16]. The armed force used against Libya in 2012 has some media coverage in national newspapers but limited academic coverage. Therefore, this thesis aims to delve deeper into this area. Resolution 1973 (2011) did not permit the deployment of ground troops in Libya or the removal of Gaddafi through forceful means. What followed were Special Forces on the ground and a claim that it was impossible to protect civilians without Gaddafi's toppling or possible assassination. Resolution 1973 [17] did not strictly permit Britain's bombing raids on civilian targets to reach Gaddafi. Therefore, from a legalist perspective, this use of force would face criticism. However, the topic under discussion is the legitimacy of an 'illegal' opposition force. If, as was suggested, it was impossible to protect Libyan citizens without removing Gaddafi, then perhaps force used beyond the enabling resolution can be justified if its aim was to meet the resolution's overall objective. Can we ever justify a use of force beyond the enabling resolution? A political realist perspective views the use of force as inevitable in the power politics of the intervening states, while a liberal cosmopolitan perspective elevates it as a means of averting a humanitarian catastrophe [18].

Legitimacy through Humanitarian intervention and the responsibility to Protect (Customary International law)

Humanitarian intervention, both before and after the UN Charter's adoption, has not gained the status of established state practice to justify the use of force. Therefore, a legalist perspective does not permit such action. Academics have consistently supported the concept over time [19]. Article 15 of the Covenant of the League of Nations stated: 'The members of the League reserve to themselves the right to take such action as they shall consider necessary for the maintenance of rights and justice.' This is a broad, potentially unlimited standard that permits the use of force based on each state's individual interpretation of what is just and right. 49 In the present day, one could assume that the use of force for humanitarian purposes is still subject to states' individual understanding of a situation [19]. This category could include actions intended to prevent a humanitarian catastrophe. Former UN Secretary General Kofi Annan cautioned placing legality before legitimacy in cases of humanitarian crises. 50 Regarding Rwanda, he asked the General Assembly in 1999: 'If, in those dark days and hours leading up to the genocide, a coalition of states had been prepared to act in defence of the Tutsi population but did not receive prompt Council authorisation, should such a coalition have stood aside and allowed the horror to unfold?' An overwhelming obligation to forestall a humanitarian catastrophe should, in this case, outweigh a specific legal rule to the contrary. This would appear to be self-evident; if a state can intervene to prevent suffering, then the advantages are obvious; the 'amount' of suffering, which must be present [20], is not as clear.

If it were an enforceable doctrine, the situation in Syria would be a worthy example of a current issue that would require humanitarian intervention. The internal nature of the conflict precludes self-defense, and the threat of veto has paralyzed the UNSC. In *Yugoslavia v. Belgium* [21], Belgium argued that every state has a duty to intervene to prevent human disasters, and therefore every state must have a right to do so. It is logical to argue that if states have a duty to prevent human disasters, they should also have the right to use armed force to enter a country to prevent such disasters. However, the extent of the catastrophe remains unresolved. Exactly how many citizens need to be in danger for the use of force to be legal under this doctrine? One life may be valuable enough, but we must also assess the risks to the interveners. Only a case-by-case approach can accomplish this.

Just War Theory and Moral Legitimacy

Moral legitimacy has no real legal basis in international law. It is based on philosophical ideals. 'Realists would question the basic premise that morality has anything to do with military engagement in the first place, and they would question whether this type of intervention in another state's affairs violates the notion of independent statehood [222].[22statehood [22]. In the famous example of society, saving a drowning baby from a lake is morally right, but it is not a legal requirement. In such cases, an individual has no duty to act, which could affect the humanitarian intervention argument. Perhaps it is morally right for states to intervene in response to humanitarian disasters is the argument that 'ad hoc mitigation rather than principled exception' would seek to address [233]. Scholars have proposed three broad categories that could ethically justify military engagement. These three broad categories include responding to acts of aggression, launching a pre-emptive strike against imminent or likely aggression, and addressing threats to the lives and well-being of the people. However, we

should ensure that these responses are proportionate to the aggression and the long-term, wide-ranging consequences of initiating conflict. One could argue that the 2001 use of armed force against Afghanistan was a response to aggression, serving to protect citizens' lives. If the WMD findings were accurate, the 2003 invasion of Iraq could have been classified as imminent or likely aggression of force would be "proportionate," meaning a response to terrorism and dangerous weapons [24]. However, the consequences of initiating action could be more problematic. It would be an appropriate conclusion that neither Iraq nor Afghanistan are "safe" countries after the invasions, and civilian casualties. In February 2014, the war in Afghanistan claimed the lives of at least 21,000 civilians. This would not seem proportionate to moral arguments to use force. Furthermore, 'Although moral arguments may be successful in the court of world opinion, one cannot walk into the Security Council conceding that a course of action violates international law and expect to prevail.' It is clear that morality is not law. Natural law theory is based on thoughts of right and justice [25]justice [25]. Historically, a country had the right to pursue a war as long as it was deemed 'just'. Walzer argues that morality, at the very least, does not preclude unilateral action, provided there is no immediate alternative available. In theory, this statement may seem reasonable, but in practice, it is not feasible. Initially, this theory faded away in the 15th and 16th centuries. However, with the emergence of crimes against humanity and crimes of aggression in 1919 and the Versailles Peace Treaty, there has been a return to this line of thought [26]. We needed to identify the U.S. invasion of Iraq as a "just war" to win support. The independent targeting of Saddam Hussein aligns with the just-war theory's notion of discrimination. Still, a war can only be 'just' if the claims made about it are true [27]. Furthermore, Falah *et al.* suggest that domestically, failure in war undercuts the authority of political elites. ' Therefore, once a hegemonic state has engaged in warfare, there is pressure to continue with that act, even if arguments to the contrary appear; for example, the U.S. claimed that they had reason to believe Iraq had in its possession weapons of mass destruction. Subsequent evidence indicates that the U.S.'s argument was incorrect, yet the country's use of force continued despite refuting the claims. Nevertheless, the continued use of force in Iraq was arguably based on defeating terrorism more broadly, as well as Iraq's blatant non-compliance with UNSC Resolutions [28]. In its war against terror, the United States has used force to transform Islamic nations. One could argue that this violates UN Charter Article 2(7) and the protection of state sovereignty. If this assertion holds true, what limits can we impose on "moral legitimacy"? If the use of armed force is pursued for purposes such as those mentioned above, then the claims of moral justification become weak if there is no immediate threat to civilians. However, critics might label this particular interpretation of the Bush regime as anti-American. One could argue that the USA, rather than specifically 'transforming' all Islamic nations, is attempting to achieve global democracy and peace from terrorism [29]. In *R v. Jones and others* [30], Lord Hoffman, in discussing the legal status of the 2003 Iraqi war, stated, 'Many people thought that it was morally wrong and contrary to international law.' ' Others thought that it was justified, necessary, and lawful.' This is an example of the deep-rooted problems with the idea of moral legitimacy. States will likely follow their own morals, which may not be universal. Additionally, more democratic states would likely claim a right to intervene in oppressive regimes. This could then affect the fundamental principles of sovereignty, non-intervention, and non-use of force. Natural law theory and moral legitimacy have the broadest interpretation of international law. At present, these are not legal doctrines in the strictest sense, however sensible the theory may be. Cosmopolitan theory, which maintains the possibility of a higher category of law protecting universal rights, is the closest to natural law rights. Adopting the doctrine of 'just war', morality, and natural law rights as part of international law would permit the use of force when it is right. By default, this would encompass all uses of force related to humanitarian intervention. The end of 'for the greater good' force is unclear. It would be pertinent to have a set of guidelines; without guidance, the breadth of any use of force could be vast [31]. If moral theory on the use of force were to become a legal doctrine it would address when to act, when not to act and how to act. However, the breadth of moral interpretations would ensure difficulties in coming to an exact agreement on these questions. Furthermore, it transcends the mere 'authorization' to act, and instead demands action. Although some crises may be obscene, a forced action is not likely to produce the best results. Therefore, the contemporary world is unlikely to see the emergence of a moral obligation to act [24].

CONCLUSION

This article examines the legality of the use of force in international law. The article revealed that faith in the UN may weaken when it fails to act in contexts where its Charter requires or implies it should, or when its actions fail to achieve the intended results. As a result, it is critical for the UN's integrity and vitality that it is willing and able to act in circumstances that warrant its intervention. If there was a successful alternative to meeting global aims, it would deter states from taking matters into their own hands. This leads to the conclusion that we can welcome illegal but clearly justified action, or what we might call 'legitimate' action, under certain specified circumstances.

Recommendations

The article proposes several broad areas where the UN could rationally undergo reform. As the maintainer of peace and security, it would be unwise for the UN to engage 'with incomplete and incremental change.' The UNSC

needs 'greater credibility, legitimacy, representation, effectiveness, and enhanced capacity and willingness to act in defense of the common peace.' Therefore, the article advocates for the development of a legal doctrine of humanitarian intervention. A suggested criterion is the existence of a supreme humanitarian emergency, the use of force as a last resort, and the achievement of a positive humanitarian outcome. If the UNSC can identify these criteria for lawful humanitarian intervention, it would be wiser to authorize force. The use of force would then be under central control, as opposed to unilateral state action with a potentially undefined mandate. A philosophy of limits can reject humanitarian intervention by imposing limitations on the international consensus about the connection between a state's legitimacy and its protection and advancement of human rights, restricting the willingness of intervening states to engage in long-term efforts to address root causes, and limiting the extent of intervention in the name of the international community. A different solution in response to the UNSC's ineffectiveness to act in certain circumstances would be to remove the veto power and replace it with a voting majority or majority plus one. This would prevent states from pursuing unilateral action for fear of the veto.

REFERENCES

1. Thomas, C.A.: The Uses and Abuses of Legitimacy in International Law. *Oxford Journal of Legal Studies*. 34, 729–758 (2014)
2. Mitchell, L.: International law as shibboleth: the continued appeal of heroic narratives in support of military intervention | *London Review of International Law* | Oxford Academic, <https://academic.oup.com/lril/article/11/3/481/7464035>
3. Falk, R.: Introduction: Legality and Legitimacy: Necessities and Problematics of Exceptionalism. In: Falk, R., Juergensmeyer, M., and Popovski, V. (eds.) *Legality and Legitimacy in Global Affairs*. p. 0. Oxford University Press (2012)
4. Underwood, E., and Paul, T. V.: Balance of Power, <https://www.oxfordbibliographies.com/display/document/obo-9780199796953/obo-9780199796953-0202.xml>
5. Schabas, W. A.: The Rights of Access to Justice under Customary International Law | Access to Justice as a Human Right | Oxford Academic, <https://academic.oup.com/book/8070/chapter-abstract/153473608?redirectedFrom=fulltext>
6. Voeten, E.: The Political Origins of the UN Security Council's Ability to Legitimize the Use of Force. *International Organization*. 59, 527–557 (2005). <https://doi.org/10.1017/S0020818305050198>
7. Chitalkar, P., Malone, D.M.: Recurring Pathologies of the Un Security Council: The Instructive Case of Iraq. *Journal of the Indian Law Institute*. 55, 307–326 (2013)
8. van den Herik, L.: The UN Security Council: A Reflection on Institutional Strength. In: Peters, A., Marxsen, C., Cai, C., van den Herik, L., and Maluwa, T. (eds.) *The UN Security Council and the Maintenance of Peace in a Changing World*. pp. 109–185. Cambridge University Press, Cambridge (2024)
9. Bianchi, A.: Assessing the Effectiveness of the UN Security Council's Anti-Terrorism Measures: The Quest for Legitimacy and Cohesion. *European Journal of International Law*. 17, 881–919 (2006). <https://doi.org/10.1093/ejil/chl032>
10. Westra, J.: International Law and the Use of Armed Force: The UN Charter and the Major Powers. *International Law and the Use of Armed Force: The UN Charter and the major powers*. 1–224 (2007). <https://doi.org/10.4324/9780203088913>
11. Miller, R.B.: Justifications of the Iraq War Examined. *Ethics & International Affairs*. 22, 43–67 (2008). <https://doi.org/10.1111/j.1747-7093.2008.00129.x>
12. Africa's Quest for Reform of the United Nations Security Council: A Just Cause Curbed by Unrealistic Proposals, <https://www.accord.org.za/ajcr-issues/africas-quest-for-reform-of-the-united-nations-security-council-a-just-cause-curbed-by-unrealistic-proposals/>
13. Instability in Iraq | *Global Conflict Tracker*, <https://www.cfr.org/global-conflict-tracker/conflict/political-instability-iraq>
14. Myjer, E.P.J., White, N.D.: The Twin Towers Attack: An Unlimited Right to Self-Defence? *Journal of Conflict & Security Law*. 7, 5–17 (2002)
15. Ulfstein, G.: Terrorism and the Use of Force. *Security Dialogue*. 34, 153–167 (2003)
16. Controversies Over the Customary Prohibition on the Use of Force: A Methodological Debate | *European Journal of International Law* | Oxford Academic, <https://academic.oup.com/ejil/article/16/5/803/496063?login=false>
17. Brockmeir, S. et al.: Full article: The Impact of the Libya Intervention Debates on Norms of Protection, <https://www.tandfonline.com/doi/full/10.1080/13600826.2015.1094029>
18. Dannebaum, T.: What Is Criminally Wrongful about Aggressive War? (Chapter 3) - The Crime of Aggression, Humanity, and the Soldier, <https://www.cambridge.org/core/books/abs/crime-of-aggression-humanity-and-the-soldier/what-is-criminally-wrongful-about-aggressive->

- war/3255103C59E4ECAF453DACEF98FE84D0
19. The Evolving Legitimacy of Humanitarian Interventions - Sur - International Journal on Human Rights, <https://sur.conectas.org/en/evolving-legitimacy-humanitarian-interventions/>
 20. Address by Kofi Annan to the Commission on Human Rights | United Nations Secretary-General, <https://www.un.org/sg/en/content/sg/speeches/2004-04-07/address-kofi-annan-commission-human-rights>
 21. Legality of Use of Force (Serbia and Montenegro v. Belgium), <https://www.icj-cij.org/case/105>
 22. Buchanan, A.: Introduction: The Idea of a Moral Theory of International Law | Justice, Legitimacy, and Self-Determination: Moral Foundations for International Law | Oxford Academic, <https://academic.oup.com/book/2965/chapter-abstract/143649788?redirectedFrom=fulltext>
 23. ICJ REJECTS YUGOSLAVIA'S REQUEST FOR ORDER TO HALT USE OF FORCE BY BELGIUM, REMAINS SEIZED OF CASE | Meetings Coverage and Press Releases, <https://press.un.org/en/1999/19990603.icj574.html>
 24. Taylor, I.: Just War Theory and the Military Response to Terrorism. *Social Theory and Practice*. 43, 717–740 (2017)
 25. Eggerman, M., Panter-Brick, C.: Suffering, hope, and entrapment: Resilience and cultural values in Afghanistan. *Social Science & Medicine* (1982). 71, 71 (2010). <https://doi.org/10.1016/j.socscimed.2010.03.023>
 26. DeMartino, G.F.: Counterfactual Fictions in Economic Explanation and Harm Assessment. In: DeMartino, G.F. (ed.) *The Tragic Science: How Economists Cause Harm (Even as They Aspire to Do Good)*. p. 0. University of Chicago Press (2022)
 27. Burke, A.: Just War or Ethical Peace? Moral Discourses of Strategic Violence after 9/11. *International Affairs* (Royal Institute of International Affairs 1944-). 80, 329–353 (2004)
 28. Aber, S.L.: Worldmaking at the End of History: The Gulf Crisis of 1990–91 and International Law. *American Journal of International Law*. 117, 201–250 (2023). <https://doi.org/10.1017/ajil.2023.8>
 29. Waxman, C.: Regulating Resort to Force: Form and Substance of the UN Charter Regime | *European Journal of International Law* | Oxford Academic, <https://academic.oup.com/ejil/article/24/1/151/438293>
 30. House of Lords - R v. Jones (Appellant) (On Appeal from the Court of Appeal (Criminal Division)) (formerly R v. J (Appellant)), Etc., <https://publications.parliament.uk/pa/ld200506/ldjjudgmt/jd060329/jones-4.htm>
 31. O'Keefe, R.: Crimes, the Courts and Customary International Law. *The Cambridge Law Journal*. 65, 473–476 (2006)

CITE AS: Amany Johnmary (2024). Examining the Legality of the Use of Force in International Law. NEWPORT INTERNATIONAL JOURNAL OF RESEARCH IN EDUCATION 4(3):44-49. <https://doi.org/10.59298/NIJRE/2024/4344490>