
¹ Cases in which consent is controversial include Soviet military action in Czechoslovakia in 1968 and the US operation in Grenada in 1983.

² See ICJ judgement in the *Barcelona Traction Case in 1970*.

³ A classic example is the Israeli assault on the Ugandan airport at Entebbe in 1976. Following an aircraft hijacking, a number of Israeli citizens were being held against their will by a terrorist group that was apparently being provided with both moral and physical support by the Ugandan authorities.

⁴ See the ICJ in the *Barcelona Traction Case*.

⁵ Examples include the Indian military operations in East Bengal in 1971, the Tanzanian intervention in Uganda in 1979 (both unilateral and neither justified publicly by reference to humanitarian intervention doctrine) and the multilateral intervention in Northern Iraq to protect Kurdish minorities following the UN mandated coalition operation to recover Kuwait. None of these operations benefited from a specific UN mandate, although the intervention in Northern Iraq was at least consistent with UN Security Council resolutions dealing with Iraq.

⁶ Some may argue that Article 103 of the Charter reflects such a suggestion. Certainly it obliges states to comply with their obligations under the Charter rather than with any other international obligations if there is a conflict between the two. However, this sanctions the precedence of the Charter over obligations arising from other agreements. It certainly does not oblige states to ignore their obligations, in relation to *jus cogens* for example. Indeed, were any of the organs of the UN (including Security Council) to suggest that states should act counter to *jus cogens*, the Organisation would itself be in breach of the principles of international law, something that Article 1(1) of the Charter expressly forbids.