

**The Global Initiative to Galvanize Political Commitment to International Humanitarian Law**

**WORKSTREAM 6: ICT**

**THIRD STATE CONSULTATION ON UPHOLDING INTERNATIONAL HUMANITARIAN LAW IN THE USE OF INFORMATION AND COMMUNICATION TECHNOLOGIES DURING ARMED CONFLICTS**

**16 February 2026**

**Statements by Finland**

**Session 1: Key observations by the workstream co-chairs and the ICRC towards upholding IHL in the use of ICTs during armed conflicts**

We wish to thank the ICRC and the co-chairs, Ghana, Luxembourg, Mexico and Switzerland, for these very useful consultations and for all their efforts in preparing the key observations seeking to consolidate emerging understanding on how IHL protects civilians and other protected persons and objects from the dangers arising from ICT activities in armed conflicts. Finland has actively taken part in the consultations under this work stream on upholding IHL in the use of ICTs during armed conflicts and we consider the prepared key observations to provide a good basis for further discussion.

Firstly, I wish to reiterate Finland's commitment to upholding IHL and its faithful interpretation. We wish to emphasize that IHL fully applies in cyber space.

In our intervention, we will focus on the key observations prepared on the **protection of civilian populations, civilians and civilian objects against the dangers arising from ICT activities during armed conflicts** as well as on the **protection of data**.

Regarding the key observations **on the protection of civilian populations, civilians and civilian objects against the dangers arising from ICT activities during armed conflicts**, we would wish to refer to our statements in the previous consultations. We concur that cyber means and methods of warfare must be used consistently with IHL, including the principles of distinction, proportionality and precautions, as well as the specific rules flowing from these principles. As previously highlighted, in the modern world essential services largely depend on ICT and cyber effect operations that severely disrupt civilian infrastructure and interrupt the delivery of essential services constitute one of the most important risks for civilians during armed conflict.

We very much support the key observations proposed on the protection of data. In Finland's national position, issued in 2020, it was underlined that **constant care** shall be taken to ensure the protection of **civilians and civilian objects, including** essential civilian infrastructure, civilian services and **civilian data**. In other words, civilian data shall be protected as a civilian object in accordance with IHL. Both civilian data stored in digital files and those in paper documents should be entitled to protection under IHL.

Due to limited time, regarding the key observations on **civilian ICT infrastructure used for military purposes** and **civilian involvement in ICT activities during armed conflicts**, we would also like to refer to our statements made during the previous consultations. However, we would wish to underline that when assessing the capacity of cyber means and methods to cause prohibited harm, their **foreseeable direct and indirect effects** shall be considered. If an ICT system, network or infrastructure does not constitute a military objective, it enjoys the protection as a civilian object. Civilians must be protected against attacks, unless they take direct part in hostilities including by cyber means. Children must not be allowed to take part in hostilities.

## **Session 2: Key observations by the workstream co-chairs and the ICRC towards upholding IHL in the use of ICTs during armed conflicts**

In this session, we will be focusing our comments especially on the key observations proposed regarding **protecting medical services, humanitarian activities and other specifically protected persons, objects and activities**.

Humanitarian operations and medical and humanitarian organizations and personnel benefit from several protections under IHL. The **special protections** under IHL, including for medical personnel, units and transports and humanitarian personnel and objects **shall be respected also in cyberspace and that includes their data**. States and parties to armed conflicts must allow and facilitate impartial humanitarian activities during armed conflict, and protect humanitarian personnel and objects from undue interference, including by ICT activities. Interference by cyber operations, including information operations, with the work of humanitarian organizations is never acceptable.

The landmark [resolution](#) on ICT adopted at the 34<sup>th</sup> International Conference of the Red Cross and Red Crescent clearly called on to respect and protect medical personnel, medical units and transports, humanitarian personnel and humanitarian objects, including with regard to ICT activities, as well as to allow and facilitate humanitarian activities during armed conflict, including those that rely on ICTs. In the resolution, states also recognized that ICTs are essential for efficient and effective humanitarian operations, and expressed deep concern about the impact that ICT activities may have on humanitarian organizations, including data breaches and disinformation that target them, disrupting their relief operations, undermining trust in humanitarian organizations, and threatening the safety and security of their personnel, premises and assets, and ultimately their access and ability to carry out humanitarian activities.

Finland as part of the EU [pledged](#) in the 34<sup>th</sup> International Conference to support further efforts of the International Red Cross and Red Crescent Movement, including the ICRC, in this area, with regards to its ongoing research on, and testing of a **digital emblem**.

Regarding the proposed key observations on **measures to ensure compliance with IHL**, we very much support the emphasis on **integrating gender-sensitive approaches** into national frameworks. Finland together with the Finnish Red Cross [pledged](#), in the 34<sup>th</sup> international conference, to increase awareness of gender dimensions in armed conflict. Stronger integration of a gender perspective into understanding of the law of armed conflict is necessary to strengthen protection for all.