

On the basis of Article 73 of the Rules of the Court, I submit:

**REQUEST FOR THE INDICATION OF  
PROVISIONAL MEASURES  
CONCERNING  
THE APPLICATION OF THE FEDERAL REPUBLIC OF YUGOSLAVIA  
AGAINST PORTUGAL  
FOR VIOLATION OF THE OBLIGATION NOT TO USE FORCE**

Reasons

The Federal Republic of Yugoslavia is exposed to acts of use of force by which Portugal has violated its international obligations not to resort to threat or use of force against another State, not to intervene in the internal affairs of another State and not to violate the sovereignty of another State, to protect civilians and civilian objects in time of war, to protect the environment, as well as those relating to free navigation on international rivers, to the fundamental rights and liberties of the individual, to the ban on the use of prohibited weapons and on deliberate infliction on ethnic groups conditions of life calculated to bring about physical destruction of the group.

Both military and civilian targets came under attack in the air strikes launched against the Federal Republic of Yugoslavia.

There are many casualties, including a large number of civilian deaths. Even residential areas have been attacked. Countless dwellings have been destroyed. Enormous damage has been caused to schools, hospitals, radio and television stations, institutions and cultural monuments as well as to places of worship. Many bridges, roads and railway lines have also been destroyed. Industrial facilities have not been spared either. Attacks on oil refineries and chemical plants have had serious environmental effects on some cities, towns and villages in the Federal Republic of Yugoslavia. The bombing of oil refineries and oil storage tanks as well as chemical plants is bound to produce massive pollution of the environment, posing a threat to human life, plants and animals. The use of weapons containing depleted uranium warheads is having far-reaching consequences for human health.

From the onset of the bombing of the Federal Republic of Yugoslavia, over 10 000 attacks were made against the territory of the Federal Republic of Yugoslavia. In air strikes were used: 806 warplanes (of which over 530 combat planes) and 206 helicopters stationed in 30 air-bases (situated in 5 states) and aboard 6 warships in the Adriatic Sea. More than 2,500 cruise missiles were launched and over 7,000 tons of explosives were dropped.

About 1000 civilians, including 19 children, were killed and more than 4,500 sustained serious injuries, e.g.:

- in Doganovici village, near Urosevac, the following children were killed from a cluster bomb: Endon (3), Fisnik (9), Osman (13), Burim (14) and Vajdet (15) Kodzan. In addition, two boys were wounded and taken to hospital;
- in Kursumlija: 13 dead (among them Veroljub Stevanovic) and 25 wounded (among them Dobrivoje Grcic, Milan Jankovic and Milovan Ognjenovic);
- in village of Velika Dobranja, a six-year old Arta Lugic was killed while three other children named Egzon, Neom and Arijeta were seriously wounded;

- in Pancevo: 2 dead (Dusan Bogosavljev and Mirko Dmitrovic) and 4 wounded;
- in Cacak: one dead (Mileva Kuveljic) and 7 wounded;
- in Kragujevac: over 120 workers were wounded during an attack on the car factory "Zastava";
- in Vranje: two dead (Goran Eminovic and Milica Grujic) and 23 wounded;
- in Aleksinac: 12 dead (among them Jovan Radojicic, Sofija Radojicic, Vojislav Jovanovic, Radojka Jovanovic, Dragomir Miladinovic, Snezana Miladinovic and Velimir Stankovic) and more than 40 wounded (among them Ljubica Miladinovic, Slobodan Mladenovic, Bogomir Arsic, Gvozden Milivojevic, Dragoljub Todorovic, Branislava Stevanovic, Veroljub Milutinovic, Vukica Miladinovic, Marko Miladinovic, Dijana Miladinovic, Dragica Milivojevic, Branko Stevanovic, Boban Stojanovic, Vesna Stojanovic, Srboljub Stojanovic, Marija Stojanovic, Verica Miletic, Slavimir Miletic, Dusan Miletic, Stefan Miletic, Ruica Sljivic, Zagorka Marinkovic, Srbislav Stefanovic, Natasa Stefanovic, Vesna Stefanovic, Radmila Projovic, Ljiljana Milutinovic, Nadezda Zivadinovic, Dragoljub Milosevic, Desanka Rakocevic, Slavoljub Rakocevic, Bratislav Zivadinovic, Zagorka Todorovic, Vukasin Djokic, Vladimir Jankovic, Jorgovan Bankovic, Goran Stojkovic and Todor Petric);
- in the village of Nagavac, Orahovac municipality: 11 dead (among them Cazim Krasnici, Mahmut Krasnici, Hisen Zunici and Hisni Eljsani) and 5 wounded (Zade Eljsani, Valentina Krasnici, Siresa Krasnici, Ridvan Berisa and Edonis Gasi);
- in Pristina: 10 dead (among them Adem Berisa, Radovan Aleksic, Dejan Vitkovic, and Gasi family - Mesud, Dijana, Dea, Rea and Denis) and 8 wounded;
- Grdelicka gorge: 55 killed (among them Zoran Jovanovic, Petar Mladenovic, Verka Mladenovic and Jasmina Veljkovic) and 16 wounded;
- attack on two refugee columns, with four cruise missiles, on the Djakovica-Prizren road: 75 killed (Martin Hasanaj, Lek Hasanaj, Salji Djokaj, Skendi Djokaj, and Pajaziti family - Razija, Vjolca, Violeta, Nevrija, Hastar and Fljora, Ram Maljoku, Arton Maljoku, Fikrija Sulja, Imer Celja, Ferat Bajrami, Nerdjivane Zajciri and Bersad Smailji) and 100 wounded, of whom 26 critically (among them Dzafer Mazreku, Sokolj Bajrami, Sahe Smailji, Zoja Curi, Semsije Smajli, Skumbin Sulja, Teuta Sulja, Isljam Cuni, Ljabinot Sulja, Ardijan Sulja, Zoje Tahiraj);
- in the village of Srbica: 10 killed, among whom 7 children;
- Belgrade suburb of Batajnica: a three year old girl Milica Rakic was killed, and five civilians wounded;
- in Nis: in the attack on apartment buildings one civilian was killed while 11 wounded;
- in Pristina: in the attack on the Provincial Government building in the suburb of Grmija, one civilian was killed while 2 were wounded;
- in Djakovica: in the attack on a refugee settlement housing Serb refugees from the Republic of Croatia, 10 refugees were killed and 16 wounded;
- in Belgrade: in the attack on Radio Television of Serbia office building, 15 employees were been killed and 17 wounded.

Three million children are endangered in the Federal Republic of Yugoslavia as a result of war and

bombing.

After these military attacks hundreds of thousands of citizens have been exposed to poisonous gases which can have lasting consequences for the health of the entire population and the environment.

After the destruction of the Petrovaradin bridge, Novi Sad and Petrovaradin were cut off water supply (600 000 people) since the main and city pipeline was built into the bridge. About one million citizens in our country are short of water supply due to the bombing.

About 500 000 workers became jobless due to the total destruction of industrial facilities all around the country. Two million citizens have no means of living and are unable to ensure minimum means of sustenance.

The road and railway network, in particular road and railway bridges, most of which have been destroyed or damaged beyond repair, suffered extensive destruction. The targets of attacks were:

## BRIDGES

### (a) Destroyed

1. The Varadin Bridge on the Danube;
2. The "Sloboda" (Freedom) Bridge on the Danube;
3. The "Zezelj " Bridge in Novi Sad;
4. The bridge on the river Ibar, Biljanovac;
5. The bridge on the river Vrbacka near Jezgrovica;
6. The "Lozno" railway bridge near Usce;
7. The road traffic bridge on the road leading to Brvenik near Usce;
8. The bridge near Zubin Potok on the Kosovska Mitrovica Ribarice road;
9. The old bridge on the river Rasina near the town of Krusevac;
10. The new bridge on the river Rasina near the town of Krusevac;
11. The Krusevac-Pojate bridge on the river Zapadna Morava, in the village of Jasika;
12. The railway bridge on the river Lim, between Priboj and Prijepolje, near hydroelectric power station Bistrica;
13. The bridge on the river Ibar, at the village of Brvenik, linking Korlace and Raska;
14. The bridge between Smederevo and Kovin;
15. The railway bridge on the river Kostajnica, near Kursumlija;
16. The bridge on the regional Kursumlija - Prokuplje road;
17. The bridge on the river Vrapcevska Reka near the village of Ribarice, from the direction of Kosovska Mitrovica;
18. The bridge over the railway line on the regional road Biljanovac - Mt Kopaonik;

19. The railway bridge near the village of Rudnica in the vicinity of Raska, on the Kraljevo - Kosovo Polje railway line;

20. The bridge on the Danube along the Beograd-Novı Sad road, near Beska, Indjija municipality;

(b) Damaged

1. The "Mladost" (Youth) Bridge on the Danube, connecting Backa Palanka and Ilok, was damaged;

2. The new railway/road bridge on the Danube connecting Bogojevı and Erdut was damaged;

3. The road bridge along the Magura Belaevac road, 15 kilometres from Pristina, sustained extensive damage;

4. The bridge along the Nis-Pristina main road, near Kursumlija, was extensively damaged;

5. The Grdelica gorge railway bridge on the river Juzna Morava was damaged;

6. The Grdelica gorge road bridge, on the river Juzna Morava, was damaged;

7. The road bridge on the Kosanica river near Kursumlija was damaged;

8. The road bridge on the river Toplica; on the Nis-Pristina road near the town of Kursumlija, was heavily damaged;

9. The bridge on the river Kosanica, at the village of Selo Visoko, has sustained heavy damage and is out of service;

10. The road bridge "Raskrsnica" near Donja Bistrica, on the route Priboj - Prijepolje - Nova Varos, has sustained heavy damage;

11. The railway bridge on the river Sava near Ostruznica has been heavily damaged;

12. The railway bridge on the Kraljevo - Raska railway line near Kraljevo has been heavily damaged;

RAILWAY STATIONS:

1. The Kraljevo - Kosovo Polje rail near Ibarska Slatina;

2. The Belgrade - Bar rail, due to the destruction of the railway track near the village of Strpce and destruction of the bridge on the river Lim, between Priboj and Prijepolje;

3. The Kursumlija - Prokuplje rail, near Pepeljevac village;

4. The Kraljevo - Kosovo Polje rail, near Ibarska Slatina;

5. The Nis - Pristina rail, near Kursumlija;

6. "Sarpelj" tunnel, near Jerinje village, 15 km north of Leposavic towards Raska, was destroyed;

7. Railway station in Kraljevo (Bogutovac);

8. Railway station in Kosovo Polje;

9. The Belgrade - Thessaloniki rail, due to the destruction of the bridge in the Grdelica gorge;
10. Railway station in the town of Biljanovac;
11. Railway track and overpass (Josinacka Banja) near the town of Biljanovac;
12. Railway track Kursumlija - Podujevo, due to damage of railway bridge at Kursumlija;
13. Railway track Kraljevo - Kragujevac, due to damage of the section of the track near the village of Vitanovac;
14. Railway line Uzice - Priboj ;
15. Railway line Bogojevo - Vukovar;
16. Railway line Leskovac - Predejane;

#### ROADS AND TRANSPORTERS:

1. Ibarska primary road, due to damage of the bridge on the river Ibar, Biljanovac municipality, and destruction of the road between Pozega and Cacak;
2. Belgrade-Zagreb highway, near Stari Banovci;
3. Traffic suspended on the Kosovska Mitrovica-Ribarici section of the Adriatic highway due to the destruction of the bridge on the Vrbacka river;
4. "Jedinstvo" bus station in Vranje sustained extensive damage;
5. "Kosmet Prevoz" transporter in Gnjilane (a hangar full of new buses);
6. Kraljevo-Raska primary road;
7. Bus station in Pristina;
8. Traffic has been suspended on the Krusevac-Pojate road due to the destruction of the bridge on the Zapadna Morava, in the village of Jasika;
9. Traffic has been suspended on the Nis-Pristina road, due to the fact that the bridge on the river Toplica, near the town of Kursumlija, has sustained heavy damage;
10. Traffic has been suspended on the regional road Priboj Prijepolje - Nova Varos, due to damage inflicted on the bridge "Raskrsnica" near Donja Bistrica;
11. Road maintenance company "Magistrala" in Pristina;
12. The Nis Central Bus Station;
13. The Pristina Bus Station.

#### AIRPORTS

- "Slatina" in Pristina; "Batajnica" and "Surcin" in Belgrade; Nis airport; "Ponikve" in Uzice; "Golubovci" in Podgorica, "Ladjevci" airport near Kraljevo; agricultural and sports airfield in Sombor.

The air strikes have so far destroyed or damaged all over the Federal Republic of Yugoslavia several

thousand economic facilities and dwellings. In the Leskovac region alone, over 3,500 industrial facilities and dwellings were either destroyed or damaged.

The devastation was particularly manifest in Pristina, Novi Sad, Aleksinac, Djakovica, Prokuplje, Gracanica, Cuprija, etc. Housing blocks on the outskirts of Belgrade - Kijevo Knezevac, Batajnica, Jakovo, Borca, as well as the area around Pancevo, were under attack.

#### INDUSTRY AND TRADE:

Portugal is taking part in attacks targeting the factories and industrial facilities directly catering for the needs of the population, among which are:

1. "Galenika" pharmaceutical Factory in Belgrade;
2. Industrial complex "Dvadeset Prvi Maj" in Rakovica;
3. Machine building plant "Industrija Motora Rakovica" in Rakovica;
4. Factory "Jugostroj" in Rakovica;
5. Factory "Frigostroj" in Rakovica;
6. "Lola Utva" agricultural aircraft factory in Pancevo;
7. "Zdravlje" pharmaceuticals in Leskovac;
8. "Sloboda" household appliances factory in Cacak;
9. "Din" tobacco industry in Nis;
10. "Elektronska industrija" factory in Nis;
11. "Jastrebac" machine industry in Nis;
12. Facilities of the "Beograd" rail company in Nis;
13. Construction material depot "Ogrev Invest" in Nis;
14. General merchandise depot "Kopaonik" in Nis;
15. Production line of the tobacco factory "Nis" in Nis;
16. "Elektrotehna" warehouse in Nis;
17. Food storage facility "Fidelinka" in Nis;
18. Facilities of the machine industry in Nis;
19. Office building of the company "So Produkt" in Nis;
20. Facilities of the pharmaceutical company "Velafarm" in Nis;
21. "Zastava" car factory in Kragujevac;
22. "14 Oktobar" machine factory in Krusevac;
23. Production line of the metal factory "Metalac" in Kursumlija;

24. "Krusik" holding corporation in Valjevo;
25. "Ciklonizacija" in Novi Sad;
26. "Tehnogas" in Novi Sad;
27. "Novograp" in Novi Sad;
28. "Gumins" in Novi Sad;
29. "Albus" in Novi Sad;
30. "Petar Drapsin" in Novi Sad;
31. "Motins" in Novi Sad;
32. "Izolacija" in Novi Sad;
33. "Novokabel" in Novi Sad;
34. "Istra" fittings factory in Kula;
35. The port of Bogojevo;
36. "Div" cigarette factory in Vranje;
37. "Nova Jugoslavija" printers in Vranje;
38. Furniture factory "Simpo" in Vranje;
39. Textile industry "Jumko" in Vranje;
40. Wood-processing complex "27. November" in Raska;
41. Tubes factory in Urosevac;
42. "Milan Blagojevic" chemical plant in Lucani;
43. Plastics factory in Pristina;
44. Cotton yarn factory in Pristina;
45. Shock-absorber factory in Pristina;
46. Surface coal mine "Belacevac";
47. "Binacka Morava" hydro construction company in Gnjilane;
48. Cigarette factory in Gnjilane;
49. Battery factory in Gnjilane;
50. Over 250 commercial and crafts shops in Djakovica were destroyed;
51. "Dijana" shoe factory in Sremska Mitrovica;

REFINERIES AND WAREHOUSES storing liquid raw materials and chemicals intended for oil and chemical industry, were hit in Pancevo, Novi Sad, Sombor and elsewhere, causing large contamination of

soil and the air:

1. Fuel storage in Lipovica, which caused extensive fire in the Lipovica forest;
2. "Beopetrol" storage in Belgrade;
3. "Beopetrol" storage in Bogutovac;
4. Fuel storage of the boiler plant in Novi Beograd;
5. Chemical plant "Prva Iskra" in Baric - destruction of the production line;
6. Oil Refinery in Pancevo - totally demolished;
7. Petrochemical industry "DP HIP PETROHEMIJA" in Pancevo totally demolished;
8. Fertilizer plant "DP HIP AZOTARA" in Pancevo - totally destroyed;
9. " Jugopetrol" installations in Smederevo;
10. Thermo electric power station/boiler plant in Novi Sad;
11. Oil Refinery in Novi Sad, storage of bitumen;
12. "Jugopetrol" storage in Sombor;
13. Fuel storage "Naftagas promet" which is located 10 km from Sombor;
14. "Naftagas" warehouse between Conoplja and Kljaicevo (Sombor);
15. "Beopetrol" fuel storage in Pristina;
16. Jugopetrol warehouse in Pristina;
17. Jugopetrol petrol station in Pristina;
18. Fuel depot in Gruza, near Kragujevac;

#### AGRICULTURE:

1. PIK "Kopaonik" in Kursumlija;
2. PIK "Mladost" in Gnjilane;
3. Agricultural Complex "Malizgan" in Dolac;
4. Agricultural Complex "Djuro Strugar" in Kula;
5. Agricultural and food-processing plant and a cow-breeding farm with 220 milk cows "Pester", in Sjenica, have been destroyed;
6. In forest fires caused by cruise missiles and bombs over 250 hectares of forests have been burned down;
7. Several thousand hectares of fertile land, many rivers, lakes and underground waters have been polluted due to the spillage of petrochemical substances, oil spills and slicks;

#### HOSPITALS AND HEALTH CARE CENTRES:



The aviation of Portugal also targeted many hospitals and health-care institutions, which have been partially damaged or totally destroyed, including:

- Neuropsychiatric Hospital "Dr Laza Lazarevic" and Central Pharmacy of the Emergency Centre in Belgrade;
- "Sveti Sava" hospital in Belgrade;
- Army Medical Academy in Belgrade;
- Gynaecological Hospital and Maternity Ward of the Clinical Centre in Belgrade;
- Health Care Centre in Rakovica;
- Hospital and Medical Centre in the territory in Leskovac;
- Gerontological Centre in Leskovac;
- Hospital and Poly-clinic in Nis;
- General Hospital in Djakovica;
- City Hospital in Novi Sad;
- Medical Centre and Ambulance Centre in Aleksinac;
- Medical Centre in Kraljevo;
- Dispensary on Mount Zlatibor;
- City hospital in Valjevo;
- Dispensary "Krusik" in Valjevo;
- Hospital for treatment of dystrophia in Novi Pazar;
- Health Care Centre in Kursumlija;

#### SCHOOLS (MORE THAN 200 FACILITIES):

Over 2000 schools, faculties and facilities for students and children were damaged or destroyed (over 25 faculties, 10 colleges, 45 secondary and 90 elementary schools, 8 student dormitories, as well as a number of kindergartens), including:

- Elementary schools "16. oktobar" and "Vladimir Rolovic" in Belgrade;
- Day-care centre in Petlovo Brdo housing estate in Belgrade;
- Elementary school and Engineering secondary school centre in Rakovica;
- Two secondary schools in the territory of Nis;
- Civil Engineering and Architectural Faculty in Nis;
- Mechanical Engineering Faculty in Nis;
- Electrical Engineering Faculty in Nis;

- Faculties of Law and Economics and elementary school "Radoje Domanovic" in Nis;
- Elementary schools "Toza Markovic", "Djordje Natosevic", "Veljko Vlahovic", "Sangaj" and "Djuro Danicic" and a day-care centre "Duga" in Novi Sad and creches in Visarionova Street and in the neighbourhood of Sangaj; Traffic School Centre, Faculty of Philosophy;
- Four elementary schools and a Medical high school in the territory of Leskovac;
- Elementary school in Lucane, as well as a larger number of education facilities in the territory of Kosovo and Metohija;
- Elementary schools in Kraljevo and the villages of Cvetka, Aketa and Ladjevci;
- In Sombor: elementary schools "Ivo Lola Ribar", "A. Mrazovic", "N. Vukicevic" and "Nikola Tesla" in Kljajicevo;
- School centre in Kula;
- Agricultural school in Valjevo;

#### PUBLIC AND HOUSING FACILITIES (TENS OF THOUSANDS):

- The official residence of the President of the FR of Yugoslavia in Belgrade, sustained heavy damages;
- Severe damage of the facilities of the Republican and Federal Ministry of the Interior in Belgrade,
- Damage of the building of the Institute for Security of the Ministry of the Interior in Banjica;
- Severe damage of TV RTS studio in Pristina;
- Heavily damaged Hydro-Meteorological Station (Bukulja, near Arandjelovac) ;
- Post Office in Pristina destroyed;
- Refugee centre in Pristina destroyed;
- "Tornik" ski resort on Mount Zlatibor;
- "Divcibare" mountain resort;
- "Baciste" Hotel on Mount Kopaonik;
- City power plant in the town of Krusevac;
- Meteorological Station on Mount Kopaonik damaged;
- Four libraries in Rakovica sustained heavy damage: "Radoje Dakic", "Isidora Sekulic", "Miles Crnjanski" and "Dusan Matic";
- Refugee camp "7 juli" in Paracin has sustained heavy damage;
- Office building of the Provincial Government of Vojvodina, Novi Sad;
- Hotel "Mineral" in Bogutovacka Banja sustained heavy damage;

- Office building of the power distribution board "Elektrodistribucija" in Kursumlija;
- Hotel "Putnik" on Mt. Kopaonik;
- Business centre "Usce" in Belgrade;
- Refugee camp "Majino naselje" in Djakovica;
- Radio Television of Serbia office building in Belgrade;
- Youth and children centre in Belgrade;
- Youth theater "Dusko Radovic" in Belgrade;
- Post Office in Nis;
- Several thousand housing facilities damaged or destroyed, privately or State owned, across Yugoslavia - most striking examples being housing blocks in downtown Aleksinac and those near Post Office in Pristina.

#### INFRASTRUCTURE:

- Damage of power supply transmitter in Batajnica;
- Damage of water supply system in Zemun;
- Damage of power supply transmitter in Bogutovac;
- Telephone lines cut off in Bogutovac;
- Damage of power station in Pristina;
- Damage of Bistrica hydroelectric power plant in Polinje;
- Damage of electric power transmission lines and distribution network in the zone under air strikes;
- Destruction of power supply transmitters in Belgrade suburbs of Resnik and Zemun Polje.

#### TELECOMMUNICATIONS

##### TV TRANSMITTERS:

1. Jastrebac (Prokuplje)
2. Gucevo (Loznica)
3. Cot (Fruska Gora)
4. Grmija (Pristina)
5. Bogutovac (Pristina)
6. TV transmitter on Mt Goles (Pristina)
7. Mokra Gora (Pristina)
8. Kutlovac (Stari Trg)

9. "Cigota" (Uzice)
10. "Tornik" (Uzice)
11. Transmitter on Crni Vrh (Jagodina)
12. Satellite station "Yugoslavia" (in Prilike near Ivanjica)
13. TV masts and transmitters (Novi Sad)
14. TV transmitter on Mt Ovcar (Cacak)
15. TV transmitter in Kijevo (Belgrade)
16. TV transmitter on Mt Cer
17. Relay on Mt Jagodnji (Krupanj)
18. TV transmitter "Iriski Venac" (Fruska Gora)
19. TV relay on Mt. Bukulja;
20. Transmitter in Gazimestan (Pristina);
21. RTV transmitter in Krnjaca (Belgrade);
22. RTV transmitter on Mt. Gobelj (Mt. Kopaonik);
23. RTV transmitter on top of business centre "Usce" used by RTV Kosava, RTV Pink, SOS channel, TV BK and Radio S (Belgrade).

#### CULTURAL-HISTORICAL MONUMENTS AND RELIGIOUS SHRINES MEDIEVAL MONASTERIES AND RELIGIOUS SHRINES:

1. Monastery Gracanica from 14th century;
2. Monastery Rakovica from 17th century;
3. Patriarchate of Pet;
4. Church in Jelasnica near Surdulica;
5. Monastery of the Church of St George (built in 1714) in Petrovaradin;
6. Monastery of Holy Mother (12th century) at the estuary of the Kosanica in the Toplica - territory of municipality of Kursumlija;
7. Monastery of St. Nicholas (12th century) in the territory of the municipality of Kursumlija;
8. Monastery of St. Archangel Gabriel in Zemun;
9. Roman Catholic Church St. Antonio in Djakovica;
10. Orthodox cemetery in Gnjilane;
11. Monuments destroyed in Bogutovac;
12. "Kadinjaca" memorial complex;

13. Vojlovica monastery near Pancevo;
14. Hopovo monastery, iconostasis damaged;
15. Orthodox Christian cemetery in Pristina;
16. Monastery church St Archangel Michael in Rakovica;
17. Orthodox church St Marko in Belgrade;
18. Russian Orthodox church Holy Trinity in Belgrade.

#### CULTURAL-HISTORICAL MONUMENTS AND MUSEUMS:

1. Severe damage of roof structure of the Fortress of Petrovaradin;
2. Heavy damage of "Tabacki bridge", four centuries old, in Djakovica;
3. Substantial damage of the building in Stara Carsija (Old market) in Djakovica;
4. Destroyed archives housed in one of Government buildings in Belgrade;
5. Memorial complex in Gucevo (Loznica);
6. Memorial complex "Sumarice" in Kragujevac;
7. Vojvodina Museum in Novi Sad;
8. Old Military Barracks in Kragujevac - under the protection of the state;
9. Memorial complex Crveni Krst in Nis.

Photo-evidence is supplemented as annex to the Request.

The acts described above caused death, physical and mental harm to the population of the Federal Republic of Yugoslavia; huge devastation; heavy pollution of the environment, so that the Yugoslav population is deliberately imposed conditions of life calculated to bring about physical destruction of the group, in whole or in part.

#### Possible consequences in case requested measures are not adopted

If the proposed measure were not to be adopted, there will be new losses of human life, further physical and mental harm inflicted on the population of the FR of Yugoslavia, further destruction of civilian targets, heavy environmental pollution and further physical destruction of the people of Yugoslavia.

#### Requested measures

The Government of the Federal Republic of Yugoslavia request the Court to order the next measure:

Portugal shall cease immediately its acts of use of force and shall refrain from any act of threat or use of force against the Federal Republic of Yugoslavia.

The Government of the FR of Yugoslavia reserves the right to amend and supplement this Request.

Belgrade, 28 April 1999

(Signed) Rodoljub Etinski

Agent  
for the Federal Republic of Yugoslavia