

INTERNATIONAL COURT OF JUSTICE

**CASE CONCERNING
ARBITRAL AWARD OF 3 OCTOBER 1899**

CO-OPERATIVE REPUBLIC OF GUYANA

v.

BOLIVARIAN REPUBLIC OF VENEZUELA

GUYANA'S REQUEST FOR PROVISIONAL MEASURES

6 March 2025

REQUEST OF THE CO-OPERATIVE REPUBLIC OF GUYANA FOR PROVISIONAL MEASURES

1. Pursuant to Article 41 of the Statute of the Court and Articles 73, 74 and 76 of the Rules, the Co-operative Republic of Guyana (“Guyana”) hereby requests that the Court indicate provisional measures against the Bolivarian Republic of Venezuela (“Venezuela”) as specified below. The reasons, including urgency, are set forth herein.

A. Events Giving Rise to this Request

2. The present Request is prompted by Venezuela’s announcement that it will soon hold elections *in Guyana’s sovereign territory*, which Venezuela has purported to annex in violation of the Court’s Order of 1 December 2023 and fundamental norms of international law. The elections have been scheduled for 25 May 2025. Preparations are already said to be underway. Provisional measures are urgently needed to prevent Venezuela from carrying out pre-electoral activities and conducting any elections *in Guyana’s territory*, and irreparably prejudicing Guyana’s rights at issue in these proceedings.
3. The territory in question is Guyana’s Essequibo region, comprising more than two-thirds of Guyana’s land territory, which was awarded to Guyana (then British Guiana) in the Arbitral Award of 3 October 1899, the validity of which is the subject of the present proceedings. The Court has referred to this territory as “the territory in dispute”.¹
4. On 1 December 2023, in response to Guyana’s request for provisional measures filed on 30 October 2023, the Court ordered:

“(1) Unanimously,

Pending a final decision in the case, the Bolivarian Republic of Venezuela shall refrain from taking any action which would modify the situation that currently prevails in the territory in dispute, whereby the Co-

¹ *Arbitral Award of 3 October 1899 (Guyana v. Venezuela), Provisional Measures, Order of 1 December 2023, I.C.J. Reports 2023*, pp. 666-668, paras. 36-37, 41, 45.

operative Republic of Guyana administers and exercises control over that area;

(2) Unanimously,

Both Parties shall refrain from any action which might aggravate or extend the dispute before the Court or make it more difficult to resolve.”²

5. In explaining its reasons for indicating those provisions measures, the Court stated:

“The Court observes that the situation that currently prevails in the territory in dispute is that Guyana administers and exercises control over that area. The Court considers that, pending the final decision in the case, Venezuela must refrain from taking any action which would modify that situation.”³

6. In manifest disregard of the Court’s Order, Venezuela adopted a decree, on 3 April 2024, purportedly annexing Guyana’s Essequibo region, renaming it “Guayana Esequiba State” and incorporating it as an integral part of Venezuela.⁴ This followed a series of official actions taken by Venezuela, beginning in December 2023 and described below, by which Venezuela laid the legislative and administrative groundwork for seizing and exercising control over the territory. Guyana protested these actions, to no avail.

7. Then, on 7 January 2025, President Nicolás Maduro announced that Venezuela will hold elections in “Guayana Esequiba” in which “the people of Guayana Esequiba” – that is, the *Guyanese* people who live in the Essequibo region – will elect a “Governor of Guayana Esequiba State”. President Maduro stated that:

“The election of governors and legislative councils of the 24 governorships, because we are also going to elect the governor of

² *Ibid.*, p. 668, para. 45.

³ *Ibid.*, p. 667, para. 41.

⁴ Asamblea Nacional Poder Legislativo, República Bolivariana de Venezuela, “Poder Legislativo sanciona Ley Orgánica para la Defensa del Esequibo”, (available at: <https://www.asambleanacional.gob.ve/noticias/poder-legislativo-sanciona-ley-organica-para-la-defensa-del-essequibo>) (last accessed on 5 March 2025); Asamblea Nacional, @Asamblea_Ven, “#21Mar || Queda aprobado por Unanimidad el Proyecto de Ley Orgánica para la Defensa de la Guayana Esequiba.”, *X* (21 March 2024, last accessed on 5 March 2025) (available at: https://x.com/asamblea_ven/status/1770880327424106558?s=48). The law entered into force on 3 April 2024.

Guayana Esequiba. The state of Guayana Esequiba. The first governor elected. *Voted for by the people of Guayana Esequiba.*”⁵

8. On 27 January 2025, the President of Venezuela’s National Electoral Council, Elvis Amoroso, announced that the planned elections would take place on 27 April 2025.⁶ On 5 February 2025, President Maduro made a further public announcement in which he reiterated Venezuela’s intention to hold elections in “Guayana Esequiba”:

“We will hold elections in 24 states, and for the first time, we will elect a governor for the state of Guayana Esequiba, along with its legislative council and deputies.”⁷

9. On 19 February 2025, the President of Venezuela’s National Electoral Council, Mr Amoroso, announced that the date for the elections had been pushed back by four weeks, to 25 May 2025.⁸
10. The conduct of Venezuelan elections in Guyana’s Essequibo region on that date requires, at the very least, the preparation of a list of eligible voters who reside in the region, communication with them about the mechanics of the election, installation of required electoral machinery, publication and dissemination of the candidates’ names and positions, and distribution of ballots, all of which would have to take place within Guyanese territory well before 25 May 2025.
11. It is evident that all such preparatory acts in the disputed territory leading to the holding of Venezuelan elections in “the state of Guayana Esequiba”, which are intended to lead to the appointment of a governor, legislative council and deputies for that “state”, would

⁵ Guyana’s translation (emphasis added) (Spanish original: “La elección de Gobernaciones y Consejo legislativo de las 24 gobernaciones, porque vamos a elegir al gobernador de la Guayana Esequiba también. El estado de la Guayana Esequiba. Primer gobernador electo. Por el voto del pueblo de la Guayana Esequiba.”) (7 January 2025, last accessed on 5 March 2025) (available at: <https://www.instagram.com/reel/DEgaCMIolxI/?igsh=dnA2MHcwdjNpMzYx>).

⁶ See Government of Venezuela, “CNE calls for elections for governors, deputies and legislators for next 27-A” (27 January 2025, last accessed on 5 March 2025) (available at: https://presidencia.gob.ve/Site/Web/Principal/paginas/classMostrarEvento3.php?id_evento=29530).

⁷ Venezolana de Televisión, “Head of State: On April 27th we will elect a governor for Guayana Esequiba” (5 February 2025, last accessed on 5 March 2025) (available at: <https://www.vtv.gob.ve/27a-elecciones-gobernador-guayana-essequiba/>).

⁸ Orinoco Tribune, “Venezuela: April 27 Parliamentary and Governorship Elections Postponed Until May 25” (20 February 2025, last accessed on 5 March 2025) (available at: <https://orinocotribune.com/venezuela-april-27-parliamentary-and-governorship-elections-postponed-until-may-25/>).

amount to a blatant exercise of purported sovereignty by Venezuela in violation of Guyana's sovereignty, territorial integrity and political independence, as well as the Court's Order of 1 December 2023.

12. For these reasons, Guyana respectfully requests that the Court convene hearings on the present Request at the earliest possible date.

B. Background

13. In October 2023, Venezuela announced its intention to hold a national "Consultative Referendum" in which the Venezuelan people would be invited to approve (i) Venezuela's rejection of "the line fraudulently imposed by the 1899 Paris Arbitral Award, that seeks to dispossess us of our Guayana Esequiba"; (ii) Venezuela's "historic position of not recognizing the Jurisdiction of the International Court of Justice to resolve the territorial dispute over Guayana Esequiba"; and (iii) Venezuela's intended "creation of the Guayana Esequiba State", which would be accompanied by "an accelerated and comprehensive plan ... for the present and future population of that territory, including, *inter alia*, the granting of Venezuelan citizenship and identity cards" and "incorporating that State into the map of Venezuelan territory".⁹
14. On 30 October 2023, Guyana requested that the Court indicate provisional measures, *inter alia*, to prevent Venezuela from taking action pursuant to the referendum that would seek to change the status of or otherwise affect Guyana's Essequibo region or its population, which consists of Guyanese nationals. The Court adopted an Order on 1 December 2023, as quoted above.
15. Notwithstanding the clear, unanimous and unequivocal terms of the Court's Order, Venezuela immediately acted in violation of it.
16. On 3 December 2023, Venezuela held the "Consultative Referendum" which had prompted Guyana's request for provisional measures and the resulting Order. Two days later, on 5 December 2023, the Venezuelan Government published various

⁹ Republic of Venezuela, National Electoral Council, Resolution on Referendum to be held on 3 December 2023 (20 October 2023) (quoted at para. 15 of the Court's Order of 1 December 2023).

“Announcements for the Protection and Defense of the Guayana Esequiba”. These included announcements that Venezuela would:

“1. Creat[e] [a] High Commission for the Defense of Guayana Esequiba
....

2. Activate a debate in the National Assembly on the Organic Law for the Defense of Guayana Esequiba. This legal instrument, after discussion and approval, will allow the creation of [the Venezuelan state of] Guayana Esequiba and the enforcement of the decisions approved by the people in the consultative referendum.

3. Creat[e] the Comprehensive Defense Zone of Guayana Esequiba. It will be integrated by three Areas of Integral Development and 28 Sectors of Integral Development, dependent militarily and administratively on the Region for the Integral Defense of Guayana.

4. Provisionally designat[e], pending approval of the Organic Law for the Defense of Guayana Esequiba, Alexis Rodríguez Cabello as the Sole Authority of the Guayana Esequiba. Its political-administrative seat will be in Temeremo.

5. Authoriz[e] Petróleos de Venezuela and the Venezuelan Corporation of Guayana to create the divisions of PDVSA Esequibo and CVG Esequibo. Likewise, president Nicolás Maduro will gran[t] licenses for the exploration and exploitation of oil, gas and minerals.

6. The new map of Venezuela must be published and distributed in all schools, high schools and universities in the country. In this sense, community councils, Local Committees of Sourcing and Production and the Venezuelan Army are called upon to join the distribution of the new Map of Venezuela in the communities.

7. Activate a Social Care Plan for the population of Guayana Esequiba, and carry out a census and grant identity card[s] to its inhabitants. To this end, an office of the Administrative Service of Identification, Migration and Foreign Affairs (Saime) will be established in Temeremo.

8. Establish a rule that prohibits contracting with companies that operate or collaborate in the unilateral concessions given by Guyana in the sea to be delimited.

9. Approve a Special Law that creates environmental protection areas and new national parks in Guayana Esequiba.”¹⁰

17. On 8 December 2023, President Maduro signed six presidential decrees, which *inter alia*, (i) created a new “Comprehensive Defense Zone” in the disputed territory (“ZODI-Guayana Esequiba”); (ii) designated Mr. Alexis Rodríguez Cabello as the “only” authority in this territory; (iii) authorized the state-owned companies PDVSA and CVG to grant concessions for the exploitation of oil and minerals, respectively, in that territory; (iv) ordered the incorporation of the territory in Venezuela’s official maps; (v) declared environmentally protected areas and national parks in the territory; and (vi) established the “High Commission for the Defense and Recovery of the Guayana Esequiba”.¹¹

¹⁰ Ministry of Popular Power for Ecosocialism, “Announcements for the Protection and Defense of the Guayana Esequiba” (available at: <http://www.minec.gob.ve/anuncios-para-la-proteccion-y-defensa-de-la-guayana-esequiba>) (Guyana’s translation) (last accessed on 4 March 2025); See also National Assembly of Venezuela, “NA will debate this Wednesday Organic Law for the Défense of the Guayana Esequiba” (5 December 2023, last accessed on 5 March 2025) (available at: <https://www.asambleanacional.gob.ve/noticias/an-debatira-este-miercoles-ley-organica-para-la-defensa-de-la-guayana-esequiba>); Ministry of Popular Power for Science and Technology, “President Maduro announces action plan for the defence of the Esequibo territory” (available at: <https://mincyt.gob.ve/presidente-maduro-anuncia-plan-accion-defensa-territorio-esequibo/>) (last accessed on 5 March 2025).

¹¹ See Presidential Press, “Six decrees for the protection and defense of the Guayana Esequiba” (8 December 2023, last accessed on 5 March 2025) (available at: <https://prensapresidencialvenezuela.gob.ve/index.php/2023/12/08/en-claves-seis-decretos-para-la-proteccion-y-defensa-de-la-guayana-esequiba/>). See also Delcy Rodríguez, @delcyrodriguezv, X (9 December 2023, last accessed on 5 March 2025) (available at: <https://x.com/delcyrodriguezv/status/1733312835453603868>) (“Today the President @NicolasMaduro signed a series of decrees in the framework of the Action Plan for the defence and protection of Venezuela’s new state, our Essequiba Guiana”; Guyana’s translation of the original Spanish: “Hoy el Pdte. @NicolasMaduro firmó una serie de decretos en el marco del Plan de Acción para la defensa y protección del nuevo estado de Venezuela, nuestra Guayana Esequiba”); Venezuela’s Ministry of the Popular Power for Science and Technology, “Presidente Nicolás Maduro firma decretos del Plan de Acción en defensa de la Guayana Esequiba” (8 December 2023, last accessed on 5 March 2025) (available at: <https://mincyt.gob.ve/presidente-nicolas-maduro-firma-decretos-plan-defensa-guayana-esequiba/>) (“President Nicolás Maduro signs decrees of the Action Plan in defence of Essequiba Guiana”; Guyana’s translation of the Spanish original: “Presidente Nicolás Maduro firma decretos del Plan de Acción en defensa de la Guayana Esequiba”).

18. On 21 March 2024, the Venezuelan National Assembly approved the Organic Law for the Defense of Guayana Esequiba.¹² This law, which came into force on 3 April 2024¹³, purported to:

- convert the territory in dispute into a new state of Venezuela;¹⁴
- establish the executive and legislative branches of the new state,¹⁵ and the office of comptroller;¹⁶
- vest the Venezuelan courts with jurisdiction over the territory;¹⁷
- require the President of Venezuela to “implement a special plan for the protection and development of the present and future population” of the territory;¹⁸

¹² Asamblea Nacional Poder Legislativo, República Bolivariana de Venezuela, Poder Legislativo sanciona Ley Orgánica para la Defensa del Esequibo (21 March 2024, last accessed on 5 March 2025) (available at: <https://www.asambleanacional.gob.ve/noticias/poder-legislativo-sanciona-ley-organica-para-la-defensa-del-essequibo>); Asamblea Nacional, @Asamblea_Ven, “#21Mar || Queda aprobado por Unanimidad el Proyecto de Ley Orgánica para la Defensa de la Guayana Esequiba.”, *X* (21 March 2024, last accessed on 5 March 2025) (available at: https://x.com/asamblea_ven/status/1770880327424106558?s=48).

¹³ See Venezuela’s Official Gazzete of 3 April 2024, No. 6.798, Extraordinary Gazzete, Organic Law for the Defence of the Guayana Esequiba, First Transitory Article, Guyana’s Reply, Vol. III, Annex 1 (available at: http://spgoin.imprentanacional.gob.ve/cgi-win/be_alex.cgi?Documento=T028700045985/0&Nombrebd=spgoin&CodAsocDoc=3557&t04=1&t05=png&Sesion=904168023) (last accessed on 3 March 2025). See also Nicolás Maduro, @NicolasMaduro, “Con mucho orgullo, amor y compromiso firmé y promulgué esta Ley Orgánica vinculante y obligante que ha aprobado la Asamblea Nacional, ha valido la pena rescatar el sueño de las libertadoras y los libertadores, de luchar por nuestra tierra y nuestros derechos. Más temprano que tarde, recuperaremos los derechos de Venezuela sobre la Guayana Esequiba. ¡Así lo juro y así será!” *X* (4 April 2024, last accessed on 5 March 2025) (available at: <https://x.com/nicolasmaduro/status/1775686454863176164?s=48>) (Guyana’s translation: “With great pride, love and commitment, I signed and promulgated this binding and mandatory Organic Law approved by the National Assembly, it has been worth rescuing the dream of the liberators, of fighting for our land and our rights. Sooner rather than later, we will recover Venezuela’s rights to Guayana Esequiba. So I swear and so it will be!”).

¹⁴ Organic Law for the Defence of the Guayana Esequiba, Art. 8.

¹⁵ *Ibid.*, Arts. 11, 12, First and Second Transitory Articles.

¹⁶ *Ibid.*, Art. 13.

¹⁷ *Ibid.*, Art. 16.

¹⁸ *Ibid.*, Art. 29.

- mandate that every map of Venezuela include the territory as an integral part of Venezuela and prohibit the publication of maps failing to meet this requirement;¹⁹
 - authorize the President to “adopt the necessary reciprocal measures, in accordance with international law, to guarantee the rights of [Venezuela] over” the territory;²⁰ and
 - establish the “duty” of all Venezuelans to “safeguard, protect and vindicate [Venezuela’s] sovereignty over the territory of the Guayana Esequiba”.²¹
19. As Guyana explains in its Reply on the Merits dated 9 December 2024²², these actions by Venezuela constituted flagrant violations of the Court’s Order of 1 December 2023. Venezuela’s actions were met with condemnation by the Secretary General of the Organization of American States, the Caribbean Community (CARICOM) and individual States including Belize, the Bahamas, Canada, France, the United Kingdom and the United States.²³ On 15 April 2024, the Security Council expressed its “concern about the possible escalation of tensions between Venezuela and Guyana”, and reminded the parties of their “obligations to comply with” the 2023 Provisional Measures Order.²⁴
20. Notwithstanding that widespread condemnation and the Security Council’s statement, in August 2024 Venezuela announced that it was moving forward with “a process of affirmation of sovereignty over the disputed territory”.²⁵

¹⁹ *Ibid.*, Art. 23.

²⁰ *Ibid.*, Art. 27.

²¹ *Ibid.*, Art. 8.

²² See Guyana’s Reply, Vol. I, para. 5.15.

²³ *Ibid.*, paras. 5.4-5.5.

²⁴ UNSC, *Security Council Press Statement on Guyana–Venezuela Situation*, SC/15665 (15 April 2024, last accessed on 5 March 2025) (available at: <https://press.un.org/en/2024/sc15665.doc.htm>).

²⁵ “Presidential Elections 2024: Nicolás Maduro won, the defender of the historical rights over Guayana Esequiba” (2 August 2024, last accessed on 5 March 2025) (available at <https://comisionesequibo.gob.ve/?p=8023&lang=en>).

21. The planned elections in the “State of Guayana Esequiba” are intended to build upon and entrench the various measures which Venezuela has taken since the Order of 1 December 2023, whereby it has purported to formally incorporate Guyana’s Essequibo region into Venezuela’s territory and has sought to extend and exercise Venezuela’s executive, legislative and judicial jurisdiction throughout that territory. The preparation for and conduct of elections in Guyana’s Essequibo region would constitute a further stage in the purported annexation of more than two-thirds of Guyana’s territory, this time entailing Venezuela’s direct interference with the administration and control of the territory. It would be a further egregious violation of the Court’s Order.
22. In light of these developments, and the very real threat that Venezuela will imminently take actions in the disputed territory to enable the proposed election to take place, Guyana requests the Court urgently to indicate provisional measures – as specified in Section F below.

C. *Prima Facie* Jurisdiction

23. The Court has already determined on two occasions that it has jurisdiction to determine both the validity of the 1899 Arbitral Award and the related question of the definitive settlement of the land boundary between Guyana and Venezuela. As the Court explained in the Order of 1 December 2023:

“In the present case, the Court has already found, in its 2020 Judgment, that it has jurisdiction to entertain the Application filed by Guyana on 29 March 2018 in so far as it concerns the validity of the 1899 Award and the related question of the definitive settlement of the land boundary dispute between Guyana and Venezuela (see paragraph 5 above). The Court further recalls that, in its 2023 Judgment (see paragraph 6 above), it found that it could adjudicate upon the merits of the claims of Guyana, in so far as they fell within the scope of the first subparagraph of the operative clause of the 2020 Judgment.”²⁶

24. Accordingly, it is beyond doubt that the Court has *prima facie* jurisdiction to indicate the provisional measures sought by Guyana.

²⁶ *Arbitral Award of 3 October 1899 (Guyana v. Venezuela), Provisional Measures, Order of 1 December 2023, I.C.J. Reports 2023, p. 662, para. 18.*

D. The Rights Whose Protection Is Sought and the Link Between Those Rights and the Requested Measures

25. Guyana seeks protection for its rights to the territory awarded to Guyana by the 1899 Arbitral Award, pending the Court’s determination of the validity of that Award, or, alternatively, pending the settlement by the Court of the land boundary between the Parties.
26. In the Order of 1 December 2023, the Court had no difficulty in finding that Guyana’s right to sovereignty over the territory awarded to it by the 1899 Arbitral Award was plausible:

“The Court recalls its finding in the 2020 Judgment that a land boundary dispute exists between the Parties. It further observes that the territory which forms the object of that dispute was awarded to British Guiana in the 1899 Award.... For these reasons, the Court considers that Guyana’s right to sovereignty over the territory in question is plausible.”²⁷

27. For precisely the same reasons, the rights which Guyana seeks to protect by the present request for provisional measures – in particular its right to sovereignty over the territory awarded to it by the 1899 Award, which Venezuela refers to as “Guayana Esequiba” – are manifestly plausible.
28. As to the link between those plausible rights and the provisional measures requested by Guyana, in the Order of 1 December 2023 the Court noted that the provisional measures sought by Guyana included a measure which sought to ensure that Venezuela did not “take any actions that are intended to prepare or allow the exercise of sovereignty or *de facto* control over any territory that was awarded to British Guiana in the 1899 Arbitral Award”. The Court “consider[ed] that this measure is aimed at protecting Guyana’s right which the Court has found plausible”.²⁸ It therefore “conclude[d]...that a link exists between the right claimed by Guyana that the Court has found to be plausible” and that requested provisional measure.²⁹

²⁷ *Ibid.*, p. 663, para. 23.

²⁸ *Ibid.*, p. 664, para. 25.

²⁹ *Ibid.*, para. 26.

29. Those reasons are equally applicable to the present request for provisional measures. By this request, Guyana seeks to prevent Venezuela from engaging in new acts – namely the holding of elections in Guyana’s Essequibo region and the creation of executive and legislative bodies in that territory, as well as elected public officials – which would be intended to prepare for and enable the exercise of sovereignty and *de facto* control by Venezuela over Guyana’s territory. There is therefore a clear link between the provisional measures sought by Guyana and the plausible rights which those measures are intended to protect.

E. The Risk of Irreparable Prejudice and Urgency

30. If Venezuela conducts electoral activities in the territory on Guyana’s side of the boundary line established by the 1899 Award, this will cause grave and irreparable harm to Guyana. Holding elections is a quintessential exercise of sovereignty by a State. The conduct of Venezuelan elections in respect of Guyana’s sovereign territory would involve Venezuela purporting to exercise sovereign powers which only Guyana is entitled to exercise in that territory. Moreover, the planned elections are specifically intended to facilitate the establishment and operation of Venezuelan legislative and executive institutions and jurisdiction in respect of that territory – institutions whose very purpose would be to assert and implement Venezuelan permanent control over the territory.
31. In the Order of 1 December 2023, the Court noted that Venezuelan officials had made “official statements [which] suggest that Venezuela is taking steps with a view towards acquiring control over and administering the territory in dispute.”³⁰ The Court concluded that:

“[I]n light of the strong tension that currently characterizes the relations between the Parties, the circumstances described above present a serious risk of Venezuela acquiring and exercising control and administration of the territory in dispute in the present case. It therefore concludes that there is a risk of irreparable prejudice to the right claimed by Guyana in the present proceedings that the Court has found plausible... The Court further considers that Venezuela’s expressed readiness to take action with regard to the territory in dispute in these proceedings at any moment

³⁰ *Ibid.*, p. 666, para. 36.

following the referendum scheduled for 3 December 2023 demonstrates that there is urgency, in the sense that there is a real and imminent risk of irreparable prejudice to Guyana’s plausible right before the Court gives its final decision.”³¹

32. Those observations apply *a fortiori* to the present request for provisional measures. As a result of the acts summarized above that Venezuela has committed since the Court’s Provisional Measures Order, the tension that characterizes the relations between the Parties is stronger than it was when that Order was made in late 2023. Venezuela’s purported creation of a “Guayana Esequiba State” and its purported incorporation of that “State” within Venezuela’s territory provide the clearest evidence of Venezuela’s intention to annex *de jure* the entirety of Guyana’s Essequibo region and to control and govern that territory as though it were Venezuela’s own sovereign territory. Venezuela’s explicit plans to conduct imminent elections in “Guayana Esequiba” – and its intention to use those elections to facilitate the creation of Venezuelan legislative and executive organs there – are consistent with and confirm that Venezuela intends to acquire and exercise control and administration over that territory.
33. The conduct of Venezuelan elections in Guyana’s Essequibo region would cause irreparable harm to Guyana. If Venezuela conducts such elections, then even were the Court to subsequently deliver a Judgment on the Merits which upholds the validity of the 1899 Award or which otherwise settles the Parties’ land boundary in a manner that leaves the Essequibo region under Guyana’s sovereignty, there is a real risk that Venezuela would refuse to revoke its purported exercises of sovereignty in that territory and would continue to control and administer the territory as though it were its own. This is therefore a paradigmatic situation where provisional measures are required under Article 41 of the Court’s Statute in order to preserve Guyana’s rights.
34. The need for provisional measures is urgent. The planned elections are due to take place on 25 May 2025 and will inevitably be preceded by extensive preparatory acts, including acts within Guyana’s Essequibo region affecting the Guyanese population. In order to preserve Guyana’s rights, it is therefore necessary for the provisional measures to be indicated by the Court well before that date. Accordingly, Guyana

³¹ *Ibid.*, para. 37.

respectfully asks that the hearings on its request be scheduled as soon as possible, to enable such provisional measures as might be indicated by the Court to be issued before serious and irreparable prejudice to Guyana's rights occurs.

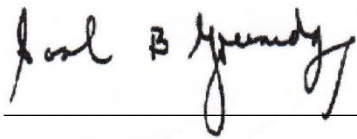
F. The Requested Measures

35. For the foregoing reasons, Guyana requests the Court to indicate the following provisional measures, which would remain in effect until the issuance of the Court's Judgment on the Merits:

1. Venezuela shall not conduct any election in, or in respect of, any part of the territory on Guyana's side of the boundary line as established by the 1899 Arbitral Award, including by doing any of the following acts:
 - a. purporting to extend the right to vote in any Venezuelan elections to any individuals living within that territory;
 - b. distributing ballot papers, poll cards, electoral materials or any other physical or electronic electoral documents to individuals within that territory;
 - c. presenting or naming or otherwise supporting candidates for any Venezuelan elections within that territory;
 - d. establishing polling stations, counting stations or electoral offices within that territory;
 - e. purporting to establish, elect or appoint any office of governor, legislative council, deputies or any other legislative or governmental official in respect of any part of that territory; and
 - f. communicating directly or indirectly with any residents in that territory in regard to any elections planned by Venezuela.
2. Venezuela shall refrain from taking any action which purports to annex *de jure* or *de facto* any territory on Guyana's side of the boundary line established by the 1899 Arbitral Award, including by incorporating "Guayana Esequiba" as part of Venezuela.

3. Venezuela shall refrain from taking any action which would seek to modify the situation that currently prevails in the territory in dispute, whereby Guyana administers and exercises control over that area.

Respectfully submitted,



Agent of the Co-Operative Republic of Guyana

6 March 2025