

## REPARATIONS

### Victims

The notion of victims under international law is not limited to the first line heirs of the deceased person and may possibly encompass close relatives of the deceased who can reasonably be considered to have suffered moral prejudice as a result of the violations (*Zongo*, Reparations, para 46). The determination of who qualifies as a close relative in this regard must be done on a case-by-case basis depending on the circumstances of each case (*Zongo*, Reparations, para 49). In the *Zongo* reparations case, spouses, children and parents of the deceased were accepted as close relatives who qualify for compensation (*Zongo*, Reparations, para 50).

It is therefore not relevant that the persons recognised as victims by the court in terms of international law are the same persons recognised as heirs of the deceased person under domestic law (*Zongo*, Reparations, para 54).