



JUSTICE DENIED—THE PATTERN OF DEATHS IN AND AFTER CUSTODY IN TIBET

“Detention in Tibet can be a death sentence—without investigation, without accountability, there is no justice.”

<https://savetibet.org/justice-denied-the-pattern-of-deaths-in-and-after-custody-in-tibet>

I. INTRODUCTION

“In Tibet, imprisonment may amount to a death sentence. In many cases, it has.”

- Tencho Gyatso, International Campaign for Tibet

Tsedon was a 20-year-old university student in Lhasa, studying hard, dreaming of her future, when she was taken into custody by Chinese authorities^[1]. Weeks later, she was dead. Her body was not returned to her family, no autopsy was conducted, and no explanation was made public.

Across Tibet, similar stories have unfolded over the past decade; this report documents at least 16 such cases between 2014 and 2026. Geshe Pende Gyaltzen, a 56-year-old monk and scholar who spent his life mediating village disputes, died in custody^[2]. Gonpo Namgyal, a village leader who believed Tibetan children should learn in their own language, died days after his release^[3]. Tulku Hungkar Dorje Rinpoche, a revered spiritual teacher whose work helped thousands, disappeared into custody and never came back^[4]. Norsang was a father of six who refused forced political classes and had his death hidden for nearly two years^[5].

These cases come from different parts of Tibet and from people living very different lives, yet their deaths unfolded in a familiar pattern. Individuals are taken into custody, frequently without access to lawyers or family members, and held in conditions where there is little to no outside oversight. Accounts of abuse, ill-treatment, or denial of medical care emerge but are rarely examined independently. In some cases, people die in detention; in others, they are released only when their condition has already deteriorated beyond recovery. ICT has documented cases of Tibetan families receiving back their loved ones, injured, unconscious, or unable to speak. They often die days later.

This pattern has been documented by the International Campaign for Tibet for almost two decades. In an earlier report covering the period from 2008 to 2014, the International Campaign for Tibet documented 14 Tibetans who have died in detention or shortly thereafter, underscoring the longstanding nature of these violations.^[6] When such violations persist for years, they cease to be exceptions and become evidence of how the system is designed to function. The absence of transparency, accountability, and investigations exposes a system in which the Chinese authorities operate with total impunity. For Tibetans, this creates a pervasive climate of fear that follows individuals into every

aspect of their lives. That fear intensifies at the moment of arrest, where detention is not experienced as a legal process but as a state of extreme uncertainty, carrying the risk of disappearance and death.

“These are not isolated tragedies. They reveal a pattern in which Tibetans are taken into custody and do not come back alive.”

After death, the pattern continues. Bodies are withheld or cremated under strict state control. Families are denied access, prevented from carrying out religious rites, and blocked from verifying the cause of death. No independent investigations are conducted, and no accountability follows.

As one Tibetan relative and former political prisoner, Tsering Dorjee, explained, “We are not told where they are. We are not told what happened. And when they die, we are not allowed to know why. The Chinese government does whatever it wants to the Tibetan people - there is no law, no procedure, nothing.”

The UN Committee against Torture, which is the treaty body of independent experts monitoring the implementation of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT), defines torture as “systematic” when it is habitual, widespread and deliberate. The recurrence of these deaths, combined with the consistent failure to investigate or provide redress, indicates that this threshold is met in Tibet.

Detention in Tibet is not only a deprivation of liberty. It is life-threatening.

II. A PATTERN OF DEATH IN CUSTODY

“This is not just arbitrary detention. It is a system where people are taken into custody alive - and returned to their families as bodies, or not at all.”



An undated photo of Tibetan student Tsedon. (Photo: Private/anonymous)

For some Tibetans, detention ends before release ever comes. They disappear into custody and emerge only as a body or not at all. This report documents ten such cases of Tibetans who did not survive detention.

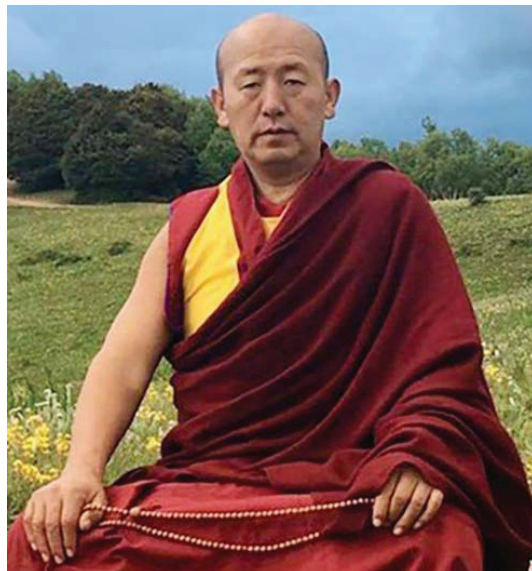
The case of Tsedon reflects this pattern. A 20-year-old university student in Lhasa, she was detained in Nyemo County on 26 December 2023 while still pursuing her studies and planning for the future^[7]. Within weeks, she was dead. Authorities did not return her body, no autopsy was conducted, and no explanation was made public. Her family, teachers, and classmates were left without answers. Her case is not an isolated one but part of a broader and deeply concerning pattern that ICT has documented across Tibet.

In one of the most recent cases documented, Samten, a 25-year-old monk from Ditsa Geden Tashi Choedingling Monastery (in Amdo, CH: Hualong County, Haidong City, Qinghai Province), died in police custody in December 2025^[8]. Authorities claimed he had “suddenly fallen ill” during a transfer to the hospital, but local sources believe he was beaten to death during interrogation. His body was returned to the monastery under strict orders not to disclose any information, and the circumstances of his detention remain unclear due to severe restrictions on access to information. Samten had reportedly been under constant police surveillance since 2021 after sharing photographs related to elections organized by the Central Tibetan Administration.

Geshe Pende Gyaltsen was a respected monk who had dedicated his life to religious study and community mediation. He was detained after assisting in resolving a local dispute and was reportedly in good health at the time of his arrest. On 26 January 2023, he died in custody^[9]. In the aftermath, authorities imposed restrictions on his monastery and the surrounding community, prevented individuals from viewing his body, and transferred his remains to Beijing. These measures not only obstructed religious rites but also prevented any independent scrutiny of the circumstances of his death.

“There is no justice or equality for Tibetans under this system, and no real laws we can rely on.”

- Dorjee Tsering, friend of Geshe Pende Gyaltsen



An undated photo of Tibetan monk Geshe Pende Gyaltsen.
(Photo: Private/anonymous)

Earlier cases follow the same trajectory of detention, death, and concealment. In 2019, Norsang, a 36-year-old father of six from Nagchu, located in the “Tibet Autonomous Region,” died in custody after refusing to participate in political re-education campaigns. His death was concealed for nearly two years, and when information did emerge, his family and community were warned against speaking about it. No autopsy was conducted, and no investigation has been made public^[10]. In 2016, Trigyal died while serving a 13-year sentence imposed after he refused to comply with a politically driven campaign to display the Chinese flag. The circumstances of his death were never independently examined^[11].

The same pattern is evident in earlier documented cases. Lobsang Yeshi, a village leader from Chamdo, was detained in 2014 after opposing a gold mining project and was reportedly subjected to torture and denial of medical care. He died in a hospital in 2015; authorities attributed his death to illness while preventing his family from viewing his body and carrying out a tightly controlled cremation^[12]. That same year, Tenzin Delek Rinpoche, one of Tibet's most revered religious leaders, died in prison following years of alleged abuse and medical neglect^[13]. His death prompted international concern, including from UN human rights mechanisms, with the UN Committee against Torture raising the case in its review of China and highlighting concerns about deaths in custody linked to a lack of medical care^[14]. UN Special Procedures also raised Tenzin Delek Rinpoche's case directly with the Chinese authorities, underscoring the seriousness of the allegations and the absence of any independent investigation^[15].

For his family, however, the lack of answers has never been resolved.

“We have spent years asking what happened to him, and still, there are no answers,” said Nyima Lhamo, the niece of Tenzin Delek Rinpoche. “We were never allowed to see my uncle’s body.”

Despite sustained international attention, his body was not returned, and those who sought answers faced intimidation. As Nyima Lhamo continued to emphasize:

“Without the body, without an investigation, there is no truth.”

Other cases reinforce this pattern. Yudruk Nyima died while still in police custody following his arrest; although his family filed a complaint, no findings were ever released^[16]. Karmey, a 22-year-old from Golog, died just one day after being taken into custody, reportedly following severe beatings^[17].

More recently, the case of Tulku Hungkar Dorje demonstrates that this pattern has not only continued but, in some instances, extended beyond China's borders. According to a communication issued by several UN Special Procedures, he was arrested in Ho Chi Minh City in March 2025 by Vietnamese authorities in the presence of Chinese officials and subsequently disappeared. For several days, Dorje's family received no information about his whereabouts or condition. Authorities later announced that he had died in custody, attributing his death to a “heart attack” without providing evidence. His body was cremated at night without family consent and without any independent forensic examination^[18].

Under Article 6 of the International Covenant on Civil and Political Rights (ICCPR), to which China is a signatory, States have a duty to protect the right to life, including for those in custody^[19]. The Human Rights Committee, which is the treaty body of independent experts monitoring the implementation of the ICCPR, has emphasized that deaths in detention must be subject to prompt, impartial and effective investigation^[20]. Articles 12 and 13 of the CAT, to which China is a State Party, likewise require authorities to investigate wherever there are reasonable grounds to believe that torture or ill-treatment has occurred^[21]. In the cases documented by ICT, there is no evidence that these obligations have been met. Instead, they reveal a recurring pattern of custodial deaths followed by concealment and impunity.

III. RELEASED TO DIE

Many Tibetans do not die from their injuries while detained but are released when it is already too late. In these cases, death occurs outside formal custody, but under

circumstances that are directly linked to the treatment they endured while detained. This report documents six such cases below.



An image of Gonpo Namgyal.
(Photo: Private/anonymous)

The case of Gonpo Namgyal illustrates this pattern. A village leader from Darlag County (Ch: 达日县), Ponkor Township (Ch: 红科乡), Golog, TAP, Qinghai Province, who believed Tibetan children to be able to learn in their own language. For that, he was held incommunicado for months following his detention in 2024. When he was released, he was gravely weakened and unable to recover, and witnesses said his body showed signs of abuse, including electrical burn marks. He died three days after being released, without any explanation from authorities regarding his condition or the treatment he had received in custody^[22].

“We are denied the truth, and we are forbidden from even speaking about the people we lost.”

- Relative of Gonpo Namgyal

Other cases demonstrate the same sequence of abuse, medical neglect and delayed release. Tenzin Nyima, a 19-year-old monk from Dza Wonpo Monastery in Wonpo, in Sershul (Ch: Shiqu) County, Kardze (Ch: Ganzi) Tibetan Autonomous Prefecture, Sichuan Province, was detained on 9 November 2019. His arrest came two days after he and three other Wonpo monks briefly distributed leaflets and shouted slogans calling for Tibetan independence outside the local Wonpo government office. He was so severely beaten in custody that he went into a coma. He was released from prison in early October 2020, and on 9 October, he died in the hospital^[23]. No investigation or explanation was ever provided regarding the injuries that led to his death.



Before picture of Tenzin Nyima and after picture in the hospital following severe physical abuse by Chinese authorities in detention. (Photo: Private/anonymous)



An image of Lhamo.
(Photo: Private/anonymous)

Lhamo, a Tibetan woman from Driru County, was detained on suspicion of sending money to relatives abroad. She was later found in the hospital, unable to speak and bearing visible injuries. She died two days later, and her body was immediately cremated, preventing any independent examination^[24].

Gendun Sherab, a monk arrested in 2017 for sharing a message from the Dalai Lama, was beaten in detention and released in critical condition. His health continued to deteriorate, and he was reportedly denied access to hospitals in Lhasa. He died in 2020 as a result of untreated injuries sustained during his detention^[25].

Similarly, Choekyi, a monk imprisoned for producing a garment marking the Dalai Lama's birthday, was released on 18 January 2019 in extremely poor health after years in detention. Despite international calls for medical care while in prison, he died after his release without any official explanation provided^[26]. Meanwhile, Tashi Paljor, a monk at the Wenpo monastery in Chamdo (in Chinese, Changdu) prefecture in the Tibet Autonomous Region (TAR), was returned on 28 February 2014 to his family severely beaten, unable to speak, and died the following day on 1 March 2014^[27].

His relative in exile, Tibetan monk Golog Jigme, stated:

“Choekyi died at home in front of his family, without receiving proper medical care. Even now, his family remains under surveillance and has been excluded from government benefits.”

- Golog Jigme, Tibetan monk and relative of Choekyi



Monk Chokyi before and after, (left) an undated photo before his detention and (right) an undated photo of him lying at home, waiting to die, as he was not allowed to receive medical treatment in a hospital.
(Photo: Anonymous source)

These cases are often treated as separate from deaths in custody. In reality, they form part of the same pattern of abuse.

Under international law, the State’s responsibility does not end upon release. Where individuals are released in a life-threatening condition as a result of torture or medical neglect in detention, the State remains responsible for the resulting harm. The CAT requires States to prevent acts of torture and ill-treatment in all circumstances, including through the provision of adequate medical care^[28]. The International Covenant on Civil and Political Rights further guarantees humane treatment of persons deprived of liberty^[29].

While on record, the individual does not officially die in detention, they do not survive it.





IV. NO BODY, NO TRUTH

“By the time families are informed, the body is gone - and with it, the truth.”

What happens after death is as revealing as what happens before it.

Across the cases documented in this report, families are frequently denied access to the bodies of their relatives. In some cases, remains are withheld entirely. In others, cremations are carried out quickly, under strict state supervision, or at night, without family consent or respect to religious beliefs.

These practices do more than deepen the trauma of loss. They eliminate the possibility of verification.

| LAW VS. REALITY | |
|--|--|
| International law requires | What happens in Tibet |
|  Investigations into deaths | No investigations |
|  Access to family | Incommunicado detention |
|  Medical care | Denied or delayed |
|  Autopsy | No autopsies, corpses are immediately cremated |

Without access to the body, there can be no independent autopsy. Without an autopsy, there can be no confirmed cause of death, and without that, there can be no accountability.

As one relative explained, “They took him away, and even in death, they would not return him to us.”

International law is clear. Under Articles 12 and 13 of the CAT, States must initiate investigations ex officio wherever there are reasonable grounds to believe that torture or ill-treatment has occurred, including all deaths in custody and any death closely linked to treatment during detention^[30]. These obligations apply equally to deaths that occur during detention and to

deaths that occur after release, where the cause is suspected to relate to injuries, torture, or medical neglect suffered while detained.

The right to life under Article 6 of the ICCPR imposes a heightened duty of care on States in situations of detention. As the Human Rights Committee has emphasised, this duty requires States to demonstrate that a death was not caused by an act or omission

attributable to them; a requirement that can only be met through a prompt, independent, and effective investigation^[31]. In none of the cases documented in this report is there any evidence that such an investigation has been carried out or made public. Instead, evidence is systematically removed, bodies are withheld, autopsies are not conducted, information is not disclosed and families are excluded.

The Minnesota Protocol on the Investigation of Potentially Unlawful Death and the 2016 United Nations Manual on the Effective Prevention and Investigation of Extra-legal, Arbitrary, and Summary Executions, reinforces these obligations^[32]. It requires that investigations be independent, impartial, thorough, prompt and capable of (1) determining the cause, manner, and circumstances of death and (2) identifying any responsible officials (paras. 15–16). Investigators must recover, preserve, and analyze evidence with full access to evidence, witnesses and relevant documentation (para. 25(b)); an autopsy should “almost always” be performed; and any decision not to conduct one must be justified in writing and subject to judicial review (paras. 21–23, 25–26). Investigations must be transparent through openness to families and the public (para. 32). The protocol emphasizes that families have a right to participate meaningfully; to be kept informed of the investigation’s progress and findings (paras. 34–35); to have access to the body to the extent necessary for the effective exercise of their rights (para. 28); and to have access to information about the circumstances of death (para. 12).

This pattern and China’s intentional obfuscation and interference is evidenced by the lack of institutional independence in investigative mechanisms. Responsibility for investigating deaths in custody lies with the People’s Procuratorate, an authority that is not independent but operates within the same political and security structures responsible for detention. In cases involving Tibetans, this non-separation creates a structural conflict of interest – the same system that detains individuals is also responsible for investigating their deaths.

UN human rights mechanisms have repeatedly raised concerns about this failure to investigate. In multiple communications, they have documented cases in which Chinese authorities did not initiate even basic inquiries into allegations of torture, excessive force or unexplained deaths involving Tibetans. In one instance, authorities failed to respond to complaints from dozens of Tibetans who reported severe police violence during a peaceful protest^[33]. More recently, the UN communication concerning Tulku Hungkar Dorje confirmed the continuation of this pattern. Authorities prevented access to his body, carried out a cremation at night without family consent and provided no indication that any investigation meeting international standards had been undertaken^[34].

Taken together, the recurrence of custodial deaths, the suppression of evidence, and the absence of independent investigation point to China’s systematic violation of international law. The failure to investigate means not only loss but also permanent uncertainty, while for those responsible, it means impunity. The result is a system in which deaths occur, but the truth about those deaths is systematically obscured.

V. A SYSTEM WITHOUT SAFEGUARDS

These cases reflect a legal and institutional framework that fails to prevent abuse and, in practice, enables it. The legal framework governing detention in China remains fundamentally inconsistent with international standards on torture, and those inconsistencies matter because they help explain why abuse in Tibet is able to continue without accountability.

China's Criminal Law does not recognize torture as a distinct and comprehensive offense in line with the CAT – despite China being a State Party to the Convention since 1988. Instead, Article 247 criminalises the extraction of confessions by torture and the use of violence to obtain witness statements^[35], while Article 248 criminalises physical abuse of persons in custody^[36]. These provisions are narrower than the definition of torture set out in Article 1 of the CAT, which covers the intentional infliction of severe physical or mental pain or suffering for purposes including punishment, intimidation, coercion, or discrimination^[37]. That gap is not technical. Chinese criminal law excludes important categories of abuse from the definition itself. Torture committed to punish a monk for displaying an image of the Dalai Lama, to intimidate a language advocate, or to discriminate against a Tibetan detainee because of his or her identity is not fully captured by a legal framework focused primarily on extracting confessions. In practice, this weakens both prevention and accountability.

The scope of liability is also limited. Article 247 applies only to “judicial officers,” excluding other officials who may exercise de facto control over detainees, including police, state security personnel, and prison staff. Penalties are similarly inadequate. Torture under Article 247 carries a maximum sentence of three years' imprisonment or short-term custody, unless the conduct causes injury, disability, or death, in which case other offenses such as intentional injury or homicide are used instead^[38]. This effectively reclassifies torture as an ordinary violent crime and obscures its systemic and state-sanctioned character.

These deficiencies are especially serious in the Tibetan context because detention does not occur in a neutral legal environment. Chinese authorities frequently prosecute Tibetans under broad and vaguely defined offences such as “inciting separatism” or “endangering national security” for conduct linked to religious, linguistic or cultural identity. The result is that laws which already fail to define torture properly are applied within a wider system that disproportionately targets Tibetans in the first place.

Under international law, China's obligations extend beyond the CAT. Article 7 of the ICCPR, which China signed in 1998, prohibits torture and ill-treatment in absolute terms^[39]. As a signatory to the ICCPR, China is further bound under Article 18 of the Vienna Convention on the Law of Treaties not to defeat the *object and purpose* of the Covenant before ratification^[40]. The prohibition of torture has also attained the status of a peremptory norm of customary international law. The Committee against Torture has repeatedly called on China to bring its domestic legislation into line with Article 1 of the CAT, to which China has been a State Party for 38 years^[41].

Arbitrary and incommunicado detention remain central pillars of China's rule in Tibet and are key enabling conditions for torture and ill-treatment. These practices violate the absolute prohibitions contained in Article 2 of the CAT and Articles 9 and 10 of the ICCPR, as well as the standards established by the UN Working Group on Arbitrary Detention and the Body of Principles for the Protection of All Persons under Any Form of Detention or Imprisonment^[42]. They also constitute a common factual backdrop to the deaths of Tibetans in custody and post-release deaths documented in Sections III and IV. Under Article 9 of the ICCPR, no one shall be subjected to arbitrary arrest or detention, and all persons deprived of liberty must be informed of the reasons for their arrest, have prompt access to legal counsel and be brought before a judicial authority without delay^[43]. In the Tibetan context, however, detainees are regularly held in undisclosed locations, denied prompt access to lawyers and families and effectively cut off from all external oversight.

China's Criminal Procedure Law compounds these violations. Article 39 allows meetings with counsel only within 48 hours of request and permits investigators to delay access indefinitely in “state security” or “terrorism” cases^[44]. Given that Tibetans are routinely arrested under state security crimes of “inciting separatism” or “endangering national

security,” this provision systematically enables prolonged incommunicado detention in cases where the risk of torture is highest. The measure authorising “residential surveillance at a designated location” (RSDL) permits up to six months of incommunicado detention in secret facilities without judicial review^[45].

“This system is built to operate in the dark.”

The Committee against Torture has expressed grave concern that these provisions may amount to incommunicado detention in secret places and put detainees at a high risk of torture or ill-treatment^[46]. UN Special Procedures have also repeatedly documented that Tibetan detainees are held for weeks or months without access to family, lawyers, or medical care, and that authorities often refused to disclose the location of detention^[47] ^[48] ^[49].

VI. WHO IS BEING TARGETED - AND WHY

“None of these people died for ordinary crimes. They died for being Tibetan.”

- A relative of a deceased Tibetan, 2026

The individuals documented in this report were not engaged in violent or criminal conduct. They were monks, students, teachers and community leaders. Their actions included teaching the Tibetan language, sharing religious teachings, protecting local environments and supporting their communities. UN Special Procedures have raised concerns that China’s policies in Tibet amount to a broader pattern of “acculturation and assimilation” that seeks to erase a distinct Tibetan culture, language and religion and replace it with a Han-centric model^[50]. Discrimination is the engine.

International law is clear: when ill-treatment is inflicted for discriminatory reasons, it meets the legal definition of torture (CAT, Article 1)^[51]. In its General Comment No. 2, the Committee against Torture also makes clear that protection for groups “especially at risk of torture,” including minorities and marginalized communities, is part of the State’s preventive obligations, and States must not engage in or tolerate torture “for reasons based on discrimination of any kind”^[52]. In Tibet, detention is often linked to the expression of religious, cultural, and linguistic identity. The legal framework not only fails to prevent torture; in practice, it helps create the conditions in which torture is more likely to occur. In Tibet that protection is absent. Discrimination is not a side effect; it is the driver.

“For Tibetans who fall into the hands of the Chinese authorities, they are entirely at their mercy. But discrimination begins long before detention.”

- A recently arrived Tibetan refugee who requested anonymity, from Drukgo County, Kham, interviewed in April 2026

VII. NO JUSTICE FOR FAMILIES

“After he died under the torture at the hands of the Chinese government, not only was any factual investigation forbidden, but even speaking about him became strictly prohibited.”

- A relative of a deceased Tibetan detainee

Discriminatory targeting is compounded by an almost complete lack of redress for Tibetan victims of torture, medical neglect, arbitrary detention, and deaths in custody. For the families of those who die, there is little prospect of justice.

As one family member stated, “We cannot grieve, we cannot investigate, and we cannot seek justice.”

China’s State Compensation Law^[53] excludes psychological suffering and limits liability to direct acts of state personnel, thereby denying compensation for torture or ill-treatment perpetrated with official acquiescence, contrary to Article 14 of the CAT and General Comment No. 3 (2012).

Remedies under the SCL are limited to financial compensation and do not include rehabilitation, satisfaction or guarantees of non-repetition, contrary to General Comment No. 3 (2012), which emphasises that monetary awards alone cannot constitute full redress for torture^[54].

The law’s two-year limitation period for filing claims (Article 32) is inconsistent with Article 14 of the CAT^[55] and General Comment No. 3^[56], which affirm that statutes of limitation should not apply to torture because of its continuing effects. In the Tibetan context, this restriction effectively forecloses access to justice. Victims often remain imprisoned or under surveillance for years, while families of those who die in custody face intimidation, denial of information and threats of reprisal if they seek redress.

By maintaining a framework that excludes psychological harm, limits liability, and imposes restrictive deadlines, China denies victims of torture, particularly Tibetans, access to justice and effective remedies, in violation of Article 14 of the CAT.

Compensation claims are adjudicated by the same authorities implicated in the violations, undermining the impartiality required by international standards. To date, no Tibetan family is known to have obtained compensation or an official acknowledgement for a death in custody. Families seeking justice face intimidation, surveillance, and collective punishment, in violation of Article 13 of the CAT and Article 2 (3) of the ICCPR, which guarantee the right to an effective remedy.

This denial of redress is acutely visible in the deaths documented in Section II. None of the families of Tsedon, Geshe Pende Gyaltzen, Norsang, Trigyal, Lobsang Yeshe, Tenzin Delek Rinpoche, Yudruk Nyima, Karmey, Tulku Hungkar Dorje, Gonpo Namgyal, Tenzin Nyima, Lhamo, Gendun Sherab, Choekyi or Tashi Paljor are known to have received compensation, an apology or even an official explanation consistent with international standards. Requests for information are ignored or denied, and families are frequently warned against speaking publicly about the circumstances of the death.

This denial is compounded by intimidation and surveillance. Families who attempt to seek answers, speak publicly or pursue accountability risk reprisals including threats, restrictions on movement or detention. In this environment, even asking questions can carry consequences^[57]. UN Special Procedures have documented that Chinese authorities ignored formal complaints from dozens of Tibetans about police violence^[58]. Families were denied information about trials, places of detention, or the health of their detained relatives^[59], demonstrating a systemic refusal to provide remedies or transparency. Such reprisals violate Article 13 of the CAT and Article 2(3) of the ICCPR, which guarantee the right to an effective remedy, and further entrench impunity for state agents^[60].

In the Tibetan context, these obligations are consistently ignored. The result is a system in which families are left without truth, without accountability and without recourse.

As one family member described, “We are left with silence - and the silence is part of the system.”

VIII. RECOMMENDATIONS

To Governments:

- Raise individual cases of Tibetan deaths in custody and deaths following release and call for prompt, independent and impartial investigations in line with international standards, including public disclosure of the findings and adequate compensation and redress for affected families.
- Press for meaningful, unfettered access to Tibet for independent observers, including UN monitors, diplomats and journalists, with access to detention facilities and the ability to meet confidentially with the families of deceased detainees.
- Publicly condemn reprisals against Tibetans and call for the protection of family members, witnesses and communities seeking information or accountability.
- Consider the use of targeted measures, including sanctions and visa restrictions, against officials credibly implicated in serious human rights violations, including deaths in custody, torture and enforced disappearance.
- Affirm the right of families to know the truth about the circumstances of a relative's death, including access to remains, information on cause of death, and the ability to carry out religious and cultural practices without interference.

To the Government of the People's Republic of China:

- Ensure that all allegations of torture or other cruel, inhuman, or degrading treatment or punishment are promptly, thoroughly, effectively, and impartially investigated in accordance with articles 12 and 13 of the CAT, regardless of the rank or position of the alleged perpetrators.
- Ensure that all persons suspected of having committed acts of torture or ill-treatment are prosecuted under offences that reflect the gravity of such acts and, if convicted, receive penalties commensurate with their seriousness, as required under article 4 of the CAT. Guarantee that victims and families have access to effective remedies, including adequate compensation, rehabilitation, satisfaction, and guarantees of non-repetition.
- Guarantee that all detainees have timely and effective access to adequate medical care, including access to qualified medical professionals independent of the detention facility, and the right to consult a doctor of their choosing and emergency treatment without delay.
- Adopt safeguards to prevent inappropriate political interference in judicial proceedings, including by Chinese Communist Party Politics and Law Committees, and ensure judicial independence in law and practice.

To the United Nations:

- Explicitly address deaths in custody in Tibet as part of a broader pattern of torture, discrimination, and impunity.
- Call for investigations into allegations of torture, deaths in custody, enforced disappearances, and denial of medical care, and request public reporting on investigative outcomes.
- Request comprehensive, disaggregated data on allegations, investigations, prosecutions, and convictions for torture and ill-treatment, including data specific to Tibetan areas, to enable effective compliance with the CAT.
- Continue to seek meaningful, unrestricted access to Tibetan areas, detention facilities, courts, and emphasize that preventive monitoring is a core component of torture prevention under international law.
- Systematically follow up on China's implementation of prior recommendations related to torture, arbitrary detention, discrimination, and accountability.
- Monitor and publicly condemn reprisals against human rights defenders, lawyers, victims' family members and individuals engaging with UN mechanisms.

Appendix

Overview of documented cases of deaths in or after custody

| Personal background | Known location | Date of death | Died | Key details |
|--|---|-----------------|---------------|---|
| Tashi Paljor བཏམ་ཤེས་དཔལ་འབྱོར། (扎西班觉) | | | | |
| Monk | Wenpo Monastery, Chamdo city (Chinese: 昌都市, TAR) | 1 March 2014 | After release | Returned beaten and unable to speak; died the next day |
| Karmey ཀལ་མེ། (卡尔梅) | | | | |
| Youth, age 22 | Darlag County (Ch: Dari, 达日县), Golog, Qinghai | December 2014 | In custody | Died one day after detention, reportedly after beatings |
| Lobsang Yeshe ལོ་བཟང་ཡེ་ཤེས། (洛桑益西) | | | | |
| Village leader (opposed gold mining) | Dzogang County (Ch: 左贡县), Chamdo, TAR | 2015 | In custody | Tortured and denied medical care; died in hospital |
| Tenzin Delek Rinpoche ལྷུ་སྐུ་བསྟན་འཛིན་བདེ་ལེགས། (丹增德勒) | | | | |
| Revered religious leader | Nyagchu County (Ch: Yajiang, 雅江县), Kardze, TAP, Sichuan | 2015 | In custody | Died in prison after years of alleged abuse; case raised by UN bodies |
| Trigyal འི་རྒྱལ་། (赤嘉) | | | | |
| Refused to fly the Chinese flag | Diru County (Ch: Biru, 比如县), TAR | 2016 | In custody | Died while serving a 13-year sentence |
| Yudruk Nyima གཡུ་འབྲུག་ཉི་མ། (玉珠尼玛) | | | | |
| Detainee | Dege County (Ch: Derge, 德格县), Kardze, TAP, Sichuan | 2016 | In custody | Family complaint filed; no findings ever released |
| Norsang རོ་བཟང་། (诺桑) | | | | |
| Father of six; refused re-education | Nagchu County (Ch: Naqu, 那曲市), TAR | 2019 | In custody | Death concealed for nearly two years |
| Gendun Sherab དགེ་འདུན་ཤེས་རབ། (更登喜饶) | | | | |
| Monk (shared a Dalai Lama message) | Rongpo Rabten Monastery, Sog County (Ch: 索县), TAR | 2020 | After release | Denied hospital care; died from untreated detention injuries |
| Choekyi ཚོ་སྐྱེད། (曲吉) | | | | |
| Monk | Phugu Monastery, Serta County (Ch: Seda, 色达县), Kardze, TAP, Sichuan | 2020 | After release | Released in poor health (18 Jan 2019); died without medical care |
| Tenzin Nyima བསྟན་འཛིན་ཉི་མ། (丹增尼玛) | | | | |
| Monk, age 19 | Detained in Sereshul County, (Ch: Serxu, 石渠县), Kardze, TAP, Sichuan | 9 October 2020 | After release | Beaten into a coma in custody; died days after release |
| Lhamo ལྷ་མོ། (拉姆) | | | | |
| Woman detainee | Diru County (Ch: Biru, 比如县), TAR | October 2020 | After release | Found injured in hospital; died two days later; cremated immediately |
| Geshe Pende Gyaltzen དགེ་བཤེས་པན་བདེ་རྒྱ་རྒྱལ་མཚན། (潘德坚赞) | | | | |
| Monk & scholar, age 56 | Nyagchu County (Ch: Yajiang, 雅江县), Kardze, TAP, Sichuan | 26 January 2023 | In custody | In good health when detained; remains transferred to Beijing |
| Tsedon ཚེ་སྐོན། (次卓) | | | | |
| University student, age 20 | Nyemo County (Ch: 尼木县), TAR | Early 2024 | In custody | Detained 26 Dec 2023 in Lhasa; died within weeks; body withheld |
| Gonpo Namgyal མགོན་པོ་ནམ་རྒྱལ། (贡布朗杰) | | | | |
| Village leader; language advocate | Detained in Darlag County (Ch: 达日县), Golog, TAP, Qinghai | December 2024 | After release | Held incommunicado for months; died three days after release |
| Tulku Hungkar Dorje ལྗེ་དཀར་རྡོ་རྗེ། (卍嘎多杰) | | | | |
| Spiritual teacher (lama) | Arrested in Ho Chi Minh City, Vietnam | 2025 | In custody | Disappeared after arrest abroad; body cremated at night |
| Samten བསམ་འགན། (桑丹) | | | | |
| Monk, age 25 | Ditsa Monastery, Hualong County (Ch: 化隆县), Hualong Hui Autonomous County, Qinghai | December 2025 | In custody | Died in police custody; body returned under secrecy orders |

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“14. The Committee expresses grave concern over the amended articles of the Criminal Procedure Law permitting a person under residential surveillance to be placed “at a designated location” for up to six months, in cases involving crimes of “endangering State security”, “terrorism” or serious “bribery”, and when confinement in their home may impede the investigation. The Committee notes with concern that, although families must be notified within 24 hours of the decision, the Law does not indicate that they must be told the reason or the place of detention, which could be any unregulated and unmonitored facility. The Committee is of the view that these provisions, together with the possibility of refusing access to a lawyer for these types of crimes, may amount to incommunicado detention in secret places, putting detainees at a high risk of torture or ill-treatment (art. 2).”

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International Campaign for Tibet (ICT) | 1825 Jefferson Place NW | Washington, DC 20036 | United States of America
Phone: (202) 785-1515 | Fax: (202) 785-4343 | info@savetibet.org

ICT Europe
Funenpark 1D | 1018 AK
Amsterdam, The Netherlands
Phone: +31 (0)20 3308265
Fax: +31 (0)20 3308266
icteurope@savetibet.nl

ICT Deutschland e.V.
Schönhauser Allee 163 | 10435
Berlin, Germany
Phone: +49 (0)30 27879086
Fax: +49 (0)30 27879087
info@savetibet.de

ICT Brussels
11, rue de la linière | 1060
Brussels, Belgium
Phone: +32 (0)2 609 44 10
Fax: +32 (0)2 609 44 32
info@save-tibet.eu