

## Terrorist Modus Operandi and Protection of Human Rights

Samanta Kowalska

---

**Abstract:** *Nowadays, terrorist attacks increasingly often take on an amorphous form, which may cause the society to assume a state of inaction or to inspire a false sense of security. Escalation of terrorist attacks leads to the introduction of new counteractive measures and revision of the existing systems of security. The current reflections emphasise how the essence of human rights ought to serve as a point of reference for organs of the law enforcement and legislation alike, with the aim of preventing arbitrary surveillance of citizens. The paper demonstrates why it is important for counter-terrorism strategy to be continually revisiting this axiom, which leads to increased practicality of regulations concerning identification and effective combating of terrorism. The axiology of human rights navigates towards universal, timeless values which have the capability of uniting people for the benefit of effective preventive measures based on active involvement, reasonable and future-oriented legislation.*

**Key Words:** *International Law; International Public Law; Terrorism; Human Rights; International Relations; Preventive Diplomacy.*

---

### Introduction

The phenomenon of terrorism is one of the most amorphous, unpredictable and ruthless threats to security both for individuals and nations. Terrorism steps out of legal, analytic and descriptive standards. Contemporary terrorists set themselves not only political, but also economic aims and aims in cultural sphere. One of terrorism's immanent traits is constant transformation into malicious forms of violence. Increasingly more often the attacks are of a non-military nature. One of the most alarming changes is the tendency for debasement of the essence of law, state and human rights. Terrorism is one of the important asymmetrical factors of shaping of international relations. The dangerous connections of some governments with terrorists and terrorists with organised crime not infrequently make it hard to distinguish a terrorist act from other forms of violence. Scientific and technical progress is another determinant, as are globalisation and changes in mentality and organisation of

social life. Knowledge about terrorism should be verified and supplemented and extended continuously.

The phenomenon of terrorism is one of the key issues studied by researchers and experts on security. Depending on the adopted research criteria, terrorism may be defined in various ways.<sup>1</sup> It is not unusual for different ministries of the same country to use different terminology. Nicholas J. Perry likened the efforts to find a definition of terrorism that is both satisfactory and adequately reflects reality to the “Holy Grail”.<sup>2</sup> One approach to analysis of the definition of terrorism postulates identifying the qualities that remain constant throughout the time: violence, political nature, inspiring a sense of chronic fear, antagonizing of the society, fetishisation of violence, mediatisation of violent attempts.<sup>3</sup>

### Terrorist paradigm

The report by the European Police Office has shown an increased risk of terrorist coups with the use of home-made explosives (known as “HMEs”).<sup>4</sup> Other tools in the terrorist inventory include charges of the Triacetone Triperoxide type (hereinafter referred to as the “TATP”),<sup>5</sup> which are difficult to detect, since they can be stored in drink bottles, postal packages, etc. Due to its properties, the TATP is used as an initiat-

---

<sup>1</sup> See SCHMID, A. Terrorism – The Definitional Problem. *Case Western Reserve Journal of International Law*. 2004, vol. 36, no. 2, pp. 375-419. ISSN 0008-7254.

<sup>2</sup> See the statement of Nicholas J. Perry recalled from GREENE, A. Defining Terrorism: One Size Fits All?. *International & Comparative Law Quarterly* [online]. 2017, vol. 66, no. 2, p. 413 [cit. 2021-10-04]. ISSN 1471-6895. Available at: <https://doi.org/10.1017/s0020589317000070>.

<sup>3</sup> See BRUCE, G. Definition of Terrorism – Social and Political Effects. *Journal of Military and Veterans' Health*. 2013, vol. 21, no. 2, p. 30. ISSN 1835-1271; and SCHMID, A. P. The Revised Academic Consensus Definition of Terrorism. *Perspectives on Terrorism*. 2012, vol. 6, no. 2, p. 159. ISSN 2334-3745.

<sup>4</sup> See *European Union Terrorism Situation and Trend Report 2021* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2021, p. 28 [cit. 2021-10-04]. ISBN 978-92-95220-26-3. Available at: <https://doi.org/10.2813/677724>.

<sup>5</sup> See *European Union Terrorism Situation and Trend Report 2019* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2019, p. 19 [cit. 2021-10-04]. ISBN 978-92-95209-76-3. Available at: <https://doi.org/10.2813/788404>; and GONSALVES, M. D., K. COLIZZA, J. L. SMITH and J. C. OXLEY. In Vitro and in Vivo Studies of Triacetone Triperoxide (TATP) Metabolism in Humans. *Forensic Toxicology* [online]. 2021, vol. 39, no. 1, pp. 59-72 [cit. 2021-10-04]. ISSN 1860-8973. Available at: <https://doi.org/10.1007/s11419-020-00540-z>.

ing material for the detonation of other explosives.<sup>6</sup> The TATP devices may contain metal parts to cause the greatest possible injuries. Around the time that the EUROPOL report was being developed, the highest numbers of casualties were noted as due to jihadi attacks. The attacks were carried out according to one or a combination of the following strategies: mass murders (e.g. Barcelona, London, 2017), attacks aimed at symbols of authority (e.g. Paris, 2017), attacks directed against the ideology of the Western lifestyle and the symbols representing it (e.g. Manchester, 2017). The time period covered by the report was characterised by a rise in cases of aggressors acting alone (known as “lone actor”).<sup>7</sup> In the attacks carried out by jihadists, a frequent method was to use improvised explosive devices (known as “IEDs”) attached to a belt or a different item of clothing.<sup>8</sup>

Fanaticism, coupled with irrational ideology, may result in unpredictable behaviour. Transformations in social life, scientific and technological progress as well as globalisation make it impossible to adopt a single, uniformly accepted definition of terrorism. The publication “Knights of Lone Jihad” proliferated by the Islamic State of Iraq and Syria (ISIS, Daesh) via social media contained a call to poison food and water using chemical, biological, radiological, nuclear (known as “CBRN”)

---

<sup>6</sup> See SALZANO, E., G. LANDUCCI, G. RENIERS and V. COZZANI. Domino Effects Related to Home-made Explosives. *Chemical Engineering Transactions* [online]. 2014, vol. 36, p. 349 [cit. 2021-10-04]. ISSN 2283-9216. Available at: <https://doi.org/10.3303/cet1436059>.

<sup>7</sup> See *European Union Terrorism Situation and Trend Report 2021* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2021, pp. 53-54 [cit. 2021-10-04]. ISBN 978-92-95220-26-3. Available at: <https://doi.org/10.2813/677724>; see also BARNES, B. D. Confronting the One-man Wolf Pack: Adapting Law Enforcement and Prosecution Responses to the Threat of Lone Wolf Terrorism. *Boston University Law Review*. 2012, vol. 92, no. 5, pp. 1613-1662. ISSN 0006-8047; and KAPLAN, J., H. LÖÖW and L. MALKKI, eds. *Lone Wolf and Autonomous Cell Terrorism* [online]. 1<sup>st</sup> ed. London: Routledge, 2015. 266 p. [cit. 2021-10-04]. ISBN 978-1-315-72426-3. Available at: <https://doi.org/10.4324/9781315724263>.

<sup>8</sup> See *European Union Terrorism Situation and Trend Report 2018* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2018, p. 18 [cit. 2021-10-04]. ISBN 978-92-95200-91-3. Available at: <https://doi.org/10.2813/00041>. Cf. *European Union Terrorism Situation and Trend Report 2020* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2020, p. 20 [cit. 2021-10-04]. Available at: <https://www.europol.europa.eu/publications-events/main-reports/european-union-terrorism-situation-and-trend-report-te-sat-2020>; and *European Union Terrorism Situation and Trend Report 2021* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2021, p. 29 [cit. 2021-10-04]. ISBN 978-92-95220-26-3. Available at: <https://doi.org/10.2813/677724>.

weapons.<sup>9</sup> Since ancient times, water reservoirs have always been locations of strategic importance. Throughout the ages, control of water resources has been utilised as a form of defence against invaders, means of exerting pressure, weakening the man power and the military potential of the adversary. Bodies of water have been poisoned, pipelines and pumping stations destroyed. There have also been attempts at alteration of climatic conditions, e.g. by causing heavy fall of rain or snow. The American air weather service, in order to hinder a truck transport of military equipment by the North Vietnamese Army, used planes to disperse silver iodide over the North and South Vietnam, Cambodia and Laos (known as “Operation Popeye”).<sup>10</sup> As a result of weather modification by means of cloud seeding, the soil maintained a high level of moisture, the surfaces of roads were softened and landslides occurred, thwarting transport of people and equipment.

It is worth noting that at present, terrorists utilise both modern technologies and military knowledge alongside methods used in ‘classic’ crime. To provide an example, the Federal Aviation Administration banned the practice of aerial application in agriculture after it was discovered that one of the people arrested after the 11 September attacks had tried to gain an agricultural aircraft of this sort for terrorist purposes.<sup>11</sup> At the same time, the police secured spots of water intake that supply water to the citizens of New York and Washington.<sup>12</sup> Moreover, there is a continuing risk of attacks on nuclear power plants, the goal of which

---

<sup>9</sup> See UNAL, B. and S. AGHLANI. *Use of Chemical, Biological, Radiological and Nuclear Weapons by Non-state Actors: Emerging Trends and Risk Factors* [online]. 1<sup>st</sup> ed. London: Chatham House, 2016, p. 22 [cit. 2021-10-04]. Innovation Series. Available at: <https://www.lloyds.com/news-and-insights/risk-reports/library/use-of-chemical-biological-radiological-and-nuclear-weapons-by-non-state-actors>.

<sup>10</sup> See FLEMING, J. R. The Pathological History of Weather and Climate Modification: Three Cycles of Promise and Hype. *Historical Studies in the Physical and Biological Sciences* [online]. 2006, vol. 37, no. 1, p. 13 [cit. 2021-10-04]. ISSN 1533-8355. Available at: <https://doi.org/10.1525/hsp.2006.37.1.3>.

<sup>11</sup> See MONKE, J. *Agroterrorism: Threats and Preparedness*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2007, pp. 1-59. CRS Report for Congress, no. RL32521; and CHAPPUIS, R. D. The Flight of Toxic Tort – Aerial Application of Insecticides and Herbicides: From Drift Liability to Toxic Tort. *Journal of Air Law and Commerce*. 1992, vol. 58, no. 2, pp. 411-453. ISSN 0021-8642.

<sup>12</sup> See COPELAND, C. *Terrorism and Security Issues Facing the Water Infrastructure Sector*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2010. 18 p. CRS Report for Congress, no. RL32189.

is either to procure radioactive materials or to cause a catastrophe.<sup>13</sup> In turn, in year 2002, four Moroccans were arrested under the suspicion of links to Al-Qaeda and an intended terrorist attack involving the poisoning of the pipeline supplying water to the United States Embassy in Rome with a cyanide-based chemical.<sup>14</sup> The dynamics of generating terrorism necessitates revision of the systems of security currently in place.

Moreover, modern terrorism constitutes a threat not only to the rights of the individual, but also to the biological balance. Laboratory development of combinations of bacteria and viruses for criminal purposes may produce unpredictable outcomes. Biological agents spread instantly and across borders.<sup>15</sup> Terrorists can isolate biological material themselves; they obtain it from a sponsor state, nongovernmental actor or by means of theft from hospitals, microbial banks or laboratories. For example, in year 2004, in Dirksen Senate Office Building (Washington) a highly toxic substance, ricin,<sup>16</sup> was found. Ricin is known to cause organ failure and to lead to cell death by blocking the synthesis of proteins. The Federal Bureau of Investigation prevented an attack in which members of the Minnesota Patriots Council were planning to use ricin in cream and spray forms. During the arrest 0.7 grams of ricin were found that had been produced by the members of the organisation.<sup>17</sup> Had the attack not been thwarted, this amount would have been sufficient to cause the loss of numerous lives.

Radiological weapons present another form of threat. Radioactive isotopes are relatively easy to obtain. The risk of illegal proliferation of

---

<sup>13</sup> See BUNN, G., Ch. BRAUN, A. GLASER, E. LYMAN and F. STEINHAUSLER. Research Reactor Vulnerability to Sabotage by Terrorists. *Science & Global Security* [online]. 2003, vol. 11, no. 2-3, p. 101 [cit. 2021-10-04]. ISSN 1547-7800. Available at: <https://doi.org/10.1080/714041032>.

<sup>14</sup> See GLEICK, P. H. Water and Terrorism. *Water Policy* [online]. 2006, vol. 8, no. 6, p. 489 [cit. 2021-10-04]. ISSN 1996-9759. Available at: <https://doi.org/10.2166/wp.2006.035>.

<sup>15</sup> See *Proliferation: Threat and Response* [online]. 1<sup>st</sup> ed. Washington, DC: Office of the Secretary of Defense, 2001. 125 p. [cit. 2021-10-04]. Available at: <https://irp.fas.org/threat/prolif00.pdf>. Warning against the threat of malicious contamination of crops and animal feed remains relevant to this day.

<sup>16</sup> See CENCIARELLI, O., S. REA, M. CARESTIA, F. D'AMICO, A. MALIZIA, C. BELLECCI, P. GAUDIO, A. GUCCIARDINO and R. FIORITO. Bioweapons and Bioterrorism: A Review of History and Biological Agents. *Defence S&T Technical Bulletin*. 2013, vol. 6, no. 2, p. 116. ISSN 1985-6571.

<sup>17</sup> See SHEA, D. and F. GOTTRON. *Ricin: Technical Background and Potential Role in Terrorism*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2004, p. 4. CRS Report for Congress, no. RS21383.

radioactive chemicals is increased in the case of insufficient protection of military areas, laboratories and research institutes that have been used to accumulate, to stock or to manufacture fissure materials. The collapse of the Soviet Union, military crises and rise in criminalisation of the society have heightened the risk of former, poorly guarded laboratories and military facilities being broken into with the intention of proliferation of nuclear material. Furthermore, it is impossible to rule out the possibility of specialised smuggling networks cooperating with high-ranking government officials, which is another factor that may increase the danger of illegal possession of nuclear material.

One such radioactive isotope is caesium 137, used in the process of food preservation, utilised in the manufacturing of phototubes, glass and ceramics, in geophysical surveys, etc. It should be noted that cancers may develop even up to thirty years after the exposure. There is reason for vigilance not only among services, but also civilians, since radiological dispersal devices may be used out in the open (e.g. from a plane) as well as indoors (e.g. in ventilation and air conditioning systems of public utility facilities).<sup>18</sup> The tools used by terrorists to achieve their main target are continually being modernised, which demonstrates that the discussed phenomenon is not at all 'dormant'.

At present, there is a growing risk of aviation terrorism stemming from the availability of unmanned aerial vehicles (known as "UAVs"), e.g. drones, which could be used to carry explosives or missiles. Ajay Lele and Archana Mishra have pointed out the threat of drones being used by terrorists not only for transportation of conventional explosive materials, but also the so-called "WMDs"<sup>19</sup> (weapons of mass destruction, including biological, chemical, nuclear weapons, industrial substances that act as asphyxiants, poisonous or carcinogens, etc.). On the other hand, unmanned aerial vehicles may prove helpful in the prevention of terrorism.

---

<sup>18</sup> See MEDALIA, J. *"Dirty Bombs": Technical Background, Attack Prevention and Response, Issues for Congress*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2011, p. 1. CRS Report for Congress, no. R41890; DURAKOVIC, A. Medical Effects of a Transuranic "Dirty Bomb". *Military Medicine* [online]. 2017, vol. 182, no. 3-4, pp. 1591-1595 [cit. 2021-10-04]. ISSN 1930-613X. Available at: <https://doi.org/10.7205/milmed-d-16-00256>; and TANG, Z., Y. LI, X. HU and H. WU. Risk Analysis of Urban Dirty Bomb Attacking Based on Bayesian Network. *Sustainability* [online]. 2019, vol. 11, no. 2, 12 p. [cit. 2021-10-04]. ISSN 2071-1050. Available at: <https://doi.org/10.3390/su11020306>.

<sup>19</sup> See LELE, A. and A. MISHRA. Aerial Terrorism and the Threat from Unmanned Aerial Vehicles. *Journal of Defence Studies*. 2009, vol. 3, no. 3, p. 61. ISSN 0976-1004.

This brings to mind the events that occurred in Yemen, where the Central Intelligence Agency utilised the Predator drone equipped with an AGM-114 missile nicknamed “Hellfire”. It was used to blow up the vehicle that was carrying a group of members of Al-Qaeda, including Qaed Salim Sinan al-Harethi. The man was wanted in the United States of America in connection with premises of his participation in the preparation of a terrorist attack against the American destroyer U.S.S. Cole in port of Aden (a city located on the Gulf of Aden, Yemen). The attack claimed 17 United States sailors, 39 more were injured.<sup>20</sup> The events in Yemen are considered by some researchers as the beginning of “the era of weaponized drone warfare”.<sup>21</sup>

The Americans also used a drone in the operation during which the Iranian general Qassem Soleimani, commander of the Quds Force of the Islamic Revolutionary Guard Corps, was shot. These groups were considered as terrorist organisations by the administration of the former American President Donald Trump. The current American President Joe Biden, an opposing candidate in the presidential race, commented on the decision of Donald Trump to order a strike against Iran in these words: “... tossed a stick of dynamite into a tinderbox”.<sup>22</sup> The attack occurred in Baghdad on 3 January 2020. The United States Department of Defense issued the following statement: “General Soleimani was actively developing plans to attack American diplomats and service members in Iraq and throughout the region. General Soleimani and his Quds Force were responsible for the deaths of hundreds of American and coalition service members and the wounding of thousands more. He had orchestrated attacks on coalition bases in Iraq over the last several months – including the attack on December 27<sup>th</sup> – culminating in the death and wounding of additional American and Iraqi personnel. General Soleimani also approved the attacks on the United States Embassy in Baghdad that took place this week. This strike was aimed at deterring future Iranian attack

---

<sup>20</sup> See PERL, R. and R. O’ROURKE. *Terrorist Attack on USS Cole: Background and Issues for Congress*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2001. 6 p. CRS Report for Congress, no. RS20721.

<sup>21</sup> See YIN, T. Game of Drones: Defending against Drone Terrorism. *Texas A&M Law Review* [online]. 2015, vol. 2, no. 4, p. 635 [cit. 2021-10-04]. ISSN 1942-8634. Available at: <https://doi.org/10.37419/lr.v2.i4.3>.

<sup>22</sup> See BORGER, J. and M. CHULOV. US Kills Iran General Qassem Suleimani in Strike Ordered by Trump. In: *The Guardian* [online]. 2020-01-03 [cit. 2021-10-04]. Available at: <https://www.theguardian.com/world/2020/jan/03/baghdad-airport-iraq-attack-deaths-iran-us-tensions>.

plans. The United States will continue to take all necessary action to protect our people and our interests wherever they are around the world". The White House declared that the strike against Iran was a defensive action within the context of an antiterrorist strategy. Iran's Supreme Leader Ayatollah Ali Khamenei repeatedly and publicly called general Soleimani "a martyr of the revolution". In the opinion of many persons, the attack has put the region at risk of a new wave of violence.

Furthermore, on 8 January 2020, a Boeing 737-800 UR-PSR passenger plane crashed shortly after its departure from Tehran. It was scheduled for a flight from Tehran to Kiev. There were 167 passengers and 9 members of the crew on board. All were killed in the catastrophe. The victims included citizens of Iran, Canada, Ukraine, Afghanistan, Sweden, Germany and Great Britain. Initially, the Ukrainian Embassy reported that the cause of the crash was an engine failure rather than an act of terror.<sup>23</sup> After reviewing the recording which captured the moment of impact of a missile against the plane, the statement was retracted. However, the Iranian authorities denied any ties to the catastrophe. The authenticity of the video has not been challenged. On 11 January 2020, Iran admitted to 'unintentionally' targeting the flight PS752. The President of Iran, Hassan Rouhani, attributed it to a "human error".<sup>24</sup> After the attack by the United States forces, the Iranian troops were "at their highest level of readiness". According to the President of Iran, the decision to shoot down the plane was made after it approached a "sensitive military centre" in the form of the Islamic Revolutionary Guard Corps base and was erroneously recognised as a "hostile" unit. The downing happened 4 hours and 14 minutes after Iran's retaliatory missile strikes on two United States military bases located on the Iraqi territory (Al Asad, Erbil). The President of Iran described the actions which led to the downing of the Ukraine International Airlines flight as an "unforgivable mistake".<sup>25</sup> The German Foreign Minister Heiko Maas appealed on the European Union to be more involved in the affairs in the Near and Middle East.

---

<sup>23</sup> See Iran Plane Crash: Ukrainian Jet Was 'Unintentionally' Shot Down. In: *BBC News* [online]. 2020-01-11 [cit. 2021-10-04]. Available at: <https://www.bbc.com/news/world-middle-east-51073621>.

<sup>24</sup> See Iran Plane Crash: Ukrainian Jet Was 'Unintentionally' Shot Down. In: *BBC News* [online]. 2020-01-11 [cit. 2021-10-04]. Available at: <https://www.bbc.com/news/world-middle-east-51073621>.

<sup>25</sup> See Iran Plane Crash: Ukrainian Jet Was 'Unintentionally' Shot Down. In: *BBC News* [online]. 2020-01-11 [cit. 2021-10-04]. Available at: <https://www.bbc.com/news/world-middle-east-51073621>.



The current situation between the United States of America and Iran can be described as a test for the allies of the United States of America, a time of trial for the existing NATO strategy and for the Western countries. In order to gauge the 'climate' in the region, one must consider the past. In the State of the Union message to the Congress on January 2002, the then United States President George Bush used the term 'axis of evil'<sup>26</sup> to refer to the states that financially supported terrorism and to the terrorist organisations themselves. In George Bush's view, Iran, Iraq and North Korea were at the centre of this axis.<sup>27</sup> After the attack on the World Trade Center, the American administration accused Iraq of supporting terrorism and possession of weapons of mass destruction. Despite the passage of time, the effects of the conflict in the Persian Gulf, as a result of which Saddam Hussein's regime was overthrown, can still be felt until this day. On 20 March 2003, an international coalition of troops launched an armed attack on Iraq. After the invasion of Afghanistan (2001) and the attack on Iraq (2003), the question still stands to what extent have these actions contributed to stabilisation of the situation in the region, neutralisation of the terrorist threat, supplies and infrastructure of the militants, and what the social and economic costs have been incurred. After the collapse of Hussein's rule was also the looting and plundering of monuments. Nowadays, the destruction of cultural assets is not only a part of the reality of war, but an element of a terrorist strategy. The ongoing activity of the Islamic State of Iraq and Syria (ISIS) and other terrorist organisations demonstrates how amorphous and hybrid in nature the phenomenon of terrorism is and that the process of 'normalisation' of the situation in the region has not yet been concluded. The Near

---

<sup>26</sup> See BONHAM, G. M. and D. HERADSTVEIT. The "Axis of Evil" Metaphor and the Restructuring of Iranian Views toward the US. *Vaseth: Journal of the European Society for Iranian Studies*. 2005, vol. 1, no. 1, p. 89. ISSN 1827-1367.

<sup>27</sup> The above-mentioned phrase is believed to have been inspired by the words of David Frum who spoke of an "axis of hatred" during his speech at the White House, describing the relationship between Iraq and terrorism. The term was later changed to "axis of evil" by Michael Gerson, Frum's superior. Afterwards, following the suggestion of Condoleezza Rice, President George Bush's National Security Advisor, and Stephen Hadley, Deputy National Security Advisor, Iran and North Korea were included in the "axis of evil". See BONHAM, G. M. and D. HERADSTVEIT. The "Axis of Evil" Metaphor and the Restructuring of Iranian Views toward the US. *Vaseth: Journal of the European Society for Iranian Studies*. 2005, vol. 1, no. 1, p. 89. ISSN 1827-1367. To this day, some criticise the term as a propaganda slogan used to 'justify' the actions of the United States of America, with regards to national security and foreign policy of the day.

East is one of sensitive regions in world politics, characterised by rivalry of powers and the clash of geopolitical and economic interests.

The escalation of conflicts and disputes is one of the major destabilising factors in international relations. Azar Eskandarpour and Achim Wennmann have described the current situation in international politics as a “fluid security landscape”.<sup>28</sup> In the light of the above-mentioned, the preventive diplomacy takes on special significance. Its purpose is to undertake actions aimed at neutralisation of areas of tension which could develop into armed conflict. The rise in organised crime and generation of increasingly frequent and brutal acts of political and criminal violence cause destabilisation in current systems of security.

Furthermore, it is necessary to take note of the progressing multiplication of international relations, as a result of which there emerge non-governmental and trans-national organisations that exhibit growing ability to influence the international community. Terrorist organisations rank among the most dynamically evolving actors. Preventive actions are also hindered by nebulosity of terrorist organisations.

### Prevention of terrorism in relation to the human rights

At the beginning of the 21<sup>st</sup> Century, terrorist activity continues to expand into new areas of the life of individuals, states and international organisations. Terrorists are determined to create a climate of mutual enmity and hostility within societies and to start a chain reaction, the goal of which is to cause the states to implement excessive restrictions of freedom against people who are not, in fact, involved in terrorism. These facts illustrate that terrorist *modus operandi* does not refrain from exerting psychological pressure and manipulation of public opinion. In fact, engendering chronic fear is one of the key elements of the terrorist strategy. Therefore, it is not only the weaponry that is being updated; the modernisation also entails the tactics of intimidation.

Research by the German Institute for Human Rights in the context of international fight against terrorism demonstrates that there exist coun-

---

<sup>28</sup> See ESKANDARPOUR, A. and A. WENNMANN. *Strengthening Preventive Diplomacy: The Role of Private Actors* [online]. 1<sup>st</sup> ed. Geneva: Graduate Institute of International and Development Studies, Centre on Conflict, Development and Peacebuilding; Geneva Peacebuilding Platform, 2011, p. 4 [cit. 2021-10-04]. Available at: <https://www.graduateinstitute.ch/library/publications-institute/strengthening-preventive-diplomacy-role-private-actors>.

tries which are perceived as being democratic, where, in fact, the situation has gotten out of control, leading to the emergence of “islands outside the law”.<sup>29</sup> The violations include e.g. the use of interrogation methods recognised as torture (exposure to extremely low temperatures, mock executions, waterboarding, etc.).<sup>30</sup> In connection with the above-stated, the legal basis for operation of special services, the scope of their authority and limits of power need to be clearly defined.

In the case of the Youth Initiative for Human Rights against Serbia,<sup>31</sup> the European Court of Human Rights pointed that officers who are in possession of specialised equipment for the purpose of performing their duties are not to practice arbitrary surveillance of citizens. Upon analysis of the Article 10 paragraph 2 of the Convention for the Protection of Human Rights and Fundamental Freedoms (the European Convention on Human Rights),<sup>32</sup> it can be inferred that measures taken within the scope of prevention and precaution ought to be proportional and considered as “necessary in a democratic society”. It is crucial to exercise good judgement in the interpretation of terminology employed in the above-stated conventional norm, e.g. “interests of national security”, “public safety”, so as not to allow abuse of authority on the part of officers or not to permit introduction of laws that would neglect to incorporate the element of freedom of expression.<sup>33</sup> Effective combating of cybercrime and better protection of personal data in keeping with the right to privacy and freedom of speech require coherent programs, laws and international cooperation in criminal cases. Regulations in this area should be implemented

---

<sup>29</sup> See HEINZ, W. S. and J.-M. AREND. *The International Fight against Terrorism and the Protection of Human Rights: With Recommendations to the German Government and Parliament* [online]. 1. Aufl. Berlin: Deutsches Institut für Menschenrechte, 2005, p. 5 [cit. 2021-10-04]. ISBN 3-937714-07-3. Available at: <https://nbn-resolving.org/urn:nbn:de:0168-ssoar-316915>.

<sup>30</sup> See *Case of Babar Ahmad and Others v. the United Kingdom* [2012-04-10]. Judgement of the European Court of Human Rights, 2012, Application No. 24027/07, 11949/08, 36742/08, 66911/09 and 67354/09, § 170.

<sup>31</sup> See *Case of Youth Initiative for Human Rights v. Serbia* [2013-06-25]. Judgement of the European Court of Human Rights, 2013, Application No. 48135/06.

<sup>32</sup> See *Convention for the Protection of Human Rights and Fundamental Freedoms* [1950-11-04], signed at Rome on 4 November 1950.

<sup>33</sup> See KOWALSKA, S. Freedom of Speech in the Face of Terrorism – Selected International Law Regulations. *Adam Mickiewicz University Law Review* [online]. 2018, vol. 8, pp. 35-47 [cit. 2021-10-04]. ISSN 2450-0976. Available at: <https://doi.org/10.14746/ppuam.2018.8.02>.

in a manner that ensures concordance between the goals and principles, without particular imputation.

The 11 September attacks were, in the words of Eran Shor, “a milestone in the global counterterrorist landscape”,<sup>34</sup> a turning point in the antiterrorist legislation on national and international level alike. However, introduction or revision of the antiterrorist regulations must be approached with caution, so as not to lead to arbitrary restriction of rights and freedoms. To provide an example, India repealed the regulations that had been introduced in the year 2002, because of ambiguity in the area of e.g. an unclear definition of terrorism in the domestic law, which opened the door to an excessively broad interpretation. The laws were constructed in such a way that the conclusions formed by the court concerning the accused were in violation of the spirit of the principle of presumption of innocence. The court decisions warranted detention without presenting allegations and without a specified time limit. The right to a fair trial by a court was not being observed and the regulations were followed differentially, depending on the administrative unit and the social status of individuals.<sup>35</sup> The Supreme Court of India emphasised that terrorism frequently arises in places where the human rights are violated and where the people have no hope of justice.<sup>36</sup> This leads to the conclusion that an antiterrorist strategy should not be based solely on force, but should also address its causes, such as deficit of values, in various areas of the human activity.

The case law of the European Court of Human Rights has allowed lesser strictness of the evidence and scope of the meaning in interpretation of “reasonable suspicion” when it comes to terrorist crimes. However, this is not tantamount to consent to circumvent or to violate the

---

<sup>34</sup> See SHOR, E. Constructing a Global Counterterrorist Legislation Database: Dilemmas, Procedures, and Preliminary Analyses. *Journal of Terrorism Research* [online]. 2011, vol. 2, no. 3, pp. 49-50 [cit. 2021-10-04]. ISSN 2049-7040. Available at: <https://doi.org/10.15664/jtr.228>.

<sup>35</sup> See KALHAN, A., G. P. CONROY, M. KAUSHAL, S. S. MILLER and J. S. RAKOFF. Colonial Continuities: Human Rights, Terrorism, and Security Laws in India. *Columbia Journal of Asian Law*. 2006, vol. 20, no. 1, p. 96. ISSN 1094-8449. In turn, about the definition of “terrorism” in law of the United Kingdom, see *The Impact of UK Anti-terror Laws on Freedom of Expression* [online]. 1<sup>st</sup> ed. London: Article 19, 2006, p. 4 and following [cit. 2021-10-04]. Available at: <https://www.article19.org/data/files/pdfs/analysis/terrorism-submission-to-icj-panel.pdf>.

<sup>36</sup> See KALHAN, A., G. P. CONROY, M. KAUSHAL, S. S. MILLER and J. S. RAKOFF. Colonial Continuities: Human Rights, Terrorism, and Security Laws in India. *Columbia Journal of Asian Law*. 2006, vol. 20, no. 1, p. 97. ISSN 1094-8449.

standards of the human rights protection as established by the conventional norms.<sup>37</sup> In the face of cross-sectoral and hybrid threats, the standards of security with regards to prevention of terrorism need to be increased. This must not lead to an unequal treatment of various members of the society or to introduction of “double standards” in the human rights.

Regarding these issues, it is crucial to remain conscious of the axiology of the human rights, which gives priority to the respect of the human dignity by the organs of the state authority.<sup>38</sup> It should be noted that states do have the right to regulate the issues of foreign nationals, but the process should not be characterised by arbitrariness. In accordance with the standards of the human rights protection, it is unacceptable to deport an individual to a country where he/she may face an immediate threat of loss of life or health. In an action of J. K. against Sweden,<sup>39</sup> the European Court of Human Rights assessed the situation of members of a family from Baghdad who were perceived as collaborationists in their home country on account of the family managing a construction and transport business that cooperated with the Americans. Its office was located at the United States military base “Victoria Camp”.<sup>40</sup> The family received threats from members of Al-Qaeda. The threats were indeed real, as the daughter of one of the applicants passed away not longer after her car was shot at by a group of fighters. The applicants were seeking asylum in Sweden, but their motion was rejected.<sup>41</sup> The European Court of Human Rights ruled that deportation would constitute a violation of the fundamental rights and expose the applicants to inhuman or degrading treatment, as described in the Article 3 of the European Convention on Human Rights. The situation in Iraq, at the time, was widely known, also owing to the reports of non-governmental organisations dedicated to the protection of the human rights.

---

<sup>37</sup> See *Case of O'Hara v. the United Kingdom* [2001-10-16]. Judgement of the European Court of Human Rights, 2001, Application No. 37555/97, §§ 34 – 38.

<sup>38</sup> See KOWALSKA, S. Terrorystyczny modus operandi – rozważania w kontekście ochrony i aksjologii praw człowieka. In: W. SCHEFFS, W. JASZCZUR and P. KAMIŃSKI, red. *Edukacja w bezpieczeństwie i obronności*. 1. wyd. Kalisz: Kaliskie Towarzystwo Przyjaciół Nauk, 2020, pp. 209-223. ISBN 978-83-62689-81-1.

<sup>39</sup> See *Case of J. K. and Others v. Sweden* [2016-08-23]. Judgement of the European Court of Human Rights, 2016, Application No. 59166/12.

<sup>40</sup> See *Case of J. K. and Others v. Sweden* [2016-08-23]. Judgement of the European Court of Human Rights, 2016, Application No. 59166/12, § 9.

<sup>41</sup> Cf. *Case of H. and B. v. the United Kingdom* [2013-04-09]. Judgement of the European Court of Human Rights, 2013, Application No. 70073/10 and 44539/11.

In the context of terrorism, which is a unique complex and ruthless social phenomenon, the issue in question should inspire deep reflection that transcends formal and procedural aspects. The European Parliament Resolution on the External Dimension of the Fight against International Terrorism (2006/2032(INI)) emphasised that counteracting terrorism ought to be implemented in a way that upholds respect for the human rights, so as not to remove or not to decrease the “true area of freedom, security and justice”.<sup>42</sup> At present, the public mood in many countries is declining. The lack of consistent action to remedy radicalisation, also in the media and online, may bring about radicalism and spreading of malicious forms of violence. There is an observable rise in homophobic attitudes and hostility towards people of other cultural, religious and world-view backgrounds. Many countries have witnessed a rise in attacks on refugee centres. Prevention of terrorism should also entail combating destructive ideologies that act as a feeding ground of violence.

## Conclusions

Analysis of the phenomenon of terrorism reveals increasingly brutal and amorphous manifestations of crime. Terrorist *modus operandi* encompasses traditional and modern achievements of technology alike. Terrorism seeks to nullify the spirit of the human rights, to disturb biological balance and to devastate the continuation of history and culture. Attacks against critical structures of the state and international organisations lead to the development of new security standards. The human rights exist in a relationship with the values that constitute the human identity. This paper provides an analysis of transformations in terrorist *modus operandi*, with a focus on the more effective protection of the rights of an individual. These considerations have demonstrated that effective preventive-protective measures can be implemented when the driving factor behind them is not a delusional and destructive ideology, but rather the axiology of the human rights. Arguments have been presented in favour of the thesis that the human rights approached in a rational manner constitute the foundation upon which not illusory security and international cooperation can be built.

---

<sup>42</sup> See European Parliament Resolution on the External Dimension of the Fight against International Terrorism [2007-02-15]. EU Doc. 2006/2032(INI), point 1.

## References

- BARNES, B. D. Confronting the One-man Wolf Pack: Adapting Law Enforcement and Prosecution Responses to the Threat of Lone Wolf Terrorism. *Boston University Law Review*. 2012, vol. 92, no. 5, pp. 1613-1662. ISSN 0006-8047.
- BONHAM, G. M. and D. HERADSTVEIT. The “Axis of Evil” Metaphor and the Restructuring of Iranian Views toward the US. *Vaseteh: Journal of the European Society for Iranian Studies*. 2005, vol. 1, no. 1, pp. 89-105. ISSN 1827-1367.
- BORGER, J. and M. CHULOV. US Kills Iran General Qassem Suleimani in Strike Ordered by Trump. In: *The Guardian* [online]. 2020-01-03 [cit. 2021-10-04]. Available at: <https://www.theguardian.com/world/2020/jan/03/baghdad-airport-iraq-attack-deaths-iran-us-tensions>.
- BRUCE, G. Definition of Terrorism – Social and Political Effects. *Journal of Military and Veterans’ Health*. 2013, vol. 21, no. 2, pp. 26-30. ISSN 1835-1271.
- BUNN, G., Ch. BRAUN, A. GLASER, E. LYMAN and F. STEINHAUSLER. Research Reactor Vulnerability to Sabotage by Terrorists. *Science & Global Security* [online]. 2003, vol. 11, no. 2-3, pp. 85-107 [cit. 2021-10-04]. ISSN 1547-7800. Available at: <https://doi.org/10.1080/714041032>.
- Case of Babar Ahmad and Others v. the United Kingdom* [2012-04-10]. Judgement of the European Court of Human Rights, 2012, Application No. 24027/07, 11949/08, 36742/08, 66911/09 and 67354/09.
- Case of H. and B. v. the United Kingdom* [2013-04-09]. Judgement of the European Court of Human Rights, 2013, Application No. 70073/10 and 44539/11.
- Case of J. K. and Others v. Sweden* [2016-08-23]. Judgement of the European Court of Human Rights, 2016, Application No. 59166/12.
- Case of O’Hara v. the United Kingdom* [2001-10-16]. Judgement of the European Court of Human Rights, 2001, Application No. 37555/97.
- Case of Youth Initiative for Human Rights v. Serbia* [2013-06-25]. Judgement of the European Court of Human Rights, 2013, Application No. 48135/06.

- CENCIARELLI, O., S. REA, M. CARESTIA, F. D'AMICO, A. MALIZIA, C. BELLECCI, P. GAUDIO, A. GUCCIARDINO and R. FIORITO. Bioweapons and Bioterrorism: A Review of History and Biological Agents. *Defence S&T Technical Bulletin*. 2013, vol. 6, no. 2, pp. 111-129. ISSN 1985-6571.
- CHAPPUIS, R. D. The Flight of Toxic Tort – Aerial Application of Insecticides and Herbicides: From Drift Liability to Toxic Tort. *Journal of Air Law and Commerce*. 1992, vol. 58, no. 2, pp. 411-453. ISSN 0021-8642.
- Convention for the Protection of Human Rights and Fundamental Freedoms* [1950-11-04].
- COPELAND, C. *Terrorism and Security Issues Facing the Water Infrastructure Sector*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2010. 18 p. CRS Report for Congress, no. RL32189.
- DURAKOVIC, A. Medical Effects of a Transuranic “Dirty Bomb”. *Military Medicine* [online]. 2017, vol. 182, no. 3-4, pp. 1591-1595 [cit. 2021-10-04]. ISSN 1930-613X. Available at: <https://doi.org/10.7205/mil-med-d-16-00256>.
- ESKANDARPOUR, A. and A. WENNMANN. *Strengthening Preventive Diplomacy: The Role of Private Actors* [online]. 1<sup>st</sup> ed. Geneva: Graduate Institute of International and Development Studies, Centre on Conflict, Development and Peacebuilding; Geneva Peacebuilding Platform, 2011. 14 p. [cit. 2021-10-04]. Available at: <https://www.graduateinstitute.ch/library/publications-institute/strengthening-preventive-diplomacy-role-private-actors>.
- European Parliament Resolution on the External Dimension of the Fight against International Terrorism* [2007-02-15]. EU Doc. 2006/2032 (INI).
- European Union Terrorism Situation and Trend Report 2018* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2018. 68 p. [cit. 2021-10-04]. ISBN 978-92-95200-91-3. Available at: <https://doi.org/10.2813/00041>.
- European Union Terrorism Situation and Trend Report 2019* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Co-



- operation, 2019. 80 p. [cit. 2021-10-04]. ISBN 978-92-95209-76-3. Available at: <https://doi.org/10.2813/788404>.
- European Union Terrorism Situation and Trend Report 2020* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2020. 97 p. [cit. 2021-10-04]. Available at: <https://www.europol.europa.eu/publications-events/main-reports/european-union-terrorism-situation-and-trend-report-te-sat-2020>.
- European Union Terrorism Situation and Trend Report 2021* [online]. 1<sup>st</sup> ed. The Hague: European Union Agency for Law Enforcement Cooperation, 2021. 112 p. [cit. 2021-10-04]. ISBN 978-92-95220-26-3. Available at: <https://doi.org/10.2813/677724>.
- FLEMING, J. R. The Pathological History of Weather and Climate Modification: Three Cycles of Promise and Hype. *Historical Studies in the Physical and Biological Sciences* [online]. 2006, vol. 37, no. 1, pp. 3-25 [cit. 2021-10-04]. ISSN 1533-8355. Available at: <https://doi.org/10.1525/hsp.2006.37.1.3>.
- GLEICK, P. H. Water and Terrorism. *Water Policy* [online]. 2006, vol. 8, no. 6, pp. 481-503 [cit. 2021-10-04]. ISSN 1996-9759. Available at: <https://doi.org/10.2166/wp.2006.035>.
- GONSALVES, M. D., K. COLIZZA, J. L. SMITH and J. C. OXLEY. In Vitro and in Vivo Studies of Triacetone Triperoxide (TATP) Metabolism in Humans. *Forensic Toxicology* [online]. 2021, vol. 39, no. 1, pp. 59-72 [cit. 2021-10-04]. ISSN 1860-8973. Available at: <https://doi.org/10.1007/s11419-020-00540-z>.
- GREENE, A. Defining Terrorism: One Size Fits All?. *International & Comparative Law Quarterly* [online]. 2017, vol. 66, no. 2, pp. 411-440 [cit. 2021-10-04]. ISSN 1471-6895. Available at: <https://doi.org/10.1017/s0020589317000070>.
- HEINZ, W. S. and J.-M. AREND. *The International Fight against Terrorism and the Protection of Human Rights: With Recommendations to the German Government and Parliament* [online]. 1. Aufl. Berlin: Deutsches Institut für Menschenrechte, 2005. 43 p. [cit. 2021-10-04]. ISBN 3-937714-07-3. Available at: <https://nbn-resolving.org/urn:nbn:de:0168-ssoar-316915>.

- Iran Plane Crash: Ukrainian Jet Was ‘Unintentionally’ Shot Down. In: *BBC News* [online]. 2020-01-11 [cit. 2021-10-04]. Available at: <https://www.bbc.com/news/world-middle-east-51073621>.
- KALHAN, A., G. P. CONROY, M. KAUSHAL, S. S. MILLER and J. S. RAKOFF. Colonial Continuities: Human Rights, Terrorism, and Security Laws in India. *Columbia Journal of Asian Law*. 2006, vol. 20, no. 1, pp. 93-234. ISSN 1094-8449.
- KAPLAN, J., H. LÖÖW and L. MALKKI, eds. *Lone Wolf and Autonomous Cell Terrorism* [online]. 1<sup>st</sup> ed. London: Routledge, 2015. 266 p. [cit. 2021-10-04]. ISBN 978-1-315-72426-3. Available at: <https://doi.org/10.4324/9781315724263>.
- KOWALSKA, S. Freedom of Speech in the Face of Terrorism – Selected International Law Regulations. *Adam Mickiewicz University Law Review* [online]. 2018, vol. 8, pp. 35-47 [cit. 2021-10-04]. ISSN 2450-0976. Available at: <https://doi.org/10.14746/ppuam.2018.8.02>.
- KOWALSKA, S. Terrorystyczny modus operandi – rozważania w kontekście ochrony i aksjologii praw człowieka. In: W. SCHEFFS, W. JASZCZUR and P. KAMIŃSKI, red. *Edukacja w bezpieczeństwie i obronności*. 1. wyd. Kalisz: Kaliskie Towarzystwo Przyjaciół Nauk, 2020, pp. 209-223. ISBN 978-83-62689-81-1.
- LELE, A. and A. MISHRA. Aerial Terrorism and the Threat from Unmanned Aerial Vehicles. *Journal of Defence Studies*. 2009, vol. 3, no. 3, pp. 54-65. ISSN 0976-1004.
- MEDALIA, J. *“Dirty Bombs”: Technical Background, Attack Prevention and Response, Issues for Congress*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2011. 83 p. CRS Report for Congress, no. R41890.
- MONKE, J. *Agroterrorism: Threats and Preparedness*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2007. 59 p. CRS Report for Congress, no. RL32521.
- PERL, R. and R. O’ROURKE. *Terrorist Attack on USS Cole: Background and Issues for Congress*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2001. 6 p. CRS Report for Congress, no. RS20721.


- Proliferation: Threat and Response* [online]. 1<sup>st</sup> ed. Washington, DC: Office of the Secretary of Defense, 2001. 125 p. [cit. 2021-10-04]. Available at: <https://irp.fas.org/threat/prolif00.pdf>.
- SALZANO, E., G. LANDUCCI, G. RENIERS and V. COZZANI. Domino Effects Related to Home-made Explosives. *Chemical Engineering Transactions* [online]. 2014, vol. 36, pp. 349-354 [cit. 2021-10-04]. ISSN 2283-9216. Available at: <https://doi.org/10.3303/cet1436059>.
- SCHMID, A. P. The Revised Academic Consensus Definition of Terrorism. *Perspectives on Terrorism*. 2012, vol. 6, no. 2, pp. 158-159. ISSN 2334-3745.
- SCHMID, A. Terrorism – The Definitional Problem. *Case Western Reserve Journal of International Law*. 2004, vol. 36, no. 2, pp. 375-419. ISSN 0008-7254.
- SHEA, D. and F. GOTTRON. *Ricin: Technical Background and Potential Role in Terrorism*. 1<sup>st</sup> ed. Washington, DC: Library of Congress, Congressional Research Service, 2004. 6 p. CRS Report for Congress, no. RS21383.
- SHOR, E. Constructing a Global Counterterrorist Legislation Database: Dilemmas, Procedures, and Preliminary Analyses. *Journal of Terrorism Research* [online]. 2011, vol. 2, no. 3, pp. 49-77 [cit. 2021-10-04]. ISSN 2049-7040. Available at: <https://doi.org/10.15664/jtr.228>.
- TANG, Z., Y. LI, X. HU and H. WU. Risk Analysis of Urban Dirty Bomb Attacking Based on Bayesian Network. *Sustainability* [online]. 2019, vol. 11, no. 2, 12 p. [cit. 2021-10-04]. ISSN 2071-1050. Available at: <https://doi.org/10.3390/su11020306>.
- The Impact of UK Anti-terror Laws on Freedom of Expression* [online]. 1<sup>st</sup> ed. London: Article 19, 2006. 10 p. [cit. 2021-10-04]. Available at: <https://www.article19.org/data/files/pdfs/analysis/terrorism-submission-to-icj-panel.pdf>.
- UNAL, B. and S. AGHLANI. *Use of Chemical, Biological, Radiological and Nuclear Weapons by Non-state Actors: Emerging Trends and Risk Factors* [online]. 1<sup>st</sup> ed. London: Chatham House, 2016. 31 p. [cit. 2021-10-04]. Innovation Series. Available at: <https://www.lloyds.com/news-and-insights/risk-reports/library/use-of-chemical-biological-radiological-and-nuclear-weapons-by-non-state-actors>.

YIN, T. Game of Drones: Defending against Drone Terrorism. *Texas A&M Law Review* [online]. 2015, vol. 2, no. 4, pp. 635-673 [cit. 2021-10-04]. ISSN 1942-8634. Available at: <https://doi.org/10.37419/lr.v2.i4.3>.

**Ph.Dr. Samanta Kowalska**

Regional Research Center  
Calisia University in Kalisz  
Nowy Świat St. 4  
62-800 Kalisz  
Poland

[s.kowalska@akademikaliska.edu.pl](mailto:s.kowalska@akademikaliska.edu.pl)

 <https://orcid.org/0000-0002-8803-3901>