

Update note on ‘encounter’ killings in Uttar Pradesh, India, for the UN Special Rapporteur on extrajudicial, summary or arbitrary executions

21 May 2025

A. Introduction and context

In December 2018, the Special Rapporteur, along with four other Special Procedures mandate holders, had written to the Government of India, highlighting reports of 15 Muslim individuals being allegedly killed by police forces in Uttar Pradesh between 2017 and 2018, in incidents that bore the hallmarks of custodial killings disguised as ‘encounters’.¹ The victims had allegedly been abducted and tortured in police custody; identical narratives were used by police in nearly each case in First Information Reports (FIRs), but post-mortem evidence had contradicted official claims of self-defence. Crucially, the Indian Supreme Court’s mandated guidelines² to be followed in ‘encounter’ cases were systematically flouted: families were not notified, magistrates did not conduct inquiries, and FIRs named only the (now-deceased) victims, never police officers. The Special Rapporteurs had also noted political rhetoric endorsing these extrajudicial killings (including by Chief Minister Yogi Adityanath), and the harassment of family members and activists who had sought accountability.

While the Special Rapporteurs’ communication did not receive an official response from the Indian government, it was brought to the notice of the Indian Supreme Court, which reportedly termed the issue a ‘very serious,’ and set hearings.³ However, to date, not one police officer who fatally shot someone in Uttar Pradesh since 2017 has faced disciplinary action, let alone criminal prosecution. In fact, the Uttar Pradesh government has continued to hand out gallantry medals and cash rewards to police officials known to have conducted ‘encounter’ killings, further normalising the use of staged shootings—resulting in death or maiming—as a crime control measure.

B. Continuing and emerging patterns since 2018

- **Latest available statistics on incidence:** Despite increasing scrutiny, both nationally and by international observers⁴, dozens of ‘encounter’ shootings continue to be reported from across the country every year, including areas marked by armed conflict (such as Kashmir and Chhattisgarh), but also states governed by the Hindu nationalist Bharatiya Janata Party (BJP), where ‘encounters’ continue to be used as a crime control measure even in the absence of armed conflict.

In Uttar Pradesh, police reported killing 34 alleged ‘criminals’ in 2019, 26 in 2020, 26 in 2021, 14 in 2022, and 26 in 2023.⁵ By March 2025, according to government figures, the cumulative toll in these ‘encounters’ had risen to 222 killed and 8118 injured, since Yogi

¹ UA IND 27/2018

² PUCL v. State of Maharashtra (2014), order available [here](#).

³ <https://www.nationalheraldindia.com/india/uttar-pradesh-sc-orders-hearing-on-17-encounter-cases-by-yogi-govt-calls-it-a-very-serious-matter>

⁴ Extrajudicial killings of Muslims and other religious minorities, although not those specifically in the context of ‘encounters’, were also highlighted by the UN Human Rights Committee, in its 2024 Concluding Observations on India. See UN Human Rights Committee, ‘Concluding Observations on the Fourth Periodic Report of India’ (2024) CCPR/C/IND/CO/4 paras 45–46.

⁵ <https://www.hindustantimes.com/cities/lucknow-news/perception-vs-reality-encounter-deaths-fall-under-yogi-2-0-rule-101726249289660.html>

Adityanath assumed charge as the state's Chief Minister in 2017.⁶ These 'encounters' in UP have continued to disproportionately impact Muslims – as of September 2024 (when the death toll was 207), 32.3 per cent (67) of the victims were members of the Muslim community, who account for only 19 per cent of the state's population, suggesting institutional bias.⁷ Many of these cases, reported mostly from western UP districts like Muzaffarnagar that have a large Muslim population, also largely bore patterns that had previously been highlighted by the Special Rapporteur – allegations of abduction and torture in custody, before being shot in staged settings.

(The 'encounters' in Uttar Pradesh appear to have inspired a similar extrajudicial killing campaign in Assam, where Muslims account for 34 per cent of the population and the BJP's Himanta Biswa Sarma assumed power in May 2021. In the first 13 months of Sarma's tenure, Assam police are reported to have killed 51 individuals (of which 22, or 43 per cent, were Muslims) in 161 'encounter' incidents.⁸ By February 2025, the number of 'encounter' incidents was reported to have risen to 171 – the total number of fatalities and their religious breakdown is unavailable.⁹)

- **Rising 'half-encounters':** Media reports have suggested that the incidence of 'encounters' resulting in fatalities has declined in Uttar Pradesh during the second tenure of the Adityanath government (after re-election in March 2022), despite some notable examples, such as those of individuals linked to Atiq Ahmed, an incarcerated Muslim politician and alleged gangster, in February- April 2023, as well as at least three other Muslims who had been accused of involvement in cow slaughter before being shot dead.¹⁰

However, Uttar Pradesh police forces have increasingly resorted to 'half-encounter' shootings to exclusively target Muslims accused of involvement in cow slaughter/smuggling, activities that are prohibited in the state under its cow protection law. Such shootings skyrocketed in 2024, when SAJC reviewed reports of at least 56 Muslims (and 2 Hindus) being shot at and grievously injured by police forces, sustaining bullet injuries in the knees and leg before being formally arrested by police officials in the presence of media. 53 of the injured Muslims were accused by police of involvement in cattle smuggling, while two were accused of involvement in the murder of a Hindu man amid communal violence (in Bahraich). All shootings were acknowledged—and celebrated—by district-level police units on their official social media handles.¹¹ An investigative report published in August 2024 revealed that this 'half-encounter' campaign is internally referred to as Operation *Langda* (Lame) by UP Police officials.¹²

- **Continuing endorsement of 'encounters' by political leadership:** As noted previously by the Special Rapporteur in the 2018 communication to India, Uttar Pradesh's political leadership has continued to openly endorse and glorify 'encounter' killings, vowing that lawbreakers would be 'knocked down', 'sent to Yamraj' (the Hindu god of death and

⁶ <https://www.hindustantimes.com/cities/lucknow-news/8-years-of-yogi-govt-222-dreaded-criminals-killed-8118-injured-in-police-encounters-101742153658050.html>

⁷ <https://www.indiatvnews.com/uttar-pradesh/from-asad-ahmed-to-vikas-dubey-to-mangesh-yadav-prominent-encounters-list-in-uttar-pradesh-under-cm-yogi-adityanath-rule-up-bahraich-latest-updates-2024-10-17-957624>

⁸ <https://maktoobmedia.com/india/assam-police-killed-51-people-in-13-months-22-were-muslims/>

⁹ <https://www.thehindu.com/news/national/sc-reserves-verdict-on-whether-assam-followed-pucl-guidelines-for-police-encounters/article69261956.ece>

¹⁰ See a more detailed but non-exhaustive case list [here](#).

¹¹ See a more detailed but non-exhaustive case list, along with links to videos and social media posts, [here](#).

¹² <https://newlinesmag.com/reportage/extrajudicial-killings-may-be-frequent-in-indias-most-populous-state/>

justice), '[reduced to dust](#)', etc. During election campaigns (in UP, other states, and during India's 2024 General Election), Adityanath has continued to celebrate his government's violent record, particularly against Muslims. ('[We deal with them so harshly that their descendants will remember.](#)')

In violation of Supreme Court guidelines, the Adityanath government has also continued to openly reward police officials involved in such 'encounters'. In August 2024, at least six police officials reported to have carried out the 'encounter' killings of four individuals linked to Atiq Ahmed were given Police Gallantry medals for their 'extraordinary actions'.¹³

C. Institutional responses and systemic barriers

- **Response of Supreme Court:** In January 2019, while hearing a public interest litigation (PIL) filed by civil society groups in 2018, the Special Rapporteur's communication was brought to the attention of the Indian Supreme Court, which reportedly termed the issue as 'very serious'.¹⁴ However, for several years, the SC did not issue any definitive orders, conducting sporadic hearings but not directing a comprehensive investigation, instead deferring to the state's narrative that all norms and procedures previously issued by the SC were being followed. (In 2014, the SC had issued a 16-point set of guidelines to be followed in 'encounter' cases nationwide, including, inter alia, independent investigations.¹⁵)

In August 2023, after large-scale media reporting of the 'encounter' killings of individuals linked to Atiq Ahmed, the SC re-engaged with the issue, directing the UP government to submit a detailed affidavit on all 183 'encounter' killings recorded in the state since 2017. The affidavit was to include the status of investigations, chargesheets, and trials in each case, as well as information on compliance with the SC's previous guidelines, and the involvement of the NHRC.¹⁶ In September 2023, the UP government was reported to have submitted its affidavit, claiming that every one of the 183 'encounters' had been duly investigated as per the SC's guidelines, with no fault found in any. The affidavit pointed to various commissions of inquiry constituted by the state government, as well as various internal compliance measures taken by the government, such as daily district-wise progress reports on encounters and the incorporation of SC guidelines into police manuals.¹⁷ As of May 2025, the SC has not delivered a final judgment or appointed a special investigator. The matter is presumably still sub judice.

The SC's approach to 'encounters' can thus be characterised as cautious and largely deferential to the state's own investigative processes, and as failing to provide an effective check on Uttar Pradesh's encounter spree.

¹³ <https://indianexpress.com/article/cities/lucknow/atiq-ashraf-killing-judicial-commission-rules-out-pre-planned-conspiracy-police-negligence-9489809/>

¹⁴ <https://www.nationalheraldindia.com/india/uttar-pradesh-sc-orders-hearing-on-17-encounter-cases-by-yogi-govt-calls-it-a-very-serious-matter> ; WP (Criminal) 118 of 2018 (Supreme Court of India), order available [here](#).

¹⁵ PUCL v. State of Maharashtra (2014), order available [here](#).

¹⁶ <https://indianexpress.com/article/india/sc-seeks-reply-from-up-govt-on-plea-demanding-probe-into-encounter-killings-5242962/> (Case title: Vishal Tiwari v. Union of India | Aisha Noori v. Union of India, W.P. CrI. 177/2023 | W.P. CrI. 280/2023)

¹⁷ <https://www.livewlaw.in/top-stories/supreme-court-encounter-killing-investigation-uttarpradesh-government-report-239057> ; <https://indianexpress.com/article/india/no-fault-on-part-of-police-in-killing-of-atiq-ashraf-up-govt-tells-sc-8963297/>

- **Response of National Human Rights Commission:** India’s NHRC—whose GANHRI accreditation is set to be downgraded¹⁸ to ‘B’ status due to its failure to, inter alia, adequately respond to systemic human rights violations and limit the involvement of police officers in investigations—has also engaged with the ‘encounter’ issue.

In 2018, after a 20-year-old Muslim man was killed in an ‘encounter’ in Muzaffarnagar district, the NHRC was reported to have issued show-cause notices to UP’s Chief Secretary and constituted a five-member inquiry team to investigate 17 flagged ‘encounter’ deaths, noting prima facie violations of the SC’s guidelines.¹⁹ However, the NHRC did not publicise the findings of the investigation. The NHRC has since received numerous reports about ‘encounters’ and ‘half-encounters’ from victims’ families, but its response has typically been characterised by cursory reviews, a tendency to side with the state’s accounts, and an unwillingness to use its powers to seek accountability.²⁰ According to an analysis by a civil society coalition, of information gleaned through Right to Information (RTI) applications in 2023, the NHRC registered 239 cases of death in police ‘encounters’ across India, presumably including the 183 flagged before the SC that year).²¹ Of these, 66% were simply closed with no action taken by NHRC. Only in about 10% of cases did the NHRC issue directives to police authorities for further investigation. In these, not a single case led to compensation for victims, or disciplinary action or prosecution for alleged perpetrators. Additionally, the NHRC was also found to have used terms like ‘Naxalite’, ‘terrorist’ and ‘smuggler’ while referring to the victims, suggesting a bias towards the state narrative.

- **Systemic barriers and fear of reprisal:** Media reports have highlighted how several structural and procedural weaknesses in the domestic justice system have converged to make accountability for ‘encounter’ killings in UP virtually impossible. These have ranged from police malpractices in registering cases and preserving evidence, to the misconduct of magistrates and prosecutors, to the broader culture within law enforcement that discriminates against Muslims and valorises extrajudicial violence over due process.²² A nationwide survey of police personnel in 2025 revealed that over half of all Hindu respondents felt Muslims are ‘naturally prone’ to committing crimes, and 22% of all respondents favoured ‘encounter’ killings of ‘dangerous criminals’.²³ As noted by the Special Rapporteur in the 2018 communication, intimidation and reprisals against families and HRDs, including in the form of direct and overt threats, and implication in fabricated criminal cases, continue to further compound the problem. One victim, who had been shot in the leg by police in western UP in 2022, was quoted in a news report as saying: ‘They shot at my left leg, and I spent six months in jail. They warned me against

¹⁸ <https://www.thenewsminute.com/news/explained-why-indias-nhrc-faces-a-downgrade-from-a-to-b-status>

¹⁹ <https://www.thehindu.com/news/national/other-states/nhrc-issues-notices-to-up-govt-dgp/article25626410.ece>

²⁰ <https://newlinesmag.com/reportage/extrajudicial-killings-may-be-frequent-in-indias-most-populous-state/> ; also page 112 of ‘[Extinguishing Law and Life: Police Killings and Cover-Up in the State of Uttar Pradesh](#)’

²¹ https://www.commoncause.in/wotadmin/upload/SPIR_2025-a.pdf (pages 169-70)

²² <https://newlinesmag.com/reportage/extrajudicial-killings-may-be-frequent-in-indias-most-populous-state/>

²³ https://www.commoncause.in/wotadmin/upload/SPIR_2025-a.pdf (pages 169-70)

opening my mouth before the court. [...] At least I am alive now. If I seek action against the police, they will definitely kill me.’²⁴

The combined effect of these failures is a system where ‘encounters’ and ‘half-encounters’ are both normalised and insulated from consequences, creating a climate of impunity that is especially dangerous for Muslims. Victims and their families do not merely face judicial apathy but continue to be actively subjected to various forms of reprisals from the police, all aimed at coercing them into abandoning their pursuit of justice.

D. Other resources

- SAJC [case lists](#): (Non-exhaustive) lists of: (i) Alleged ‘encounter’ killings of Muslims in Uttar Pradesh since 2022, (ii) Alleged ‘half encounter’ maimings of Muslims in Uttar Pradesh in 2024.
- ‘[Extrajudicial killings may be frequent may be frequent in India’s most populous state](#)’, an investigative news report by Saurav Das. (published August 2024)
- ‘[Report of the panel of independent international experts to examine information about alleged violations of international law committed against Muslims in India since July 2019](#)’ authored by Sonja Biserko, Marzuki Darusman and Stephen Rapp (published in July 2022, Uttar Pradesh ‘encounters’ covered in pages 22, 420)
- ‘[Extinguishing Law and Life: Police Killings and Cover-Up in the State of Uttar Pradesh](#)’, a detailed report by an Indian civil society coalition. (published October 2021)

²⁴ <https://newlinesmag.com/reportage/extrajudicial-killings-may-be-frequent-in-indias-most-populous-state/> ; also page 97 of ‘[Extinguishing Law and Life: Police Killings and Cover-Up in the State of Uttar Pradesh](#)’ for more on patterns in state reprisals.