



JOINT APPEALS BOARD
ISBA/JAB/APPEAL/HALL/2025

Jonathan Hall (the "Appellant")

v.

Secretary General of the International Seabed Authority
(the "Respondent")

Order No. 24 (2026)

ORDER ON THE REQUEST FOR ANONYMITY IN PUBLICATION OF JUDGMENT

Introduction

1. The present Order concerns a request by the Appellant that the judgment rendered by the Joint Appeals Board ("Board" or "JAB") in his case against the Secretary-General of the International Seabed Authority ("ISA" or "Authority") be published in anonymized form. The request arises in the context of the Board's decision to publish its judgments in furtherance of transparency and consistency of jurisprudence within the internal justice system of the Authority.
2. It will be determined whether the Appellant has demonstrated exceptional circumstances warranting departure from the general principle that judgments of international administrative tribunals identify the parties by name.

Procedural History

3. On 13 January 2026, the JAB Secretariat informed the Parties that, in line with the Board's commitment to transparency and consistency of jurisprudence, it intended to publish on the Authority's website all judgments issued in 2025 and thereafter. The Appellant was invited to indicate whether he requested that the judgment in the present case be published in anonymised form.
4. By email dated 20 January 2026, the Appellant stated that he was, in principle, in favour of transparency. He further expressed the view that publication should occur concurrently with all



related orders and judgments, as well as the submissions of both parties. In the same correspondence, the Appellant indicated that he did not object, in principle, to the use of his name, provided that the names of the Respondent and the members of the Board were also published in full, without omission or redaction. He requested, however, that references to his medical diagnosis and to the name and location of his medical treatment be removed from any published texts.

5. On 26 January 2026, the JAB Secretariat requested the Appellant to submit a justification for his request for anonymity, informing that the Respondent would be afforded an opportunity to comment on his justification of the request of the anonymity in the publication of his judgment. By correspondence dated 30 January 2026, the Appellant responded that his correspondence of 20 January 2026 already set out his position. He emphasized, in particular, his request that his private medical information not be disclosed publicly and maintained that this concern justified limitations on publication.

6. On 2 February 2026, the Secretariat transmitted the Appellant's correspondence to the Respondent and invited comments thereon. By submission dated 6 February 2026, the Respondent objected to the request for anonymity. The Respondent submitted that the Appellant had not demonstrated exceptional circumstances warranting departure from the general principle that judgments identify the parties by name, as reflected in the jurisprudence of the United Nations Appeals Tribunal (UNAT). The Respondent did not object to the redaction of confidential medical information. The Respondent further observed that the Appellant had not expressly requested that his name be withheld from publication.

Considerations

7. From the outset, it is recalled that matters relating to the form and modalities of publication of its judgments, including questions of anonymity, fall within the Board's inherent powers to regulate its proceedings and publications. Although the Revised Rules of Procedure of the JAB do not specifically address publication, the JAB exercises this discretion in the absence of provisions to the contrary, in a manner consistent with its mandate to ensure transparency, consistency, and fairness in its operations.



8. In the present case, the Appellant's submissions primarily raise conditional and procedural considerations regarding the form of publication. Specifically, the Appellant consents to the use of his name only on the condition that the Board also publishes the names of the Respondent and all judges in full. The Appellant further objects to what he perceives as *ad hoc* publication procedures and expresses concern that the judgment omits or redacts the names of the Respondent and certain Board members. While these concerns are noted, they do not constitute grounds for granting anonymity. The request for anonymity must be assessed on the basis of exceptional circumstances directly related to the need to protect the Appellant's identity, rather than on conditions tied to the Board's publication practices.

9. It is also recalled that the publication of judicial decisions identifying the parties is a central feature of international administrative justice, reflecting the principles of transparency, accountability, and consistency of jurisprudence.

10. As consistently affirmed in the UNAT jurisprudence, the names of litigants are routinely included in judgments in the interests of transparency, institutional accountability and confidence in the administration of justice. Anonymity constitutes a departure from this general rule and may be granted only in exceptional circumstances, where such a measure is clearly demonstrated to be necessary and proportionate to the interests at stake (see *Lee-2014-UNAT-481*, citing *Servas v. Secretary-General of the United Nations*, Order No. 127 (2013) para. 5; *Pirnea 2014-UNAT-456*, para. 18; *Fedorchenko-2015-UNAT-499*, para. 29; see also *Buff-2016-UNAT-639*, para. 21).

11. Employment-related grievances frequently involve sensitive matters, including allegations of harassment, security considerations, or personal financial information. Such circumstances, however, do not in themselves justify anonymity, as international administrative tribunals routinely adjudicate disputes of this nature. The automatic concealment of parties' identities in such cases would significantly undermine transparency and public confidence in the administration of justice.

12. In this case, the Appellant has not identified any specific sensitive personal information in the judgment that would in itself warrant protection through anonymity, beyond the medical information addressed below. Nor has he demonstrated how publication of his name would cause



him exceptional harm or prejudice that differs from the ordinary consequences of being a party to judicial proceedings. The Appellant's references to his medical diagnosis and treatment details are acknowledged as constituting confidential information warranting protection; however, this concern can and will be addressed through targeted redaction of that specific information, without the need for full anonymity of the judgment.

13. Moreover, the Appellant's identity and related proceedings are already part of the public record through proceedings before the UNAT. The UNAT has addressed matters involving the same Appellant in the context of proceedings arising from decisions taken by the International Seabed Authority, as reflected in Order No. 591 (2025), Order No. 601/Corr.1 (2025), and Judgment No. 2025-UNAT-1580, all of which identify the Appellant by name and concern the same factual background as the present case. These decisions were published without anonymity on the United Nations internal justice website, thereby establishing the Appellant's identity as part of the public record in matters concerning the Authority's internal justice proceedings.

14. In these circumstances, anonymity of the Board's judgment would no longer serve its intended protective function. Where the identity of a party and the relevant factual matrix have already been disclosed through non-anonymised UNAT decisions and orders concerning the same or related proceedings, anonymity at first instance would be ineffective and artificial.

15. In summary, anonymity is not an end in itself, but rather a mechanism for balancing privacy interests against the fundamental principle of transparency in adjudication. In this case, because the Appellant's identity and related factual context are already public through UNAT proceedings, and because the Appellant has not established that publication of his name would cause exceptional harm beyond what may be addressed through targeted medical redaction, such balancing favours denial of the request for anonymity at the JAB stage.

16. In light of the aforementioned, the Appellant has not established exceptional circumstances capable of justifying publication of the judgment in anonymised form.

17. The Chair is satisfied that publication of the judgment in its original form, with appropriate redaction of confidential medical information, will not prejudice procedural fairness, impair the intelligibility of the decision, or adversely affect the administration of justice. On the contrary,



publication identifying the parties promotes consistency of jurisprudence, legal certainty, and confidence in the Authority's internal justice framework.

ORDER

FOR THESE REASONS,

The Chair of the Joint Appeals Board hereby **ORDERS:**

18. The Appellant's request for anonymity in publication of the judgment is dismissed.

19. The judgment shall be published on the International Seabed Authority's website in its original form, with the exception that confidential medical information, including the Appellant's medical diagnosis and the name and location of treatment, shall be redacted from the published version.

Order dated 19th day of February 2026

Judge Martha Halfeld Furtado de Mendonça Schmidt

Chair of the Joint Appeals Board

International Seabed Authority