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**Summary prepared by the Office of the High Commissioner
for Human Rights in accordance with paragraph 15 (c) of the
annex to Human Rights Council resolution 5/1**

Guinea*

Summary

The present report is a summary of 7 stakeholders' submissions¹ to the universal periodic review. It follows the structure of the general guidelines adopted by the Human Rights Council. It does not contain any opinions, views or suggestions on the part of the Office of the United Nations High Commissioner for Human Rights (OHCHR), nor any judgement or determination in relation to specific claims. The information included herein has been systematically referenced in endnotes and, to the extent possible, the original texts have not been altered. Lack of information or focus on specific issues may be due to the absence of submissions by stakeholders regarding these particular issues. The full texts of all submissions received are available on the OHCHR website. The report has been prepared taking into consideration the four-year periodicity of the first cycle of the review.

* The present document was not edited before being sent to United Nations translation services.

I. Background and framework

A. Scope of international obligations

1. Joint submission 1 (Coordination des Organisations Guinéennes de Défense des Droits Humains (CODDH), Centre du Commerce International pour le Développement (CECIDE), in partnership with l'Association des ressortissants de Baraka pour le développement (ARDEBA) and with technical support from Global Rights) reported that Guinea had ratified the main international and regional human rights legal instruments.² Amnesty International (AI) recommended that Guinea ratify the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.³

B. Constitutional and legislative framework

2. AI reported that the 1990 Constitution, as revised in 2001, contains some limited rights considered as inviolable and inalienable and that its preamble reaffirms Guinea's commitment to fundamental human rights and obligations as contained in the UN Charter, the Universal Declaration on Human Rights, the African Union Charter and the African Charter on Human and Peoples' Rights.⁴ Joint submission 1 pointed out that the Constitution had been suspended on 28 December 2008 by the National Council for Democracy and Development (CNDD).⁵

3. Joint submission 1 indicated that the new Child Code, which strengthens child protection and specifically refers to child trafficking, domestic abuse and abuse at work, was promulgated in 2008, but that no concrete steps for its implementation have been taken.⁶

4. According to joint submission 1, the Mining Code governs mining activities and includes provisions for environmental protection in that field; those provisions are supplemented by the Environment Code and the Water Code.⁷

C. Institutional and human rights infrastructure

5. Joint submission 1 raised the question of the actual difference between the remits of the National Human Rights and Fundamental Liberties Directorate (in the Ministry of Justice) and the National Observatory for Human Rights, established in 2008 by a decree of the Office of the Prime Minister, neither of which has any concrete impact in practice.⁸ Joint submission 1 recommended that Guinea establish a single national human rights institution in keeping with the Paris Principles.⁹

6. The Institute on Religion and Public Policy (IRPP) indicated that plans to create positions for a National Director of Christian Affairs and a National Director of Islamic Affairs in order to aid in the goals of improving religious freedom have been proposed by the Secretariat General of Religious Affairs. These positions have yet to be established.¹⁰

II. Promotion and protection of human rights on the ground

A. Cooperation with human rights mechanisms

1. Cooperation with treaty bodies

7. AI recommended that Guinea submit its outstanding reports to the Human Rights Committee, the Committee against Torture and the African Commission on Human and Peoples' Rights.¹¹

2. Cooperation with special procedures

8. AI also recommended that Guinea invite the UN Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions.¹²

B. Implementation of international human rights obligations, taking into account applicable international humanitarian law

1. Equality and non-discrimination

9. Joint submission 1 reported that despite the fact that the Constitution guarantees equality between men and women, the 114 deputies in the National Assembly include only 19 women, or 16.7 per cent of the representatives. Similarly, women account for just 520 of the 3,003 high-level posts in the various national administrative bodies, or 17 per cent.¹³

10. In respect of disabled persons, joint submission 1 reported that 80 per cent of disabled persons have no access to basic social services and that illiteracy afflicts 85 per cent of disabled persons, and is especially high among women. Nearly 75 per cent of public buildings are inaccessible to persons with motor disabilities. Nearly 90 per cent of disabled persons are forced to beg. Guinea lacks appropriate support programmes for their socio-economic and cultural integration.¹⁴

2. Right to life, liberty and security of the person

11. AI reported that, although there has been no execution in Guinea since 2001, death sentences continue to be handed down and in November 2008, the Prosecutor General declared that this punishment will be carried out as provided by Guinean law. In December 2008, Guinea abstained in the vote on the UN General Assembly resolution calling for a worldwide moratorium on executions. As of October 2009, more than 26 persons remain on death row in Conakry and Kindia high security prisons.¹⁵ AI recommended that Guinea impose an immediate moratorium on executions, commute all death sentences and progressively reduce the number of crimes punishable by death with a view to the abolition of the death penalty.¹⁶

12. AI reported on the excessive and deliberate use of force by the Guinean authorities whenever their authority is challenged in the streets or in public gatherings. On several occasions over the four year reporting period, the security forces have carried out extrajudicial executions and used excessive force against demonstrators or others, and by shooting those fleeing in the back. These violations have been committed with impunity.¹⁷ AI made reference to such excessive use of force during students demonstrations in 2006; the January–February 2007 demonstrations for a better living condition and for the departure of the late President Lansana Conté; the October 2008 demonstrations against the high cost of basic commodities; and the public gathering of demonstrators opposed to the candidacy of the head of the junta in the presidential elections, which took place on 28 September 2009.¹⁸

13. With regard to the 28 September 2009 events, Human Rights Watch (HRW) reported that members of the Presidential Guard and some gendarmes working with the Anti-Drug and Anti-Organized Crime unit, carried out a massacre that left at least 150 people dead both shot dead directly or killed in the ensuing panic. HRW has found evidence strongly suggesting that the killings and widespread sexual violence, committed largely by the Presidential Guard, were organized in a premeditated manner.¹⁹ Joint submission 1 reported that following those events, at least 12 targeted killings were carried out in Conakry and its vicinity with the aim of creating an atmosphere of fear, intimidating the population and discouraging possible witnesses of the events from coming forward.²⁰

14. AI reported that, over the past four years, it has documented cases of systematic and widespread torture and ill-treatment throughout the country, committed by members of the police and the gendarmerie against prisoners of conscience, demonstrators and common law detainees. No inquiry is known to have taken place in these cases.²¹ Joint submission 1 reported on similar concerns.²²

15. HRW reported that throughout 2009, members of the military committed numerous acts of theft and violence against businesspeople, diplomats and ordinary citizens. Although the National Council for Democracy and Development (CNDD) promised in May 2009 to prevent acts of criminality by military personnel, little concrete action was taken to improve the situation. No member of the military has yet faced arrest, investigation, or prosecution.²³ HRW reported that the police continue to engage in widespread extortion from citizens.²⁴ HRW recommended that Guinea uphold article 14 of the African Charter on Human and Peoples' Rights, including ensuring that state officials (and the military) do not seize property arbitrarily and without compensation.²⁵

16. AI indicated that, since 2007, it has documented several cases of violence against women, including rape by security forces. AI notably made reference to a number of women, who were publicly raped and beaten by soldiers, including "Red Berets" – the Presidential Guard, during and after the demonstration of 28 September 2009.²⁶ In this regard, HRW reported that the security forces carried out widespread rape and sexual violence against dozens of girls and women at the stadium, often with such extreme brutality that their victims died from the wounds inflicted.²⁷

17. AI recommended that Guinea give clear instructions to the security forces to always act in compliance with international human rights law, in particular, the right to life and the total prohibition of torture and other ill-treatment.²⁸ HRW made a similar recommendation.²⁹ AI also recommended that Guinea bring to justice anyone suspected of having committed extrajudicial executions, torture, ill-treatment, rape and other grave human rights violations, in accordance with international standards of fairness.³⁰ HRW made a similar recommendation.³¹ Joint submission 1 recommended that Guinea carry out a major reform of the defence and security forces and put in place a programme to ensure continuous training in human rights and humanitarian law.³²

18. Joint submission 1 reported that violence against girls was of particular concern. Sexual assault is a serious problem, above all for young girls. Female genital mutilation (FGM) is a widespread practice in all regions of Guinea and in all religious and ethnic groups, and is generally carried out on girls between the ages of 4 and 17. While FGM is punishable by law, there have not yet been any cases prosecuted. Early marriage is common, despite the fact that it is illegal.³³

19. HRW reported that prolonged pre-trial detention of both criminal suspects and perceived opponents to the CNDD government remains a serious human rights issue. In addition, over 80 percent of those held in Guinea's main prison in Conakry have not been brought to trial; some have been awaiting trial for more than five years.³⁴ AI reported that journalists, members of the opposition, demonstrators as well as members of the security

forces regularly face arbitrary detentions in very dire conditions.³⁵ HRW recommended that Guinea release or charge according to international fair trial standards all military officers and opposition supporters held in detention since the December 2008 coup.³⁶

20. HRW reported that prison and detention centers remain severely overcrowded and operate far below international standards. Malnutrition and inadequate healthcare and sanitation led to the deaths of tens of detainees. Convicted and untried prisoners, and in some centers, children and adults are not separated. Unpaid prison guards regularly extort money from prisoners and their families, exacerbating problems of hunger and malnutrition.³⁷ Joint submission 1 reported on similar concerns.³⁸

21. HRW reported that the Child Code was adopted in May 2008. The Code contains several enhanced protection measures for children, and throughout the year government and international organizations were engaged in a public awareness campaign to combat trafficking. The establishment of a special police unit to investigate child prostitution, trafficking, and other abuses resulted in a few arrests; however, there have been few prosecutions.³⁹

22. Joint submission 1 pointed to a large increase in the number of minors engaged in begging and street vending in Conakry. Children are subjected to trafficking and to difficult work, often for people who are never brought to justice.⁴⁰

23. Global Initiative to End All Corporal Punishment of Children (GIEACPC) reported that corporal punishment is lawful in the homes and in alternative care settings.⁴¹ GIEACPC recommended that Guinea introduce legislation as a matter of urgency to prohibit all corporal punishment of children in the family home and all other settings.⁴²

3. Administration of justice, including impunity, and the rule of law

24. Joint submission 1 reported that dysfunction in the courts is a major contributing factor to impunity in Guinea.⁴³ It added that trials — especially those involving the most destitute people — are not conducted with respect for due process. The lack of legal aid means that poor people are forced to appear in court without the assistance of a lawyer. The presumption of innocence is often transformed into a presumption of guilt. Trials are often delayed beyond the time allowed by law, which means that pretrial detention extends for long periods.⁴⁴

25. Joint submission 1 noted that, while the Constitution and the Judiciary (Organization) Act of 23 December 1991 establish that judges are independent, in practice, there are often proven cases of interference by members of the executive or legislative branches. The low salary of judges and their living and working conditions make them vulnerable to corruption.⁴⁵ HRW also reported that the judiciary in Guinea is rife with deficiencies, including lack of independence from the executive branch, inadequate resources, corruption, poorly trained magistrates and other personnel, and insufficient numbers of attorneys.⁴⁶ Joint submission 1 recommended that Guinea respect the principle of separation of powers by guaranteeing the independence of the judiciary.⁴⁷

26. HRW indicated that a call from a CNDD top law enforcement official for vigilante justice to be meted out against suspected thieves has seriously undermined respect for the rule of law in Guinea.⁴⁸ According to joint submission 1, two alleged highway robbers were killed following that call.⁴⁹ HRW recommended that Guinea retract the call for the formation of vigilante groups and any calls to kill suspected criminals.⁵⁰

27. AI reported that, in May 2007, the authorities established a National Commission of Inquiry “charged with conducting investigations into grave human rights violations and offences committed during the strikes of June 2006 and January–February 2007” when more than 130 people were killed by the security forces. However, the Commission of

Inquiry did not conduct any investigations and one year later, the President of the Commission accused the government of freezing financial support to the Commission.⁵¹ Joint submission 1 reported that the Government issued an order establishing a national commission of inquiry following the events of 28 September 2009, but that no one has been prosecuted.⁵²

28. AI reported that, in October 2009, the UN Secretary-General established an International Commission of Inquiry to shed light on the events of September 2009 when grave human rights violations, including rape, were committed by the security forces. This decision was endorsed by the African Union and the Economic Community of the West African States. Also in October 2009, the office of the International Criminal Court launched a preliminary examination of the September 2009 violence to determine whether the alleged crimes fell within the court's jurisdiction.⁵³ In that regard, HRW reported that the armed forces engaged in a systematic attempt to hide the evidence of the crimes during which they removed numerous bodies from the stadium and hospital morgues and buried them in mass graves.⁵⁴ HRW recommended that Guinea cooperate with the international commission of inquiry.⁵⁵

29. HRW reported that the *National Observatory for Democracy and Human Rights*, whose mission is to investigate ongoing human rights abuses and conduct human rights education was created under President Conté's rule but that it has been unable to operate because of a lack of funding, logistical support, and political will. HRW recommended that Guinea provide funds to this institution for its effectively functioning.⁵⁶

30. HRW recommended that Guinea ensure that victims of armed robbery, extortion, rape, and other abuses by members of the military are adequately and speedily compensated.⁵⁷ AI made similar recommendations.⁵⁸ AI also recommended that Guinea suspend from duty anyone reasonably suspected of having committed offences under international law or other human rights abuses, or of having participated in such offences, until the allegations against them can be independently and impartially investigated.⁵⁹

4. Right to privacy, marriage and family life

31. ARC international (ARCI), in a joint submission, reported that Guinea maintains criminal sanctions against sexual activity between consenting adults as per article 325 of the 1998 Penal Code.⁶⁰ ARCI recommended that Guinea bring its legislation into conformity with its international human rights obligations by repealing all provisions which criminalise sexual activity between consenting adults of the same sex.⁶¹

5. Freedom of religion or belief, expression, association and peaceful assembly and right to participate in public and political life

32. IRPP reported that the 1990 Constitution protects the rights of its citizens to select, change, and practice their own religious beliefs.⁶² IRPP indicated that all new religious groups are required to register with the Ministry of the Interior and Security. No religious groups have been expelled from Guinea to this date.⁶³ IRPP also indicated that the military coup of December 2008 is becoming a threat to the stability of the state and that various freedoms, including the freedom of religion, maybe severely compromised.⁶⁴

33. IRPP reported that the ownership of private radio or television by religious groups or political parties has been forbidden. However, religions and political parties can still legally broadcast on other privately owned or commercial radio. Furthermore, Islam and Christian programs are allowed to use seventy-five minutes per week to broadcast on national television.⁶⁵

34. Joint submission 1 reported that the Constitution and Guinean law guarantee freedom of expression and that there are more than 20 independent press outlets in

Guinea.⁶⁶ It pointed to an increase in the number of attacks against freedom of expression since 2006; private radio stations were “vandalized” in 2007, and journalists were attacked in 2009.⁶⁷ Reporters without Borders reported that, since the military authorities took control of the state on 23 December 2008, the situation of press freedom did not improve.⁶⁸ In addition, RWB indicated that, since the repression of the opposition demonstration in September 2009, the press freedom situation is getting worse from day to day, the climate has become extremely menacing.⁶⁹

35. Joint submission 1 reported that the State media generally covered the activities of the authorities and offered little opportunity for the airing of opposing viewpoints.⁷⁰ AI indicated that journalists regularly face politically motivated intimidation and harassment, as well as arbitrary detention and imprisonment. There are also restrictions on freedom of speech and of the press, particularly when the authorities are being criticized.⁷¹ AI added that, in 2009, threat and intimidation of private radios have continued and some of them now impose a self-censorship and play music rather than reporting to avoid being raided.⁷² RWB indicated that many journalists have been attacked during the 28 September events and that all the journalists who covered these events are now under severe pressure from the military authority. Some journalists are withholding their by-lines from their reports while others have fled their homes and sometimes even have left the country, with the aim of hiding themselves and their family. Several journalists with other news media have been accused of “giving information to foreigners”.⁷³ RWB also reported that Guinean authorities have apparently decided to stop allowing foreign reporters into the country and provided several examples, which occurred in October 2009.⁷⁴

36. AI recommended that Guinea uphold the right to freedom of expression and assembly, in particular in the context of future electoral campaigns.⁷⁵

37. HRW stated that, despite its various commitments to restore constitutional order to Guinea within 60 days, the coup leaders quickly suspended the country’s Constitution and declared a ban on political and union activity, which was lifted and reinstated throughout 2009.⁷⁶ HRW reported that during a news conference held in August 2009, the CNDD president warned political leaders not to protest publicly.⁷⁷ HRW also reported on bans on phone text-messaging and political activity, which have been imposed in 2009.⁷⁸ Joint submission 1 reported that there has been fraud in past elections and drew attention to the fact that the president of CNDD has stated his desire to stand as a candidate in the presidential election, pointing out that such a step would do nothing to improve the right to take part in public affairs and the right to vote.⁷⁹ HRW recommended that Guinea hold free, fair, and transparent parliamentary and presidential elections as quickly as possible and accept adequate international monitoring of the polls.⁸⁰

6. Right to work and to just and favourable conditions of work

38. HRW reported that significant numbers of children continue to labour in gold and diamond mines and quarries where they perform dangerous work for little pay. Tens of thousands of girls – some trafficked from neighbouring countries – work as domestic labourers, often in conditions akin to slavery.⁸¹

7. Right to social security and to an adequate standard of living

39. Joint submission 1 reported that notwithstanding the country’s natural wealth, the poverty rate increased from 49.2 per cent in 2002 to 53.6 per cent in 2005. That trend is attributable to economic and financial mismanagement, problems in governance since the beginning of the decade, poor management of public resources, corruption, a lack of social dialogue and disregard for democratic principles.⁸²

40. Regarding natural resources, joint submission 1 pointed out that under the Constitution the Guinean people have an inalienable right to such resources, which must benefit all Guineans equally. However, the Interministerial Committee for the Renegotiation of Mining Agreement Contracts (CIRCAM), established in 2007, has concluded that the State has, through numerous agreements, ceded control of its wealth through one-sided contracts and agreements tainted by serious financial imbalances.⁸³

41. Joint submission 1 further pointed out that CNDD would not help to combat corruption and make the mining sector into a genuine tool for socio-economic development, as it does not follow up on the efforts made by CIRCAM, which enjoyed popular support, in particular thanks to the participation of civil society organizations. The military Government is currently engaged in negotiations aimed at investing in more than 10 development sectors, in particular energy and aluminium mining.⁸⁴ Joint submission 1 reported that Guinea is now in the validation stage of its candidacy for the Extraction Industries Transparency Initiative (EITI). Without that validation, Guinea would risk losing access to funding from private investors and international financial institutions.⁸⁵ Joint submission 1 recommended that Guinea observe a moratorium on the signing of new contracts for the exploitation of natural resources until free and democratic elections can be held.⁸⁶

42. Joint submission 1 pointed out that mining operations are inevitably disruptive to the neighbouring population, which is unable to take part in decisions relating to mining concessions. It cited the case of people who fear that their homes are on a concession and that they will one day be displaced.⁸⁷ In the case in question, the people are completely unaware of the two environmental impact studies required by Guinean law.⁸⁸

43. According to joint submission 1, mining concessions also have an impact on the right to food, when cultivated land is occupied and damaged. Food is increasingly being imported, with an impact on the price and on its economic accessibility. Furthermore, the laws establishing compensation rates are vague and provide no clear enforcement procedure.⁸⁹

44. Joint submission 1 reported that the activities of mining companies prevent local populations from practicing small-scale panning for gold, which is a means of subsistence for them. It cited the case of a company that has its guards arrest gold panners and hand them over to the police, who detain them in metal containers in which the heat becomes unbearable. Most often, they are released once a payment is made.⁹⁰

45. Joint submission 1 pointed to the notorious lack of access to water, especially among people living in mining areas. Even if the mining companies cover the cost of providing water, their own water needs can reduce the amount of clean water available and make it less accessible.⁹¹

46. Joint submission 1 reported that the environmental impact of mining has led to a series of violations of economic, social and cultural rights. The Government and CNDD sent a commission of inquiry to assess the negative environmental impacts of a mining company on the environment and on the population, but there has been no follow-up.⁹²

47. Joint submission 1 recommended that Guinea strengthen the protection of social, economic and cultural rights by publishing the environmental impact surveys of mining companies in Guinea and by monitoring the impact of their activities on the water, the soil and the air, by making the results public and by demanding that they prevent and repair damages.⁹³

8. Right to education

48. IRPP reported that the Ministry of Education is currently trying to incorporate the madrasas into the government-financed system, as to compel them to offer a public school curriculum.⁹⁴

III. Achievements, best practices, challenges and constraints

N/A

IV. Key national priorities, initiatives and commitments

N/A

V. Capacity-building and technical assistance

N/A

Notes

¹ The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: www.ohchr.org. (One asterisk denotes a non-governmental organization in consultative status with the Economic and Social Council).

Civil society

AI	Amnesty International*, London, United Kingdom;
ARCI	ARC International (ARCI); International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA); ILGA Europe*; Pan African ILGA; Geneva, Switzerland; joint submission;
GIEACPC	Global Initiative to End All Corporal Punishment of Children, London, United Kingdom;
HRW	Human Rights Watch*, New York, United States of America;
IRPP	Institute on Religion and Public Policy, Washington, United States of America;
Joint submission 1	Coordination des Organisations Guinéennes de Défense des Droits Humains (CODDH), Centre du Commerce International pour le Développement (CECIDE), in partnership with L'Association des ressortissants de Baraka pour le développement (ARDEBA) and with technical support from Global Rights, joint submission;
RWB	Reporters Without Borders*, Paris, France.

² Joint submission 1, para. 5.

³ AI, p. 8.

⁴ AI, p. 3.

⁵ Joint submission, para. 6.

⁶ Joint submission 1, para. 39.

⁷ Joint submission 1, para. 6.

⁸ Joint submission 1, para. 7.

⁹ Joint submission 1, para. 42 (f).

¹⁰ IRPP, para. 3.

¹¹ AI, p. 7.

¹² AI, p. 7.

¹³ Joint submission 1, para. 40.

¹⁴ Joint submission 1, para. 41.

¹⁵ AI, p. 7.

- ¹⁶ AI, p. 8.
¹⁷ AI, p. 4.
¹⁸ AI, p. 4; see also Joint Submission 1, paras. 8–9.
¹⁹ AI, p. 2.
²⁰ Joint submission 1, para. 10.
²¹ AI, p. 5.
²² Joint submission, paras. 22–23.
²³ HRW, p. 3.
²⁴ HRW, p. 3.
²⁵ HRW, p. 5.
²⁶ AI, p. 5; see also joint submission 1, para. 37.
²⁷ HRW, p. 2.
²⁸ AI, p. 7.
²⁹ HRW, pp. 4–5.
³⁰ AI, p. 7.
³¹ HRW, p. 4.
³² Joint submission 1, para. 42 (c).
³³ Joint submission, para. 38.
³⁴ HRW, pp. 3–4.
³⁵ AI, p. 5.
³⁶ HRW, p. 5.
³⁷ HRW, p. 3.
³⁸ Joint submission 1, paras. 20–21.
³⁹ HRW, p. 4.
⁴⁰ Joint submission 1, para. 39.
⁴¹ GIEACPC, p. 2.
⁴² GIEACPC, p. 1.
⁴³ Joint submission 1, para. 18.
⁴⁴ Joint submission 1, para. 18.
⁴⁵ Joint submission 1, para. 19.
⁴⁶ HRW, p. 3.
⁴⁷ Joint submission 1, para. 42 (f).
⁴⁸ HRW, p. 3.
⁴⁹ Joint submission 1, para. 11.
⁵⁰ HRW, p. 5.
⁵¹ AI, p. 3.
⁵² Joint submission 1, para. 12.
⁵³ AI, pp. 3–4.
⁵⁴ HRW, p. 2.
⁵⁵ HRW, p. 4.
⁵⁶ HRW, p. 5.
⁵⁷ HRW, p. 4.
⁵⁸ AI, p. 7.
⁵⁹ AI, p. 7.
⁶⁰ ARCI, p. 1.
⁶¹ ARCI, p. 2.
⁶² IRPP, para. 3.
⁶³ IRPP, para. 4.
⁶⁴ IRPP, para. 17.
⁶⁵ IRPP, para. 11.
⁶⁶ Joint submission 1, para. 13.
⁶⁷ Joint submission 1, para. 14.
⁶⁸ RWB, p. 1.
⁶⁹ RWB, p. 1.
⁷⁰ Joint submission 1, para. 13.
⁷¹ AI, p. 6.

- ⁷² AI, p. 6.
⁷³ RWB, pp. 1–2.
⁷⁴ RWB, p. 2.
⁷⁵ AI, p. 7.
⁷⁶ HRW, p. 1.
⁷⁷ HRW, p. 2.
⁷⁸ HRW, p. 2.
⁷⁹ Joint submission 1, paras. 16–17.
⁸⁰ HRW, p. 4.
⁸¹ HRW, p. 4.
⁸² Joint submission 1, para. 24.
⁸³ Joint submission 1, para. 25.
⁸⁴ Joint submission 1, paras. 26, 28.
⁸⁵ Joint submission 1, para. 27.
⁸⁶ Joint submission 1, para. 42 (h).
⁸⁷ Joint submission 1, para. 30.
⁸⁸ Joint submission 1, para. 31.
⁸⁹ Joint submission 1, para. 32.
⁹⁰ Joint submission 1, para. 33.
⁹¹ Joint submission 1, para. 34.
⁹² Joint submission 1, para. 35.
⁹³ Joint submission 1, para. 42 (j–k).
⁹⁴ IRPP, para. 9.
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