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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\***

**Vanuatu**

The present report is a summary of six stakeholders' submissions<sup>1</sup> 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.

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

## **I. BACKGROUND AND FRAMEWORK**

### **A. Scope of international obligations**

1. Amnesty International (AI) as well as the Coalition of Non-Governmental Organisations (NGO Coalition) welcomed in particular the signing by Vanuatu, in 2007, of the International Covenant on Civil and Political Rights (ICCPR).<sup>2</sup> AI<sup>3</sup> and the NGO Coalition<sup>4</sup> also called on the Government to accede to ICESCR.
2. Disability Promotion and Advocacy Association (DPAA) congratulated the Government on becoming the first country in Oceania to ratify at a national level the Convention on the Rights of Persons with Disabilities (CPD) in 2008<sup>5</sup> but encouraged it to deposit its instruments of ratification to the United Nations as soon as possible.<sup>6</sup> The NGO Coalition also urged the Government of Vanuatu to ratify the United Nations Convention Against Corruption.<sup>7</sup>

### **B. Constitutional and legislative framework**

3. AI stated that the courts' position with regard to domestic application of international treaties has been somewhat mixed. In one case, the Court of Appeal ruled that the provisions in international treaties need to be domesticated through legislation before they are applicable, and in another case, the Supreme Court used CEDAW to grant descendants of the female line equal rights to land entitlements.<sup>8</sup> AI called on the Government to enact laws to reflect the principles of ratified human rights treaties, as well to enact enabling legislation to ensure that these principles are applicable in the courts.<sup>9</sup> The NGO Coalition also recommended domestication and implementation of the CPD.<sup>10</sup> It urged the Government to access international organizations and donors for assistance in implementing its international obligations.<sup>11</sup>
4. AI mentioned that Section 74 of the Constitution provides that the "rules of custom shall form the basis of ownership and use of land." In addition, there is also no clear provision in the Constitution that states that when customary law and domestic legislation are in conflict, the equality provisions of the Constitution must prevail. AI called on the Government to review the Constitution and add a clear provision that the Constitution (particularly the human rights chapter) prevails when there is conflict between customary law and domestic legislation.<sup>12</sup> The NGO Coalition also called on the Government to amend its domestic law to include provisions for protection in compliance with the Convention on the Rights of the Child.<sup>13</sup>
5. DPAA stated that Chapter 2 of the Constitution enshrines a list of fundamental rights and freedoms, which can be enjoyed without discrimination.<sup>14</sup>

### **C. Policy measures**

6. Regarding persons with disabilities, DPAA acknowledged the strides made so far by the Government to recognise and support the inclusion of persons with disabilities in national programmes and development plans, but also recognized the limitations in financial, technical and human resources to ensure the advancement of persons with disabilities.<sup>15</sup>
7. In that respect DPAA acknowledged the appointment of the Special Needs Officer in the Ministry of Education in 2003 and the establishment of the National Disability Committee in 2007<sup>16</sup> but encouraged the Government to support this Committee with adequate financial, human and technical resources.<sup>17</sup> DPAA also congratulated the Shefa Provincial Government Council for adopting the CPD as its platform for action in June 2008 and for the other measures adopted for the promotion of the rights of persons with disabilities and encouraged the five other

provinces to follow its lead.<sup>18</sup> DPAA commended Sanma and Torba Provincial Governments for their support to disability organizations.<sup>19</sup>

8. DPAA also congratulated the Government for developing in 2007 its National Disability Policy & Plan of Action (NDPPA) 2008-2015 which incorporates provisions of the CPD and the Biwako Millennium Framework for Action toward the Asian and Pacific Decade of Persons with Disabilities 2003-2012,<sup>20</sup> but was concerned that the NDPPA was not launched by October 2008.<sup>21</sup> DPAA encouraged the Government to develop a 5-10 year strategy to mainstream disability and implement the provisions of the CPD and the Biwako Millennium Framework for Action.<sup>22</sup> The NGO Coalition recommended that the Government implement the National Disability Policy and include it in the national budget.<sup>23</sup>

## II. PROMOTION AND PROTECTION OF HUMAN RIGHTS ON THE GROUND

### A. Cooperation with human rights mechanisms

9. With reference to the consideration of Vanuatu in May 2007 by the Committee on the Elimination of All Forms of Discrimination against Women, DPAA stated that there was no public awareness on the content of the Committee's recommendations<sup>24</sup> and encouraged the Government to raise awareness on the actions it will take to address the recommendations made by the Committee.<sup>25</sup>

### B. Implementation of international human rights obligations

#### 1. Equality and non discrimination

10. Regarding discrimination against women, the NGO Coalition highlighted that the legal system fails to enforce the constitutional provision guaranteeing equal status between men and women.<sup>26</sup> AI stated that customary rules in the context of land ownership are often used to deny women or their direct descendants the sharing of land resources equally with those who are descendants of the male lineage.<sup>27</sup>

11. AI stated that the use of customary law can also be used to deny women equality in other areas, despite Constitutional guarantees against such discrimination. Until recently, women were not allowed to speak in *nakamals* (traditional meeting houses) when important issues affecting the community were discussed. While this has changed in some areas, there are still parts of Vanuatu where women are banned from speaking in *nakamals*. In addition, the island courts (the lowest in the hierarchy of courts), which are community-based and serve the majority of the population, adopt decisions based on customary laws and practices, which are often discriminatory against women.<sup>28</sup> Consequently, AI called on the Government to review and amend all relevant laws which discriminate against or perpetuate the discrimination and marginalisation of women and to ensure that there is not only equality in legislation, but also *de facto* equality, in line with Vanuatu's obligations under CEDAW. The NGO Coalition recommended to the Government to implement specific recommendations made by the Committee on the Elimination of All Forms of Discrimination Against Women related to the domestication of CEDAW provisions and violence against women.<sup>29</sup> The NGO Coalition also recommended that the Government of Vanuatu implement all human rights instruments regarding women's rights, especially CEDAW and its Optional Protocol.<sup>30</sup> AI further called on the Government to allocate resources and capacity to provide effective and ongoing human rights and legal training to judicial officers in the lower courts (magistrates and Island courts).<sup>31</sup>

12. In the same vein, AI noted that the Citizenship Act (Cap 112) is discriminatory against women. Under the Act, a foreign woman married to a ni-Vanuatu man is entitled to automatic citizenship, whereas a foreigner married to a ni-Vanuatu woman does not have automatic rights to citizenship. AI stated that the Ombudsman highlighted these discriminatory provisions in 1999. The Government outlined in its combined CEDAW report of 2007 that a review of the Citizenship Act was imminent. To date, however, there has been no development on this.<sup>32</sup> AI called on the Government to amend the Citizenship Act without delay so that it complies with Vanuatu's constitutional provisions and its obligations under the CEDAW.<sup>33</sup>

13. AI indicated that the Constitution of Vanuatu provides for protection against discrimination on the grounds of race, origin, religious or traditional beliefs, political beliefs and sex but does not include other disadvantages, such as disability, economic status, sexual orientation or living with HIV/AIDS. AI stated that there is a risk of human rights violations against such marginalised groups, as recently exemplified by the case of a woman living with HIV/AIDS.<sup>34</sup> It called on the Government to amend Section 5 of the Constitution by adding "disability, health, economic status and sexual orientation" as prohibited grounds for discrimination.<sup>35</sup> The NGO Coalition made a similar recommendation regarding disability.<sup>36</sup> DPAA stated that it made a submission to the Constitutional Review Committee set up by Parliament in 2002 to include disability as a ground for non-discrimination.<sup>37</sup> DPAA also reported that the Constitution refers to the adoption of laws for the special benefit, welfare, protection or advancement of women, children and young persons, members of underprivileged groups or inhabitants of less developed area.<sup>38</sup> DPAA, in that regard, encouraged the Government to develop special temporary measures to ensure that women in Government can advance within the public sector, in line with CEDAW, the Constitution and the 2007 Government's Gender Equity Policy benchmark.<sup>39</sup> The NGO Coalition urged the Government of Vanuatu to seriously consider reforming discriminatory laws such as Family Law Legislation(s).<sup>40</sup>

14. DPAA acknowledged the Shefa Provincial Government Council for the adoption of the CEDAW in May 2004 as its platform for action and for the appointment of a Women's Coordination Officer to advance the status of women in the Province.<sup>41</sup> However, DPAA deplored the appointment of a man in October 2008 as the Director of the Department of Women's Affairs and encouraged the Government to review this decision.<sup>42</sup>

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

15. AI stated that violence against women is widespread in the country, although there is increasing awareness of this issue, mainly due to the work of women's NGOs.<sup>43</sup> The NGO Coalition stated that domestic violence is not specifically included as discrimination in the law, nor is it viewed as discrimination. The causes of this violence as well as child abuse are complex and culturally woven in the status of women and men, *kastom* and substance abuse of alcohol and kava amongst others.<sup>44</sup> AI added that the prevalence of domestic violence in society is further compounded by social and cultural norms and practices. The culture of the groom or his family giving bride price to a woman's family in exchange for her hand in marriage has often been used to justify violence against the women and their poor treatment in general at the hands of their husbands and in-laws. This practice effectively puts a commercial value on women, leading to an oft heard excuse that 'because I have paid for her, I can do whatever I want with her'. AI said that, in spite of the revocation of 80,000 Vatu minimum bride price by the *Malvatumauri* (Council of Chiefs) in 2006, the practice of bride price is still widespread.<sup>45</sup> AI reported that Parliament passed the Family Protection Act in June 2008, because of civil society lobbying and campaigning, aimed at protecting family members from violence in the home. The

Act clearly states that the custom of bride price is not an acceptable excuse for violence in the home.<sup>46</sup> The NGO Coalition acknowledged that this Act criminalizes domestic violence and aims at improving the family situation, notably for women and children.<sup>47</sup> The NGO Coalition and AI urged the Government to work towards its effective implementation.<sup>48</sup> AI called on the Government to allocate adequate resources for its effective implementation, as well as to work with the *Malvatumauri* to raise awareness of the revocation of the practice of bride price.<sup>49</sup>

16. The NGO coalition deplored the lack of data regarding violence against women. It reported that assault was ranked as the number one form of physical violence between 1988 and 2002 and that men are responsible for 62 per cent of unlawful assaults upon women according to data gathered by the Office of the Public Prosecutor in 1992.<sup>50</sup> AI was concerned that violence against women is under-reported due to cultural norms, stereotyping, prejudices and lack of access to town centres and health facilities. AI stated that no figures are available on this issue in 5 out of 6 provinces in the country.<sup>51</sup> But it cited figures indicating that the Vanuatu Women's Centre, which works with survivors of violence, has since its establishment in 1992, in Port Vila, a city of approximately 35,000 people, dealt with 2,954 cases of domestic violence.<sup>52</sup>

17. AI called on the Government to ensure greater awareness across the country of domestic violence and means to end such violence and to provide ongoing policing and prosecution training for police and other relevant departments on effective ways to address domestic violence.<sup>53</sup> Similarly, the NGO Coalition called on the Government to provide its full support in the implementation of research and the development of multi-sectoral social policies and strategies to address violence against women.<sup>54</sup>

18. The NGO Coalition underlined that the National Plan of Action for Women 2007-2011 (NPAW 2007-2011) is the outcome of the first ever National Women's Forum organised by Government. The NPAW 2007-2011 plans on taking integrated measures to prevent and eliminate violence against women, study the causes and consequences of violence against women, eliminate trafficking in women and assist victims of violence due to prostitution and trafficking.<sup>55</sup>

19. The Global Initiative to End All Corporal Punishment of Children (GIEACPC) indicated that corporal punishment is lawful in homes and in alternative care settings, while it is prohibited in schools under the Education Act (2001). GIEACPC highlighted that, while corporal punishment is not available as a sentence for crime in relevant acts, it is used in rural areas as a traditional form of punishment favoured by chiefs. In addition, GIEACPC indicated that corporal punishment is not among permitted disciplinary measures in the Correctional Services Act (2006), but that there is no explicit prohibition of its use in relation to disciplinary measures in institutions accommodating children in conflict with the law.<sup>56</sup>

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

20. The NGO Coalition stated that the marginalized and poor in the Vanuatu society do not easily have access to justice due to the lack of available information on accessing justice, including legal knowledge accessible to the grassroots.<sup>57</sup> The NGO Coalition also urged the Government of Vanuatu to enforce the Ombudsman Act.<sup>58</sup>

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

21. The NGO Coalition stated that the Constitution and legislation do not grant the right to information, but it commended the Government for enabling greater stakeholder participation in policy formulation by institutionalising the role of chiefs, NGOs and civil society in decision-making at all levels of Government. The NGO Coalition reported that it is difficult for Vanuatu citizens to get information on the conduct of public affairs,<sup>59</sup> and made reference to a number of challenges in implementing the right to information, such as the culture of secrecy, the low literacy rate and poor transport and means of communication. In addition, it stated that Government offices and officers do not have authority and power to provide information to citizens on a regular basis.<sup>60</sup> In this regard, the NGO coalition urged the Government of Vanuatu to adopt a law on the right to information and to establish complaint mechanisms in order to implement this right. It also urged the Government to train and equip government information personnel in providing efficient and accessible services to the public with regards to access to information, as well as to establish user-friendly libraries in the Provinces.<sup>61</sup>

#### **5. Right to work and to just and favourable conditions of work**

22. The NGO Coalition expressed concern at the lack of job opportunities for young people in Vanuatu and at the high unemployment rate in both rural and urban areas. It also was concerned at the lack of qualifications of young people due to the low level of education, in addition to their inability to access loans to start new businesses due to the required security conditions.<sup>62</sup> It recommended that the Government take responsibility to provide equal job opportunities in all sectors for young men and women and review the current programs of employment opportunities for young people. In addition, the NGO Coalition recommended that the Government include young people, in a fair manner, in its existing employment initiatives, to create special measures for employment opportunities for young people, and to take initiatives to ensure decent working conditions for young people.<sup>63</sup>

23. The NGO Coalition recommended that the Government of Vanuatu create an enabling working environment for people with special needs to ensure decent working conditions and employment.<sup>64</sup> The NGO Coalition also urged the Government of Vanuatu to enact an Employment Relations Bill that accords maternity and employment security for women.<sup>65</sup>

#### **6. Right to social security and to an adequate standard of living**

24. The NGO Coalition recommended that the Government facilitate research on nutritional deficiency, particularly for women, as articulated in the Millennium Development Goals Report 2005. It also recommended to the Government of Vanuatu to develop programmes for the implementation of Millennium Development Goals recommendations.<sup>66</sup>

25. The NGO Coalition noted that the River Care Water Project is improving water sources in Vanuatu, but expressed concern at the pollution of water sources and at the lack of water supply in the country. It noted that the availability of clean water, environmental sanitation and hygienic practices are of the utmost importance for good health. Malarial mosquitoes breed in water pools and diarrhoeal diseases are associated with contaminated water and food, unhygienic practices and insanitary conditions. In that respect, the NGO Coalition recommended that the Government undertake additional measures to increase access to safe clean drinking water and improve sanitation, in accordance with the recommendations of the Committee on the Rights of the Child.<sup>67</sup>

26. Earthjustice (EJ) pointed out that Vanuatu is on the United Nations list of Least Developed Countries, and ranked 118 out of 177 countries in 2005 and that over 78 per cent of the population lives in isolated, rural areas, where they are dependent upon subsistence economies of agriculture (80 per cent of households) and fishing (35 to 90 per cent of households).<sup>68</sup> According to EJ, the physical destruction of land and property in Vanuatu due to sea-level rise, climate-related storm events, increased shoreline erosion, the destruction of subsistence agriculture and coral reef ecosystems essential to ni-Vanuatu livelihoods and its impact on freshwater resources violates the rights to life, food, health, property, culture and traditional knowledge, the rights of indigenous peoples, and the rights to a means of subsistence, an adequate standard of living, and a healthy environment.<sup>69</sup> In that regard, EJ encouraged the Government of Vanuatu to increase efforts to provide citizens with information and education on the impacts of climate change, and to provide opportunities for public participation in decision-making concerning measures to mitigate and adapt to the harms that will result.

### **7. Right to education and to participate in the cultural life of the community**

27. Marist Asia – Pacific Solidarity Office; Fondazione Marista per la Solidarietà Internazionale and Franciscans International (MA/FMSI/FI) commended Vanuatu for the progress made regarding the right to education but highlighted that free primary education has still not been realised.<sup>70</sup> According to them, parents are not taking seriously their responsibilities to send children to school, in spite of the Education Act (No. 21 of 2001), which makes it a duty for them to do so. In addition, MA/FMSI/FI stated that primary education is not yet free and that fees are due in accordance with the Education Act. This hindrance to school attendance was recognised in the Education for All National Plan of Action (2001-2015 Republic of Vanuatu).<sup>71</sup> The NGO Coalition also referred to the payment of fees,<sup>72</sup> which is the most common reason why children do not attend primary school and are not able to progress to secondary school, according to a survey conducted by MA/FMSI/FI.<sup>73</sup> They recommended that the Government of Vanuatu to find effective ways to support children whose families cannot afford school fees.<sup>74</sup> The NGO Coalition recommended that the Government of Vanuatu implement the concluding observations of the Committee on the Rights of the Child to make education compulsory and free of charge, with a priority for primary education.<sup>75</sup>

28. The NGO Coalition indicated that girls are underrepresented in primary school and represented 42.1 per cent of pupils in primary schools in 2001.<sup>76</sup> It thus recommended that the Government implement the recommendation of the Committee on the Rights of the Child to increase access and enrolment of girls into the education system.<sup>77</sup>

29. DPAA reported that, according to 2007 statistics from the Ministry of Education, 8 per cent of students in primary education and 12 per cent in secondary education have some form of disability. It acknowledged that 450 children did not attend schools because of their disabilities in 2007.<sup>78</sup> The NGO Coalition also raised this issue, saying that the Government had not realised its commitments to establish two schools in the main urban centres of Port Vila and Luganville for disabled children by 2005 and to commence special education teacher training by 2006.<sup>79</sup> DPAA encouraged the Government to complete its Inclusive Education Policy and Strategy by 2009 and to train teachers to teach children with disabilities; to recruit other specialists; and to make educational facilities as well as other public places and transport systems accessible to persons with disabilities.<sup>80</sup> The NGO Coalition recommended that the Government implement the recommendation of the Committee on the Rights of the Child to establish special education programs for children with disabilities and promote their inclusion in society.<sup>81</sup>

30. The NGO Coalition<sup>82</sup> and MA/FMSI/FI<sup>83</sup> stated that primary education is not compulsory. Family problems, pregnancies, need to care for siblings or relative, health factors, the need for most secondary school children to travel and board away from their families, villages and neighbourhood and, more generally, the tension between traditional family life and the need for an education, were among factors invoked in one survey referred to by MA/FMSI/FI, which interfered with school attendance in primary and secondary education.<sup>84</sup> Similar concerns were presented by the NGO Coalition.<sup>85</sup> MA/FMSI/FI encouraged the Government of Vanuatu to implement compulsory primary education and to promote a parent awareness program on the importance of education for children.<sup>86</sup> The NGO Coalition made a similar recommendation to positively promote cultural attitudes towards education.<sup>87</sup> In addition to an increasing youth population and urbanisation of the population, MA/FMSI/FI noted in their survey that some young people do not have the incentive to continue secondary education as they do not find it relevant. There is a lack of alternative options for students unable to pass exams in order to progress on to secondary school and tertiary education.<sup>88</sup> The NGO Coalition stated that young people who have been dropped out or were 'pushed out' suffer from poor trade skills and that alternative education, such as rural training centres, is limited.<sup>89</sup> It recommended that the Government support the work of Rural Training Centre by providing an annual budget to the Vanuatu Rural Development Training Centre Association, which oversees the establishment of the Rural Training Centre in Vanuatu.<sup>90</sup>

31. MA/FMSI/FI noted that the percentage of students progressing from primary to secondary school has increased since 2000 but that there are still many young people out of secondary school<sup>91</sup>. MA/FMSI/FI recommended that the Government of Vanuatu find relevant and appropriate secondary school and vocational education models to assist young people in finding paid and meaningful work, particularly for young people, who have dropped out or been 'pushed out' of the education system.<sup>92</sup>

32. MA/FMSI/FI deplored the lack of data on school retention rates, although it noted the Government has made some progress in addressing the need for centralized data collection and analysis.<sup>93</sup> The NGO Coalition stated that up to 25 per cent of teachers are not qualified. In order to explain poor retention, the NGO Coalition listed other causes such as the use of English or French instead of the mother tongue in primary school, overcrowding of schools, the use of rote learning and the use of teaching material from other countries, which are seen as irrelevant to skills needed in the country.<sup>94</sup> In this regard, MA/FMSI/FI recommended that the Government continue its good efforts in setting up policy and infrastructure, such as bodies to oversee the quality of teacher training and monitoring, collection of data on student results, and a system to monitor and improve the quality of the curriculum.<sup>95</sup> The NGO Coalition recommended the Government to introduce local languages as an additional tool of instruction and improve the overall quality of education.<sup>96</sup>

### **III. ACHIEVEMENTS, BEST PRACTICES, CHALLENGES AND CONSTRAINTS**

33. According to EJ, the International Panel on Climate change predicted sea level rise in Vanuatu to be 0.50 to 0.94 meters by 2100 and threaten to inundate and erode coastal plains, where more than 88,000 ni-Vanuatu live. In addition, the intensity of storms and cyclones (three per year in Vanuatu) is projected to increase. EJ highlighted the responsibility shared by the major greenhouse gas emitting states and stated that the Government of Vanuatu must do all within its power to increase its mitigation and adaptation efforts to protect the right of the people of Vanuatu to a clean and ecologically sustainable environment.

#### IV. KEY NATIONAL PRIORITIES, INITIATIVES AND COMMITMENTS

N/A.

#### V. CAPACITY-BUILDING AND TECHNICAL ASSISTANCE

34. The NGO Coalition recommended to the Government of Vanuatu to continue its technical cooperation programmes with UNICEF, WHO and others to improve primary health care.<sup>97</sup>

#### Notes

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<sup>1</sup> The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: [www.ohchr.org](http://www.ohchr.org). (One asterisk denotes a non-governmental organization in consultative status with the Economic and Social Council. Two asterisks denote a national human rights institution with “B” status)

#### *Civil society*

AI	Amnesty International, London, United Kingdom*
DPAA	Disability Promotion and Advocacy Association
EJ	Earthjustice, Oakland, CA, USA
GIEACPC	Global Initiative to End All Corporal Punishment of Children, London, United Kingdom
MA/FMSI/FI	Marist Asia, Pacific Solidarity Office ; Fondazione Marista per la Solidarietà Internazionale ; and Franciscan International*
NGO Coalition	Vanuatu Rural development Training centre Association; Transparency International*; Vanuatu Red Cross Society; Youth Challenge International, Vanuatu; Vanuatu Young People Project; Live and Learn Environmental Education; and Wan Smol Bag Theatre, Vanuatu.

<sup>2</sup> AI, p. 4 ; NGO Coalition, p. 2.

<sup>3</sup> AI, p. 6.

<sup>4</sup> NGO Coalition, p. 8.

<sup>5</sup> DPAA, p. 1.

<sup>6</sup> DPAA, p. 3.

<sup>7</sup> NGO Coalition, p. 7.

<sup>8</sup> AI, p. 5.

<sup>9</sup> AI, p. 6.

<sup>10</sup> NGO Coalition, p. 6.

<sup>11</sup> NGO Coalition, p.2.

<sup>12</sup> AI, p. 6.

<sup>13</sup> NGO Coalition, p. 4-5.

<sup>14</sup> DPAA, p. 3.

<sup>15</sup> DPAA, p. 2.

<sup>16</sup> DPAA, p. 1.

<sup>17</sup> DPAA, p.2.

<sup>18</sup> DPAA, p. 1.

<sup>19</sup> DPAA, p. 1.

<sup>20</sup> DPAA, p. 1.

<sup>21</sup> DPAA, p. 2.

<sup>22</sup> DPAA, p. 3.

<sup>23</sup> NGO Coalition, p.6.

<sup>24</sup> DPAA, p. 4.

<sup>25</sup> DPAA, p. 4.

<sup>26</sup> NGO Coalition, p. 3.

<sup>27</sup> AI, p. 6.

<sup>28</sup> AI, p. 4.

<sup>29</sup> NGO Coalition, p. 4.

<sup>30</sup> NGO Coalition, p. 4-5.

<sup>31</sup> AI, p. 6

<sup>32</sup> AI, p. 4.

<sup>33</sup> AI, p. 6.

<sup>34</sup> AI, p. 3.

<sup>35</sup> AI, p. 6.

<sup>36</sup> NGO Coalition, p. 3.

<sup>37</sup> DPAA, p. 2.

<sup>38</sup> DPPA, p. 3-4.

<sup>39</sup> DPAA, p. 4.

<sup>40</sup> NGO Coalition, p. 4.

<sup>41</sup> DPAA, p. 1.

<sup>42</sup> DPAA, p.4.

<sup>43</sup> AI, p. 5.

<sup>44</sup> NGO Coalition, p. 3

<sup>45</sup> AI, p. 5.

<sup>46</sup> AI, p. 5.

<sup>47</sup> NGO Coalition, p. 3.

<sup>48</sup> NGO Coalition, p. 4 ; AI, p. 6.

<sup>49</sup> AI, p. 6

<sup>50</sup> NGO Coalition, p. 3.

<sup>51</sup> AI, p. 5.

<sup>52</sup> AI, p. 5.

<sup>53</sup> AI, p. 6

<sup>54</sup> NGO Coalition, p. 4.

<sup>55</sup> NGO Coalition, p. 3.

<sup>56</sup> GIEACPC, p. 2.

<sup>57</sup> NGO Coalition, p. 7.

<sup>58</sup> NGO Coalition, p. 7.

<sup>59</sup> NGO Coalition, p.6.

<sup>60</sup> NGO Coalition, p. 7.

<sup>61</sup> NGO Coalition, p. 7.

- <sup>62</sup> NGO Coalition, p. 8
- <sup>63</sup> NGO Coalition, p. 8.
- <sup>64</sup> NGO Coalition, p.8.
- <sup>65</sup> NGO Coalition, p. 4.
- <sup>66</sup> NGO Coalition, p. 8.
- <sup>67</sup> NGO Coalition, p.9.
- <sup>68</sup> EJ, p. 2.
- <sup>69</sup> EJ, p. 3-4..
- <sup>70</sup> MA/FMSI/FI, para.3.
- <sup>71</sup> MA/FMSI/FI, para. 6..
- <sup>72</sup> NGO Coalition, p. 5.
- <sup>73</sup> MA/FMSI/FI, para. 7.
- <sup>74</sup> MA/FMSI/FI, p. 5.
- <sup>75</sup> NGO Coalition, p.5.
- <sup>76</sup> NGO Coalition, p. 5.
- <sup>77</sup> NGO Coalition, p. 5.
- <sup>78</sup> DPAA, p. 2.
- <sup>79</sup> NGO Coalition, p. 5.
- <sup>80</sup> DPAA, p. 3.
- <sup>81</sup> NGO Coalition, p.6.
- <sup>82</sup> NGO Coalition, p. 5.
- <sup>83</sup> MA/FMSI/FI, para. 3.
- <sup>84</sup> MA/FMSI/FI, paras. 8-10.
- <sup>85</sup> NGO Coalition, p. 5.
- <sup>86</sup> MA/FMSI/FI, para. 4.
- <sup>87</sup> NGO Coalition, p.6.
- <sup>88</sup> MA/FMSI/FI, para. 13.
- <sup>89</sup> NGO Coalition, p. 5.
- <sup>90</sup> NGO Coalition, p.6.
- <sup>91</sup> MA/FMSI/FI, para. 14.
- <sup>92</sup> MA/FMSI/FI, p. 5.
- <sup>93</sup> MA/FMSI/FI, paras. 17-17.
- <sup>94</sup> NGO Coalition, p. 5.
- <sup>95</sup> MA/FMSI/FI, p. 5.
- <sup>96</sup> NGO Coalition, p. 6.
- <sup>97</sup> NGO Coalition, p.9.