



RWANDA

Compliance with the International Covenant on Economic, Social and Cultural Rights

Suggested List of Issues on Gender, Right to Work, Right to Education, Right to Adequate Food, and Civil Society

Submitted by The Advocates for Human Rights,

a non-governmental organization in special consultative status with ECOSOC since 1996

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Founded in 1983, **The Advocates for Human Rights** (The Advocates) is a volunteer-based non-governmental organization committed to the impartial promotion and protection of international human rights standards and the rule of law. The Advocates conducts a range of programs to promote human rights in the United States and around the world, including monitoring and fact-finding, direct legal representation, education and training, and publications. The Advocates is also the primary provider of legal services to low-income asylum seekers in the Upper Midwest region of the United States, and survivors of human rights abuses in Rwanda have requested legal assistance from The Advocates.

The Advocates has worked extensively in collaboration with members of the Rwanda diaspora, both for purposes of documenting human rights conditions in Rwanda, and in the context of asylum and other immigration proceedings. The present report was developed with first-hand information from and in collaboration with activists and asylum-seekers from Rwanda.

EXECUTIVE SUMMARY

1. **Gender-based violence** against women continues to be a serious problem in Rwanda.¹ While a commendable number of social outreach programs have been implemented with the goal of changing public perception of domestic and sexual violence and the **stereotypes** that perpetuate it. A recent government survey found that over half of the adult population believed that there are several circumstances where domestic violence is justified.² This statistic underscores the urgency of enhancing services available for victims, and also measuring the efficacy of the efforts underway to eliminate stereotypes that lead to gender-based violence.
2. Workers in Rwanda face unfair work conditions and restrictions on their freedoms, without protecting their rights. **Domestic workers and informal traders coming from rural outlets to the capital are particularly vulnerable** to abusive practices by State and private actors.
3. The **2012 NGO law** continues to include burdensome operational requirements.³ Credible third-party sources continue to cite the use of ministerial discretion in the interpretations of the statutes as well as overly burdensome data requirements for successful registration.⁴

Rwanda fails to uphold its obligations under the Convention on Economic, Social, and Cultural Rights (ICESCR)

4. As a State Party to the ICESCR, Rwanda has an obligation to respect, fulfill and protect the rights of all people from discrimination (Article 2 (2)). The Government of Rwanda has an obligation under the ICESCR to take progressive steps to fulfill the rights to fair work conditions to all people in its jurisdiction (Article 6), adequate food (Article 11), education (Article 13).

I. Protection from discrimination (Art. 2 (2))

Stereotypes (Concluding Observations paragraph 9)

5. In its 2013 Concluding Observations, the Committee on Economic, Social and Cultural Rights (“The Committee” or “ESCR Committee”) expressed concern about the persistence of patriarchal stereotypes regarding the roles and responsibilities of men and women, and about the lack of effectiveness on measures taken to increase income generating activities for women,

¹ National Institute of Statistics of Rwanda (NISR) [Rwanda], Ministry of Health (MOH) [Rwanda] and ICF, 2019-20 Demographic and Health Survey Summary Report, (Kigali, Rwanda, and Rockville, Maryland, USA: NISR and ICF, 2021) pg. 15, <https://dhsprogram.com/pubs/pdf/SR271/SR271.pdf>.

² Ibid.

³ International Center for Not-for-Profit Law, “Civic Freedom Monitor: Rwanda,” (accessed May 2022). <https://www.icnl.org/resources/civic-freedom-monitor/rwanda>.

⁴ K4D, *HelpDesk Report: Legislation on non-governmental organisations (NGOs) in Tanzania, Kenya, Uganda, Ethiopia, Rwanda and England and Wales*, by Luke Kelly (August 2019) pg. 10, <https://reliefweb.int/report/ethiopia/helpdesk-report-k4d-legislation-non-governmental-organisations-ngos-tanzania-kenya>; Freedom House, “Freedom in the World 2022: Rwanda, Associational and Organizational Rights (E2),” (accessed May 2022) <https://freedomhouse.org/country/rwanda/freedom-world/2022>.

particularly rural women.⁵

6. The ESCR Committee recommended that Rwanda intensify the efforts to ensure the practical application of its legislation on gender equality, policy implementation on the matter, and awareness-raising campaigns on the elimination of harmful cultural attitudes against women and girls.⁶
7. In the State Report, Rwanda stated, “traditional patriarchal stereotypes and gender inequality continue being addressed through public education, regular Radio and TV talk shows on different subjects including but not limited to financing for gender equality and the role of Gender Responsive Budgeting program, human trafficking, teenage pregnancy and other Gender Based Violence issues in general.”⁷
8. As a baseline to assess the overall challenges facing Rwanda regarding stereotypes, the recently published 2019-20 Rwanda Demographic and Health Survey (2019-20 RDHS) described attitudes toward domestic violence and “wife beating” in Rwanda: 65% of women and 39% of men believe a husband is justified in beating his wife for at least one of the following reasons: if she burns the food, argues with him, goes out without telling him, neglects the children, refuses to have sex with him, has sex with someone else, or looks in his phone. Both women and men are most likely to agree that wife beating is justified if the wife has sex with someone else (61% and 36%, respectively).⁸ This recent survey reflects the state's challenge to overcome harmful public attitudes that perceive domestic violence to be justified in certain cases.
9. **Suggested questions relating to stereotypes:**
 - What are the criteria being considered to establish both a baseline and periodic reporting for measuring the effectiveness of initiatives? Please reply with respect to:
 - Use of media, including radio and television
 - Community discussion programs
 - Public school education
 - What whole-of-government measures are in place on a long-term, even generational, basis to dispel the stereotypes represented in the 2019-20 RDHS survey and otherwise held by the public? To what extent is this issue addressed in the visionary goals for 2030 and 2050 that Rwanda has endorsed?
 - What role, if any, has the Rwanda Gender Monitoring Office and their new gender

⁵ Committee on Economic, Social and Cultural Rights, Concluding observations on the second to fourth periodic report of Rwanda, adopted by the Committee at its fiftieth session (June 10 2013), U.N Doc E/C.12/RWA/CO/2-4, ¶ 9.

⁶ Ibid, ¶21(a)(b)(c).

⁷ Committee on Economic, Social and Cultural Rights, *Fifth periodic report submitted by Rwanda under articles 16 and 17 of the Covenant, due in 2018*, (June 24, 2022), U.N. Doc. E/C.12/RWA/5, ¶47.

⁸ National Institute of Statistics of Rwanda (NISR) [Rwanda], Ministry of Health (MOH) [Rwanda] and ICF, 2019-20 Demographic and Health Survey Summary Report, (Kigali, Rwanda, and Rockville, Maryland, USA: NISR and ICF, 2021) pg. 15, <https://dhsprogram.com/pubs/pdf/SR271/SR271.pdf>.

management information system (GMIS) played in collecting soft data with respect to these programs, potentially using and producing data on the benchmarked progress of programs reported by the State?

- How is the state engaging with or involving NGOs that serve women victims of violence to raise public awareness of the issue and dispel harmful stereotypes?

Gender-based Violence (Concluding Observations, paragraph 10)

10. In its 2013 Concluding Observations, the ESCR Committee expressed concern about the information absence about investigations, prosecutions, convictions, and penalties on cases of gender-based violence. The Committee also noted the lack of information on the effectiveness and impact of the measures taken to decrease of gender-based violence.⁹ The Committee recommended ensuring the effective application of the State legislation against gender-based violence, and to “intensify its efforts to provide support services to victims and ensure adequate staffing of these services.”¹⁰
11. In response, in its 2021 State Party Report, Rwanda stated that the State is implementing a “National Action Plan for the Implementation of the Kampala Declaration on Sexual and Gender Based Violence. The implementation runs through 2022.”¹¹ The Rwandan State also provided information about the development of a “national coordination framework operates at the national and decentralized levels and takes into account political leadership, technical expertise and operationalization down to the local communities.”¹²
12. Despite Rwanda's numerous initiatives to combat gender-based violence against women, many women are not informed about the availability of and accessing services. In particular, women in rural areas, women with lower levels of education, and women in vulnerable groups do not receive accurate information about reporting violence and accessing services.¹³
13. Rwanda has made significant progress on women’s rights over the last decade. Rwanda continues to rank in the Top Ten in the Global Gender Gap Report, as measured by the World Economic Forum.¹⁴ Despite this progress, there is still room for improvement.
14. Access to shelters is crucial for protection of victims of domestic violence. In addition to providing safety and essential services, they also enhance the ability to enforce protective orders and establish future support and permanent housing. In accordance with recommended standards, an estimated 1,350 shelter beds are required to serve Rwanda’s population of 13.5

⁹ Committee on Economic, Social and Cultural Rights, *Concluding observations on the second to fourth periodic report of Rwanda, adopted by the Committee at its fiftieth session* (June 10 2013), U.N Doc E/C.12/RWA/CO/2-4, ¶ 10.

¹⁰ Committee on Economic, Social and Cultural Rights, *Concluding observations on the second to fourth periodic report of Rwanda, adopted by the Committee at its fiftieth session* (June 10 2013), U.N Doc E/C.12/RWA/CO/2-4, ¶ 10.

¹¹ Committee on Economic, Social and Cultural Rights, *Fifth periodic report submitted by Rwanda under articles 16 and 17 of the Covenant, due in 2018*, (June 24, 2022), U.N. Doc. E/C.12/RWA/5, ¶54.

¹² Committee on Economic, Social and Cultural Rights, *Fifth periodic report submitted by Rwanda under articles 16 and 17 of the Covenant, due in 2018*, (June 24, 2022), U.N. Doc. E/C.12/RWA/5, ¶55.

¹³ Written communication from Rwandan human rights defender, 2 June 2022.

¹⁴ World Economic Forum, *Global Gender Gap Report 2020*, (Geneva, Switzerland: World Economic Forum, December 2019) pg. 299, https://www3.weforum.org/docs/WEF_GGGR_2020.pdf.

million.¹⁵ Rwanda has increased the number of Isange One Stop Centre (IOSC) locations to a total of 44 as of 2020 and over 49,000 victims of gender-based violence received assistance from the IOSC from 2015 to 2018. Such efforts to provide safe shelter and services to victims are welcome, and the state should continue to provide adequate support and resources to these centers.¹⁶

15. Kigali alone (population 1.2 million), however, should have at least 125 shelter beds available. Information on this topic (temporary vs. long-term shelters and number and locations of beds) continues to be scarce. A robust program of shelter management, operated using a victim-centered approach, including the compiling of data with respect to the number of beds in accessible locations continues to be a key criterion in combatting gender-based violence against women.

Data on Gender-based Violence

16. The statistics, published in 2021 by the National Institute of Statistics of Rwanda (NISR) for the period of 2019-20, show that 37% of Rwandan women over age 15 have experienced physical violence; 16% of women have experienced physical violence in the prior 12 months.¹⁷ 60% of that physical violence (among ever-married women) was perpetrated by their current husband/partner and 27% by a former husband/partner.¹⁸ Spousal violence was reported by 46% of ever-married women (age 15-49), whether physical, sexual, or emotional.¹⁹ The most common form of spousal violence among ever-married women is physical violence (36%).²⁰ These data may not reflect the actual number of women who have experienced abuse, however, as most abuse that is reported is physical, while psychological or emotional abuse goes largely unreported.²¹ These numbers have increased since the 2014-15 report when the same demographic group experienced physical violence at a rate of 35% (for Rwandan women over

¹⁵ UN Women, *Handbook for Legislation on Violence against Women*, (New York: UN Women, 2012) pg. 29 https://www.unwomen.org/sites/default/files/Headquarters/Attachments/Sections/Library/Publications/2012/12/UN_W_Legislation-Handbook%20pdf.pdf.

¹⁶ United Nations Rwanda and UN Women, “Rwanda’s Holistic Approach to Tackling the Different Faces of Gender-Based Violence (GBV)” accessed June 3 2022, ¶4 <https://rwanda.un.org/en/15872-rwandas-holistic-approach-tackling-different-faces-gender-based-violence-gbv>.

¹⁷ National Institute of Statistics of Rwanda (NISR) [Rwanda], Ministry of Health (MOH) [Rwanda] and ICF, 2019-20 Demographic and Health Survey Summary Report, (Kigali, Rwanda, and Rockville, Maryland, USA: NISR and ICF, 2021) pg. 15, <https://dhsprogram.com/pubs/pdf/SR271/SR271.pdf>.

¹⁸ National Institute of Statistics of Rwanda (NISR) [Rwanda], Ministry of Health (MOH) [Rwanda] and ICF, 2019-20 Demographic and Health Survey Summary Report, (Kigali, Rwanda, and Rockville, Maryland, USA: NISR and ICF, 2021) pg. 15, <https://dhsprogram.com/pubs/pdf/SR271/SR271.pdf>.

¹⁹ National Institute of Statistics of Rwanda (NISR) [Rwanda], Ministry of Health (MOH) [Rwanda] and ICF, 2019-20 Demographic and Health Survey Summary Report, (Kigali, Rwanda, and Rockville, Maryland, USA: NISR and ICF, 2021) pg. 15, <https://dhsprogram.com/pubs/pdf/SR271/SR271.pdf>.

²⁰ National Institute of Statistics of Rwanda (NISR) [Rwanda], Ministry of Health (MOH) [Rwanda] and ICF, 2019-20 Demographic and Health Survey Summary Report, (Kigali, Rwanda, and Rockville, Maryland, USA: NISR and ICF, 2021) pg. 15, <https://dhsprogram.com/pubs/pdf/SR271/SR271.pdf>.

²¹ Written communication from Rwandan human rights defender, 2 June 2022.

age 15) and 14% (in the prior 12 months).²² These recent statistics demonstrate the urgent need to produce detailed analysis and conclusive reports for staff and stakeholders working to address this issue.

17. Suggested questions relating to gender-based violence:

- How many shelter beds are there currently in Rwanda and what is the number of temporary vs long-term beds? How are “temporary” and “long-term” defined with respect to length of stay?
- What are the short-and-long term plans to develop adequate shelter facilities to properly serve domestic violence victims and with a victim-centered approach?
- What factors are contributing to the apparent increase in gender-based violence against women, whether it is a rise in prevalence or in reporting? What goals and measurements have been established for both short-term and long-term improvement in collection of these statistics?
- Please provide data about cases of gender-based violence against women, disaggregated by age, education level, employment, rural vs urban/geographic location and relationship status of both the victim and the offender. How does the government intend to use this data be used to target interventions and support funding for future prevention measures?
- Please provide information on the number of cases of psychological, emotional, or economic abuse, disaggregated by age, education level, employment, rural vs urban/geographic location and relationship status of both the victim and the offender.

II. Informal work and unfair work conditions (Art. 6 and Concluding Observations 12-19)

18. In its 2013 Concluding observations, The ESCR Committee expressed concern about the high rate of unemployment in the country,²³ and the lack of “comprehensive data on the impact of training and vocational programmes with regard to access to the labour market, in particular for young persons.”²⁴ The Committee recommended Rwanda to take steps to reduce rate of unemployment and reinforce targeted plans and programs to combat unemployment.²⁵
19. The State of Rwanda lacks systemic information collection procedures about informal work. The lack of data restricts internal accountability, as the information available is outside the country.²⁶ Testimonies present that many Rwandans rely on informal trade to obtain resources for survival, without the protection or support of the Rwandan State. Often, the government restricts local and small food sellers or hawkers from trading on the street by using

²² National Institute of Statistics of Rwanda (NISR) [Rwanda], Ministry of Health (MOH) [Rwanda], and ICF International. Rwanda Demographic and Health Survey 2014-15, (Rockville, Maryland, USA: NISR, MOH, and ICF International, 2015) pg. 267. <https://dhsprogram.com/pubs/pdf/FR316/FR316.pdf>.

²³ Committee on Economic, Social and Cultural Rights, Concluding observations on the second to fourth periodic report of Rwanda, adopted by the Committee at its fiftieth session (June 10 2013), U.N Doc E/C.12/RWA/CO/2-4, ¶ 10.

²⁴ Committee on Economic, Social and Cultural Rights, Concluding observations on the second to fourth periodic report of Rwanda, adopted by the Committee at its fiftieth session (June 10 2013), U.N Doc E/C.12/RWA/CO/2-4, ¶ 10.

²⁵ Committee on Economic, Social and Cultural Rights, Concluding observations on the second to fourth periodic report of Rwanda, adopted by the Committee at its fiftieth session (June 10 2013), U.N Doc E/C.12/RWA/CO/2-4, ¶ 10.

²⁶ Interview to Human Rights Defender, December 2022.

disproportionate and excessive force, and placing informal workers in detention.²⁷ According to testimonies, most of the informal workers are women and young people, with limited access to resources.²⁸ According to the International Labour Organization, for 2021, the unemployment rate of women and young persons is higher than the average Rwandan “the national unemployment rate was 15.8%. For women, the unemployment rate was slightly higher at 17.4%. For young persons, unemployment was 23.2%.”²⁹

20. Media outlets have reported security guards seizing informal traders’ boxes, chasing, and hitting them.³⁰ The City of Kigali placed fines on sellers and buyers, and restrictions. After the killing of one informal trader: “Ms. Uwamahoro,” the Rwanda government committed to the creation of proper formal markets and cooperatives.³¹ Currently, there is a lack of information about the progress of this policy.

Rwandan Government fails to Domestic Workers from Human Rights Abuses.

21. Testimonies exhibited a lack of labor protection for domestic workers in Rwanda. According to testimonies, domestic workers are treated under unfair conditions and are commonly harassed by their employers.³² Reports also exhibit that domestic workers are overworked, restricted from leaving their employers' houses in their free time, and mistreated or withheld their payment.³³

22. News outlets such as New Times reported that “many underage girls subjected to domestic work and abuse by their bosses.”³⁴ Most of the domestic workers come from rural Rwanda. Research has found that “the rural- urban influx of low-income population is responsible for an expansion in informal settlement and therefore human trafficking in Kigali city by the names of Kangondo and Kibiraro of Remera sector, Gasabo district.”³⁵

23. Suggested questions relating to fair work conditions

- What measures has the State taken to protect domestic workers from unfair work conditions and harassment by their employers?

²⁷ Interview to Human Rights Defender, December 2022.

²⁸ Interview to Human Rights Defender, December 2022.

²⁹ International Labor Organization, “Country Profiles,” Jan. 3, 2023, <https://ilostat.ilo.org/data/country-profiles/>.

³⁰ Kristen Van Schie, *Kigali’s trade-off: Sell and be arrested or starve on Mail & Guardian* (Mar 6 2019). Available at: <https://mg.co.za/article/2019-03-06-kigalis-trade-off-sell-and-be-arrested-or-starve/>

³¹ The East African Police in running battles with Kigali city vendors again (May 20, 2016). Available at: <https://www.theeastafrican.co.ke/tea/rwanda-today/news/police-in-running-battles-with-kigali-city-vendors-again--1350188>

³² Interview to Human Rights Defender, December 2022.

³³ Interview to Human Rights Defender, December 2022; Glorioso Usugi, *Mistreatment, Underpayment Plague Domestic Workers in Rwanda*, *Global Press Journal* (Nov. 19, 2012). Available at:

<https://globalpressjournal.com/africa/rwanda/mistreatment-underpayment-plague-domestic-workers-in-rwanda/>

³⁴ Ange Iliza, *Domestic workers face heightened abuse*, *News Times* (Jul.21, 2020). Available at:

<https://www.newtimes.co.rw/article/178572/News/domestic-workers-face-heightened-abuse>

³⁵ Gacinya, J. and Kirimi, E., 2022. *Assessing the influence of Rural–Urban migration on human trafficking in Rwanda*. *Sociol Int J*, 6(1), pp.16-23. P. 17.

- What measures has the State taken to provide accountability mechanisms for abusive employers?
- What concrete measures has the Rwandan government taken to raise awareness about labor rights and accountability mechanisms among marginalized and disadvantaged communities, including informal workers, women —especially rural women, and young people?
- What concrete measures has the State taken to facilitate the transition from the informal to the formal economy for informal workers, especially for rural women and young people?

III. Right to education (Arts. 13-14 and Concluding Observations 27-28)

1. In its 2013 Concluding Observations, the ESCR Committee encouraged Rwanda to “intensify its efforts to progressively make secondary education fully free.”³⁶
2. While the availability of education, especially universal primary education, has improved in the last years in Rwanda, according to testimonies, the quality, accessibility, and acceptability of education require further and better actions from the State.³⁷ According to information from first information sources, **private institutions in Rwanda provide education services to most Rwandans as the public schools lack resources, especially in rural areas.**³⁸
3. Academic research presents findings on the matter as follows: “From interviews with various head teachers revealed that there is no quality education due to some constraints such as poverty, professorial system of rotation which makes learners to be unfamiliar with teachers, and the double shifting system which makes learners to waste learning time in upper primary. Besides, the focus group discussion results with students and interviews pointed out that these schools are for the poor people because students from ‘rich families’ attend schools of excellence/boarding or private schools.”³⁹
4. The same research also exhibits “Results indicate that there is no high quality in basic education schools due to poor quality of learners joining these schools; inadequate human, material and financial support; poverty of parents and professorial system. It was also found that there are negative attitudes towards basic education schools.”⁴⁰
5. **Suggested questions relating to the right to education:**
 - What measures has Rwanda taken to allocate the maximum available resources for education in public schools and guarantee quality and adaptable education provision?
 - What measures has Rwanda taken to monitor the provision of education by private institutions?

³⁶ Committee on Economic, Social and Cultural Rights, Concluding observations on the second to fourth periodic report of Rwanda, adopted by the Committee at its fiftieth session (June 10 2013), U.N Doc E/C.12/RWA/CO/2-4, ¶ 27.

³⁷ Interview with Human Rights Defender, December 2022.

³⁸ *Id.*

³⁹ Nizeyimana G, Nzabairwa W, Mukingambeho D, Nkiliye I. *Hindrances to quality of basic education in Rwanda*. Rwandan Journal of Education. 2020;5(1). P. 61

⁴⁰ Nizeyimana G, Nzabairwa W, Mukingambeho D, Nkiliye I. *Hindrances to quality of basic education in Rwanda*. Rwandan Journal of Education. 2020;5(1). P. 64

- What measures has Rwanda taken to ensure that private educational institutions do not supplant or replace public education?⁴¹

IV. Right to adequate food (Art. 11)

24. In Rwanda, farms are family units, small, and semi-subsistence-oriented.⁴² According to testimonies and research, the Government of Rwanda is promoting monocultures of maize among local and small farmers⁴³ by providing mainly fertilizers, seeds, and subsidies primarily for maize crops.⁴⁴ As a consequence, **rural low-income farmers doing subsistence farming are forced to prioritize selling the food they harvest instead of having their food sustainability.**⁴⁵ This State practice affects the acceptability and adaptability of the food Rwandans obtain.

25. The testimony collected by The Advocates corresponds with research on agricultural studies that observes: "... the key dimension of Rwanda's agrarian policy is to intensify agriculture and transform the subsistence farming into a modern and commercial agriculture. This policy includes the formalization of land tenure, the promotion of intensified production of specified marketable crops through use of modern inputs, and regional specialization where regions concentrate on specific crop combinations depending upon the agro-climate in that region"⁴⁶ Findings on Rwanda public policies on land use consolidation and crop intensification program have caused from insufficient balanced food, decrease in food quality, food sustainability, and food accessibility.⁴⁷

26. Suggested questions relating to adequate food:

- What measures has the Rwandan government taken to guarantee the right to food for people in rural Rwanda?
- What measures has Rwanda taken to promote acceptable and adaptable crops for people in Rural Rwanda?
- What measures has the Rwandan government taken to promote crops that fulfill the provision of acceptable food within the Rwandan culture?

⁴¹ See The Abidjan Principles on the human rights obligations of States to provide public education and to regulate private involvement in education. Adopted on 13 February 2019. Available at:

<https://www.abidjanprinciples.org/en/principles/overview>

⁴² Food and Agriculture Organization, Country Fact Sheet On Food And Agriculture Policy Trends, available at:

<https://www.fao.org/3/i5900e/i5900e.pdf>

⁴³ Manuel Milz, *The authoritarian face of the "Green Revolution": Rwanda capitulates to agribusiness on GRAIN* (Aug. 8 2011), available at: <https://grain.org/es/article/entries/4322-the-authoritarian-face-of-the-green-revolution-rwanda-capitulates-to-agribusiness>

⁴⁴ Interview to Human Rights Defender, December 2022.

⁴⁵ Interview to Human Rights Defender, December 2022.

⁴⁶ Ngango, J., Hong, S. Improving farm productivity through the reduction of managerial and technology gaps among farmers in Rwanda. *Agric & Food Secur* 10, 11 (2021). <https://doi.org/10.1186/s40066-020-00284-4>.

Available at: <https://agricultureandfoodsecurity.biomedcentral.com/articles/10.1186/s40066-020-00284-4#citeas>

⁴⁷ Chigbu, Uchendu Eugene, Pierre Damien Ntihinyurwa, Walter Timo de Vries, and Edith Ishimwe Ngenzi. *Why Tenure Responsive Land-Use Planning Matters: Insights for Land Use Consolidation for Food Security in Rwanda*.

International Journal of Environmental Research and Public Health 16, no. 8 (2019): 1354. P. 10,

<https://doi.org/10.3390/ijerph16081354>.

V. Non-governmental Organizations

27. The **2012 NGO law continues to include burdensome registration and operational requirements**. Credible secondary sources confirm that “registration and reporting requirements for both domestic and foreign nongovernmental organizations (NGOs) are onerous, and activities that the government defines as divisive are prohibited.”⁴⁸ International NGOs have even broader requirements than NGOs and must establish who will continue their work after the programs end and provide “all information relating its geographical establishment throughout the world.”⁴⁹
28. The RGB has broad discretion (versus concise criteria) as to whether an NGO can be registered. A refusal of registration by the RGB may cite the NGO as a threat to “security, public order, health, morals, and human rights.”⁵⁰ The RGB may also de-register an NGO based on the same discretionary assessments.⁵¹
29. Additionally, NGO independence can be compromised by the RGB’s business practices. One report found that “Many organizations receive funds from the RGB which challenges their independence. Several NGOs have been banned in recent years, leading others to self-censor. The government has been accused of employing infiltration tactics against human rights organizations.”⁵² These restrictions in Rwanda's law impede the work of civil society, including NGOs working to protect women's rights.
30. **Suggested questions relating to interference in Non-Governmental Organizations:**
- What specific changes to the law (Law No. 04/2012 and 05/2012) has Rwanda considered enacting? How will these changes address the existing barriers that NGOs face in delivering services in Rwanda?
 - What governmental mechanisms, if any, are in place to assure that individual NGOs can operate autonomously and enjoy freedom of assembly and association as guaranteed by international law?

⁴⁸ Freedom House, “Freedom in the World 2022: Rwanda, Associational and Organizational Rights (E2),” (accessed May 2022) <https://freedomhouse.org/country/rwanda/freedom-world/2022>.

⁴⁹ International Center for Not-for-Profit Law, “Civic Freedom Monitor: Rwanda, Legal Analysis, Barriers to Entry,” (accessed May 2022). <https://www.icnl.org/resources/civic-freedom-monitor/rwanda>.

⁵⁰ International Center for Not-for-Profit Law, “Civic Freedom Monitor: Rwanda, Legal Analysis, Barriers to Operational Activity,” (accessed May 2022). <https://www.icnl.org/resources/civic-freedom-monitor/rwanda>

⁵¹ K4D, *HelpDesk Report: Legislation on non-governmental organisations (NGOs) in Tanzania, Kenya, Uganda, Ethiopia, Rwanda and England and Wales*, by Luke Kelly (August 2019) pg. 10, <https://reliefweb.int/report/ethiopia/helpdesk-report-k4d-legislation-non-governmental-organisations-ngos-tanzania-kenya>.

⁵² Freedom House, “Freedom in the World 2022: Rwanda, Associational and Organizational Rights (E2),” (accessed May 2022) <https://freedomhouse.org/country/rwanda/freedom-world/2022>.