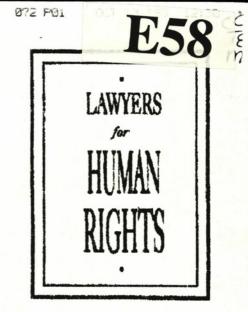
· NATIONAL DIRECTORATE ·

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MEMORANDUM

TO : TECHNICAL COMMITTEE: ELECTORAL BILL

FROM : LOBBYING COMMISSION, INDEPENDENT FORUM FOR ELECTORAL EDUCATION (IFEE)

DATE : 13 OCTOBER 1993

The IFEE Lobbying Commission has read the draft prepared for the Multi-party Negotiating Forum and has decided that the following needs attention:

1. We feel very strongly about the issue of the <u>TBVC "states"</u> and would therefore like to repeat a previous recommendation:

The present citizens (8 million) of the TBVC states were unjustly deprived of their SA citizenship. Those who are resident in those states and those who have not been resident in SA long enough to have their citizenship restored to them should be accorded their basic human rights of exercising their franchise in the forthcoming elections. It is the duty of the Negotiating Forum and the TEC to protect those rights - whether or not those "governments" decide formally to incorporate the provisions of the transitional legislation into their law.

"Acceptable identity documents" should therefore also include:

- TBVC Identity documents
- TBVC Travel documents
- SA passbooks or reference books (Quite a significant number of older people still use those for purposes of identification)
- Because it is important that the emerging democracy has as broad a base as possible and to avoid any perception that SA citizens couldn't vote as the result of a "technicality", we feel the IEC should retain the power to issue voter's cards if it deems it necessary and that those cards shall constitute adequate proof of the holder's entitlement to vote. It might still be possible that the Commission might deem it necessary to issue such cards if it is of the view that the present forms of ID documents have not been issued to a sufficient number of people of the population. (It is again a matter of trust or the lack thereof in the structures of our own making: the IEC).
- 3. We welcome the use of the term "voting station". Some of our members still suggest however, that an entirely new term "voting centre" may be less clumsy and less ambiguous.

4.

Although in terms of Section 7 (1), the act makes provision for authorised monitors and observers not to be excluded from the voting station, it may be appropriate for this Act to give greater prominence to the role of a force of <u>non-partisan</u>, <u>domestic</u> <u>observers</u>, who are drawn from their communities and speak the local language by providing for the following in the Electoral Bill:

- a. A section that deals with the powers, duties and functions of registered domestic observers and accredited international observers such as the one dealing with the Appointment and powers, duties and functions of agents of registered parties.
- b. This would clarify the registered domestic observer's role with regard to the inspecting of the ballot boxes, their role during voting procedure inside the voting station, the sealing of the ballot boxes, the counting of votes and at the mobile voting stations.
- 5. <u>Section 10 (s)</u>: Should this not provide that the regional electoral officer must allow for at least one voting agent from each party at each voting station?
- Section 16 (3)(a): Is 60 letters not excessive? More than one line assumes an undue importance on a ballot paper. We suggest 35 letters as being quite enough for the name of any party.
- Section 16 (6)(a)(iii): This might be too wide. We suggest that the paragraph ends with a full stop after the word violence.
 (If a party seeking election chooses to offend us on grounds of race, gender, ethnic origin, colour, sexual orientation, age, disability, religion, conscience, creed, culture or language we won't vote for them. At this stage of the democratic process, their prejudices are better exposed than covered up by regulations which force them to hide what they stand for)
- 8. Section 17 (a): We feel that the physical address of the party should be published.
- 9. <u>Chapter iv Registration of Parties</u>: The chapter appears to give the public two chances to object to the registration of a party before and after the issuance of a registration certificate. We feel the public should have only one chance to object and that should be after application and publication. One week should be allowed for such objections.
- 10. <u>Section 20 (1)</u>: Should the number of days and voting hours not be for the IEC to determine? We suggest that the State President's powers should be confined to proclaiming the hour and date on which the polling will commence.
- 11. <u>Section 21 (1)</u>: The deposits seem excessive. Some parties with a national profile who may want to contest the election in each of the nine or ten regions would have a problem in finding R250 000,00 to deposit in addition to the R10 000,00. We feel this might also exclude some smaller parties and there is every reason why they should be encouraged to participate.

12. <u>Section 22 (2)</u>: Why should the Chief Director have the power to decide "any place on the list"? Surely the party concerned should specify the place on the list of the new candidate.

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- 13. <u>Section 23 (7)</u>: Should read: The district electoral officer <u>shall</u> make known the locations and estimated times at which a mobile voting station shall function during the voting period in local newspapers and on radio stations.
- 14. <u>Section 24: Foreign Voting Stations</u>: We feel quite strongly that these should provide for international observers to monitor proceedings.
- 15. Section 32: The secrecy of the ballot is of major importance and there should be no possibility of identification. Our society is rife with authoritarian structures and violence and intimidation is the order of the day. The secrecy of the ballot is a powerful tool against intimidation. Secrecy with regard to whom you voted for as well sa the fact that you voted. Since there will most probably be calls for stay-aways from certain sectors, it is important that we use invisible ink to mark voters. That will enable them to vote without being detected.

We also have a concern that people who are in positions of power, authority and control such as chiefs and headmen or district pension officers or other officials in government departments, should not be eligible for appointment as election, party or voting agents.

16. Section 36: Any objection to voting in terms of this section should be recorded.

We would also like to submit to the Technical Committee the <u>Outline for HR</u> <u>Analysis of Electoral Laws and Procedure</u>, which we received from the UN Centre for HR.

CONVENOR

CECILLE VAN RIET LAWYERS FOR HUMAN RIGHTS

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UNITED NATIONS CENTRE FOR HUMAN RIGHTS PROGRAMME OF ADVISORY SERVICES AND TECHNICAL ASSISTANCE

> Outline for Human Rights Analysis of Electoral Laws and Procedures

I. General Review

-DO THE LAWS AND PROCEDURES RESPECT INTERNATIONAL STANDARDS?

-DO THEY REFLECT THE PARTICULAR NEEDS, ASPIRATIONS, AND HISTORICAL REALITIES OF THE PEOPLE INVOLVED?

-DO THEY GIVE VOICE TO THE POLITICAL WILL AND RIGHTS TO SELF-DETERMINATION OF THE PEOPTE?

II. Broad Standards

-ARE THEY FREE?

-ALLOWING UNFETTERED EXPRESSION OF THE WILL OF THE PEOPLE? -SET IN AN ATMOSPHERE FREE FROM INTIMIDATION?

-ACCOMPANIED BY MECHANISMS FOR THE PROTECTION OF HUMAN RIGHTS?

-ARE THE PREREQUISITE RIGHTS SECURED?

- -FREE EXPRESSION?
- -FREE OPINION?
- -FREE INFORMATION?
- -FREE ASSEMBLY?
- -FREE ASSOCIATION?
- -INDEPENDENT JUDICIAL PROCEDURES?

-IS THE SECRECY OF THE BALLOT PROTECTED?

-ARE THEY FAIR?

-ESTABLISHING EQUAL SUFFRAGE?

-ESTABLISHING UNIVERSAL (ADULT) SUFFRAGE?

-ESTABLISHING NON-DISCRIMINATION IN VOTING RIGHTS?

-ESTABLISHING TECHNICAL SAFEGUARDS TO PROTECT FAIRNESS?

-DO THEY PROVIDE FOR PERIODICITY?

-REASONABLE INTERVALS FOR NEW ELECTIONS?

-ADEQUATE PREPARATION TIME FOR EACH PHASE OF THE PROCESS?

-LIMITATIONS ON PERMISSABLE EMERGENCY INTERRUPTIONS?

-ARE THEY GENUINE?

-WITH GENUINE PROCEDURES TO ACCOMMODATE THE WILL OF THE PEOPLE?

-WITH GENUINE EFFECTS, INCLUDING & TRANSFER OF POWER?

-WITH & GENUINE CHOICE OF DIFFERENT PARTIES OR CANDIDATES?

-DO THEY PROVIDE FOR EQUAL ACCESS TO CANDIDATURE AND SERVICE?

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-DO THEY FACILITATE AN INFORMED CHOICE BY THE ELECTORATE?

III. Specific Analysis

-ADMINISTRATION

-IS THE ADMINISTRATIVE STRUCTURE INDEPENDENT AND OBJECTIVE? -IS IT EFFECTIVE?

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-IS A SINGLE LINE OF ULTIMATE AUTHORITY ESTABLISHED?

-IS THE METHOD OF APPOINTMENT OBJECTIVE AND UNBIASED? -IS THE MEANS OF COMPENSATION POTENTIALLY CORRUPTING? -WILL STAFF HAVE THE NECESSARY QUALIFICATIONS TO PERFORM WELL? -ARE ALL LEVELS OF STAFF INSULATED FROM BIAS?

-FROM POLITICAL PRESSURE?

-FROM POLITICALLY MOTIVATED SALARY ADJUSTMENT OR DENIAL?

-ARE LEGAL GUARANTEES IN PLACE TO PREVENT CORRUPTION ?

- -TO PREVENT BIAS?
- -TO PREVENT FRAUD?

-IS THERE PUBLIC CONSENSUS ON THE ADMINISTRATIVE STRUCTURE? -WILL THERE BE ADEQUATE ADVANCE TRAINING OF OFFICIALS?

-CONSTITUENCY DELINITATION

-DO THE DISTRICTS AND BOUNDARIES RESPECT EQUAL SUFFRAGE?

-ARE THEY DRAWN TO DISCOUNT THE VOTES OF A PARTICULAR GROUP? -A PARTICULAR GEOGRAPHIC AREA?

-DO THEY TAKE INTO ACCOUNT AVAILABLE DEMOGRAPHIC INFORMATION?

-IS THERE AN ACCURATE CENSUS?

-DO THEY TAKE TOPOGRAPHY INTO ACCOUNT?

-DO THEY TAKE GEOGRAPHIC DISTRIBUTION INTO ACCOUNT?

-WILL POLLING STATIONS BE DISTRIBUTED EVENLY?

-REGISTRATION OF RLECTORS

-IS ADVANCE REGISTRATION PROPOSED?

-ARE PROVISIONS FOR QUALIFICATIONS FAIR?

-ARE RESIDENT REQUIREMENTS FAIR?

-ARE PROCEDURES FOR LISTS AND REGISTERS FAIR?

-ARE THEY EFFECTIVE?

-ARE PROCEDURES ESTABLISHED FOR CHALLENGES TO THE LISTS?

-FOR APPEALS ON SUCH DECISIONS?

-ARE LISTS ACCESSIBLE TO INTERESTED PARTIES?

-DO DISQUALIFYING FACTORS REPRESENT IMPERMISSIBLE DISCRIMINATION?

-DO THEY ALLOW MAXIMUM REASONABLE ENFRANCHISEMENT?

-ARE THERE TECHNICAL BARRIERS TO VOTING BY QUALIFIED PERSONS?

-PROCEDURES FOR REGISTRATION OF THOSE APPROACHING MINIMUM AGE?

-IS THE REGISTRATION PERIOD LONG ENOUGH FOR MAXIMUM ACCESS?

-IF NO ADVANCE REGISTRATION, WILL THERE BE OTHER MEANS OF -PREVENTING DOUBLE VOTING?

-PREVENTING UNQUALIFIED VOTING?

-NOMINATIONS, PARTIES, AND CANDIDATES

-IS UNFAIR ADVANTAGE GIVEN TO GOVERNMENT-SUPPORTED CANDIDATES? -ARE PROVISIONS FOR CANDIDATE QUALIFICATIONS CLEAR?

-ARE THEY FAIR?

-DO THEY DISCRIMINATE AGAINST WOMEN?

-DO THEY DISCRIMINATE AGAINST PARTICULAR RACIAL GROUPS?

-AGAINST CERTAIN ETHNIC GROUPS?

-IS DISQUALIFICATION SUBJECT TO INDEPENDENT REVIEW?

-DO PARTIES FACE UNREASONABLE RESTRICTIONS ON PARTICIPATION? -ON CAMPAIGNING?

-ARE PARTY NAMES AND SYMBOLS PROTECTED UNDER LAW?

-ARE PROCEDURES FOR PARTY AGENTS, IF ALLOWED, FAIR AND CLEAR? -ARE NOMINATION TIMES AND PLACES CLEARLY PROVIDED? -DOES THE LAW FAIRLY ADDRESS CAMPAIGN FINANCING? -IS THERE ADEQUATE TIME FOR POLITICAL CAMPAIGNING? -POLLING, TABULATION, AND REPORTING -ARE THERE DETAILED PROVISIONS FORM THE FORM OF BALLOTS? -FOR THE DESIGN OF BALLOT BOXES? -FOR THE DESIGN OF VOTING COMPARTMENTS? -FOR THE MANNER OF POLLING? -DO THESE DESIGNS PROTECT THE PROCESS FROM FRAUD? -DO THEY RESPECT THE SECRECY OF THE VOTE? -ARE BALLOTS CLEARLY WORDED? -ARE PROXY AND ABSENTEE VOTING PROCEDURES IN PLACE? -DO SUCH PROCEDURES FACILITATE BROAD PARTICIPATION? -DO THEY COMPROMISE ELECTORAL SECURITY? -ARE DISABLED VOTERS ACCOMMODATED? -ARE OTHERS WITH SPECIAL NEEDS ACCOMMODATED? -ELDERLY OR INFIRM VOTERS? -STUDENTS? -CONSCRIPTS? -WORKERS? -FOREIGN SERVICE PERSONNEL? -PRISONERS WHO HAVE RETAINED VOTING RIGHTS? -DO POLLING STAFF HAVE CLEAR GUIDANCE ON IDENTIFYING VOTERS? -ARE QUESTIONS TO BE PUT TO VOTERS LIMITED BY STATUTE? -IS THE ATTENDANCE OF OBSERVERS PROVIDED FOR? -IS COUNTING OPEN TO OFFICIAL OBSERVATION? -ARE ALL BALLOT PAPERS TO BE SYSTEMATICALLY ACCOUNTED FOR? -IS THE COUNTING PROCESS SECURE AND FAIR? -ARE THERE PROVISIONS FOR SAFE STORING OF ELECTION MATERIALS? -ARE RECOUNT PROCEDURES ESTABLISHED FOR QUESTIONABLE RESULTS? -COMPLAINTS, PETITIONS, AND APPEALS -IS STANDING PROVIDED TO ALL AGGRIEVED PARTIES? -IS SUBSTANTIVE REDRESS AVAILABLE? -DOES PETITION PROCESS SET THE SCOPE OF AVAILABLE REVIEW? -DOES THE LAW CLEARLY ESTABLISH PROCEDURES FOR PETITIONS? -ARE PETITIONS THE SOLE MEANS OF CHALLENGING RESULTS? -ARE THE POWERS OF THE BODY CHARGED WITH REVIEW CLEAR? -IS THAT BODY AN INDEPENDENT JUDICIAL BODY? -ARE MULTIPLE LEVELS OF REVIEW AVAILABLE WHERE APPROPRIATE? -WHAT IS THE EFFECT OF CONFIRMED IRREGULARITIES ON OUTCOME? -IS THERE REDRESS FOR INDIVIDUALS DENIED VOTING RIGHTS? -RESPECT FOR FUNDAMENTAL HUMAN RIGHTS -IS FREE EXPRESSION GUARANTEED? -FREE OPINION? -FREE INFORMATION? -FREE ASSEMBLY? -FREE ASSOCIATION? -RESPECT FOR THE RIGHTS OF THE PERSON? -RESPECT FOR OTHER HUMAN RIGHTS? -IS THERE A PREVAILING ATMOSPHERE OF INTIMIDATION? -ARE THERE OTHER LAWS WHICH MAY DISCOURAGE PARTICIPATION? -IS A STATE OF EMERGENCY IN EFFECT?

-IS OTHER EXCEPTIONAL LEGISLATION IN EFFECT?

-ARE ANY EXCEPTIONAL MEASURES STRICTLY REQUIRED BY THE

EXIGENCIES OF THE SITUATION?

- -ARE EXCEPTIONAL MEASURES CALCULATED TO CORRUPT THE PROCESS?
- -ARE EXCEPTIONAL MEASURES CALCULATED TO UNNECESSARILY DELAY THE PROCESS?

-OFFENSES, PENALTIES, AND MAINTENANCE OF ORDER

-DOES THE LAW PROTECT THE PROCESS FROM CORRUPTION?

- -FROM OFFICIAL NONFEASANCE, MISFEASANCE, AND MALFEASANCE?
- -FROM OBSTRUCTION?

-FROM UNDUE INFLUENCE?

-FROM PERSONATION?

-FROM BRIBERY?

-FROM TREATING?

-FROM INTIMIDATION?

-FROM ALL FORMS OF ILLEGAL AND CORRUPT PRACTICES?

-DO PENALTIES AND PROCEDURES RESPECT INTERNATIONAL STANDARDS FOR THE ADMINISTRATION OF JUSTICE?

-ARE POLICE TO BE PRESENT AT THE POLLS?

-IF SO, IS THIS ABSOLUTELY NECESSARY?

-WILL IT HAVE AN INTIMIDATING EFFECT ON VOTERS?

-COULD POLLING OFFICIALS FULFIL THE POLICE FUNCTION?

-IS CRIMINAL LIABILITY IMPOSED FOR OFFICIAL MISCONDUCT?

-IS CIVIL LIABILITY IMPOSED FOR RECOVERY AGAINST OFFICIALS?

-MEDIA ACCESS AND REGULATION

-ARE ARRANGEMENTS IN PLACE FOR FAIR MEDIA ACCESS? -BY ALL PARTIES?

-BY ALL CANDIDATES?

-ARE THE MAJOR INFORMATION MEDIA GOVERNMENT-CONTROLLED?

-ARE THE MAJOR INFORMATION MEDIA GOVERNMENT-LICENSED?

-ARE SAFEGUARDS PROVIDED AGAINST CENSORSHIP?

-AGAINST FAVOURITISM?

-AGAINST UNFAIR GOVERNMENT ADVANTAGE?

-AGAINST UNEQUAL ACCESS DURING CAMPAIGN PERIODS?

-ARE THERE PROVISIONS FOR EQUAL TIME?

-FOR EQUAL PRIORITY OF BROADCASTS?

-IS THERE BROAD AGREEMENT ON THE REGULATION SYSTEM?

-PUBLIC INFORMATION AND VOTER EDUCATION

-IS A VOTER EDUCATION CAMPAIGN PLANNED?

- -IS IT SUFFICIENTLY FUNDED?
- -IS IT UNBIASED?

-IS IT BASED UPON THE LEVEL OF VOTING EXPERIENCE OF THE POPULATION?

-IS IT EDUCATIONALLY APPROPRIATE?

-IS IT CULTURALLY APPROPRIATE?

-IS IT TARGETED TO ALL QUALIFIED AGE GROUPS?

-DOES IT ENCOURAGE PARTICIPATION BY WOMEN? -DOES IT ENCOURAGE PARTICIPATION BY ALL ETHNIC GROUPS?

-DOES IT EXPLAIN WHERE TO VOTE'

-DOES IT EXPLAIN WHEN TO VOTE?

-DOES IT EXPLAIN WHO CAN VOTE?

-DOES IT EXPLAIN HOW TO VOTE?

-IS IT CONDUCTED IN ALL NATIVE LANGUAGES?

-DOES IT ENCOURAGE CONFIDENCE IN THE PROCESS?

-IS LITERATURE WIDELY AVAILABLE?

-IS PROGRAMMING WIDELY BROADCAST?

-ARE OUTLYING AND RURAL AREAS REACHED?

-OBSERVATION AND VERIFICATION -IS THE PRESENCE OF OBSERVERS EXPRESSLY PROVIDED FOR? -WILL NATIONAL OBSERVERS BE ALLOWED? -WILL INTERNATIONAL OBSERVERS BE ALLOWED? -IS THEIR ROLE CLEARLY SET OUT BY LAW? -IS THEIR ROLE DESCRIBED IN VOTER EDUCATION MATERIALS? -ARE THEY TO BE AFFORDED FREE MOVEMENT WITHIN THE COUNTRY? -WILL THEY HAVE ACCESS TO ALL IMPORTANT EVENTS? -HOW WILL THEY BE PROTECTED FROM HARM? -HOW WILL INTERPERENCE WITH THEIR DUTIES BE PREVENTED? -HOW WILL INTERPERENCE WITH THEIR DUTIES BE PREVENTED? -HOW WILL THEY BE TRAINED AND ORIENTED? -WILL THEY BE SUFFICIENT IN NUMBERS? -HOW WILL THEY BE HOUSED AND OTHERWISE ACCOMMODATED? -WHAT WILL BE THEIR SPECIFIC ROLE? -WILL THEY HAVE STANDING TO FILE COMPLAINTS AND PETITIONS?

-LEGAL AUTHORITY AND STRUCTURE

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-ARE POLITICAL RIGHTS ENSHRINED IN THE CONSTITUTION? -IN OTHER HIGH ORGANIC LAW OF THE STATE?

-DOES THIS EXPRESSLY INCLUDE THE RIGHT TO FREE ELECTIONS?

-TO PERIODIC ELECTIONS?

-TO UNIVERSAL, EQUAL, NONDISCRIMINATORY SUFFRAGE?

-TO A SECRET BALLOT?

-TO STAND FOR OFFICE AND BE ELECTED?

-TO HAVE ACCESS TO PUBLIC SERVICE ON EQUAL TERMS?

-TO FREE EXPRESSION, OPINION, INFORMATION, ASSEMBLY, AND ASSOCIATION?

-FOR PLURALISM AND POLITICAL PARTIES?

-IS STATUTORY LANGUAGE CLEAR AND CONCISE?

-IS IT SPECIFIC ENOUGH TO FORESTALL POTENTIAL ABUSE OF DISCRETION?

-TO FORESTALL DISCRIMINATORY APPLICATION?

-TO FORESTALL INTERPRETATIONS WHICH DISCOURAGE FREE SPEECH? -TO FORESTALL INTERPRETATIONS WHICH DISCOURAGE FULL PARTICIPATION?

-IS STATUTORY LANGUAGE GENDER NEUTRAL?

-DOES IT ENCOURAGE PARTICIPATION BY WOMEN?

-ARE LAWS AND REGULATIONS TRANSLATED INTO ALL LANGUAGES?

-HAS SUBSIDIARY LEGISLATION BE PROMULGATED?

-ARE REGULATIONS SUFFICIENTLY DETAILED?

-ARE ADMINISTRATIVE INSTRUCTIONS CLEAR AND COMPREHENSIVE? -HAVE MANUALS BEEN PRODUCED TO GUIDE STAFF AT ALL LEVELS?

-INTERNATIONAL LEGAL RESPONSIBILITY

-IS THE STATE A MEMBER OF THE UNITED NATIONS?

-IS IT A PARTY TO THE INTERNATIONAL COVENANT ON CIVIL AND POLITICAL RIGHTS? (ART. 25).

-IS IT A PARTY TO THE INTERNATIONAL CONVENTION ON THE ELIMINATION OF ALL FORMS OF RACIAL DISCRIMINATION? (ART.5).

-IS IT A PARTY TO THE INTERNATIONAL CONVENTION ON THE ELIMINATION OF ALL FORMS OF DISCRIMINATION AGAINST WOMEN? (ART.7).

-IS IT A PARTY TO THE CONVENTION ON THE POLITICAL RIGHTS OF WOMEN? (ARTS. I, II.III).

-IS IT A PARTY TO THE INTERNATIONAL CONVENTION ON THE SUPPRESSION AND PUNISHMENT OF THE CRIME OF APARTHEID? (ART.II).

-IS IT A PARTY TO THE FIRST OPTIONAL PROTOCOL OF THE COVENANT



ON CIVIL AND POLITICAL RIGHTS?

-IF SO, HAS THE HUMAN RIGHTS COMMITTEE CONSIDERED ANY

COMPLAINTS REGARDING ARTICLE 25 OF THE COVENANT ON CIVIL AND POLITICAL RIGHTS?

-IS THE STATE & PARTY TO ANY REGIONAL HUMAN RIGHTS INSTRUMENTS PROVIDING FOR POLITICAL RIGHTS?

-DO THE LAWS AND PROCEDURES FOR ELECTIONS CONFORM WITH ALL OF THE REQUIREMENTS OF THE ABOVE INSTRUMENTS?

- -DO THEY MEET THE REQUIREMENTS OF ART. 21 OF THE UNIVERSAL DECLARATION OF HUMAN RIGHTS?
- -DO THEY MEET THE REQUIREMENTS OF THE CHARTER OF THE UNITED NATIONS, WHERE APPLICABLE?
- -DO THEY RESPECT ART. 4 OF THE DECLARATION ON THE ELIMINATION OF DISCRIMINATION AGAINST WOMEN?
- -DO THEY RESPECT ART. 5 OF THE PROCLAMATION OF TEHERAN?
- -DO THEY RESPECT ARTS. 2 AND 5 OF THE DECLARATION ON THE GRANTING OF INDEPENDENCE TO COLONIAL COUNTRIES AND PEOPLES? -DO THEY RESPECT ARTS. 5 AND 18 OF THE DECLARATION ON SOCIAL PROGRESS AND DEVELOPMENT?
