

Special Rapporteur on the situation of human rights in the Islamic Republic of Iran A/71/418 para 85

Full recommendation

The Special Rapporteur therefore urges the authorities to recognize that freedom of religion or belief entails the freedom to choose a religion or belief and that measures that impose special restrictions on the practice of other faiths, or that discriminate on the basis of religion or belief, violate the guarantee of equal protection under article 26 of the International Covenant.

Assessment using Impact Iran human rights indicators¹

The Iranian legal framework does not adequately protect the right to freedom of religion or belief, including the right to have or to adopt a religion of his choice.

The Constitution of the Islamic Republic of Iran names the Twelver *Ja'fari* School of Shia Islam as the state religion and stipulates that “other Islamic schools are to be accorded full respect, and their followers are free to act in accordance with their own jurisprudence in performing their religious rites” (Article 12).² Article 13 of the Constitution provides that the Zoroastrian, Jewish, and Christian Iranians “are the only recognized religious minorities” under Iranian law. Because there are no laws safeguarding the right of religious minorities to worship, maintain places of worship or assemble, the structural exclusion of other religious minorities leaves them without legal protection to manifest and practice their religion or belief.

Religious minorities recognized by Articles 12 and 13 of the Constitution, have few places of worship compared to their numbers. Sunnis are not allowed to build new mosques in major cities, including Tehran. In addition, a number of Sunni religious seminaries have reportedly been destroyed by the government³ and authorities have reportedly closed Sunni mosques or prevented Sunnis from gathering for congregational prayers.⁴ Only 1% of religious temples in Iran are non-Muslim.⁵ In Tehran, there are about 15 churches for 43,987 Christians (one church

¹ CCPR.18.1.S.1; CCPR.18.1.S.2; CCPR.18.1.S.3; CCPR.18.1.S.4; CCPR.18.1.S.5; CCPR.26.1.S.1; CCPR.27.1.S.1; CCPR.27.2.S.1; CCPR.18.1.P.1; CCPR.18.1.P.2; CCPR.18.1.P.3; CCPR.18.1.P.4; CCPR.18.1.P.5; CCPR.18.3.P.1; CCPR.26.1.P.1; CCPR.27.1.P.1; CCPR.27.2.P.1; CCPR.27.1.P.2; CCPR.18.1.O.2; CCPR.18.1.O.3; CCPR.18.1.O.4; CCPR.18.1.O.5; CCPR.18.1.O.6; CCPR.18.1.O.7; CCPR.18.1.O.8; CCPR.18.1.O.10; CCPR.18.1.O.14; CCPR.18.2.O.1; CCPR.18.2.O.2; CCPR.18.3.O.1; CCPR.18.3.O.2; CCPR.26.1.O.1; CCPR.27.1.O.2; CCPR.27.2.O.2; CCPR.27.2.O.3

² The Constitution of the Islamic Republic of Iran, English translation, <https://irandataportal.syr.edu/wp-content/uploads/constitution-english-1368.pdf>

³ Joint submission to the Human Rights Committee from All Human Rights for All in Iran, Association for Human Rights in Kurdistan – Geneva, Association for the Human Rights of the Azerbaijani People in Iran, Iran Human Rights Documentation Center, OutRight International, Siamak Pourzand Foundation, Small Media, Impact Iran, 2020,

https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/IRN/INT_CCPR_NGO_IRN_42317_E.pdf

⁴ Rights Denied: Violations against ethnic and religious minorities in Iran, <https://minorityrights.org/wp-content/uploads/2018/03/Rights-Denied-Violations-against-ethnic-and-religious-minorities-in-Iran.pdf>

⁵ Based on Province annual data reports, as of 2018.

every 2932 Christians).⁶ Insufficient quantities of places of worship results in religious minorities gathering via informal assemblies inside their own home, frequently termed “house churches”,⁷ or in underground prayer halls (*namaz khane*).⁸ House churches are often raided by the government on the basis that they do not hold necessary permits from the authorities.⁹ Attendees are arrested and imprisoned on charges of “acting against national security by organizing and conducting house-churches” or “propaganda against the state and insulting the sacred Iranian establishment”.¹⁰ 2018 and 2019, in particular, saw an unprecedented wave of raids on private house gatherings related to religion or belief, leading to a large number of arrests, detention and imprisonment.¹¹ Related charges include “breaching national security” or “propaganda against the holy regime of the Islamic Republic of Iran”.¹²

The *Baha’i* faith, with members numbering an estimated 350,000¹³ in Iran, is not recognized under Iranian law and does not have any official place of worship. Since August 2005, more than 1,253 *Baha’is* have been arrested in Iran solely on the basis of their religious beliefs.¹⁴

The lack of places of worship and the regular dismantling of religious informal meetings frustrates the rights of religious minorities to manifest their religion or belief. The threat of raids, arrests, detention and imprisonment for those identified as belonging to certain religious minorities disincentivizes community and public manifestation.

The Iranian legal framework does not adequately protect the right to have or to adopt a religion or belief of one’s choice and effectively imposes restrictions on the rights of individuals belonging to religious minorities in Iran. The lack of legal safeguards under Iran law enables Iranian authorities to resort to practices that may well amount to coercion impairs the freedom to have, or to adopt, a religion of one’s choice.

⁶ Based on Province annual data reports, as of 2018.

⁷ Joint submission to the Human Rights Committee from The World Evangelical Alliance, Open Doors, Christian Solidarity Worldwide, Middle East Concern, Article 18, 29 May 2020 , https://articleeighteen.com/wp-content/uploads/2020/06/F3430b-2020-JointReport_Iran_HRCttee_ListOfIssues-dragged-1.pdf

⁸ 2019 Report on International Religious Freedom: Iran, U.S. Department of State, <https://www.state.gov/reports/2019-report-on-international-religious-freedom/iran/>

⁹ Joint submission to the Human Rights Committee from The World Evangelical Alliance, Open Doors, Christian Solidarity Worldwide, Middle East Concern, Article 18, 29 May 2020 , https://articleeighteen.com/wp-content/uploads/2020/06/F3430b-2020-JointReport_Iran_HRCttee_ListOfIssues-dragged-1.pdf

¹⁰ Joint submission to the Human Rights Committee from The World Evangelical Alliance, Open Doors, Christian Solidarity Worldwide, Middle East Concern, Article 18, 29 May 2020 , https://articleeighteen.com/wp-content/uploads/2020/06/F3430b-2020-JointReport_Iran_HRCttee_ListOfIssues-dragged-1.pdf

¹¹ Joint submission to the Human Rights Committee from The World Evangelical Alliance, Open Doors, Christian Solidarity Worldwide, Middle East Concern, Article 18, 29 May 2020 , https://articleeighteen.com/wp-content/uploads/2020/06/F3430b-2020-JointReport_Iran_HRCttee_ListOfIssues-dragged-1.pdf

¹² Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019 <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

¹³ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

¹⁴ Baha’i International Community, https://www.bic.org/sites/default/files/pdf/iran/the_bahais_of_iran_-_a_persecuted_community.pdf

Article 19 of the Constitution guarantees that all people enjoy equal rights, “whatever the ethnic group or tribe to which they belong” and that “color, race, language, and the like, do not bestow any privilege”.¹⁵ However, the Constitution omits an explicit provision recognizing religion or belief as a protected characteristic. Article 20 of the Constitution states that “All citizens of the country, both men and women, equally enjoy the protection of the law and enjoy all human, political, economic, social, and cultural rights, in conformity with Islamic criteria”. Additionally, Article 23 of the Constitution stipulates that “the investigation of individuals’ beliefs is forbidden, and no one may be molested or taken to task simply for holding a certain belief.”¹⁶

Many elements of Iran’s domestic legal framework discriminate between *Shia* Muslims, Muslim and non-Muslim minorities. According to the Constitution of the Islamic Republic of Iran, candidates for the presidency, members of the Assembly of Experts, the Guardian Council, or the Expediency Council all must follow the official religion of the State, excluding Muslim and non-Muslim minorities from holding high governmental positions.¹⁷ Further, Article 881 of the Civil Code bars non-Muslims from inheriting property from Muslims. The Islamic Penal Code (IPC) also prescribes different penalties depending on the religion of the perpetrator and/or the victim of some crimes.

Such shortcomings in the legal framework set the structure for the institution of discriminatory policies and practices in the Islamic Republic of Iran, extending to the employment sector. Iranian law theoretically forbids the investigation of individual beliefs,¹⁸ but discrimination in access to employment is institutionalized through the practice of *gozinesh*, a mandatory screening process set forth in the Selection Law based on Religious and Ethical Standard of 1995.¹⁹ As described by the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, the process “involves investigations conducted by the Supreme Selection Council and the Ministry of Intelligence into the acceptability of an applicant’s beliefs, previous political opinions and affiliations” and is intended to ensure that applicants “adhere to and have knowledge of Islam, follow the theory of *Velayat-e-faqih* (rule of an Islamic jurist under Shi’ite Islam) and are loyal to the Islamic Republic of Iran.”²⁰ Not only is *gozinesh* in contravention of Article 23 of the Constitution, it also bars minorities or anyone who are unable or unwilling to accept these requirements from seeking employment in the public sector.²¹ Members of religious

¹⁵ The Constitution of the Islamic Republic of Iran, English translation, <https://irandaportal.syr.edu/wp-content/uploads/constitution-english-1368.pdf>

¹⁶ The Constitution of the Islamic Republic of Iran, English translation, <https://irandaportal.syr.edu/wp-content/uploads/constitution-english-1368.pdf>

¹⁷ The Constitution of the Islamic Republic of Iran, English translation, <https://irandaportal.syr.edu/wp-content/uploads/constitution-english-1368.pdf>

¹⁸ Article 23 The Constitution of the Islamic Republic of Iran

http://www.iranchamber.com/government/laws/constitution_ch03.php

¹⁹ Amnesty International, 2012, https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/

²⁰ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

²¹ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

and ethnic minorities have reportedly been the target of denial of employment in the Islamic Republic of Iran.^{22 23} For example, members of the Yarsan community reported the denial of public sector jobs through the application of *gozinesh* requirements.^{24 25}

Reports have shown that religious minorities in the Islamic Republic of Iran face human rights violations such as: arbitrary deprivation of life and extrajudicial executions, a disproportionate number of executions on national security-related charges, arbitrary arrests and detention in connection with range of peaceful activities, incitement to hatred, forced closure of businesses and discriminatory practices and denial of employment and restrictions on access to education and other basic services.²⁶ Additionally, a new rule proclaimed in January 2020 will only allow citizens to register as one of the country's recognized religions to the state-issued National Identity Card—which is required for almost all government and other transactions.²⁷

Iranian discriminatory practices' also single out unrecognized religious minorities, notably members of the *Baha'i* faith. Although the government affirmed that “all *Baha'is* can freely perform their personal rituals”²⁸ the *Baha'i* faith is considered as a “misguided sect” in Iran and *Baha'i* worship and religious practices are deemed heresy.²⁹ In 1991, the Government institutionalized a policy against *Baha'i* citizens in a memorandum entitled ‘The *Baha'i* Question’, produced by Iran’s Supreme Revolutionary Cultural Council and approved by the Supreme Leader. The document outlines a series of measures aiming at restricting Iranian *Baha'is* access to education, economic and cultural life. Although the Government affirmed that the *Baha'is* had not been singled out for discrimination,³⁰ the document remains in force today. On 26 March 2018, the Supreme Leader Ali Khamenei issued, via his website, a new religious decree (*fatwa*) concerning “association and dealing with *Baha'is*”. He stated that, “[y]ou should avoid any association and dealings with this perverse and misguided sect.”³¹ *Baha'is* are prohibited from practicing their faith publicly, and they are not allowed to operate houses of

²² Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

²³ *Baha'i* International Community, Submission to the Universal Periodic Review of Iran, 2019, <https://undocs.org/A/HRC/WG.6/34/IRN/3>

²⁴ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

²⁵ www.iranhumanrights.org/2017/05/most-yarsani-religious-minority-candidates-disqualified-from-irans-2017-councils-elections/

²⁶ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

²⁷ Center for Human Rights in Iran, <https://www.iranhumanrights.org/2020/01/bahais-unrecognized-minorities-in-iran-must-now-hide-religion-to-obtain-government-id/>

²⁸ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019 <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

²⁹ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019 <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

³⁰ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

³¹ *Baha'i* International Community, https://www.bic.org/sites/default/files/pdf/iran/the_bahais_of_iran_-_a_persecuted_community.pdf

worship.³² *Baha'i* cemeteries have been desecrated, and in some cases turned into parks and cultural buildings and *Baha'is* have not been allowed to bury their dead in accordance with their religious laws.³³

The right to convert from Islam to a religion or belief in the Islamic Republic of Iran, although not explicitly specified in the law, is in practice criminalized. In a previous draft of the Islamic Penal Code (2013), Article 225 was aimed at making the death penalty mandatory for convicted male apostates, or the crime of *ertedad* (apostasy). The draft article was withdrawn before the adoption of the revised Islamic Penal Code in 2013 and Iranian law does not expressly criminalize conversion from Islam to another religion³⁴; however, under Article 220 of the Islamic Penal Code and Article 167 of the Iranian Constitution, a judge may refer to Islamic law to rule on crimes not explicitly defined in the law. As apostasy is considered as a *hadd* offence (a crime for which a fixed punishment is derived from the Qur'an or the Hadith³⁵), a judge may still invoke Articles 220 of the Penal Code and Article 167 of the Constitution to convict and sentence individuals accused of apostasy on this basis. Commonly, however, the Iranian Judiciary resorts to national security charges instead of apostasy, as illustrated by the treatment of Christian converts. Because Christian converts are considered as apostates by Iranian authorities,³⁶ they are barred from accessing officially recognized Christian churches and churches holding services for Farsi-speaking Christians have been forced to close by the Iranian government.³⁷ As a result Christian converts resort to gather in informal meetings, commonly called “house churches”.³⁸ State authorities regularly conduct raids and arrest and sentence organizers of such meetings to prison.³⁹ Attendees are arrested and imprisoned on charges of “acting against national security by organizing and conducting house-churches” “propaganda

³² NGO joint submission to the Human Rights Committee, 2019, All Human Rights for All in Iran, Association for Human Rights in Kurdistan – Geneva (KMMK-G), Association for the Human Rights Of The Azerbaijani People In Iran (AHRAZ), Iran Human Rights Documentation Center (IHRDC), OutRight International, Siamak Pourzand Foundation, Small Media, and Impact Iran,

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=INT%2fCCPR%2fNGO%2fIRN%2f42317&Lang=en

³³ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019

<https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

³⁴ Joint submission to the Human Rights Committee from All Human Rights for All in Iran, Association for Human Rights in Kurdistan – Geneva, Association for the Human Rights of the Azerbaijani People in Iran, Iran Human Rights Documentation Center, OutRight International, Siamak Pourzand Foundation, Small Media, Impact Iran, 2020,

<https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/IRN/INT_CCPR_NGO_IRN_42317_E.pdf>

³⁵ Amnesty International <<https://www.amnesty.org/download/Documents/MDE1327082016ENGLISH.PDF>>

³⁶ Report of the Special Rapporteur on the situation of human rights in Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

³⁷ Joint submission to the Human Rights Committee from The World Evangelical Alliance, Open Doors, Christian Solidarity Worldwide, Middle East Concern, Article 18, 29 May 2020 , https://articleeighteen.com/wp-content/uploads/2020/06/F3430b-2020-JointReport_Iran_HRCtee_ListOfIssues-dragged-1.pdf

³⁸ Report of the Special Rapporteur on the situation of human rights in Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

³⁹ Joint submission to the Human Rights Committee from All Human Rights for All in Iran, Association for Human Rights in Kurdistan – Geneva, Association for the Human Rights of the Azerbaijani People in Iran, Iran Human Rights Documentation Center, OutRight International, Siamak Pourzand Foundation, Small Media, Impact Iran, 2020, <https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/IRN/INT_CCPR_NGO_IRN_42317_E.pdf>

against the state and insulting the sacred Iranian establishment”⁴⁰, “propagation of Zionist evangelical Christianity” or “administering and managing the home churches”.⁴¹ Christian converts are reportedly arrested, prosecuted and imprisoned on national security charges, in connection with a range of peaceful activities, including simply participating in religious or cultural activities, resulting in long prison and flogging sentences.⁴² The end of 2018 and 2019 saw an unprecedented wave of raids on private house gatherings related to religion or belief, leading to a large number of arrests.⁴³ Charges notably included “Christianity mission” and “disturbing public opinion”.⁴⁴

While it is technically possible to file discrimination complaints with the Administration of Justice Court, the Article 90 Commission in the Parliament, and the Oversight Bodies for the exercise of Citizenship Rights in the country’s provincial courts, there is no evidence that judicial actions are taken in response to complaints.⁴⁵ Hate crimes, such as motivated killings and desecration of cemeteries, particularly against *Baha’is*, have not been investigated by the Iranian authorities.^{46 47}

According to the Human Rights Committee, “freedom to “have or to adopt” a religion or belief necessarily entails the freedom to choose a religion or belief, including the right to replace one’s current religion or belief with another or to adopt atheistic views, as well as the right to retain one’s religion or belief”.⁴⁸ The constant threat of persecution may well amount to attempts from the Iranian State to prevent individuals from choosing a religion of their choice or converting to a religion or belief. In the context of a State that considers itself Shia by law, such measures

⁴⁰ Joint submission to the Human Rights Committee from The World Evangelical Alliance, Open Doors, Christian Solidarity Worldwide, Middle East Concern, Article 18, 29 May 2020 , https://articleeighteen.com/wp-content/uploads/2020/06/F3430b-2020-JointReport_Iran_HRCtee_ListOfIssues-dragged-1.pdf

⁴¹ Report of the Special Rapporteur on the situation of human rights in Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

⁴² Joint submission to the Human Rights Committee from All Human Rights for All in Iran, Association for Human Rights in Kurdistan – Geneva, Association for the Human Rights of the Azerbaijani People in Iran, Iran Human Rights Documentation Center, OutRight International, Siamak Pourzand Foundation, Small Media, Impact Iran, 2020, https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/IRN/INT_CCPR_NGO_IRN_42317_E.pdf

⁴³ Joint submission to the Human Rights Committee from The World Evangelical Alliance, Open Doors, Christian Solidarity Worldwide, Middle East Concern, Article 18, 29 May 2020 , https://articleeighteen.com/wp-content/uploads/2020/06/F3430b-2020-JointReport_Iran_HRCtee_ListOfIssues-dragged-1.pdf

⁴⁴ Human Rights Activists News Agency (HRANA) <https://www.en-hrana.org/a-christian-citizen-was-arrested-and-another-was-went-into-exile>

⁴⁵ Joint submission to the Human Rights Committee from All Human Rights for All in Iran, Association for Human Rights in Kurdistan – Geneva, Association for the Human Rights of the Azerbaijani People in Iran, Iran Human Rights Documentation Center, OutRight International, Siamak Pourzand Foundation, Small Media, Impact Iran, 2020, https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/IRN/INT_CCPR_NGO_IRN_42317_E.pdf

⁴⁶ Joint submission to the Human Rights Committee from All Human Rights for All in Iran, Association for Human Rights in Kurdistan – Geneva, Association for the Human Rights of the Azerbaijani People in Iran, Iran Human Rights Documentation Center, OutRight International, Siamak Pourzand Foundation, Small Media, Impact Iran, 2020, https://tbinternet.ohchr.org/Treaties/CCPR/Shared%20Documents/IRN/INT_CCPR_NGO_IRN_42317_E.pdf

⁴⁷ Report of the Special Rapporteur on the situation of human rights in the Islamic Republic of Iran, 18 July 2019, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N19/222/62/PDF/N1922262.pdf?OpenElement>

⁴⁸ UN Human Rights Committee (HRC), *CCPR General Comment No. 22: Article 18 (Freedom of Thought, Conscience or Religion)*, 30 July 1993, CCPR/C/21/Rev.1/Add.4, available at: <https://www.refworld.org/docid/453883fb22.html>

imposing restrictions on the basis of religion or belief may well amount in practice to coercion to renounce or to convert to a minority faith and as such are incompatible with the prohibition of discrimination based on religion or belief under Article 18 of the Covenant. The Human Rights Committee stipulated that the “recognition of a religion as a State religion should not result in any impairment of the enjoyment of any of the rights under Article 18, nor in any discrimination against adherents of other religions or non-believers, since the right to freedom of religion and belief and the prohibition of discrimination do not depend on the recognition as an official religion or belief”.⁴⁹ Iranian penal sanctions, policies and practices instituted against religious minorities may well amount to attempts to compel believers or non-believers to adhere to their religious belief and congregations, to recant their religion or belief or to convert. The Human Rights Committee has stated that such conduct is inconsistent with Article 18 of the ICCPR.⁵⁰ Additionally, the imposition of special restrictions on the practice of other faiths, or discrimination on the basis of religion or belief in Iran, violate Article 26 of the ICCPR.

Recommendation Status:

This recommendation has **NOT** been implemented.

⁴⁹Human Rights Committee Concluding Observations, 3 August 1993, CCPR/C/79/Add.25

https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2f79%2fAdd.25&Lang=en

⁵⁰ CCPR General Comment No. 22: Article 18 < <https://www.refworld.org/docid/453883fb22.html> >