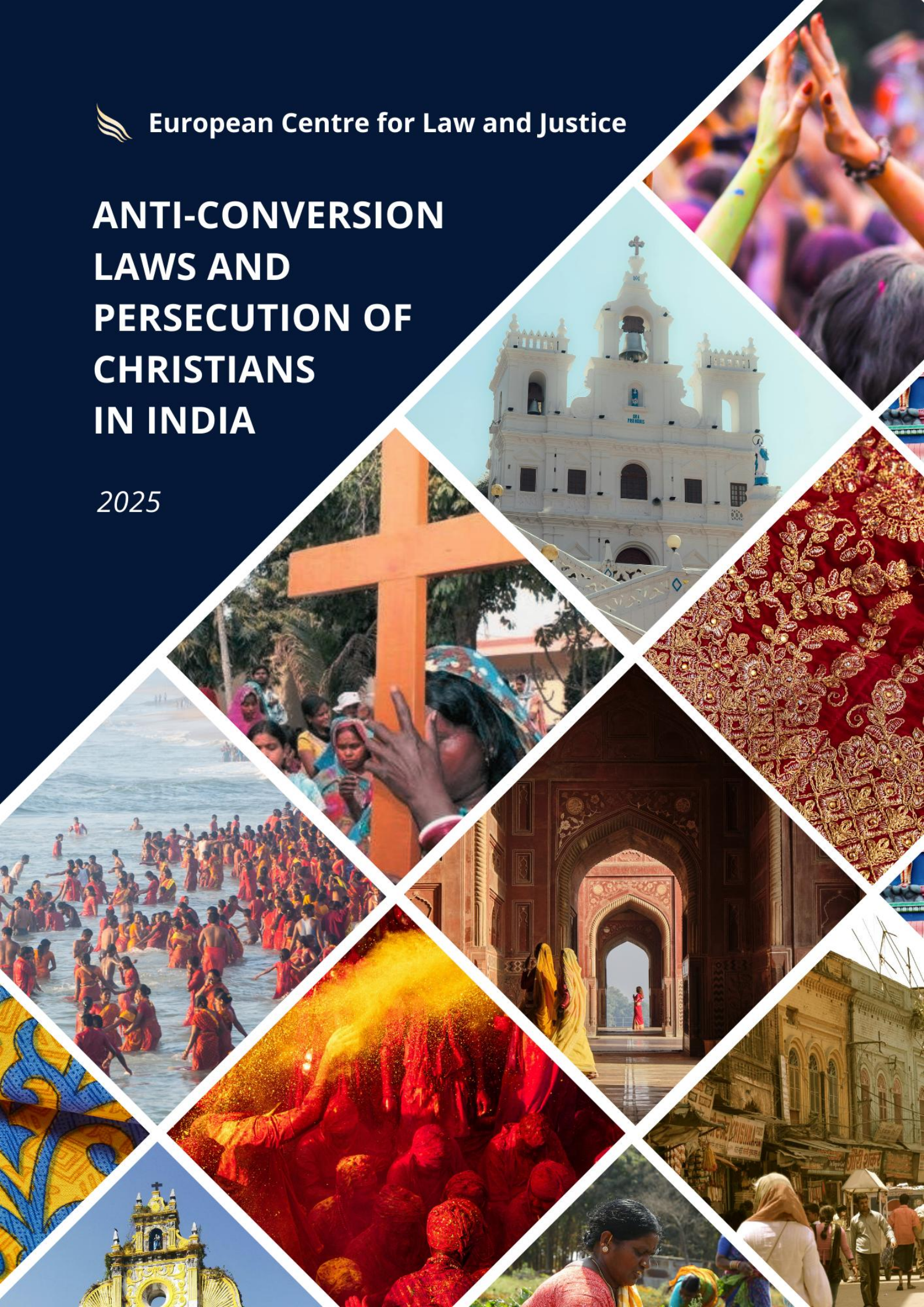




European Centre for Law and Justice

# ANTI-CONVERSION LAWS AND PERSECUTION OF CHRISTIANS IN INDIA

2025





**Grégor Puppinck**, PhD, is the Director of the ECLJ. In 2016, he was appointed as a member of the OSCE/ODIHR Expert Group on Freedom of Religion or Belief, whose role is to support OSCE participating States in implementing their commitments regarding the right to freedom of religion or belief.

**Thibault van den Bossche** is an Advocacy Officer for Religious Freedom at ECLJ. He holds a Master 2 in International Relations from Lyon 3 University (France) and a Master 2 in Communication and Media from Senghor University in Alexandria (Egypt).

**Manaëm Huet** holds a Bachelor's degree in International Relations from the University of Geneva and a Master in International Law from the University of St. Gallen (Switzerland). He is a legal intern at the ECLJ.

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#### **European Centre for Law and Justice**

4 Quai Koch  
67000 Strasbourg  
www.eclj.org  
secretariat@eclj.org  
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# INTRODUCTION

The European Centre for Law and Justice (ECLJ) is an international, non-governmental organization committed to promoting and defending human rights globally. With Special Consultative Status before the United Nations Economic and Social Council (ECOSOC), the ECLJ actively addresses critical human rights violations, including threats to religious freedom.

This report examines the escalating persecution of Christians in India, following the 41st Session of the Universal Periodic Review (UPR) of India in 2022. **The analysis places particular emphasis on the impact of anti-conversion laws, which have been used as a tool of oppression against religious minorities, particularly Christians.**

Hindu nationalists use these laws to target Christians with false accusations of conversions. In 2024, more than 160 violent attacks against Christians were reported in India<sup>1</sup>. The attacks range from violent attacks on church and prayer meetings to physical assaults<sup>2</sup>. Between January and September 2024, nearly 600 church services were disrupted by Hindu extremists<sup>3</sup>. During the first half of 2023, 400 incidents occurred, up from 274 reported over the same period in 2022<sup>4</sup>.

## I. Background

### *A/ Religious Demographics of India*

India, home to approximately 1.4 billion people, is a religiously diverse country<sup>5</sup>. According to the 2011 Census, the major religious groups are:

- Hindus – 80%
- Muslims – 14%
- Christians – 2.3%<sup>6</sup>

The remaining percentage consists of followers of tribal and indigenous spiritual traditions<sup>7</sup>. Despite this diversity, religious minorities, like Christians, face increasing discrimination and violence<sup>8</sup>. **While India's Constitution guarantees religious freedom, Hindu nationalist movements have fueled a growing intolerance against non-Hindu faiths<sup>9</sup>.**

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<sup>1</sup> CNA, (2025), *Christians face arbitrary arrests, grave religious freedom violations in India*

<sup>2</sup> Ibid.

<sup>3</sup> Open Doors, (2024), *Persecution increases in Uttar Pradesh under harsher anti-conversion laws.*

<sup>4</sup> The Christian Post, (2023), *At least 400 acts of violence committed against Christians in India in first half of 2023: report*

<sup>5</sup> Open Doors, (2025), *Situation of Religious Freedom for Christians, India*, World Watch List 2025, p.2

<sup>6</sup> Population Census, (2011), [Christian population in India](#).

<sup>7</sup> Open Doors, (2025), *op. cit.*, p.2

<sup>8</sup> ECLJ, (2022), [India UPR](#), §3

<sup>9</sup> Id., §§ 2,4

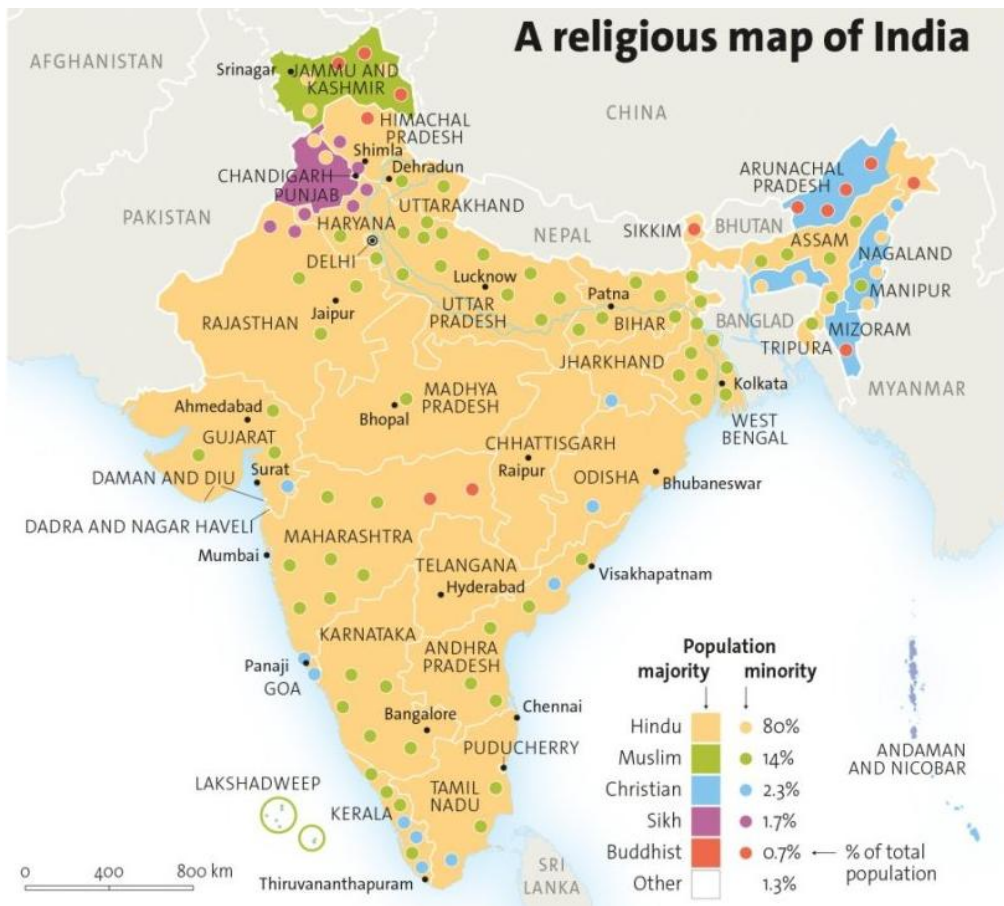


Figure 1: A religious map of India, statistics based on the 2011 Census. (from: *Le Monde Diplomatique*)

### ***B/ A Changing Landscape of Religious Harmony***

Often hailed as the world's largest democracy, India has become increasingly hostile toward Christians and other religious minorities in recent years<sup>10</sup>. This troubling trend, highlighted in the ECLJ's 2022 UPR submission<sup>11</sup>, stands in stark contrast to the country's reputation for religious tolerance, noting that Hinduism and Buddhism, both originating in India, were traditionally regarded as philosophies centered on peace<sup>12</sup>. For instance, **the concept of *ahimsa* (non-violence) has played a pivotal role in shaping India's cultural and spiritual identity<sup>13</sup>. However, since the 1990s<sup>14</sup>, a more militant and aggressive strain of Hinduism has emerged**, leading to a sharp decline in tolerance for dissent, minority rights, and religious diversity<sup>15</sup>.

<sup>10</sup> ECLJ, (2022), [India UPR](#), §2

<sup>11</sup> Ibid.

<sup>12</sup> Open Doors, (2024), *India: Background Information*, World Watch Research, p.3

<sup>13</sup> Apam Napat, (n.d.), [Ahimsa and Indian culture: A journey through history, philosophy, and modern relevance](#), Retrieved February 10, 2025

<sup>14</sup> Sajib K. Banik, (2021), *The development of Hindu Nationalism (Hindutva) in India in the twentieth century: a historical perspective*, Philosophy and Progress, Vols. LXIX-LXX, p.213

<sup>15</sup> Open Doors, (2024), *op. cit.*, p.3

### **C/ Varna (caste) system**

Before continuing with the political and legal system of India let's present the traditional caste system. It's a hierarchical structure dividing society into 4 primary varnas (classes)<sup>16</sup>:

- Brahmins (priests, scholars)
- Kshatriyas (warriors, rulers)
- Vaishyas (merchant, traders)
- Shudras (laborers, artisans, servants)

Below the four varnas are the "Dalits", historically called "Untouchables", who were excluded from the caste hierarchy and relegated to the most degrading jobs (e.g., manual scavenging, disposing of dead animals)<sup>17</sup>. Caste is hereditary and determines social status, occupation, and access to resources<sup>18</sup>.

### Dalits Christians and Affirmative Action Policies

Dalits, also known as **Scheduled Castes (SCs)**, have faced extreme discrimination and marginalization for centuries<sup>19</sup>.

To address these injustices, the Indian Constitution provides the possibility to take affirmative action policies, articles such as art. 15(4) or 16(4) allows the state to make special provisions or reserve employment posts for SCs and Scheduled Tribes (STs)<sup>20</sup>. STs are communities who did not accept the caste system and preferred to reside deep in the jungles, forests, mountains...<sup>21</sup>

For example, art. 46 of the Constitution provides:

- *"The State shall promote with special care the educational and economic interests of the weaker sections of the people, and, in particular, of the Scheduled Castes and the Scheduled Tribes, and shall protect them from social injustice and all forms of exploitation<sup>22</sup>."*

However, Dalit Christians, who should logically be part of the SCs are systematically excluded from these benefits due to a discriminatory policy under the Presidential Order of 1950<sup>23</sup>. **This order states that only Dalits belonging to Hinduism, Sikhism (since 1956), and Buddhism (since 1990) qualify for affirmative action, while those who convert to Christianity or Islam lose access to these protections and advantages<sup>24</sup>.**

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<sup>16</sup> Manali S. Deshpande, (2010), *History of the Indian Caste System and its Impact on India Today*, California Polytechnic State University, p.3

<sup>17</sup> Id., pp.3, 15, 27

<sup>18</sup> Id., pp.16-18

<sup>19</sup> Id., p.29

<sup>20</sup> Articles 15(4) & 16(4), [Indian Constitution](#). *Examples: Reservations in political representations can be found in Article 330ss Constitution*

<sup>21</sup> Manali S. Deshpande, (2010), op. cit., pp.3, 15, 27, 29

<sup>22</sup> Article 46 [Indian Constitution](#)

<sup>23</sup> Durani T., (2023, May 29), [Marginalized twice over: The struggle of Dalit Christians in India](#), Oxford Human Rights Hub., Retrieved February 10, 2025, §§ 1, 3

<sup>24</sup> Ibid.

## II. Political and Legal Landscape

### *A/ India's Political and Legal Structure*

To understand how India's domestic policies conflict with its constitutional and international obligations, it is essential to examine the political and legal framework under which these policies operate.

India operates as a federal system<sup>25</sup>, with governance divided between the central government and 28 states, plus 8 union territories<sup>26</sup>. The latter being directly governed by the central government, while states enjoy varying degrees of autonomy<sup>27</sup>.

India presents itself as a Sovereign, Secular, Democratic Republic with a Parliamentary system of Government<sup>28</sup>. **However, in practice, Hindu nationalist influences have increasingly shaped state policy, undermining secular governance and institutionalizing discrimination against religious minorities<sup>29</sup>.**

#### *Hindu Nationalism and Its Impact on Religious Minorities*

The rise of Hindu nationalism, particularly through organizations such as the Rashtriya Swayamsevak Sangh (RSS) and its affiliates, has become a driving force behind the persecution of religious minorities in India<sup>30</sup>. **These groups adhere to Hindutva ideology<sup>31</sup>, which envisions India as an exclusively Hindu nation, portraying Christians and Muslims as cultural and demographic threats<sup>32</sup>.** Beyond religious differences Christianity also poses a challenge to the traditional "varna" (caste) system<sup>33</sup>.

### *B/ Hindu Nationalism's Political Influence & The role of the BJP*

Since May 2014, India has been governed by the Bharatiya Janata Party (BJP)<sup>34</sup>, a party ideologically aligned with the Rashtriya Swayamsevak Sangh (RSS) and heavily influenced by Hindutva ideology<sup>35</sup>.

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<sup>25</sup> Open Doors, (2024), *India: Background Information*, World Watch Research, p.4

<sup>26</sup> Government of India, (n.d.), [States and Union Territories](#), Retrieved February 10, 2025

<sup>27</sup> Waseem A. Sofi, (2021), *Autonomy of a State in a Federation, A special case study of Jammu and Kashmir*, Palgrave macmilan, State autonomy in the context of Indian Federation, p.51

<sup>28</sup> Government of India, (n.d.), [States and Union Territories](#), Retrieved February 10, 2025

<sup>29</sup> Open Doors, (2024), op. cit., p.4

<sup>30</sup> Sajib K. Banik, (2021), *The development of Hindu Nationalism (Hindutva) in India in the twentieth century: a historical perspective*, Philosophy and Progress, Vols. LXIX-LXX, pp.224-227

<sup>31</sup> Ibid.

<sup>32</sup> Selvaraj S., (2024), *Acts of Violence? Anti-Conversion Laws in India*, Social & Legal Studies, p.791

<sup>33</sup> ECLJ, (2022), [India UPR](#), §2

<sup>34</sup> Open Doors, (2024), op. cit., p.3

<sup>35</sup> Sajib K. Banik, (2021), op. cit., pp.224-227



The BJP, by being in favor and remaining silent toward anti-conversions laws<sup>36</sup>, has actively pursued Hindutva's objectives of making Hinduism the state religion, despite the Constitution's commitment to secularism<sup>37</sup>.

### Chief Minister Modi & His Legacy

Statistics back this degrading situation of religious freedom. Under the leadership of Prime Minister Narendra Modi of the BJP, India has witnessed an alarming increase in violence against Christians. According to data from the United Christian Forum, incidents of anti-Christians violence have risen exponentially between 2014 and 2024<sup>38</sup>, correlating with the rise of Hindu nationalist influence in government.

Before becoming Prime Minister, Modi served as Chief Minister of Gujarat from 2001 to 2014. His tenure was marked by one of India's worst episodes of communal violence, the 2002 Gujarat riots. Modi faced criticism for his handling of the riots<sup>39</sup> during which significant violence was directed at Muslims, resulting in numerous casualties<sup>40</sup>. As a result, Modi was banned from entering the United States for nearly a decade, due to allegations of "severe violations of religious freedom"<sup>41</sup>. Despite the international condemnation, Modi's Hindu nationalist stance seemingly solidified his domestic support, allowing him to be elected as Prime Minister in 2014 and re-elected in both 2019 and 2024<sup>42</sup>, consolidating his political influence and that of the BJP.

**This ideological shift has undermined secular governance and created an environment where discriminatory practices against religious minorities are increasingly institutionalized.**

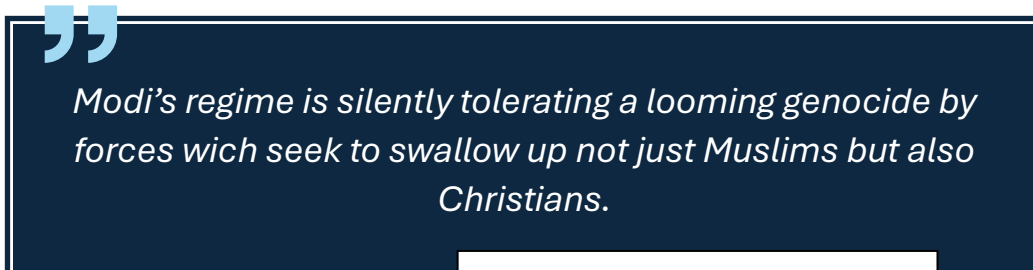


Figure 2: Quote from Pieter Friedrich.  
 (from: [Medium](#))

<sup>36</sup> Library of Congress, (n.d.), [State Anti-conversion Laws in India](#), section "III. Examination of State-Level Legislation", subsection "D. Chhattisgarh". See also, [among others], Open Doors, (2024), *India: Background Information*, World Watch Research, pp.14-15

<sup>37</sup> Open Doors, (2024), op. cit., p.4

<sup>38</sup> International Christian Concern, (2024, December 26), [New data shows sharp increase in attacks on Christians](#), Retrieved February 10, 2025

<sup>39</sup> Sher A. Bukhari, (2024), [The Rise of Hindutva Politics in India](#), Centre for Strategic and Contemporary Research (CSCR), Retrieved February 10, 2025, §5

<sup>40</sup> Ibid.

<sup>41</sup> U.S. Department of State, (2005), [Issue of Gujarat Chief Minister Narendra Modi's Visa Status](#), Retrieved February 10, 2025

<sup>42</sup> Open Doors, (2025), *Situation of Religious Freedom for Christians, India*, World Watch List 2025, p.2



### The Government's position

Government officials and political leaders have been involved in harassing religious minorities, as highlighted from a letter sent by senior civil servant to Prime Minister Narendra Modi<sup>43</sup>. For example, in 2023, civil society activists accused BJP's Chief Minister N. Biren Singh of fueling divisions in Manipur by politically backing violent groups and portraying the Christian Kuki community as criminals linked to drug trafficking and illegal immigration<sup>44</sup>.

Reports also indicate that local polices have either assisted violent mobs in disrupting Christian worship services or remained passive as mobs attacked Christian's believers<sup>45</sup>.

Beyond physical violence, economic discrimination has also been encouraged, **with some public figures advocating for boycotts of Christian and Muslims businesses**<sup>46</sup>.

**As a result, members of India's religious minority communities have questioned the government's ability, and willingness, to protect them from violence, investigates crimes committed against them, and uphold their right to religious freedom**<sup>47</sup>.

The government's rhetoric and actions have enabled a climate of hostility where attacks against religious minorities occur with increasing frequency. The following section outlines documented cases of persecution from 2022 to 2024.

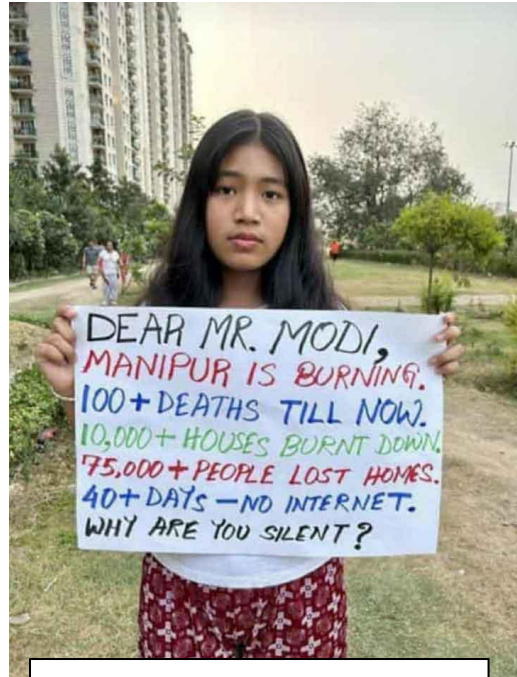


Figure 3: Young girl holding a sign about violence in Manipur. (from: [ACN International](#))

## III. The Latest Development of the Persecution

According to the United Christian Forum (UCF), incidents of violence against Christians have risen sharply since the Hindu nationalist Bharatiya Janata Party (BJP) came to power in 2014<sup>48</sup>. **While fewer than 100 incidents were reported that year, the number increased to nearly 300 by 2018 and continued to rise annually, reaching approximately 750 in 2023, averaging 2 attacks on Christians per day**<sup>49</sup>. UCF attributes these attacks to organized efforts by pro-Hindu groups targeting Christian communities<sup>50</sup>.

<sup>43</sup> U.S. Department of State, (2024), [2023 Report on International Religious Freedom: India](#), pp.1, 3

<sup>44</sup> HRW, (2024), [World Report 2024, India Events of 2023](#), section "Religious Minorities, Dalits, and Tribal Groups"

<sup>45</sup> U.S. Department of State, (2024), op. cit., pp.1-2

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

<sup>47</sup> Id., p.1

<sup>48</sup> International Christian Concern, (2024, November 25), [Christians increasingly face persecution throughout India](#), Retrieved February 10, 2025, §6

<sup>49</sup> Id., §§6-7

<sup>50</sup> Id., §7

The UCF's "Violence Monitor Report 2024", based on cases reported through its helpline, recorded 834 incidents in 2024 alone, with Uttar Pradesh (209 incidents) and Chhattisgarh (165 incidents) reporting the highest numbers<sup>51</sup>. However, these figures represent only the cases reported to UCF, suggesting that the actual number of incidents may be significantly higher.

The U.S. Commission on International Religious Freedom (USCIRF) Annual Reports, alongside findings from Open Doors and Hindutva Watch highlights the worsening state of religious freedom in India. Reporting numerous attacks on religious minorities and increasing misuse of anti-conversion laws to target vulnerable communities<sup>52</sup>.

Follow below for a non-exhaustive list of documented violations from 2022 to 2024. Given the sheer number of incidents, we will focus on 3 to 5 key cases per year that illustrate the scope and severity of the persecution faced by Christians in India.

### ***A/ Persecution in 2022***

- **February 2022: Radicals Hindus destroy 40-year-old Catholic center**

In February, Hindu groups demolished the St. Anthony's Holy Cross Center, a Catholic house of prayer and hospitality in Southern India. The structure, built 40 years ago, served as a sanctuary for local Christian community, providing support to troubled families and asylum seekers. Hindu groups labelled the building "illegal" and demanded its destruction. Without legal justification, the group approached the site with a bulldozer and razed the building, rendering 30 Christian families homeless<sup>53</sup>.

In the same week another act of violence was reported at Kistaram village in central India, where village's residents set fire to a Protestant church<sup>54</sup>.

- **July 2022: Arrests of Christians in Uttar Pradesh**

In July, authorities in Uttar Pradesh arrested multiple pastors and Christians on **charges of forced conversion**, leading to the disruption of several Christian gatherings. In one incident, Pastor S. Kanoojiya and four other Christians were arrested and held in police custody<sup>55</sup>. Although released on bail, Pastor Kanoojiya was forced to shut down his house church, which gathered 150 Christians every week. Reflecting on the persecution, he stated, "There have been constant efforts by radical Hindu nationalists to close down the church," adding that he now plans to visit individual congregants to continue worship and prayer.<sup>56</sup>

On the same day, radical Hindu groups, including members of RSS disrupted another worship service, harassed Christians, and influenced police to arrest five congregants

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<sup>51</sup> The Wire, (2025, January 10), [834 Attacks on Christians in India in 2024, 100 more than 2023: Rights Group](#), Retrieved February 10, 2025

<sup>52</sup> USCIRF, (2023), [India, USCIRF-recommended for countries of particular concern \(CPC\)](#), section "Attacks on Religious Minorities"

<sup>53</sup> The End Time News, (2022, February 8), [Radical Hindus destroy 40-year-old Catholic center](#), Retrieved February 10, 2025

<sup>54</sup> Ibid.

<sup>55</sup> International Christian Concern, (2022, December 7), [More Christians arrested in India](#), Retrieved February 10, 2025

<sup>56</sup> Ibid.

on charges of forced conversion. In a separate incident, another pastor was arrested while visiting a local family<sup>57</sup>.

- **July 2022: Dalit-Christian women arrested for “forced conversions”**

In July 2022, six Dalit-Christian women were arrested in Azamgarh, Uttar Pradesh, falsely accused of engaging in forced conversions during a child’s birthday party. The women had simply been offering prayers before cutting the cake, but the leader of an Hindutva group filed a complaint under the Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021. Then, the women got arrested and were denied bail, seemingly for the Hindutva group political gain<sup>58</sup>.



Figure 4: Christians in India during a peace march in 2020 in Kolkata.  
(from: [Vatican News](#))

- **August 2022: Christian evangelist brutally murdered by his own family**

In August 2022, Madhavan, a Christian evangelist in West Bengal, was brutally murdered by his own family and local villagers for refusing to renounce his faith. He was dragged into a forest, doused in petrol, and burned alive<sup>59</sup>. Shockingly, local police refused to take action, dismissing the murder as a “family issue” and refusing to investigate<sup>60</sup>. This gruesome act is not an isolated incident but rather one of countless cases where Christians in India face extreme violence, often with complete impunity.

- **December 2022: Anti-Christian Riots Across 20 Villages in Chhattisgarh**

In December, Christians across 20 villages in the Narayanpur and Kondagaon districts of Chhattisgarh were violently attacked by radical Hindu nationalists for refusing to renounce Christianity and re-convert to Hinduism. The attacks, which targeted Christians gathering for Sunday worship, included the looting and destruction of homes, the desecration of churches and physical assaults. Some sustained serious injuries that required hospitalization, while others fled to the jungle or nearby police stations<sup>61</sup>.

<sup>57</sup> Ibid.

<sup>58</sup> The Wire, (2022, August 8), [UP: Six Dalit-Christian women jailed after VHP alleges “forced conversions” at birthday party](#), Retrieved February 10, 2025

<sup>59</sup> CSW, (2022, August 23), [Christian man burnt to death by his own family](#), Retrieved February 10, 2025

<sup>60</sup> Ibid.

<sup>61</sup> CBN News, (2022, December 29), [Anti-Christian riots surge across 20 villages in India: ‘Increasingly dangerous climate’](#), Retrieved February 10, 2025



A witness described families, including women and children, left stranded in the cold without food or water. Police reportedly refused to intervene, telling the victims to “fend for themselves”<sup>62</sup>.

A church leader stated that these attacks evoke traumatic memories of the August 2008 Kandhamal anti-Christian riots, during which 39 Christians were killed and 3906 homes destroyed by radical Hindu nationalists<sup>63</sup>.

## ***B/ Persecution in 2023***

### **- January 2023: Christians left homeless in Chhattisgarh**

Following the attacks seen in December 2022, displaced Christians were forced to take shelter in open stadiums and government facilities with inadequate provisions, lacking food, water, clothing, and blankets. Many victims reported that village nationalist

leaders incited violence and encouraged social boycotts, further marginalizing the Christian community. With the most vulnerable (children, women) facing threats, physical attacks, and obscene comments<sup>64</sup>.

### **- October 2023: Hindutva groups are misusing Uttar Pradesh’s (UP) anti-conversion law**

An “*Article 14*” study of 101 cases filed under the Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021, revealed that **over 60% of First Information Reports (alleging forced conversion to Christianity) were lodged by third parties, primarily Hindutva organizations rather than the alleged victims**<sup>65</sup>. These cases were often based on vague accusations, such as the mere presence of Christian literature or prayer gatherings and lacked legal standing according to the provisions of the law, which specify that only an aggrieved person or their close relative can file a complaint<sup>66</sup>.

Former official criticized this misuse of law<sup>67</sup> that facilitates false accusations and enables the police to register baseless cases against Christians.

For example, Pastor Paras, arrested in 2022 under the UP’s anti-conversion law after a third-party complaint accused him of “luring people” to convert with money and fear tactics. He had simply attended a prayer meeting and recited a Bible verse when the police came to arrest him. He then spent 19 days in jail, showing how these laws can be used to intimidate and arrest Christians<sup>68</sup>.

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<sup>62</sup> Ibid.

<sup>63</sup> Hindutva Watch, (2022, December 22), [Anti-Christian riots in India surge across 20 villages: Persecution](#), Retrieved February 10, 2025

<sup>64</sup> Portes Ouvertes, (2023, January 6), [Inde: des centaines de chrétiens sans abri](#), Retrieved February 10, 2025

<sup>65</sup> Kumar A., (2023, October 11), [Hindutva groups are misusing UP's anti-conversion law, as police register cases with no legal standing](#), section “Prayagraj, Uttar Pradesh », Article 14, Retrieved February 10, 2025

<sup>66</sup> [Uttar Pradesh prohibition of unlawful conversion of religion act](#), No. 3 of (2021), *English version p.8*, §4. See also: Kumar A, op. cit., section “Behind the FIRs”

<sup>67</sup> Kumar A, op. cit., section “Behind the FIRs”

<sup>68</sup> Id., section “The Case of Pastor Paras”

Subsequently, in August 2024, UP amended its Religious Freedom Act to allow any person to file a complaint (cf. fn 63 for the legal provision)<sup>69</sup>.

- **May 2023: Clashes in Manipur**

In May 2023, violent clashes broke out between the Hindu Meitei majority and the Christian Kuki population in Manipur, resulting in over 200 deaths, the displacement of 60'000 people<sup>70</sup>, and the destruction of more than 250 churches<sup>71</sup>. The conflict began after Kuki tribes held protests opposing a move to grant tribal status to the Meitei community, a designation typically reserved for marginalized groups to access affirmative action benefits, such as reserved jobs and land protections. In Manipur, this decision was perceived as a direct threat to the Kuki tribes, as it would enable the Meiteis to claim land historically owned by the Kuki community. Feeling deeply wronged, the Kukis began protesting peacefully, but the situation quickly escalated into an ethnic and religious conflict<sup>72</sup>.

The attacks were marked by brutal violence, including killings, arson, and sexual crimes, primarily aimed at the Christian Kuki community. In one horrifying incident, two Kuki women were paraded naked, their relatives beaten to death<sup>73</sup>.

The violence also extended beyond ethnic lines, as Meitei Christians also faced attack from Hindu groups. **Many were forced to renounce Christianity by signing conversion affidavits and burning their Bibles. Those who refused were subjected to threats, assaults, and the destruction of their churches<sup>74</sup>.**

Kuki leaders accused the Manipur government, led by the BJP, of complicity and inaction in the violence, pointing to failures by state authorities to protect minorities or intervene effectively. Reports of police inaction and delayed investigations into major crimes, such as the assault on Kuki women, fueled allegations of systemic bias. Despite a formal complaint lodged in May, authorities only initiated investigations months later, following national and international outcry over a viral video of the incident<sup>75</sup>.

Many Kukis described the attacks as an orchestrated effort to marginalize them both ethnically and religiously, underscoring the vulnerability of Christians in the region. The inability of authorities to intervene effectively or address the needs of the displaced highlights the neglect faced by Christian minorities during this crisis<sup>76</sup>.

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<sup>69</sup> Act No.3 of 2021: **“Any aggrieved person, his/her parents, brother, sister, or any person who is related to him/her by blood, marriage or adoption may lodge a First Information Report [...]”**

Act No. 7 of 2024, Amendment to §4: **“[A] contravention of the provisions of the Act may be given by any person [...]”** (emphasis added). [Amendment](#), English version p.20 of the PDF

<sup>70</sup> BBC, (2023, September 20), [Torture, rape, killings in Manipur: An Indian state's brutal conflict](#), Retrieved February 10, 2025

<sup>71</sup> USCIRF, (2023, June 22), [Violence against tribal Christians in Manipur, India](#), Retrieved February 10, 2025

<sup>72</sup> Portes Ouvertes, (2023, June 12), [Inde : comprendre les violences au Manipur](#), Retrieved February 10, 2025

<sup>73</sup> BBC, (2023, September 20), op. cit.

<sup>74</sup> New Lines Magazine, (2023, December 27), [Meitei Christians in India's Manipur face broad attacks](#), Retrieved February 10, 2025

<sup>75</sup> BBC, (2023, September 20), op. cit.

<sup>76</sup> Ibid.

OpenDoors, in July 2023 article, shared the testimony of a young Christian women from Manipur who was forced to give birth in the jungle while fleeing violence that destroyed her home<sup>77</sup>.

As of December 2024, the situation in Manipur remains tense, the conflict persists, and many displaced individuals continue to live in challenging conditions. Despite calls for intervention, **Prime Minister Modi has not visited the state since the violence began and has only tasked Home Minister Amit Shah to address the crisis**<sup>78</sup>.

### ***C/ Persecution in 2024***

- **August 2024: Family of deceased pastor forced to re-convert for burial, Chhattisgarh**

In August, the family of pastor Manju was coerced to renounce their faith and undergo ghar-wapsi (a ritual to reconvert to their original religion) in exchange for permission to bury the pastor in their village. Additionally, local villagers demanded that the family pay INR 200'000 (USD 2'300) as another condition for burial<sup>79</sup>.

Despite pleas from the family and the presence of other pastors who came to conduct the funeral, the police sided with the villagers. Ultimately, the pastor's wife and children were forced to participate in animistic rituals, and pastor Manju was buried with non-Christian rite<sup>80</sup>.

Very recently (January 2025), the Supreme Court upheld a decision from the Chhattisgarh High Court essentially concluding that a person can be denied a burial in his own village because of his faith<sup>81</sup>.

- **October 2024: Christians attacked in Chhattisgarh while police stood by**

In October, a mob of hundreds attacked 14 Christians after they refused to renounce their faith. The mob beat the victims to the extent of breaking bones and causing head trauma, they demolished their homes and destroyed their harvested crops. A police officer who tried to intervene was injured, but the majority of officers failed to protect the victims<sup>82</sup>.

Nagesh Micha, a Christian activist, stated: "The police, which are supposed to uphold the fundamental rights of an individual, have allowed 14 people to be beaten in their presence, [...] "This means there are higher authorities who are supporting the mobs"<sup>83</sup>."

<sup>77</sup> Portes Ouvertes, (2023, July 19), [Inde \(Manipur\) : « Dieu a protégé mon bébé et ma vie ! »](#), Retrieved February 10, 2025

<sup>78</sup> Associated Press, (2024, December 23), [Tens of thousands displaced by ethnic violence in northeast India suffer squalid conditions in camps](#), Retrieved February 10, 2025

<sup>79</sup> International Christian Concern, (2024, August 30), [Family of deceased pastor coerced to re-convert for burial](#), Retrieved February 10, 2025

<sup>80</sup> Ibid.

<sup>81</sup> Scroll.in, (2025, January 29), [Why a Christian pastor was denied a burial in his own village by India's Supreme Court](#), Retrieved February 10, 2025

<sup>82</sup> Voice of the Martyrs Canada, (2024, November 14), [Police watch as Christians suffer mob attack](#), Retrieved February 10, 2025

<sup>83</sup> Archons of the Ecumenical Patriarchate, (2024, November 8), [India: Police watch as mob attacks 14 Christians in Chhattisgarh](#), Retrieved February 10, 2025



- **December 2024: Disrupting Christmas celebrations**

Christmas 2024 in India was marked by violence and disruption as Hindu nationalist groups attacked Christian gatherings in several states, including Kerala, Rajasthan, Uttar Pradesh, Odisha, Madhya Pradesh, and Manipur. The violence, allegedly carried out by Hindu extremists, included vandalism of churches and nativity scenes, physical assaults on pastors and believers, and disruptions of Christmas services in schools, public spaces, and private homes<sup>84</sup>.

In Kerala, they attacked a Christmas celebration at a school in Palakkad<sup>85</sup>. In Odisha, two women and a man were tied to a tree and beaten for alleged conversion activities, while in another incident, a pastor and his pregnant wife were forced to trample on Bibles. In Madhya Pradesh and Jabalpur, statues of Mary were vandalized, and worship services were disrupted in Bhopal. Meanwhile, in Manipur, the ongoing ethnic



*Figure 5: A woman comforts her son after the Jaranwala violence in August 2023. (from: [ACN International](#))*

violence between the Meitei and Kuki communities flared up again, with reports of attacks on Christmas day<sup>86</sup>. Despite Indian Prime Minister Narendra Modi attending a Christmas event hosted by the Catholic Bishops' Conference of India in New Delhi, and his public praise of Jesus Christ's teachings on love and harmony, members of Hindu nationalist groups continued their campaign of intimidation and violence. Several Christian leaders and bishops criticized this double standard, accusing the Hindu nationalists of hypocrisy for promoting harmony in public while inciting violence against Christians across the country<sup>87</sup>.

The persecution patterns from 2022 to 2024 reveal a deeply concerning reality, Christians in India face **not only targeted violence from extremist groups but also legal harassment under state-backed anti-conversion laws**. The sheer number of attacks, ranging from mob violence and forced reconversions to wrongful arrests, demonstrates a systematic campaign to suppress religious minorities.

However, despite these growing violations, the Indian government continues to dismiss or downplay these findings. The government notably rejected the findings of the USCIRF calling it "biased and agenda-driven<sup>88</sup>." Rather than addressing the claims, backed by publicly

<sup>84</sup> International Christian Concern, (2024, December 28), [Hindu nationalists disrupt Christmas services throughout India](#), Retrieved February 10, 2025

<sup>85</sup> Hindutva Watch, (2024, December 24), [Kerala: Christmas crib vandalised in school days after VHP leaders arrested for disrupting school Christmas event](#), Retrieved February 10, 2025

<sup>86</sup> International Christian Concern, (2024, December 28), op. cit.

<sup>87</sup> International Christian Concern, (2024, December 28), [Hindu nationalists disrupt Christmas services throughout India](#), Retrieved February 10, 2025

<sup>88</sup> The Hindu, (2024, October 9), [What does the USCIRF report say about India?](#), Retrieved February 10, 2025

verifiable documentation, India refuses to engage<sup>89</sup>. Revealing a pattern of denial and deflection. In doing so, India fails in acknowledging the situation and addressing the discrimination faced by its religious minorities.

*Bryan Nerren, A Foreign Pastor Targeted for His Faith*

The persecution of Christians in India has not only impacted local believers but also extended to foreign religious figures. The ECLJ wish to remind the case of Christian pastor and U.S. citizen, Bryan Nerren, who was wrongfully arrested and detained for over seven months in 2019-2020<sup>90</sup>.

During this time, one customs official made it quite clear that Pastor Nerren was targeted because of his Christian faith: *“We have been ordered by the central government to crush Christianity. To stop you Americans from bringing money here, and to eliminate Christianity<sup>91</sup>.”*



*Figure 6: Tennessee pastor Bryan Nerren, shown with his wife Rhonda and their children. (from: [Word & Way](#))*

Bryan Nerren had been traveling to India and Nepal for his nonprofit ministry, the Asian Children’s Education Fellowship, which has been training Sunday School teachers, providing aid to impoverished children<sup>92</sup>. In October 2019, he was arrested in India under the Foreign Exchange Management Act (FEMA) and the Customs Act, alleging that he had failed to declare money he was carrying for ministry work<sup>93</sup>. They confiscated his passport and placed him under a travel ban<sup>94</sup>, preventing him from leaving India. During his detention, Pastor Nerren reported facing ill-treatment and religious hostility. A doctor reportedly spit on the ground upon learning that he was a Christian<sup>95</sup>.

As seen in Pastor Nerren’s case, and in cases highlighted earlier, the persecution of Christians in India extends beyond direct violence and increasingly relies on legal instruments to intimidate and suppress religious minorities. While Pastor Nerren was not charged under anti-conversion laws, his arbitrary arrest, prolonged detention, and mistreatment exemplify how existing legal frameworks, including financial regulations, are weaponized to restrict Christian activities.

Similarly, anti-conversion laws, originally intended to prevent coercion, have evolved into a powerful tool for targeting Christians. These laws criminalize religious expression,

<sup>89</sup> Ibid.

<sup>90</sup> ACLJ, (2021, March 30), [ACLJ presents at the U.N. to address religious freedom violations occurring in India and elsewhere around the world](#), Retrieved February 10, 2025

<sup>91</sup> ECLJ, (2020, June 19), [Declaration for Pastor B. Nerren and Christians in India](#), ECLJ. Retrieved February 10, 2025

<sup>92</sup> Ibid.

<sup>93</sup> Baptist Press, (2019, November 4), [U.S. pastor stranded in India awaiting hearing](#), Retrieved February 10, 2025

<sup>94</sup> Ibid.

<sup>95</sup> Ibid.

impose severe penalties for conversions, and foster an environment where false accusations can easily result in arrests, further legitimizing persecution through legal means.

The following section analyzes the structure of these anti-conversion laws, their selective enforcement, and their devastating impact on religious freedom in India.

## IV. Presenting the Situation: Anti-Conversion Laws

The Indian government and various state administrations have implemented anti-conversions laws under the pretext of protecting religion, protecting the weak<sup>96</sup>, protecting cultural and linguistic heritage<sup>97</sup>. Quite a euphemism for Hindu supremacy and the marginalization of religious minorities<sup>98</sup>. In practice, these laws have been selectively enforced against religious minorities, particularly Christians and Muslims<sup>99</sup>.

### ***A/ Some Federal Anti-Conversion Measures***

According to Selvaraj S. in his article “Acts of Violence? Anti-Conversion Laws in India,” since 2019, significant steps have been taken to embed “anti-minority” rhetoric into federal laws<sup>100</sup>. Key federal measures include:

#### **The Citizenship Amendment Act (CAA)**

The Citizenship Amendment Act (CAA), which allows refugees of all religions—except Islam—from neighboring countries to acquire Indian citizenship<sup>101</sup>. This exclusion aligns with Hindutva ideology, which seeks to privilege Hindu identity at the expense of other religious minorities.

#### **The Uniform Civil Code (UCC)**

Another significant federal proposal, the Uniform Civil Code (UCC), aims to replace personal laws based on religious scriptures and customs with a standardized legal framework governing marriage, divorce, inheritance, and adoption<sup>102</sup>. Critics, including the United States Commission on International Religious Freedom (USCIRF), highlight that it undermines religious minorities whose personal laws are central to their religious identity and freedom<sup>103</sup>. The UCC, while framed as a legal reform, is often a tool to marginalize non-Hindu traditions in favor of a homogenized national identity<sup>104</sup>.

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<sup>96</sup> Library of Congress, (n.d.), [State Anti-conversion Laws in India](#), section “II. Overview of State Initiatives”

<sup>97</sup> USCIRF, (2024), [Country Update: India, Increasing Abuses against Religious Minorities in India](#), p. 1

<sup>98</sup> Ibid.

<sup>99</sup> Library of Congress, (n.d.), op.cit., section “V. Implementation and Enforcement”, subsection “A. Human Rights Concerns”

<sup>100</sup> Selvaraj S., (2024), *Acts of Violence? Anti-Conversion Laws in India*, Social & Legal Studies, p.791

<sup>101</sup> Ibid.

<sup>102</sup> Citizen Rights Protection Council, (n.d.), [Uniform civil code in India](#), Retrieved February 10, 2025

<sup>103</sup> USCIRF, (2024), op. cit., p. 4

<sup>104</sup> Id., p. 1



## **The Indian Penal Code (IPC) and Its Weaponization**

The Indian Penal Code (IPC)<sup>105</sup> contain a provision that has been misused to criminalize religious expression. Section 295A<sup>106</sup> (of Chapter XV), which penalizes deliberate and malicious acts intended to outrage religious feelings, is highly open-ended and lacks clear parameters<sup>107</sup>. This allows for a dangerous margin of interpretation by authorities, leading to selective enforcement. For instance, Pastor Kuryichan V and his wife Salenamma were charged under Section 295A in 2022 for alleged mass conversion attempts<sup>108</sup>, demonstrating how these laws are weaponized against Christians<sup>109</sup>.

## **B/ State-Level Anti-Conversion Laws**



Figure 7: Christian community protest the proposed anti-conversion bill in east Bengaluru (from *Times of India*)

State level Freedom of Religion Acts have intensified the criminalization of religious conversions. **Currently, 12 of India's 28 states have adopted anti-conversion laws:**

- Odisha (1967), Madhya Pradesh (1968), Arunachal Pradesh (1978), Chhattisgarh (2000/2006), Gujarat (2003), Himachal Pradesh (2006/2019), Jharkhand (2017), Uttarakhand (2018), Uttar Pradesh (2020),

Haryana (2022), Karnataka (2022)<sup>110</sup>, and Rajasthan (2024)<sup>111</sup>.

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- In Arunachal Pradesh and Rajasthan, these laws have yet to be fully implemented<sup>112</sup>.

<sup>105</sup> [Indian Penal Code \(IPC\)](#)

<sup>106</sup> Indian Penal Code (IPC), section 295 A

<sup>107</sup> Singh Z., (2021), [Munawar Faruqi: a case study on the misuse of section 295A of the Indian Penal Code](#), section "3.3. The case against Section 295A"

<sup>108</sup> Hindustan Times, (2022, May 19), [Pastor booked in Kodagu over conversion charges, say police](#), Retrieved February 10, 2025

<sup>109</sup> Open Doors, (2024), *India: Background Information*, World Watch Research, p.5

<sup>110</sup> Id., pp.4-5

<sup>111</sup> International Christian Concern, (2024, December 9), [Rajasthan set to become 12th Indian state with anti-conversion law](#), Retrieved February 10, 2025

<sup>112</sup> Ensure IAS., (2025), [Arunachal Pradesh's dormant anti-conversion law revived after 46 years](#). See also: Open Doors, (2024), op. cit., p.5

**Table: Laws of Certain States and Their Main Provisions<sup>113</sup>**

State	Year of Adoption	Key Provisions
Odisha	1967	Requires prior notification of conversion <sup>114</sup> ; penalties for forced or fraudulent conversions <sup>115</sup> .
Madhya Pradesh	1968	Criminalizes conversion by “use of misrepresentation, allurement, use of threat or force, undue influence, coercion or marriage or by any other fraudulent means”, includes penalties up to 5 years (§3.1(a) & §5). Also require a declaration before conversion of religion (§10). “The burden of proof as to whether a conversion was not effected through [force, allurement, fraudulent means] lies on the accused” (§12). <sup>116</sup>
Chhattisgarh	2000-2006	Retained Madhya Pradesh’s 1968 law <sup>117</sup> . In 2024, the government indicated its desire to introduce stricter provisions <sup>118</sup> .
Gujarat	2003	Same criminalization of conversion (§3). Requires prior permission from district magistrate for conversion (§5); higher penalties for converting minors, women, SC/ST individuals (§4.2). <sup>119</sup>
Uttarakhand	2018	Criminalizes conversion, but “if any person comes back to his ancestral religion, [it] shall not be deemed conversion under this Act.” (§3) <sup>120</sup>
Uttar Pradesh	2020	Similar. Reconversion to Hinduism exempt (Act No.3, 2021, §3.2). Any person can lodge a First Information Report (Act No.7, 2024, §4). <sup>121</sup>

These laws all share very similar provisions. They seek to prevent conversion and present different penalties for breaching the law, some have been amended in later years. As one author present:

<sup>113</sup> Some provisions are found in multiple laws; in order to preserve conciseness, they are presented selectively.

<sup>114</sup> [Orissa Freedom of Religion Rules](#), (1989), §4 “**Any person intending to convert his religion, shall give a declaration before a Magistrate, [...] prior to such conversion that he intends to convert his religion on his own will.**” Also require the priest to intimate the date, place of the ceremony along with the name and addresses of the persons to be converted (§5.1).

<sup>115</sup> [Orissa Freedom of Religion Act](#), No. 2 of (1968), §§3-4

<sup>116</sup> [The Madhya Pradesh Freedom of Religion Act](#), No. 5 of (2021), *English version page 6*

<sup>117</sup> Gulf News, India, (2006), [Chhattisgarh passes anti-conversion bill](#)

<sup>118</sup> Times of India, (2024), [Chhattisgarh to bring in law to stop illegal conversions](#), Retrieved February 26, 2025

<sup>119</sup> [Gujarat Freedom of Religion Act](#), No. 22 of (2003)

<sup>120</sup> Uttarakhand Freedom of Religion, [Act No.28 of \(2018\)](#)

<sup>121</sup> [Uttar Pradesh prohibition of unlawful conversion of religion](#), Act. No. 3 of (2021), *English version p.8*. See also: Act. No.7 of (2024), *English version p.20 of the PDF*

***“The goal has been essentially the same in each draft bill: to constrain the ability of communities and individuals to convert ‘from the religion of one’s forefathers,’ often in the name of protecting those making up the ‘weaker’ or more easily ‘influenced’ sectors of society—namely women, children, backward castes and untouchables<sup>122</sup>.”***

### **The Ambiguous and Selective Application of Laws**

The vague definitions within these laws allows state authorities to selectively target Christians while exempting Hindu nationalist activities<sup>123</sup>. The US Office of International Religious Freedom (2023 Report<sup>124</sup>) categorized these laws as “laws restricting religious conversion by misrepresentation, force, undue influence, coercion, allurements, fraud, or marriage<sup>125</sup>.”

For example, the Chhattisgarh law states:

- *“No person shall convert or attempt to convert, either directly or otherwise, any person from one religious faith to another by the use of force or by allurements or by any fraudulent means nor shall any person abet any such conversion.”<sup>126</sup>*

However, the terms “force”, “fraudulent”, and “allurements” are broad and vaguely defined, granting vast discretion to authorities<sup>127</sup>. “[A]llurements” includes offering gifts, charitable activities, or promises of better lives<sup>128</sup>.

Additionally, there are extensive procedures and those accused of forced conversion face an unjust legal burden, as they are required to demonstrate that the conversion was voluntary and not coerced<sup>129</sup>, rather than the accuser demonstrating coercion.

**This makes accusations very easy, allows selective enforcement and discrimination, while criminalizing legitimate practices of proselytizing, like providing Bibles<sup>130</sup>, or offering humanitarian aid<sup>131</sup>.**

At the same time, Hinduism is often exempted through classifications like “original religion”<sup>132</sup>, for example in Himachal Pradesh, Arunachal Pradesh<sup>133</sup>, Uttar Pradesh<sup>134</sup> and

<sup>122</sup> Coleman R. J., (2007), *Authoring (in)authenticity, regulating religious tolerance: the legal and political implications of anti-conversion legislation for Indian secularism*, University of Pennsylvania, p.23

<sup>123</sup> Library of Congress, (n.d.), *State Anti-conversion Laws in India*, section “V. Implementation and Enforcement”, subsection “A. Human Rights Concerns”

<sup>124</sup> U.S. Department of State, (2024), *2023 Report on International Religious Freedom: India*

<sup>125</sup> *Id.*, Section “II. Status of government respect for religious freedom”, p.8

<sup>126</sup> ECLJ, (2022), *India UPR*, §6. See also: *Madhya Pradesh Freedom of Religion Act, No. 27 of (1968)*, Section 3. (cf. n.112)

<sup>127</sup> *Id.*, §7

<sup>128</sup> U.S. Department of State, (2024), *2023 Report on International Religious Freedom: India*, section “II. Status of government respect for religious freedom”, p.9

<sup>129</sup> *Ibid.* See also: *The Madhya Pradesh Freedom of Religion Act*, No. 5 (2021), *English version page 6*, §12

<sup>130</sup> ECLJ, (2022), *India UPR*, §7

<sup>131</sup> U.S. Department of State, (2024), *op. cit.*, p.9

<sup>132</sup> ECLJ, (2022), *India UPR*, §7

<sup>133</sup> Library of Congress, (n.d.), *State Anti-conversion Laws in India*, section “II. Overview of State Initiatives”

<sup>134</sup> *Uttar Pradesh prohibition of unlawful conversion of religion*, No. 3 of (2021), *English version p.8*, §3.2

Chhattisgarh<sup>135</sup>. Hindu practices like *ghar wapsi* (reconversion to Hinduism) remain exempt<sup>136</sup>, **which shows a complete legal double standard**, further entrenching bias against Christians.

- Notice of intention to convert mandatory in Himachal Pradesh. However: “no notice shall be required if a person reverts back to his original religion<sup>137</sup>.”

While Himachal Pradesh modified its law from “original religion” to “parents’ religion” in the Act No.13 of 2019; Or saying “immediate previous religion” in Uttar Pradesh Act No. 3 of 2021, it still implies a legal pathway favoring reconversion to Hinduism. It would mean that forced reconversion are exempted since they are not “conversion”.

- “If any person re-converts to his immediate previous religion, the same shall not be deemed to be a conversion under this Act<sup>138</sup>.”

Even though these laws appear to exclude Indian Christians from birth, they, in practice, do not. Chhattisgarh Freedom of Religion (Amendment), Act No.18 of 2006, provide that:

- “[T]he return in **ancestor’s original religion** or his own religion by any person shall not be construed as ‘conversion’<sup>139</sup>.”

Furthermore, even in states without explicit legal exemptions, *ghar wapsi* is conducted with impunity. For example, in August 2024, in Odisha, 120 Christians were forcibly “reconverted” to Hinduism “despite the long Christian heritage of [its] community members<sup>140</sup>.”

Violations of the Freedom of Religion Act, however, can result in imprisonment ranging from three to ten years and heavy fines, particularly for conversions involving women, children, or individuals from Scheduled Castes and Tribes<sup>141</sup>. Certain states, such as Haryana and Gujarat, impose additional penalties, including the annulment of marriages deemed to be for the purpose of conversion (targeting “Love-Jihads”<sup>142</sup>). In states like Andhra Pradesh and Telangana, proselytizing is prohibited near temples or in areas designated as “temple towns,” effectively barring non-Hindu propagation<sup>143</sup>.

Element	« Definition » in Laws	Effect on Christians
Allurement	Offering material or spiritual benefits to induce conversion.	Any Christian humanitarian aid can be considered forced conversion.
Force	Threat, psychological or social pressure to push someone to change religion.	Any preaching can be interpreted as pressure.
Fraud	Deceiving someone to make them convert.	Any explanation of the Bible can be classified as manipulation.

<sup>135</sup>Library of Congress, (n.d.), op.cit., section “III. Examination of State-Level Legislation”, subsection “D. Chhattisgarh”.

<sup>136</sup> Id., section “V. Implementation and Enforcement”, subsection “A. Human Rights Concerns”

<sup>137</sup> Himachal Pradesh Freedom of Religion, [Act No. 5 of \(2007\)](#), §4.1(b). / [Act No.13 of \(2019\)](#) says “parents’ religion”, §7.1(b)

<sup>138</sup> [Uttar Pradesh prohibition of unlawful conversion of religion](#), No. 3 of (2021), *English version* p.8, §3.2

<sup>139</sup> Chhattisgarh Freedom of Religion ([Amendment](#)), [Act No.18 of \(2006\)](#), §2. (*emphasis added*). See also: Uttarakhand Freedom of Religion, [Act No.28 of \(2018\)](#), §3(b)

<sup>140</sup> Voice of the Martyrs, (2024), [Christians forced to “reconvert” to Hinduism](#), Retrieved February 27,2025

<sup>141</sup> U.S. Department of State, (2024), op. cit., pp.9-10

<sup>142</sup> USCIRF, (2023), [India, USCIRF-recommended for countries of particular concern \(CPC\)](#), section “Anti Conversion Laws”

<sup>143</sup> U.S. Department of State, (2024), op. cit., pp.9-10



### **Legal Bias & Government-Endorsed Discrimination**

Recent developments further illustrate the discriminatory intent behind these laws. For example, the:

Assam Healing (Prevention of Evil) Practices Act, 2024, aims in appearance to regulate “magical healing” practices but has been explicitly linked by Assam’s Chief Minister to curbing Christian evangelism and “maintaining the religious status quo”<sup>144</sup>. Christian advocacy groups argue that the law equates prayer and proselytization with magical healing, which they believe undermines Article 25 of the Indian Constitution<sup>145</sup>. Critics have expressed concern that the bill disproportionately targets Christian practices under the guise of regulating ‘magical healing’<sup>146</sup>.

Other measures, such as Gujarat’s circular requiring prior approval for Hindu conversions to Buddhism, Sikhism, or Jainism, reflect the selective application of these laws. Hindu practices like *ghar wapsi* (reconversion to Hinduism) remain exempt though<sup>147</sup>.

### **Escalation of Anti-Conversion Persecution (2024-2025)**

In the first half of 2024, authorities in several states significantly escalated the enforcement of anti-conversion laws, with dozens of arrests targeting religious minorities<sup>148</sup>. For instance:

- **Uttar Pradesh:** In June 2024, police detained 13 Christians, including four pastors, on allegations of forced conversions. Similar charges were brought against 7 Christians in separate incidents in July. **Additionally, the state proposed a bill to strengthen its anti-conversion law, introducing life imprisonment for violators and making religious conversions a non-bailable offense**<sup>149</sup>.

In Amendment Act No. 7 of 2024, Uttar Pradesh justified this strengthening of the anti-conversion law like this:

- *“Keeping in view the sensitivity and gravity of the crime of unlawful religious conversion, the dignity and social status of women and the organised and planned activities of foreign and anti-national elements and organisations in illegal religious conversion and change in demography, it has been felt that the **amount of fines and punishments** provided in the Uttar Pradesh Prohibition of Unlawful Conversion of Religion Act, 2021 **should be increased and conditions of bail should be made more stringent**. As the existing penal provisions of the Act are not sufficient to curb and control the conversion and mass conversion in respect of a minor, disabled, mentally challenged person, woman or a person belonging to Scheduled Caste or Scheduled Tribe and apart from this as it has also become necessary to resolve certain difficulties that*

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<sup>144</sup> Ibid.

<sup>145</sup> Library of Congress, (2024, March 29), [India: Assam Legislative Assembly passes Assam Healing \(Prevention of Evil\) Practices Bill, 2024](#), section “Reaction to the Act’s Passage”, §2

<sup>146</sup> Ibid.

<sup>147</sup> Library of Congress, (n.d.), [State Anti-conversion Laws in India](#), section “V. Implementation and Enforcement”, subsection “A. Human Rights Concerns”

<sup>148</sup> USCIRF, (2024), [Country Update: India, Increasing Abuses against Religious Minorities in India](#), p. 4

<sup>149</sup> Ibid.

*have arisen in the past in various cases regarding the interpretation of section 4 of the Act, it has been decided to amend the aforesaid Act*<sup>150</sup>

- **Chhattisgarh:** Officials announced, in February 2024, stricter legislation targeting so-called “illegal conversions,” often accusing Christian pastors of coercing Hindus to convert<sup>151</sup>.

**In February 2025, Christians have been directly associated as cow killers in videos**<sup>152</sup>. Since cows are sacred in Hinduism, a call to violence resulted from it, a man named Aadesh Soni called thousands of people to raid Christians villages on the first of March 2025. An influential religious figure also incited direct action, declaring: “**Do not ask for the death penalty for cow killers. Kill them yourselves and ask for the death penalty for yourselves. Do not wait for the law to act for you.**”<sup>153</sup> Thankfully, nothing extraordinary happened on the 1<sup>st</sup> of March, as stated by Anugrah Kumar, an Indian journalist, in his interview with the ECLJ on March 3<sup>rd</sup>, 2025.



Figure 8: Scene of violence in Manipur. (from: [Open Doors](#))

## **Conclusion**

To put it simply, State-level anti-conversion laws in India do not serve to prevent forced conversions but rather function as a legal mechanism to intimidate and criminalize religious minorities, they go far beyond addressing cases of coercion and instead rely on vague and overly broad language to target Christians. It violates the principle of legal predictability, creates a chilling effect, and undermines constitutional guarantees of secularism and freedom of religion.

Provisions include requirements for individuals to notify authorities of their intent to convert and shifting the burden of proof onto the accused, adding harsh penalties of

<sup>150</sup> [Uttar Pradesh prohibition of unlawful conversion of religion](#), Amendment, Act No. 7 of (2024), *English version p.22 of the PDF*, (emphasis added)

<sup>151</sup> *Ibid.*

<sup>152</sup> Portes Ouvertes, (2025), [Prière urgente pour les chrétiens indiens qui craignent une vague de violence](#), Retrieved February 27, 2025

<sup>153</sup> *Id.*, (Literal translation from the French version)

imprisonment and heavy fines<sup>154</sup>. Furthermore, authorities, including police, often collaborate with Hindu vigilante groups to further intimidate minorities<sup>155</sup>.

**Ultimately, these laws embed systemic religious discrimination into India’s legal framework and create a climate of fear for Christians.**

Beyond the legal implications of anti-conversion law (which will be explored under Section 7), it is crucial to understand the broader system of violence that enables and sustain religious persecution in India. The following section examines how this system operates and look at India’s international commitments to protect religious freedom.

## V. Violations Against Religious Minorities

### *A/ A System of Violence*

The persecution of Christians in India extends far beyond physical attacks and individual cases (cf. [Section 4](#)), encompassing a broader system of violence that undermines their fundamental rights. Johan Galtung’s tripartite framework of violence provides a useful lens to analyze this persecution, identifying three interconnected forms of violence<sup>156</sup>:

1. **Direct Violence** – Physical attacks such as beatings, death threats, rape, and murder. These forms of violence are well-documented, as seen in [Section 4](#), where cases of mob attacks, forced conversions, and assaults against Christians are detailed.
2. **Structural Violence** – Systemic inequalities embedded within legal and institutional frameworks. Anti-conversion laws exemplify this form of violence by institutionalizing discrimination, restricting the rights of religious minorities, and creating legal risks for those choosing to convert.
3. **Cultural Violence** – The stigmatization and normalization of persecution, reinforced by nationalist rhetoric portraying Christianity as a foreign threat. State authorities have remained complicit in Hindutva narratives, either through inaction or tacit approval, further legitimizing violence and discrimination.

**This threefold system of violence creates a hostile environment for Christians, where laws, political discourse, and public sentiment work together to reinforce persecution<sup>157</sup>.**

Given this systematic persecution, India fails to meet its international human rights obligations, including protections under the ICCPR, ICESCR, CEDAW, CRC, and CERD. The following sections will outline some of these violations.

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<sup>154</sup> USCIRF, (2023), [India, USCIRF-recommended for countries of particular concern \(CPC\)](#), section “Anti Conversion Laws”

<sup>155</sup> Ibid.

<sup>156</sup> Selvaraj S., (2024), *Acts of Violence? Anti-Conversion Laws in India*, Social & Legal Studies, p.800

<sup>157</sup> *A clear example of this is ghar wapsi, where individuals who convert to Christianity face coercion and threats to reconvert to Hinduism. As we saw, in one such case, a family was forced to reconvert simply to bury their deceased relative in the village.*

Type of Violence	Examples in India
<b>Direct Violence</b>	Murders, church attacks, assaults on pastors, destruction of homes.
<b>Structural Violence</b>	Anti-conversion laws, police complicity, lack of protection for minorities.
<b>Cultural Violence</b>	Anti-Christian “campaigns”, social exclusion of converts, denial of access to state aid

### ***B/ India International Commitments***

Art. 51(c) of the Indian Constitution states that the State shall “foster respect for international law and treaty obligations”<sup>158</sup>.

In addition to being a member of the United Nations and bound by the Universal Declaration of Human Rights (UDHR) under the broader Charter-based human rights framework, **India has ratified several key international treaties, here are some relevant one:**

- International Covenant on Civil and Political Rights (ICCPR) – 10.04.1979
- International Covenant on Economic, Social and Cultural Rights (ICESCR) – 10.04.1979
- Convention on the Rights of the Child (CRC) – 11.12.1992
- Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) – 09.07.1993
- International Convention on the Elimination of All Forms of Racial Discrimination (CERD) – 03.12.1968

### ***C/ Violations***<sup>159</sup>

A very concise and non-exhaustive reminder of violations.

**In the present case, killings, torture, degrading treatment, and sexual violence** (ICCPR Art. 6 & 7): Documented cases in Manipur and Chhattisgarh show that Christians have been killed, tortured, and subjected to sexual violence. These actions violate Article 6 (right to life) and Article 7 (prohibition of torture and cruel, inhuman, or degrading treatment) under the ICCPR.

**Attacks on religious gatherings, destruction of churches, and anti-conversion laws** (ICCPR Art. 18, 20, 21): The use of anti-conversion laws to criminalize religious gatherings violates Article 18 (freedom of religion), while state-sponsored hate speech inciting violence breaches Article 20 (prohibition of war propaganda and hate speech). The restriction on Christian assembly further violates Article 21 (right to peaceful assembly).

<sup>158</sup> Article 51(c) [Indian Constitution](#)

<sup>159</sup> Open Doors, (2025), *Situation of Religious Freedom for Christians, India*, World Watch List 2025. See also [Part IV](#) of this document



**Discrimination against Dalit Christians & displaced persons** (CERD Art. 5 & Art. 26 ICCPR), lack of access to food, water and shelter for Christians refugees and displaced persons (e.g. Manipur), in violation of Article 11 of the ICESCR.

**Children are pressured into attending anti-Christian teachings**, particularly in refugee camps, violating Article 13 of the ICESCR and Articles 2 & 14 of the CRC.

The systemic persecution of Christians is not only driven by social and political forces but is also deeply embedded in legal frameworks. The persistence and selective enforcement of anti-conversion laws raise concerns about their legality. The next section will analyze these laws and how they violate India's constitutional protections for religious freedom and its international obligations.



Figure 9: Rally against religious discrimination.  
(from: *Institut Montaigne*)

## VI. The Conflict between Persecution and India's Constitution & International Obligations

As previously discussed ([cf. III.A](#)), **India presents itself as a secular democracy with constitutional guarantees for religious freedom**. However, state-level anti-conversion laws contradict these principles. This section will analyze the legal contradictions, demonstrating how these laws violate India's Constitution and breach its international human rights obligations.

### ***A/ Legality of India's Anti-Conversion Laws under the Constitution***

The Indian Constitution enshrines fundamental protections for religious freedom and non-discrimination. Article 15 explicitly states that "[t]he State shall not discriminate against any citizen on grounds only of religion, race, caste, sex, place of birth or any of them."<sup>160</sup> Similarly, Article 25 guarantees that "all persons are equally entitled to freedom of conscience

<sup>160</sup> Article 15 [Indian Constitution](#)

and the right freely to profess, practice and propagate religion," but that right is "[s]ubject to public order, morality and health and to the other provisions of this Part"<sup>161, 162</sup>.

Despite these constitutional protections, state-level anti-conversion laws directly conflict with Article 25, which guarantees the right to practice and propagate religion freely. **Some of the debate lies in the interpretation of "propagation", with conflicting views between Christians and proponents of Hindutva ideology**<sup>163</sup>.

Christians argue that propagation includes the right to evangelize and share their faith, a constitutional right and protection that can be used to legally justify the commandment to evangelize from Matthew 28:19-20. From this perspective, conversion is an inherent and constitutionally protected part of religious expression<sup>164</sup>.

However, Hindutva supporters assert that such propagation interferes with Hindu's right to freely practice their religion<sup>165</sup>. Some even equate conversion with violence, claiming:

- *"It is not that they [Christians] preach their own religion. They preach against other religions. I consider that kind of preaching as violence. I want them to know that this is violence. I am hurt and many others like me are hurt. Millions are hurt."*<sup>166</sup>

This perspective has influenced legal interpretations, notably in the 1977 Supreme Court case, *Rev. Stainislaus v. State of Madhya Pradesh*. In this ruling, the Court rejected the idea that propagation includes a right to convert others, reasoning that:

- *"There is no fundamental right to convert another person to one's own religion because if a person purposely undertakes the conversion of another person to his religion, as distinguished from his effort to transmit or spread the tenets of his religion, that would impinge on the "freedom of conscience" guaranteed to all the citizens of the country alike."*<sup>167</sup>

Thus, the Court established that freedom of conscience (for those being converted) supersedes the right to propagate religion, and that there are no fundamental rights guaranteeing the right to convert<sup>168</sup>, effectively stripping Article 25 of its intent. It further justified restrictions on religious conversion by linking forced conversion to public order concerns<sup>169</sup>. **This argumentation and case law are used to affirm the constitutional legitimacy of anti-conversion laws which tries to merge the act of "propagating" a religion with coercive conversions**<sup>170</sup>.

However, scholars explain that in its ruling, the Court ignored the legislative history of Article 25. The term "propagate" was deliberately included in the Constitution as a compromise

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<sup>161</sup> Article 25 [Indian Constitution](#)

<sup>162</sup> ECLJ, (2022), [India UPR](#), §4

<sup>163</sup> Selvaraj S., (2024), *Acts of Violence? Anti-Conversion Laws in India*, Social & Legal Studies, p.799

<sup>164</sup> Ibid.

<sup>165</sup> Ibid.

<sup>166</sup> Ibid.

<sup>167</sup> *Rev. Stainislaus v. State of Madhya Pradesh & Ors*, 1977 SCR (2) 611 (India). Retrieved from [Indian Kanoon](#)

<sup>168</sup> Ibid.

<sup>169</sup> Library of Congress, (n.d.), [State Anti-conversion Laws in India](#), section "IV. Treatment by the Supreme Court"

<sup>170</sup> Selvaraj S., (2024), *Acts of Violence? Anti-Conversion Laws in India*, Social & Legal Studies, p.799

to guarantee Christians the right to convert others<sup>171</sup>. Additionally, the Court failed to define key terms such as "inducement" and "allurement", which were at the heart of the case<sup>172</sup>.

This omission raises concerns about judicial bias and political influence in legal interpretations. **The double standard is evident: Christian conversions are treated as coercion, while "ghar wapsi" (reconversion to Hinduism) is exempt from scrutiny.** Sen Ronojoy argues that this ruling is part of the Supreme Court's historical inclination toward a "pro-Hindu" stance<sup>173</sup>.

To conclude, state's anti-conversion laws appear to be in conflict with both the literal and historical interpretation of Article 25. Despite government efforts to argue otherwise and justify these laws, their implementation has been politically and ideologically driven, undermining religious freedom and disproportionately targeting religious minorities.



Figure 10: Indranil Mukherjee/AFP. (from: [Pew Research Center](#))

## ***B/ Legality of India's Anti-Conversion Laws under International Law***

International human rights law guarantees the right of individuals to choose, change, or abandon their religion or belief without fear of persecution or coercion. Article 18 of the UDHR explicitly protects this right by stating that everyone has the freedom of religion or belief, including the right to change their religious beliefs. Similarly, Article 18(1) + GC22<sup>174</sup> of the ICCPR affirms the right of every person "to have or to adopt a religion or belief" of their choosing, reinforcing an individual's freedom to make personal decisions about their faith.

Beyond protecting the right to convert, international human rights law also safeguards the right to voluntarily persuade or support others in their decision to adopt a different religion or belief<sup>175</sup>. Article 18 UDHR ensures that individuals can manifest their religious beliefs

<sup>171</sup> Faizan M. & Sohi J.S., (2017), [Freedom of Religion in India: Current Issues and Supreme Court Acting as Clergy](#), 2017(4) BYU L. Rev. 915, p.942

<sup>172</sup> Ibid.

<sup>173</sup> Selvaraj S., (2024), *Acts of Violence? Anti-Conversion Laws in India*, Social & Legal Studies, p.799

<sup>174</sup> United Nations Human Rights Committee, (1993), General Comment No. 22: Article 18 (Freedom of Thought, Conscience or Religion), [CCPR/C/21/Rev.1/Add.4](#)

<sup>175</sup> USCIRF, (2023), [Issue Update : India's State-Level Anti-Conversion Laws](#), p.1

through "teaching, practice, worship, and observance," while Article 18(1) ICCPR upholds the right to manifest religion or belief through "worship, observance, practice, and teaching." These provisions emphasize that individuals and religious communities should be free to express and share their religious convictions.

Critically, international human rights law also prohibits coercion in matters of religion. Article 18(2) ICCPR explicitly forbids coercion that would impair an individual's freedom to have or adopt a religion or belief of their choice. However, India's anti-conversion laws contradict this principle, as they create an environment where individuals face persecution for converting or practicing a religion other than Hinduism.

Practices like *ghar wapsi* to revert to Hinduism, further underscore this coercion. Such actions compromise personal religious autonomy and, as a result, anti-conversion laws are not only inconsistent with constitutional protections under Article 25 but also violate obligations under international law.

Despite clear violations of both domestic and international law, India has consistently failed to address these issues. The Universal Periodic Review has repeatedly called India to protect religious freedom, yet the government continues to resist these recommendations. The following section explores the UPR's findings, highlighting India's refusal to implement critical reforms that would help religious minorities.

## VII. Universal Periodic Review (UPR) Recommendations

The illegality and international concern over these anti-conversion laws is not new, in this section we will explore the Universal Periodic Review recommendation received by India in 2022, revealing how these issues have been brought to India on multiple occasion, but concrete measures remain to be seen.

**In its 2022 Universal Periodic Review (UPR) submission, the ECLJ highlighted that "none of the critical recommendations regarding religious freedom [...] were supported by India."**<sup>176</sup> This refers to recommendations made during the 2017 UPR, many of which remain unimplemented. Regrettably, the situation did not improve after the 2022 UPR. During this review, India received 339 recommendations, of which it "Supported" 221 and "Noted" the remaining 118<sup>177</sup>.

Among the "Noted" recommendations, those concerning "[f]reedom of thought, conscience & religion" stand out<sup>178</sup>. India chose not to accept any of these, despite their focus on addressing the misuse of anti-conversion laws and ensuring compliance with international human rights standards and constitutional protection for freedom of religion or belief. For instance, Recommendation 151.119 from Ireland specifically urged India's states to repeal anti-conversion legislation that violates international human rights obligations<sup>179</sup>. These

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<sup>176</sup> ECLJ, (2022), [India UPR](#), §3

<sup>177</sup> OHCHR, (2023, March 27), [Human Rights Council adopts Universal Periodic Review outcomes of India, Finland, and the Philippines](#), Retrieved February 10, 2025

<sup>178</sup> OHCHR, (n.d.), [Universal Periodic Review – India](#), 4<sup>th</sup> Cycle – 41<sup>st</sup> Session, Matrix of recommendations, "Noted"

<sup>179</sup> *Id.*, Recommendation 151.119



recommendations also called for measures to prevent discrimination and violence against religious minorities and to enact laws to prevent collective or targeted religious violence<sup>180</sup>.

Similarly, recommendations addressing the rule of law and impunity were also “Noted.” Examples include Recommendation 151.323 from the Holy See, which proposed comprehensive national legislation to prosecute violence or threats against religious minorities<sup>181</sup>, and Pakistan’s recommendation to hold public officials accountable for inciting hate crimes<sup>182</sup>. By “noting” rather than accepting these recommendations, India raises questions about whether this reflects a lack of willingness or capacity to implement necessary reforms.

While India did support some recommendations under the theme of freedom of thought, conscience, and religion, these were primarily general in nature, focusing on broad principles rather than immediate, actionable measures<sup>183</sup>. This selective acceptance of recommendations allows India to project an appearance of progress on religious freedom while avoiding commitments to critical, targeted reforms.

The failure to implement UPR recommendations has direct consequences for India’s religious minorities. Systematic discrimination, legal persecution, and targeted violence continue unchecked, affecting numerous people, including children like Pranathi, an 8-year-old Dalit Christian who was asked her life’s ambition, to which she answered, “I want to become a doctor”<sup>184</sup>. . . Her dreams are obstructed by all these barriers, yet she has hope and “will try till the end”, so do we at the ECLJ, where we will continue to fight for her rights<sup>185</sup>. This reality reflects a broader pattern of persecution, which extends beyond legal restrictions and manifests as a comprehensive system of violence.

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<sup>180</sup> Id., “Noted”

<sup>181</sup> Id., Recommendation 151.323

<sup>182</sup> Id., Recommendation 151.88

<sup>183</sup> Id., “Supported”

<sup>184</sup> International Christian Concern, (2024, November 9), [Against all odds: Pranathi’s journey from poverty to possibility](#), Retrieved February 10, 2025

<sup>185</sup> Ibid.

# CONCLUSION

## *A/ Obligations Violations*

### **Anti-Conversion Laws and Legal Obligations**

As previously examined under **Section 7**, anti-conversion laws in India contradict both its Constitution and its international human rights obligations.

During the 2022 Universal Periodic Review (UPR), nations – including Ireland – as well as the Holy See, urged India to repeal anti-conversion laws to align with its human rights commitments (Recommendations 151.119 and 151.121)<sup>186</sup>. **India is not only recommended but under a legal obligation to repeal anti-conversions laws and comply with the international norms it ratified.**

### **India's Failures in its Human Rights Obligations**

Recalling the typology of tripartite obligations regarding India's obligation concerning human rights, meaning India's obligation to:

- 1) **Respect** – *obligation of non-interference – e.g. Refrain from enacting laws or policies that directly violate human rights.*

#### India's Failure to Respect

India has enacted laws and policies that actively restrict religious freedom. Anti-conversion laws directly violate the right to freedom of thought, conscience, and religion (**ICCPR Art. 18**) and create a hostile legal environment that legitimizes persecution.

- 2) **Protect** – *obligation to protect – Prevent and address violations by third parties, including private actors.*

#### India's Failure to Protect

India has consistently failed to prevent or respond adequately to violence against Christians, as seen in Manipur and Chhattisgarh. The police's inaction and even complicity in attacks highlight India's failure to protect from harm caused by third parties.

- 3) **Fulfill** – *obligation to facilitate – Take positive measures to ensure the enjoyment of human rights, including promoting, facilitating, and providing necessary protections.*

#### India's Failure to Fulfill

Rather than addressing discrimination, India has ignored impactful targeted recommendations from the 2022 Universal Periodic Review (UPR). The government has failed to provide basic services to displaced Christians and has refused to recognize the persecution of Christian Dalits, depriving them of socio-economic protections.

**India's treatment of its Christian population demonstrates failures in all three areas. India is in clear violation of its obligation under multiple international treaties.**

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<sup>186</sup> OHCHR, (n.d.), [Universal Periodic Review – India](#), 4<sup>th</sup> Cycle – 41<sup>st</sup> Session, Matrix of recommendations, 151.119 & 151.121

## ***B/ Recommendations***

Based on the findings of this report, the ECLJ urges India to take immediate and concrete actions to protect religious minorities and uphold its constitutional and international obligations. The following recommendations outline necessary legal, policy, and enforcement measures to address the escalating persecution of Christians and other religious minorities in India.

It is important to recall that India issued a standing invitation to all thematic special procedures on September 14, 2011, thereby committing to always accept requests for country visits from UN special rapporteurs<sup>187</sup>. However, despite this commitment, **the last visit by the Special Rapporteur (SR) on freedom of religion took place in 2008**. A formal request for a visit was submitted on July 10, 2023, followed by a reminder on April 25, 2024, yet India has not responded<sup>188</sup>. Similarly, the SR on Minority issues has faced persistent silence from the Indian government, despite an initial visit request in 2018 and the most recent reminder on December 18, 2024<sup>189</sup>.

### *Recommended Actions:*

1. Repeal or amend anti-conversion laws.
2. Allow the requested SRs visits.
3. Uphold constitutional and international human rights obligations.
4. Investigate and prosecute hate crimes against religious minorities.
5. End the selective enforcement of laws against religious minorities.
6. Ensure protection for victims of religious persecution.
7. Address police complicity and inaction.
8. Stop the spread of hate speech and religious intolerance by taking legal actions against political leaders and public officials that incite violence.

This once again raises doubts about India's integrity in addressing these matters.

Failure to act will only further isolate India on the global stage, damage its reputation as a secular democracy, and perpetuate the suffering of vulnerable communities.

<sup>187</sup> OHCHR, (2025), [Standing Invitations](#), India

<sup>188</sup> OHCHR, (2025), [Country visits](#), India, SR on freedom of religion

<sup>189</sup> Id., SR on minority issues