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Status of Human Rights in the Union of the Comoros for the 46^{th} Session of the Universal Periodic Review

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Introduction

1. The European Centre for Law and Justice (ECLJ) is an international, non-governmental organization dedicated to promoting and protecting human rights around the world. The ECLJ also holds Special Consultative status before the United Nations Economic and Social Council. This report discusses the status of human rights in the Union of the Comoros (the Comoros) for the 46th session of the Universal Periodic Review.

Background

- 2. The Comoros is an African archipelago nation located in the Indian Ocean near the northern part of the Mozambique Channel.¹ The population of the country's three islands—Anjouan, Moheli, and Grand Comore—approximates 888,000 people.² The Comoros is predominantly Muslim, with 98% identifying as Sunni Muslim.³ Only 2% of the population identifies with other religions, including Christians, Shia Muslims, and Jehovah's Witnesses. Sunni Islam is the official state religion.⁴ The Comoros ranks forty-second on the Open Doors' World Watch List's top fifty countries for hostility and persecution towards Christians.⁵
- 3. The Comoros was last reviewed on January 25, 2019.⁶ The review yielded 177 recommendations for the Comoros, 165 of which the Comoros accepted.⁷ Regarding religious persecution, the Comoros merely noted Italy's and Canada's recommendation to "[i]ntensify efforts to ensure full respect for freedom of religion or belief," insisting that Islam's preeminence in the Comoros is the bedrock of its social order and reaffirming its opposition to "insidious and very active forms of proselytism" from religious minorities. Regarding human trafficking, the Comoros supported the recommendations from Oman, the Central African Republic, Djibouti, Madagascar, and the United States to "[t]ake further measures to prohibit all forms of slavery and provide further psychological support to victims of trafficking in persons." The Comoros also supported recommendations from Namibia and Maldives to "[s]trengthen measures aimed at addressing violence against women and girls, including child marriages."

Legislative Framework

Religious Persecution

- 4. According to Article 2 of its Constitution, "[t]he Union of the Comoros equally recognizes the equality of all citizens before the law, without distinction of race, sex, *religion*, political belief, and it assures all citizens the full enjoyment of fundamental freedoms." ¹²
- 5. The Comorian Constitution acknowledges that the Comorian people strive to "demonstrate their commitment to the principles of fundamental rights as they are defined" under the African Charter on the Human and Peoples' Rights (ACHPR), of which the Comoros is a party, ¹³ and the Universal Declaration of Human Rights (UDHR). ¹⁴ Article 18 of the UDHR states, "[e]veryone has the right to freedom of thought, conscience and religion." ¹⁵ Article 8 of the ACHPR states, "[f]reedom of conscience, the profession and free practice of religion shall

be guaranteed. No one may, subject to law and order, be submitted to measures restricting the exercise of these freedoms." ¹⁶ The Comoros is also a signatory to the International Covenant on Civil and Political Rights ¹⁷ and, as such, must abide by the treaty's object and purpose regarding freedom of religion. Article 18 of the ICCPR states, "No one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice." ¹⁸

- 6. Despite the country's stated policy of religious liberty, there is no practical application, as the Comorian Constitution expresses a firm commitment to "cultivat[ing] a national identity based on a sole people, a sole religion (Sunni Islam), and a sole language." Article 97 of the Constitution establishes Islam as the state religion, acknowledging that "[t]he State draws on this religion, the Sunni principles and rules of obedience and the Chafi'i rites that govern belief and social life."
- 7. Consistent with its constitutional provision, the Comoros incorporates Islam into many aspects of public life. The government observes Islamic holidays, and Quranic instruction is commonly integrated into public education, although learning Islam is not officially compulsory.²¹
- 8. While in its national report to the U.N., the Comoros wrote, "[f]reedom of religion and conscience is guaranteed, and different religious communities live together peacefully,"²² this statement overlooks a key concern for non-Muslims: proselytizing or publicly practicing religions other than Sunni Islam is illegal in the Comoros, and is punishable by fines, imprisonment, or deportation.²³ The prohibition on public practice has made it difficult for Christians to express their faith through online mediums, to openly display Christian symbols, and has resulted in widespread censorship with most Christians only talking to their immediate family members about their faith.²⁴ Article 175 of the Comorian Penal Code states: "Whoever discloses, spreads, and teaches Muslims a religion other than Islam will be punished with imprisonment of three months to one year and a fine of 50,000 to 500,000 Comorian francs."²⁵ Oppression into silence can hardly be considered freedom.

Human Trafficking

- 9. The Comorian Constitution reads: "The State guarantees the rights of women, children, youth and persons living with a disability to be protected by the public powers against all forms of neglect, exploitation and violence."²⁶
- 10. Articles 322-325 of the Comoros's Penal Code prohibit and impose harsh sanctions for prostitution, be it forced or consensual.²⁷ Prostitutes, pimps, and those who solicit prostitution face imprisonment, fines, and possible banishment from the country if caught.²⁸
- 11. In December 2014, the Comoros passed Law No. 14-034, which imposed stricter criminal repercussions for trafficking and exploiting children.²⁹ Forced labor of minors under eighteen, which includes smuggling children, enslaving—for sex or for labor—and selling children, placing children in deplorable working conditions, or using children to facilitate illegal acts, incurs a penalty of up to twenty years imprisonment.³⁰
- 12. Article 23 of the UDHR states, "[e]veryone has the right to work, to free choice of employment, to just and favourable conditions of work." Article 5 of the ACHPR provides,

- "[e]very individual shall have the right to the respect of the dignity inherent in a human being and to the recognition of his legal status. All forms of exploitation and degradation of man, particularly slavery, slave trade, torture, cruel, inhuman or degrading punishment and treatment shall be prohibited."³²
- 13. The Comoros is a party to the Convention on the Rights of the Child (CRC).³³ Article 32 of the CRC recognizes "the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development."³⁴ Moreover, the Comoros is a party to the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW),³⁵ under which "States Parties shall take all appropriate measures, including legislation, to suppress all forms of traffic in women and exploitation of prostitution of women."³⁶
- 14. In June 2020, the Comoros became a party to the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children.³⁷ The protocol provides a comprehensive international framework to combat human trafficking for state parties to adopt.³⁸ Under Article 9, Section 1 of this Protocol:
 - 1. States Parties shall establish comprehensive policies, programmes and other measures:
 - (a) To prevent and combat trafficking in persons; and
 - (b) To protect victims of trafficking in persons, especially women and children, from revictimization.³⁹

Child Marriage

- 15. The Family Code of 2005 sets eighteen years old as the age of majority for both parties.⁴⁰ However, Article 15 permits a judge to grant an exception to underage parties with no minimum age requirements.⁴¹
- 16. Further, the African Charter on Human and People's Rights on the Rights of Women in Africa, to which the Comoros is a party, recognizes "[t]he minimum age of marriage for women [as] 18 years." Furthermore, the CEDAW and the African Charter on the Rights and Welfare of the Child, both of which the Comoros ratified, expressly require prohibition against child marriage, with the later providing that "[c]hild marriage and the betrothal of girls and boys shall be prohibited." ⁴³

Religious Persecution

- 17. In the Comoros, the constitutional favoritism of Islam entails little tolerance for and even allows persecution of religious groups with contrary teachings, particularly Christians.⁴⁴ Resultantly, "the prospects for freedom of religion in the Comoros are negative."⁴⁵
- 18. The Comoros ranks forty-second on the Open Doors' World Watch List's top fifty countries for hostility and persecution towards Christians. 46 Conservative Islam's

governmentally-endorsed dominance is said to be the primary reason for Christian persecution. Anti-Christian attitudes formulate in schools, as poorly funded public education and expensive private schools leave parents with no option but to send their children to Islamic madrassas. There, children learn the Quran and instructors often teach anti-Christian sentiments.

- 19. The social divide between Sunni Muslims and non-Muslims is the starkest for converts from Islam to Christianity. Radical, ultra-conservative Muslim scholars, known locally as *djaulas*, advocate for the implementation of Sharia Law in the Comoros, harass Christians, and completely ostracize converts. Converts face intense pressure from their community and family to renounce Christianity, often under the threat of their family cutting off all contact. Furthermore, instances of violence against converts often go unreported because victims fear stigma or retaliation for speaking out. Sexual violence is especially stigmatized, with many survivors never telling even their closest relatives out of shame.
- 20. The Comoros suppresses Christian expression in numerous ways, such as by banning any form of non-Islamic religious statement—including social media posts or displaying Christian symbols like the cross—in public, restricting access to shared community resources, and even obstructing the celebration of Christian ceremonies or festivals.⁵⁴ Indeed, in December 2019, the Ministry of Islamic Affairs banned celebrating Christmas in the country.⁵⁵ However, a church in Maroni defied the directive and proceeded with its Christian service privately.⁵⁶ Some government leaders condemned the ban and removed the ministry director from office.⁵⁷
- 21. Nevertheless, generally, government officials do contribute to the discrimination of Christians. The Comoros's Minister of the Interior once stated, "[l]et whoever wants to practice Christianity go to Rome. [Our] constitution didn't tell us about Christianity. Our religion is Islam." President Azali Assoumani echoed such sentiments in several speeches, believing that "religions other than Sunni Islam have no place in the Comoros." ⁵⁹
- 22. These sentiments are reflected by the pervasive societal discrimination against Christians, especially Christian converts. In some parts of the country, extremist groups exacerbate that discrimination into physical violence.⁶⁰ One Christian convert recalled how "[b]arely three days after I decided to follow Christ, my house was burned down. I was only able to rescue my laptop. All I had was the clothes on my back. I felt this was a test of my faith in Christ, but it turned out to be faith strengthening."⁶¹ Christians are forced to meet in small groups and can only share their faith in one-on-one settings for fear of imprisonment.⁶² For example, when five Christians organized a debate in their home, they were imprisoned upon being discovered.⁶³ Comorian Christians deserve the right to freely express and practice their faith in public without fear of government or societal violence.

Human Trafficking

23. Human Trafficking continues to be an issue for the Comoros. Due to its unique location, the Comoros often serves as a waypoint for African victims being trafficked into the Arabian Gulf as well as a destination for exploited children.⁶⁴ While the country is too small and too remote to be a major link in the international human trafficking chain, that criminal networks routinely traffic victims throughout all three islands without government interference is troubling.⁶⁵

- 24. Despite some displays of progress and its numerous international commitments, the Comoros still fails to meet minimum international standards for combating human trafficking, as evidenced by Human Trafficking Institute's 2022 report listing the Comoros as Tier 2.66 Worse still, "[t]he Comorian state facilitates or is actively involved in most illicit markets on the islands, with corruption being particularly focused on human trafficking." The corruption of an increasingly dictatorial executive branch, lack of effective governmental coordination between the islands, and insufficient resources all contribute to the Comoros's tepid response to human trafficking.
- 25. Because of its archipelago structure, providing maritime and border security is incredibly difficult for the Comorian law enforcement.⁶⁹ Understaffed law enforcement struggle with monitoring official ports of entry, much less the "[i]nformal ports and harbours across the islands [which] enable smaller boats to disembark and dock undetected." But even if the Comorian law enforcement had the necessary manpower and funding, "corruption is endemic in law enforcement and police officers are known to collude with criminal networks across a range of markets, actively facilitating criminal activities."
- 26. When the Comorian law enforcement does identify and rescue victims of human trafficking, there is no state-funded housing or support for the victims.⁷² Likewise, prosecution of traffickers is rare, largely because "[t]he perception amongst stakeholders on the islands is that enforcement is weak and corruption is endemic throughout the judiciary and among members of the legal profession."⁷³
- 27. Still, the Comoros showed signs of improvement in recent years. The Comoros earned its 2022 upgrade to Tier 2 after investigating instances of trafficking for the first time since 2014, identifying and supporting eight victims, as well as conducting its first trafficking prosecution. The Comorian government officials joined the international community in observing World Day Against Trafficking in 2020, redoubling its international commitments to oppose human trafficking. While modest, such progress represents a spark of hope for an impoverished country beset with corruption like Comoros.

Child Marriage

- 28. The minimum legal age for marriage in the Comoros is eighteen. Despite this, instances of child marriage are still widely common. One-third of Comorian girls under eighteen are married, totaling over 86,000 child marriages in the Comoros—over 26,000 of those marriages occurred before the girls turned fifteen. Islamic law, which governs the social life of Comorians, considers girls eligible for marriage at fourteen or fifteen years old. Worryingly, "[i]n some cases, marriages are arranged even earlier, especially for girls." Furthermore, "[t]here are no public measures to generate social support for the enforcement of laws on the minimum age of marriage and there are no legal sanctions for those facilitating a marriage of an individual who is under the minimum age of marriage."
- 29. Child marriage is a harmful practice that can result in lasting consequences for girls. Comorian child brides are frequently wedded to men much older than they are and commonly live in households where domestic abuse regularly occurs. Sadly, the social norms in the Comoros prevent married girls from reporting abuse in their marriages: "It is considered taboo for a woman to report violence and, as long as she still shares the home with the man involved, she will rarely come forward." Over half of Comorian child brides cannot attend school, with one significant reason being early impregnation—around half of all Comorian child brides give

birth before they turn eighteen.⁸⁴ Adolescent pregnancy not only has a higher "risk of complications during pregnancy and childbirth," but it also puts the mother and her child at greater economic risks.⁸⁵ With no education, and thus financial dependence on the husband, Comorian girls often feel they have no choice but to stay in the marriage, especially once a child is born.⁸⁶

30. In one harrowing account of abuse, a thirteen-year-old girl followed her neighbor into his house after returning home from school.⁸⁷ He raped and impregnated her, only to walk free from prison one year later.⁸⁸ While the girl did not marry her abuser, her story reflects the similar tragic circumstances that too often do lead to child brides.⁸⁹

Recommendations

- 31. Unfortunately, the Comoros's struggles with religious freedom, human trafficking, and child marriage are unlikely to see alleviation without drastic reforms. Rampant poverty, reliance on foreign aid, widespread government corruption, and conservative Islam shunning other religions and disempowering women all represent systemic challenges that must be solved before the Comoros can truly honor its international human rights commitments.
- 32. Nevertheless, the Comoros can focus on making incremental progress. First, the Comoros should acknowledge that true religious liberty requires the Comoros to allow every religious group to freely and openly practice their faith, including proselytizing. As one of the world's poorest and smallest economies, 90 the Comoros should not fear religious liberty but embrace it as a tool to strengthen its economy, as "countries cannot have long-run economic prosperity and freedom without actively allowing for and promoting religious liberty." 91
- 33. Second, the Comoros should continue to collaborate with international organizations to combat human trafficking, focus on developing efficient victim identification methods and support centers, and improve enforcement coordination between each island.
- 34. Third, the Comoros should enforce its law of minimum marriage age being eighteen years old and ban the practice of child marriage.

¹ *Comoros*, THE WORLD FACTBOOK, https://www.cia.gov/the-world-factbook/countries/comoros/ (Sept. 5, 2023).

 $^{^{2}}$ Id.

 $^{^3}$ Id.

⁴ *Id*

⁵ OPEN DOORS, COMOROS: FULL COUNTRY DOSSIER 3 (2023), https://www.opendoors.org/persecution/reports/Full-Country-Dossier-Comoros-2023.pdf [hereinafter OPEN DOORS, COMOROS].

⁶ *Universal Periodic Review – Comoros*, OHCHR, https://www.ohchr.org/en/hr-bodies/upr/km-index (last visited Sept. 13, 2023).

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⁷ *Comoros Infographic*, OHCHR, https://www.ohchr.org/sites/default/files/lib-

docs/HRBodies/UPR/Documents/Session32/KM/Infographic_Comoros.pdf (last visited Sept. 15, 2023).

⁸ OHCHR, UPR of Comoros (3rd Cycle – 32nd Session): Thematic List of Recommendations, https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session32/KM/Recommendations.docx (last visited Sept. 15, 2023).

⁹ Rep. of the Working Grp. on the Universal Periodic Review: Comoros Addendum, U.N. Doc. A/HRC/41/12/Add.1, at 2 (2019).

¹⁰ OHCHR, supra note 8.

¹¹ *Id*.

- $^{\rm 12}$ Constitution of the Union of the Comoros 1978 (amended 2018), art. 2,
- https://constituteproject.org/constitution/Comoros_2018.pdf (emphasis added).
- ¹³ State Parties to the African Charter Comoros, ACHPR, https://achpr.au.int/en/states (last visited Sept. 15, 2023).
- ¹⁴ CONSTITUTION OF THE UNION OF THE COMOROS 1978 (amended 2018), pmbl.
- ¹⁵ G.A. Res. 217 (III) A, Universal Declaration of Human Rights, art. 18 (Dec. 10, 1948),

https://www.ohchr.org/en/human-rights/universal-declaration/translations/english [hereinafter UDHR].

¹⁶ African Charter on Human and Peoples' Rights, adopted June 27, 1981, 1520 U.N.T.S. 217,

https://achpr.au.int/en/charter/african-charter-human-and-peoples-rights [hereinafter ACHPR].

- ¹⁷ Ratification Status for Comoros, OHCHR,
- https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?Treaty=CCPR&Lang=en (last visited Sept. 15, 2023).
- ¹⁸ International Covenant on Civil and Political Rights art. 18, *adopted* Dec. 16, 1966, 999 U.N.T.S. 171, https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights [hereinafter ICCPR].
- ¹⁹ CONSTITUTION OF THE UNION OF THE COMOROS 1978 (amended 2018), pmbl.
- ²⁰ *Id.* art. 97.
- ²¹ OPEN DOORS, *supra* note 5, at 10.
- ²² Nat'l Rep. of the Working Grp. on the Universal Periodic Rev. for Comoros on Its Thirty-Second Session, submitted in accordance with paragraph 5 of the annex to the Human Rights Council resolution 16/21, U.N. Doc. A/HRC/WG.6/32/COM/1, at 15 (2019) https://documents-dds-
- ny.un.org/doc/UNDOC/GEN/G18/332/60/PDF/G1833260.pdf?OpenElement.
- ²³ OPEN DOORS, *supra* note 5, at 6.
- ²⁴ *Id*. at 20-21.
- ²⁵ Religious Freedom Report 2023 Comoros, AID TO THE CHURCH IN NEED INT'L,

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- ²⁶ CONSTITUTION OF THE UNION OF THE COMOROS 1978 (amended 2018), art. 30.
- ²⁷ CODE PÉNAL [C. PÉNAL] [PENAL CODE] art. 322-25 (Comoros),

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- 28 Id.
- ²⁹ Law No. 14-034, Concerning Fight Against Child Labor and Child Trafficking, 2014, (Act No. 14-034/AU) (Comoros), https://antislaverylaw.ac.uk/country/comoros/.
- 30 Id
- ³¹ UDHR, *supra* note 15.
- ³² ACHPR, *supra* note 16.
- ³³ Ratification Status for Comoros, supra note 17.
- ³⁴Convention on the Rights of the Child art. 32, adopted Nov. 20, 1989, 1577 U.N.T.S. 3.

https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child [hereinafter CRC].

- ³⁵ Ratification Status for Comoros, supra note 17.
- ³⁶ Convention on the Elimination of All Forms of Discrimination against Women art. 6, *adopted* Dec. 18, 1979, 1249 U.N.T.S. 13, https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women [hereinafter CEDAW].
- ³⁷ Chapter XVIII Penal Matters: 12. a Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime, UNITED NATIONS TREATY COLLECTION,
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- ⁴⁰ Comoros, UNICEF, https://data.unicef.org/crvs/comoros/ (last visited Sept. 19, 2023); CODE DE LA FAMILLE [FAMILY CODE], art. 14. (Comoros), https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/96290/113750/F-1388962001/COM-96290.pdf.
- ⁴¹ CODE DE LA FAMILLE [FAMILY CODE], *supra* note 40.
- ⁴² Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa art. VI, *adopted* July 11, 2003, OAU Doc CAB/LEG/66.6, https://au.int/sites/default/files/treaties/37077-treaty-charter_on_rights_of_women_in_africa.pdf.

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<sup>44</sup> OPEN DOORS, supra note 5.
<sup>45</sup> Religious Freedom Report 2023 – Comoros, supra note 25.
<sup>46</sup> OPEN DOORS, supra note 5, at 3.
<sup>47</sup> Id. at 6.
<sup>48</sup> Id. at 10.
<sup>49</sup> Id.
<sup>50</sup> Id. at 13, 18.
<sup>51</sup> Id. at 20.
<sup>52</sup> Id. at 24.
<sup>53</sup> Id.
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<sup>55</sup> Religious Freedom Report 2023 – Comoros, supra note 25.
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<sup>60</sup> Persecution Watch: Praying for Believers in Comoros, VOICE OF THE PERSECUTED,
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<sup>63</sup> Id.
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<sup>68</sup> Id.
<sup>69</sup> Id.
<sup>70</sup> Id.
<sup>71</sup> Id.
<sup>72</sup> Id.
<sup>73</sup> Id.
<sup>74</sup> Tirone, supra note 66.
<sup>75</sup> Comoros Commits to Effectively Preventing, Suppressing and Punishing Trafficking in Persons, UNODC
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<sup>76</sup> CODE DE LA FAMILLE, supra note 40.
<sup>77</sup> Igi Nderi, Children of Comoros: Realizing Children's Rights in Comoros, HUMANIUM,
https://www.humanium.org/en/comoros/ (last visited Sept. 19, 2023).
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