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**STATUS OF HUMAN RIGHTS IN THE ORIENTAL REPUBLIC OF URUGUAY
FOR THE 46TH 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 Oriental Republic of Uruguay (Uruguay) for the 46th session of the Universal Periodic Review.

Background

2. Uruguay is located on the eastern coast of South America with a population of approximately 3.4 million.¹ Of the population, 42% identify as Roman Catholic, 15% as Protestant, 6% as other, 3% as agnostic, 10% as atheist, and 24% as unspecified.²

3. Uruguay's previous review was held on January 23, 2019.³ Uruguay supported all 226 recommendations it received.⁴ Particularly, Uruguay supported recommendations made by Thailand, Belarus, Guyana, Madagascar, Bahamas, Britain, Northern Ireland, Germany, Armenia, Bahrain, the Philippines, Italy, Iraq, and Nigeria to strengthen its anti-human trafficking systems and adopt a national strategy to reduce human trafficking and exploitation.⁵ Additionally, Uruguay supported the recommendation from Mexico, Iceland, and Montenegro to increase sexual education in the country to reduce early pregnancy and unsafe sexual practices.⁶ Relatedly, Uruguay supported the Netherlands's and Iceland's recommendations to ensure women's access to abortion and impose tighter restrictions on doctors' conscientious objections to performing abortions.⁷

Legislative Framework

Human Trafficking

4. Article 7 of the Uruguayan Constitution provides that “[t]he inhabitants of the Republic have the right of protection in the enjoyment of life, honor, liberty, security, labor, and property.”⁸

5. Article 280 of the Uruguayan Penal Code specifically prohibits slavery and trafficking of persons, punishable by two to six years imprisonment.⁹ Additionally, Article 78 of Uruguay's 2008 Immigration Law prescribes up to sixteen years imprisonment for anyone who “takes part in the recruitment, transportation, transfer, harboring or receipt of persons for forced labor or services, slavery or similar practices, servitude, [or] sexual exploitation. . . .”¹⁰

6. Uruguay is a party to the Convention on the Rights of the Child (CRC).¹¹ Article 32 of the CRC recognizes, “[t]he 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.”¹² Uruguay is also a party to the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW),¹³ according to which “States Parties shall take all appropriate measures, including legislation, to suppress all forms of traffic in women and exploitation of prostitution of women.”¹⁴ Moreover, Uruguay is a party to the International Covenant on Civil and Political Rights (ICCPR).¹⁵ Article 8 of the ICCPR provides that “[n]o one shall be held in slavery; slavery and the slave-trade in all their forms shall be prohibited. No one shall be held in servitude.”¹⁶

Abortion

7. In 2012, Uruguay legalized on-demand abortions for women within the first twelve weeks of pregnancy.¹⁷ Before a woman can proceed with the abortion, she must undergo consultation with a physician, psychologist, and a social worker in addition to a five-day waiting period.¹⁸ However, the law waives some or all of these pre-abortion processes and time limits in cases where the woman’s health is at risk, the fetus displays abnormalities, or the pregnancy resulted from a verified rape.¹⁹ Doctors may conscientiously object to performing the abortion, but in such a case must refer the woman to a doctor who is willing to perform the abortion.²⁰

8. Under the law, if the woman is under eighteen years old, a physician must obtain consent from her parent or guardian, if possible, before the abortion can proceed.²¹ If consent is denied, the woman may appear before a judge and demonstrate her own consent.²² The judge must resolve the matter within three days of the woman’s petition.²³

9. Article 6 of the ICCPR states that “[e]very human being has the inherent right to life. This right shall be protected by law.”²⁴

10. Additionally, the Universal Declaration of Human Rights (UDHR) states that “recognition of the inherent dignity and of the equal and inalienable rights of *all* members of the human family is the foundation of freedom, justice and peace in the world,”²⁵ and that “[e]veryone has the right to life”²⁶ Furthermore, Article 6 of the CRC states:

1. “States Parties recognize that every child has the inherent right to life.”
2. “States Parties shall ensure to the maximum extent possible the survival and development of the child.”²⁷

Analysis

Human Trafficking

11. Despite its admirable status as “a democratic, constitutional republic with a relatively robust state, strong political parties, a participative citizenry and high levels of institutionalization,”²⁸ Uruguay still struggles with human trafficking.²⁹ Despite increasing efforts to organize an actionable national enforcement plan to combat human trafficking, Uruguay does not meet minimum international standards for addressing human trafficking.³⁰

12. Uruguay faces unique challenges relating to human trafficking because “Uruguay’s location on the Atlantic Coast, makes it particularly attractive to transnational criminal organizations looking to transit people.”³¹ As such, “Uruguay is a source, transit, and destination country for human trafficking, primarily for the purposes of sexual exploitation.”³² Among Uruguay’s problems in responding to this targeted trafficking are its “failure by law enforcement to proactively identify victims, inadequate victim services and a lack of comprehensive data.”³³ For example, while “[s]helters and other services are available for victims . . . most resources like these are only in the capital of Montevideo.”³⁴

13. As in many countries, human trafficking in Uruguay disproportionately affects impoverished young women, who are often exploited by Uruguayan traffickers.³⁵ Indeed, “[i]mpoverished Uruguayan families also abet the exploitation of children in prostitution. . . .”³⁶ Uruguay’s permeable Brazilian and Argentinian borders further facilitate the free movement of persons across country lines.³⁷

14. While still lacking the necessary legal infrastructure to effectively oppose human trafficking, Uruguay is making progress. The government’s efforts to train law enforcement to identify instances of trafficking more readily, increase access to shelters and victim support resources outside the capital, and establishing a 24/7 hotline to report instances of trafficking demonstrates that Uruguay is making incremental improvements.³⁸

15. In 2021, Uruguay law enforcement teamed with Interpol in dismantling a human trafficking network between Uruguay and Spain, rescuing twenty-nine victims.³⁹ The traffickers deceived the Uruguayan women with promises of employment in Spain.⁴⁰ Upon arriving in the country though, the traffickers forced the women into prostitution.⁴¹ Eight people were arrested in connection with the trafficking network, seven of whom were of Uruguayan nationality.⁴²

16. In 2019, a Uruguayan woman, Sandra Ferrini, a sex trafficking victim herself for nearly forty years, led an anti-human trafficking march through Montevideo, the first of its kind in Uruguay.⁴³ Ferrini, who had been transported between Chile, Paraguay, Argentina, and countries in Europe, sought to bring attention to an invisible crime in Uruguay and underscore the need for more robust response to human trafficking in the country.⁴⁴ That same year, Uruguay formed a national committee specifically designed to combat human trafficking,⁴⁵ identified eighty-three victims of trafficking, and prosecuted eighteen human trafficking cases.⁴⁶

Abortion

17. Uruguay is among the few Latin American countries that provides on-demand abortion access. Despite Uruguay’s abortion laws, reports of cultural resistance to abortion, both within and outside of Uruguayan medical establishments, persist.⁴⁷

18. The legalization of abortion in Uruguay dramatically reframed how the country approaches the issue: “Uruguay’s Deputy Health Minister Leonel Briozzo noted that the decriminalization of abortion in his country coincided with progressive policies on other social issues. The abortion debate, he said, shifted from focusing on women’s rights and the rights of the fetus to emphasizing public health.”⁴⁸

19. Uruguayan medical officials reported approximately 10,000 abortions occurring each year from 2019 – 2021, accounting for about 20% of all pregnancies in Uruguay during those years.⁴⁹ About “[n]ine out of ten Uruguayan women who undergo medical abortions terminate their pregnancies through the use of self-administered pharmaceutical drugs such as misoprostol.”⁵⁰

20. Even so, Deputy Health Minister Briozzo maintains that Uruguay has one of the lowest abortion rates compared to other countries that allow access to abortion.⁵¹ Furthermore, “Briozzo emphasized that the Uruguayan government provides easily accessible information and counseling around family planning, with the ultimate goal of reducing the number of abortions,” with him claiming that “[i]f you are really against abortion, you need to fight against the criminalization of it.”⁵² Briozzo pointed to the reduction in maternal deaths resulting from illicit abortions as evidence of the 2012 law being “pro-life.”⁵³

21. Nonetheless, some abortion advocates bemoan the 2012 law as still imposing significant barriers to abortions, lamenting how “[t]he over-medicalization of abortion [in Uruguay] effectively hinders access to legal abortion services. . . .”⁵⁴ Abortion advocates also oppose the mandatory five-day waiting period⁵⁵ and the ability of doctors to refuse women seeking abortion on moral grounds.⁵⁶ Such advocates desire for Uruguay “to recognise that the termination of a pregnancy is a decision that fundamentally belongs to the woman . . .”⁵⁷ and regard abortion as a “human right” rather than a public health issue.⁵⁸

22. However, Uruguay must not succumb to such pressure. Uruguay must note that its current law permitting abortion already contradicts international human rights instruments and State practice around the world. Uruguay should remember that, while abortion laws and regulations vary across nations, what most countries do agree on is that the state has an interest, not only in protecting women and girls, but also in protecting the lives of all their citizens—including the preborn.⁵⁹ This interest is enshrined in national and international documents alike, as well as in the legislation of individual countries.

23. First, abortion has never been recognized as a human right under international law. In fact, every international human rights instrument explicitly protects life. The UDHR states that “recognition of the inherent dignity and of the equal and inalienable rights of *all* members of the human family is the foundation of freedom, justice and peace in the world,” and provides that “[e]veryone has the right to life . . .”⁶⁰ Article 6 of the ICCPR likewise states that “[e]very human being has the inherent right to life. This right shall be protected by law.”⁶¹ Similarly, the preamble to the United Nations Charter states that “the peoples of the United Nations determined . . . to reaffirm faith in fundamental human rights, in the dignity and worth of the human person”⁶²

24. Even people who support abortion instinctively know that a preborn child is a human being. One Uruguayan woman, Paula, wanted to get an abortion after an unplanned pregnancy.⁶³ She expressed frustration with how Uruguayan culture has not yet normalized abortion as an accepted practice and with the processes she had to go through before she could have an abortion.⁶⁴ After one woman congratulated her on her pregnancy, Paula recalled thinking: “Why do some people only consider motherhood as something wanted?”⁶⁵ Such comments also show the inherent contradiction between so-called “family planning” and abortion.

25. Additionally, the 1994 Cairo Conference on Population and Development clearly called for reducing abortion as a false “method” of family planning.⁶⁶ The report from that conference states that U.N. Member States have a responsibility to “take appropriate steps to help women avoid abortion, *which in no case should be promoted as a method of family planning.*”⁶⁷ “Family planning” is deciding when one will want to have children, as well as how many, and strategizing accordingly. Such means through which family planning can be promoted and accomplished is sexual education as well as contraceptives. Accordingly, once a child is conceived, the notion of “family planning” is no longer applicable and ending the preborn child’s life through an abortion is simply erroneously rationalized murder. Hence, in line with what was established at the Cairo Conference, abortion should be avoided and not falsely justified as a method or means of “family planning.”

26. Clearly, Uruguay’s law on abortion fails to fulfill its obligations under these international documents as international law recognizes the dignity of the human life of both the mother and the preborn baby. Further, Uruguay’s abortion law does not align with a majority of U.N. Member States protecting life. Currently, out of the 193 U.N. Member States, a majority (109) of them have strict limits on abortion.⁶⁸ There are sixty-seven countries that have varying gestational limits for on demand abortions.⁶⁹ Out of those sixty-seven, Uruguay is one of fifty-two that allows on demand abortions up to twelve weeks.⁷⁰

27. Second, laws permitting abortion on the basis of a woman’s right to choose are discriminatory as they disregard the father’s choice, (and obviously the preborn baby as well, as the baby is given no choice). This issue presented itself in Uruguay. Noemi Olivera, sought an abortion in a city apart from her hometown where all the doctors were conscientious objectors.⁷¹ A judge, however, intervened after the father of the child decided he wanted to keep the child, preventing Olivera from aborting her pregnancy over her objection that the law precludes consultation of the father without the woman’s consent.⁷²

28. Third, countries that permit abortion as a matter of “women’s right” should note that it does not help women in any way. In addition to violating the preborn baby’s right to life, abortion also has adverse effects on the mother, as abortion can result in physical and psychological harm to the mother. It has been well-documented that abortion can result in the perforation of the uterus or the laceration of the cervix,⁷³ as well as cause negative psychological effects such as severe shame, drug abuse, and suicidal thoughts.⁷⁴ Additionally, abortion can also hide other dangerous symptoms of an undiagnosed ectopic pregnancy,⁷⁵ and it has also been shown that abortion deprives women of the health benefits that come from continuing a pregnancy till its fruition, including protection from breast cancer.⁷⁶ In fact, even the World Health Organization acknowledges the complications of abortion in its pro-abortion guidelines.⁷⁷ All of these reasons contribute to the negative and even devastating effects abortion has on both the mother and the preborn baby. As such, it is incomprehensible how one can classify abortion as a “right.”

29. Fourth, there is another inherent contradiction in permitting abortion under the “woman’s right to choose” and forcing doctors (both men and women), against their conscience, to perform abortions. If abortion were a “matter of right” (i.e., a woman’s right to choose), it would not violate another (albeit more important) right (i.e., the right to freedom of conscience/belief). As such, Uruguay must not give in to absurd arguments under pressure and eliminate the commonsense limitations on abortion (counselling, etc.) as well as the right to conscientious objection.

Recommendations

30. Uruguay should increase its investment in combatting human trafficking. The country is a beacon of freedom and democracy in Latin America. As such, Uruguay should strive to become a country to emulate when it comes to human trafficking. Improving victim identification efforts, prioritizing the dismantling of trafficking networks, increasing access to long-term victim support outside of urban areas, and implementing a reporting system that will provide a panoptic understanding of the issue are some ways the country can grow.

31. Uruguay should roll back its efforts to legalize abortions and adopt a pro-life stance (that seems supported by its citizens) that limits abortion. It should prioritize protecting preborn children, equip women with the resources they need in order to carry out their pregnancy safely and confidently, and increase access to child placement and adoption services. At the very least, it should not succumb to internal or external pressure to expand access to abortion or remove the commonsense life affirming requirements it has in place.

¹ *Uruguay*, THE WORLD FACTBOOK, <https://www.cia.gov/the-world-factbook/countries/uruguay/> (last updated Aug. 31, 2023).

² *Id.*

³ *Universal Periodic Review – Uruguay*, OHCHR, <https://www.ohchr.org/en/hr-bodies/upr/uy-index> (last visited Sept. 7, 2023).

⁴ *Uruguay Infographic*, OHCHR, https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session32/UY/Infographic_Uruguay.pdf (last visited Sept. 7, 2023).

⁵ 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/UY/UPR32_Uruguay_Thematic_List_Recommendations.docx (last visited Sept. 7, 2023).

⁶ *Id.*

⁷ *Id.*

⁸ CONSTITUTION OF URUGUAY OF 1966 (reinst. 1985, rev. 2004), art. 6, https://www.constituteproject.org/constitution/Uruguay_2004.

⁹ CÓDIGO PENAL [PENAL CODE] art. 28 (Uru.), <https://antislaverylaw.ac.uk/wp-content/uploads/2019/08/Uruguay-Penal-Code.pdf>.

¹⁰ Ley N° 18.250 Migración, 2008, art. 78 (Uru.), <https://antislaverylaw.ac.uk/wp-content/uploads/2019/08/Uruguay-Immigration-Law.pdf>.

¹¹ *Ratification Status for Uruguay*, OHCHR, https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=188&Lang=en (last visited Sept. 7, 2023).

¹² Convention 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].

¹³ *Ratification Status for Uruguay*, *supra* note 11.

¹⁴ 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].

¹⁵ *Ratification Status for Uruguay*, *supra* note 11.

¹⁶ 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].

¹⁷ *Concepción de la Ley: La Ley y su Implementación*, MONTEVIDEO PORTAL (Oct. 18, 2012), <https://www.montevideo.com.uy/Noticias/La-ley-y-su-implementacion-uc181894>.

- ¹⁸ Ley N° 18.987, Interrupción Voluntaria del Embarazo, Normas [Voluntary Interruption of Pregnancy, Establishing Rules], 2012, art. 3 (Uru.), <https://reproductiverights.org/maps/provision/uruguays-abortion-provisions/>.
- ¹⁹ *Id.* art. 6.
- ²⁰ *Id.* art. 11.
- ²¹ *Id.* art. 7.
- ²² *Id.*
- ²³ *Id.*
- ²⁴ ICCPR art. 6, *supra* note 16.
- ²⁵ G.A. Res. 217 (III) A, Universal Declaration of Human Rights, pmbl. (Dec. 10, 1948) (emphasis added).
- ²⁶ *Id.* art. 3 (emphasis added).
- ²⁷ CRC art. 6, *supra* note 12.
- ²⁸ *Uruguay*, GLOB. ORG. CRIME INDEX (2021), <https://ocindex.net/country/uruguay>.
- ²⁹ *See generally* EL PASO CIVIL ASSOC., DUEÑOS DE PERSONAS, PERSONAS CON DUEÑOS: INVESTIGACIÓN DOBRE TRATA DE PERSONAS EN URUGUAY (2020), https://ongelpaso.org.uy/wp-content/uploads/2020/10/ELPASO_DUENOS_DE_PERSONAS.pdf.
- ³⁰ *Id.*
- ³¹ Gabrielle Gorder, *Uruguay Remains Hub For Trafficking Women to Europe*, INSIGHT CRIME (Mar. 16, 2021), <https://insightcrime.org/news/uruguay-remains-hub-for-trafficking-women-to-europe/>.
- ³² *Uruguay*, *supra* note 28.
- ³³ Gorder, *supra* note 31.
- ³⁴ Nicole Ronchetti, *Combating Human Trafficking in Uruguay*, THE BORGEN PROJECT (Mar. 28, 2021), <https://borgenproject.org/human-trafficking-in-uruguay/>.
- ³⁵ *Id.*
- ³⁶ *Uruguay*, *supra* note 28.
- ³⁷ *Id.*
- ³⁸ Ronchetti, *supra* note 34.
- ³⁹ Gorder, *supra* note 31.
- ⁴⁰ *Id.*
- ⁴¹ *Id.*
- ⁴² *Id.*
- ⁴³ Anastasia Moloney, *Former Sex Slave Leads Uruguay's First March against Human Trafficking*, REUTERS (July 30, 2019), <https://www.reuters.com/article/us-uruguay-humantrafficking/former-sex-slave-leads-uruguays-first-march-against-human-trafficking-idUSKCN1UP2FZ>.
- ⁴⁴ *Id.*
- ⁴⁵ *Id.*
- ⁴⁶ Ronchetti, *supra* note 34.
- ⁴⁷ Elizabeth Kim, *'I Was Given Photos of the Foetus': Abortion Stigma Lingers in Pioneering Uruguay*, THE GUARDIAN (Oct. 10, 2018), <https://www.theguardian.com/global-development/2018/oct/10/uruguay-pioneering-abortion-laws-changed-lives-yet-stigma-lingers>.
- ⁴⁸ CENTER FOR REPRODUCTIVE RIGHTS & INTER-AMERICAN DIALOGUE, ABORTION AND REPRODUCTIVE RIGHTS IN LATIN AMERICA: IMPLICATIONS FOR DEMOCRACY 6 (2015), https://www.reproductiverights.org/sites/crr.civicactions.net/files/documents/IAD9794%20Repro%20Rights_web.pdf.
- ⁴⁹ Robert Johnston, *Historical Abortion Statistics, Uruguay*, JOHNSTON'S ARCHIVE (Apr. 16, 2023), <https://www.johnstonsarchive.net/policy/abortion/ab-uruguay.html>.
- ⁵⁰ CENTER FOR REPRODUCTIVE RIGHTS, *supra* note 48.
- ⁵¹ *Id.*
- ⁵² *Id.*
- ⁵³ *Id.* at 7.
- ⁵⁴ Lucía Berro Pizarossa, *"Women are not in the Best Position to Make These Decisions by Themselves": Gender Stereotypes in the Uruguayan Abortion Law*, 1 U. OXFORD HUM. RTS. HUB J. 25, 30 (2019), <https://ohrh.law.ox.ac.uk/wp-content/uploads/2021/04/U-of-OxHRH-J-Women-Are-Not-in-the-Best-Position.pdf>.
- ⁵⁵ Kim, *supra* note 47.
- ⁵⁶ Diana Cariboni, *How 'Conscientious Objectors' Threaten Women's Newly Won Abortion Rights in Latin America*, OPEN DEMOCRACY (July 18, 2018), <https://www.opendemocracy.net/en/5050/conscientious-objectors-threaten-abortion-rights-latin-america/>.
- ⁵⁷ Pizarossa, *supra* note 54 at 53.
- ⁵⁸ Kim, *supra* note 47.

⁵⁹ *The World's Abortion Laws*, CTR. FOR REPROD. RTS. (Feb. 23, 2021),

https://reproductiverights.org/sites/default/files/WALM_2021update_V1.pdf.

⁶⁰ G.A. Res. 217 (III) A, Universal Declaration of Human Rights, pmbl., art. 3 (Dec. 10, 1948) (emphasis added).

⁶¹ ICCPR art. 6, *supra* note 16.

⁶² U.N. Charter pmbl.

⁶³ *Uruguay Experience*, SHOUT YOUR ABORTION (Nov. 20, 2020),

<https://shoutyourabortion.com/writing/uruguay-experience/>.

⁶⁴ *Id.*

⁶⁵ *Id.*

⁶⁶ International Conference on Population and Development, *Report of the International Conference on Population and Development*, ¶ 8.25, U.N. Doc. A/CONF/F.171/13/Rev.1,

https://www.un.org/development/desa/pd/sites/www.un.org.development.desa.pd/files/icpd_en.pdf.

⁶⁷ *Id.* ¶ 7.24 (emphasis added).

⁶⁸ *The World's Abortion Laws*, CTR. FOR REPROD. RTS. (Sept. 27, 2022), https://reproductiverights.org/wp-content/uploads/2022/09/WALM_20220927_V1.pdf.

⁶⁹ *Id.*

⁷⁰ *Id.*

⁷¹ International Federation For Gynecology and Obstetrics, *Noemi Olivera, Uruguay Gives Us Her Personal Story of Experiences with Abortion*, YOUTUBE (Oct. 20, 2018), <https://www.youtube.com/watch?v=PdeOYb-1gGE>.

⁷² *Id.*

⁷³ *Women's Right to Know: Abortion & Pregnancy Risks*, LA. DEP'T OF HEALTH, <https://ldh.la.gov/page/915> (last visited Sept. 8, 2023).

⁷⁴ Priscilla K. Coleman et al., *Women Who Suffered Emotionally from Abortion: A Qualitative Synthesis of Their Experiences*, 22 J. OF AM. PHYSICIANS & SURGEONS 113, 116-17 (2017), <https://www.jpands.org/vol22no4/coleman.pdf>.

⁷⁵ See generally *Physical Effects of Abortion: Fact Sheets, News, Articles, Links to Published Studies and More*, THE UNCHOICE, www.theunchoice.com/physical.htm (last visited Sept. 8, 2023) (listing sequelae and referencing sources).

⁷⁶ See Justin D. Heminger, *Big Abortion: What the Antiabortion Movement Can Learn from Big Tobacco*, 54 CATH. U.L. REV. 1273, 1288-89, 1290 n.119 (2005).

⁷⁷ *Abortion Care Guideline*, WORLD HEALTH ORGANIZATION & HUMAN REPRODUCTION PROGRAMME 79 (Mar. 8, 2022), <https://www.who.int/publications/i/item/9789240039483>.