
str. Dumitru Rîșcanu 11, of.41, MD 2024 Chișinău, Moldova, Tel: +373 (22) 44 96 26,
Tel/Fax: + 373 (22) 45 00 24, e-mail: info@promolex.md, www.promolex.md

**REPLY
TO THE QUESTIONNAIRE ON
THE "PREVENTION OF HUMAN RIGHTS VIOLATIONS AND ITS PRACTICAL
IMPLEMENTATION"**

6 March 2015

OHCHR REGISTRY

17 MAR 2015

Recipients: *RRDD/ROL*
E. Askew-R.
.....
.....

I. Introduction

The “Promo-LEX” Association welcomes the opportunity to give our contribution to the development of the study on the prevention of human rights violations and its practical implementation, which will be presented at the Human Rights Council at its thirtieth session. The “Promo-LEX” Association is a civil society organization with special consultative status with the UN (ECOSOC), whose purpose is to advance democracy in the Republic of Moldova through promoting and defending human rights and monitoring democratic processes. Promo-LEX works on the entire territory of Moldova, in particular in the Transnistrian region. The Association’s goals include promoting legislative reforms by actively supporting, and by defending human rights, including, when needed, in courts. At the same time, the Association closely follows the democratic process in Moldova, and manages national and international missions to monitor electoral processes.

In preparing of this submission, we used materials from the human rights defense and protection work done by Promo-LEX, and other sources of information in the text to which respective references were made.

Given that the priority areas of the Promo-LEX work are: access to justice and effective remedy for Transnistrian region inhabitants; fighting against torture and inhuman or degrading treatment; promoting liberty and security of person and combating violence and discrimination against women, our submission will focus namely on these fields and their situation in Moldova, and we will try to follow the format of the proposed questionnaire.

Before presenting the relevant information, we would like to recall the repeated statements made by the Human Rights Committee that States parties to the International Covenant on Civil and Political Rights have an obligation, in responding to human rights violations, to take preventive action to avoid recurrence. OHCHR knew what worked: *effective and broadly accessible justice systems, backed by effective, human rights-compliant laws and institutions.*¹

Thus, an effective system of justice remains the main tool in promoting and protecting human rights, but given the constant evolution of international institutions and the international legal framework, a whole set of tools and approaches in promoting and human rights was made available. Here NGOs have a special role in promoting human rights, in that, in addition to their direct interventions to protect human rights through litigation, they also apply methods of promoting human rights such as: assisting authorities in promoting reforms, conducting various training programs, reporting, monitoring and other relevant activities.

Hereinafter we will outline some activities of the “Promo-LEX” Association designed to assist state bodies in Moldova in preventing and protecting human rights throughout its territory.

¹ Summary report on the outcome of the Human Rights Council panel discussion on the role of prevention in the promotion and protection of human rights from 10 December 2014, p.4

Answers to the questionnaire:

1. Please describe legislative, judicial, administrative and other measures aimed at prevention of human rights violations and abuses in place at the domestic level, both with regard to direct prevention (aiming to prevent violations from occurring by reducing the risk factors that cause violations) and indirect prevention (aimed at ensuring non-recurrence through investigation and addressing causes of violations as well as accountability).

In Moldova, laws, policies and programs that aim to prevent human rights violations have largely been developed and adopted. However, a major concern is to carry out measures for their proper and full-fledged implementation.

The continued development of global relations has led to the fact that international acts have taken on greater importance being incorporated in local legislations in most states that adhere to one or other international act. The same is true in Moldova. According to Article 4 of the Constitution, constitutional rights and freedoms are applicable in conjunction with the relevant international instruments, based on the principle of priority of international regulations. The interpretation and application of constitutional provisions on human rights and freedoms shall be made “*in accordance with the Universal Declaration of Human Rights, with the covenants and other treaties to which Moldova is a party*”. If there is a “*conflict between the covenants and treaties on fundamental human rights to which Moldova is a party and its domestic legislation, international regulations prevail*”.

Moldova has signed and ratified several important international instruments: the International Covenant on Civil and Political Rights, ratified on 28 June 1990 by Parliament Decision No. 217-XII, and entered into force on 26 April 1993; the Optional Protocol to the International Covenant on Civil and Political Rights on individual communication was adopted on 23 January 2008; the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment was ratified on 28 November 1995; the Optional Protocol to the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment was ratified on July 24, 2006, etc. These documents are normative references for Moldova, which assumed certain responsibilities by ratifying them.

In order to have national mechanism to enforce those documents, national plans and strategies have been developed, adopted and implemented or are underway, including the Economic Growth and Poverty Reduction Strategy (2004-2006), the EU-Moldova Action Plan, The National Action Plan on Human Rights (NHRP), which is an integral part of the EU-Moldova Action Plan, and others.

We welcome the positive policy move undertaken by the Moldovan Government on 25 November 2011 when the Parliament adopted the Justice Sector Reform Strategy for 2011-2016. Another important and positive step towards promoting human rights was the ratification, on 2 July 2014, of the Association Agreement between Moldova and the European Union, and the approval of a National Action Plan for the implementation of the Agreement, which provides for actions relevant to the justice reform. The National Action

Plan for the implementation of EU-Moldova Association Agreement for 2014-2016 placed the justice reform at the top of national priorities, but the recent developments show that there are no major changes in this direction.

However there is lack of concrete actions to move the reform forward. People's distrust in the judiciary reinforces a general feeling that the state is unable to effectively defend human rights. Human rights protection can be achieved by practical and effective actions, and the efficient functioning of the judiciary remains the mainstay for all other aimed actions aimed to promote and protect human rights.

As noted by OSCE representative Robert Uhl: "*I know from experience that it is very good to change the law, but it's hard to change the culture of the institution, because efforts are being made inside to keep the old ways.*"²

Thus, according to the Quarterly Report for the monitoring period 1 April - 30 June 2014, prepared under the project "Increasing Government Accountability by Monitoring the Justice Sector Reform", implemented by Promo-LEX and the Association for Efficient and Responsible Governance (AGER), of 288 actions planned to be completed by 30 June 2014, 173 were completed and 115 remain unimplemented, which represents a 60% to 40% percentage ratio.

More recently, according to the Quarterly Monitoring Report on the implementation of the EU-Moldova Action Plan for the period October - December 2014 (conducted by independent think tank Expert Group), the judiciary remains the least credible sector, in the public perception. The Barometer of Public Opinion for November 2014 shows that 70% of respondents have zero to very little confidence in the judiciary. In addition, the prosecution reform is a major backlog, which has massively eroded public trust in the judiciary, and caused the EU to cut 1.8 million Euros from its budget support for the justice sector reform.

The civil society conclusions in this regard findings were confirmed recently by the Head of EU Delegation in Moldova, Mr. Pirkka Tapiola, who mentioned that ***the implementation of Justice Sector Reform Strategy in Moldova has slowed down considerably, and this has determined a reduction in the funding to that effect.***³

Promo-LEX has been conducting extensive work to promote basic human rights, especially in the Transnistrian region of Moldova. This region is occupied by secessionist forces, and the constitutional authorities cannot fully guarantee human rights and freedoms in the region.

Promo-LEX continuously raises the state authorities' awareness of the phenomenon of torture and ill treatments suffered by people in the Transnistrian region, particularly their detention in inhumane conditions, in absence of qualified medical assistance.

² <http://newsmoldova.md/05022015/flux-de-stiri/81163.htm>

³ <http://agora.md/stiri/6397/pirkka-tapiola-vrem-sa-vedem-pasi-concreti-in-depolitizarea-procuraturii-generale>

In this context, the International Federation for Human Rights (FIDH) sent an international mission to Moldova in November 2012 to investigate the state of the fight against torture and inhuman and degrading treatments. This mission was carried out together with Promo-LEX. As a result of this activity, in August 2013, FIDH released a report: *Torture and ill treatments in Moldova, including the Transnistrian region: assumed problems and eluded responsibilities*,⁴ reflecting the disastrous situation in Transnistria in this respect, and the lack of effective measures taken by Moldova as the only guarantor of constitutional human rights in the region.

Promo-LEX also proposed producing a report to assess the level of protection of human rights in the Transnistrian region, comparing the situation with other similar areas.

Thus, in April 2014, FIDH organized a two-day seminar on the topic: "*Human Rights Assessment in Disputed Territories in Eastern Europe: Transnistria, Nagorno-Karabakh, Abkhazia, South Ossetia and Crimea*", after which, with the support and contribution of FIDH member and partner organizations, FIDH prepared a report aimed at highlighting and detailed description of the problems of human rights in the respective territories.

The report found that, although Moldovan legislation is applicable throughout its geographical area, people in the Transnistrian region cannot enjoy their rights guaranteed by the Moldovan law. The Transnistrian region, for example, has its own local code of criminal procedure, administrative code, penal code, and others. However, in many cases, this legislation is not in accordance with international standards, one of which is the prohibition of torture. The so-called "penal code" of the breakaway region was amended in October 2012 to include the definition of torture, but this definition is narrower than the one offered by international legal standards, and there are no effective mechanisms for dealing with complaints against torture.

The findings of the report include, among others, the conclusions made by UN Senior Expert Thomas Hammarberg, who visited Transnistria in 2013, as well as UN Special Rapporteur on Torture Manfred Nowak, who visited Moldova and Transnistria in 2008⁵.

This reflects a general absence of rule of law, which is a feature of the Transnistrian region. So-called courts in the region are generally influenced by the executive. Therefore, even though certain rights seem to be guaranteed by the local laws, a general lack of rule of law and endemic corruption prevent these laws from being applied consistently, contributing to the persistence of impunity.

Moreover, despite the specific recommendations of the UN Special Rapporteur against Torture to expand the activities of the National Torture Prevention Mechanism to

⁴ http://www.promolex.md/upload/publications/ro/doc_1381238657.pdf

⁵ HAMMARBERG, Thomas. Report on Human Rights in the Transnistrian Region of the Republic of Moldova, 14 February 2013. Available at: <http://www.un.md/publicdocget/41/>

NOWAK, Manfred. Report of the Special Rapporteur on torture and other cruel, inhuman or degrading treatment or punishment. Mission to Moldova, 12 February 2009. Available at: http://www.apt.ch/content/files/Moldova_SRT%20Report%202009.pdf

Transnistria, to this day it has not been done. In addition, there are many obstacles that limit international missions and the work of representatives of the Republic of Moldova in the region. In 2010, the Council of Europe Committee for the Prevention of Torture suspended its visit to the Transnistrian region because the delegation was informed that, unlike the previous mission to the Committee, this mission would not be allowed to interview persons in preventive detention without witnesses. Such a restriction contradicts one of the fundamental characteristics of the preventive mechanism embodied by the CPT, and namely the power to interview in private any person deprived of liberty. Accordingly, the Committee's delegation decided to interrupt its visit to detention sites in Transnistria until they can exercise that power. So far, this has not happened, which perpetuates the impunity of those who violate human rights, especially in the region's detention facilities.

The Association made several appeals to the Moldovan and Russian authorities to properly prosecute all the cases of torture, arbitrary detention, unfair convictions committed in the region, in accordance with the legal provisions. We must state that, currently, Moldova does not have an effective criminal legal framework to handling criminal cases initiated against persons who arbitrarily deprive other persons of their freedom and keep them in inhuman conditions in the region. So far, no case has been brought to court.

After handling several cases of rights violations committed in Transnistria, Promo-LEX was able to provide bring evidence of such violations to the public opinion and especially the law enforcement bodies. Basically, the work of the Association is often the first source of information for the Moldovan authorities in that respect. This has not gone unnoticed by any international monitoring structures. The Association brought torture cases occurring in the so-called prisons in the region to the attention of the UN Special Rapporteur against Torture, and of the Committee against Torture, and of other representatives of international structures.

2. What action-oriented policies, practices and strategies to prevent human rights violations and abuses have been put in place at the national level, including the establishment of independent national institutions, national human rights action plans and any early warning mechanisms?

One way to improve the situation of human rights and promote them is to implement the National Action Plan recommended by the documents of the World Conference on Human Rights (1993) – the Vienna Declaration and Programme of Action. The National Action Plan on Human Rights 2011–2014 is a policy document approved by Parliament Decision No. 90 of 12.05.2011. The Commission to implement the National Action Plan on Human Rights 2011–2014 was established by Government Decision No. 70 of 06.02.2012.

Such a plan is a good idea only if it is truly practical, not just theoretical. Although the Moldovan authorities claim to have implemented this Plan, various reports on the *Assessment of human rights and fundamental freedoms confirm that Moldova still has many shortcomings in the promotion and protection of human rights.*

Thus, if we refer to one of the objectives of the Plan, and namely to “*promote and protect human rights in the Transnistrian region of Moldova*”, we find that the authorities have reported this objective as accomplished although they failed to indicate the monitoring mechanism. In Promo-LEX’s opinion, this objective was not achieved, as proven by the many pending cases at the ECHR and the endless complaints received by the Association from people in the region.

3. *How have partnerships with civil society been strengthened to harness their experience and expertise to promote and protect human rights? What roles and actions can and do civil society and NGOs take to prevent human rights violations? What measures have been taken to promote a human rights culture among the population and increase the level of human rights awareness in your country, including among public officials?*

In recent years, non-governmental organizations have become central and decisive in promoting and protecting human rights. Unfortunately, prevention and protection of human rights in the Transnistrian region of Moldova was left largely to the civil society, which, in addition to directly preventing human rights violations, simultaneously conducted indirect prevention by monitoring the current situation of the human rights in this region of Moldova, conducting various training programs in the field, and informing the public about their human rights and fundamental freedoms.

A tool for an effective promotion of human rights in the Transnistrian region, which has proven its value in time, is the Promo-LEX Newsletter, published since December 2006, under the project “Center for Resource and Development for Transnistria”. The newsletter aims to promote compliance with international standards on human rights in the Transnistrian region; to stimulate the development and increased professionalism of the nongovernmental sector in the Transnistrian region; to encourage contact, coordination and networking between NGOs from the Transnistrian region of Moldova and the rest of the country. The CRDT Newsletter is published monthly and is available in Romanian, Russian and English.⁶

The Promo-LEX Newsletter has about 5,600 subscribers. Articles published in the Newsletter serve as an important source of information for the media.⁷

One of the priority areas for Promo-LEX for 2014 was preventing and combating domestic violence. Since 2011, Promo-LEX has focused its work on promoting and protecting human rights and on fighting violence against women, particularly on the failure of the state to protect the victims of domestic violence (poor and uneven implementation of the Law on

⁶ <http://www.promolex.md/index.php?module=ebulletin>

⁷ http://www.publika.md/exercitii-militare-pentru-copiii-din-stanga-nistrului--de-cine-sunt-instruiti-tinerii-luptatori_2237991.html
<http://www.prime.md/rom/news/social/item17289/>
http://www.publika.md/studiu-promo-lex--prin-posturile-de-control-instalate-de-tiraspol-se-trece-doar-cu-mita_1779601.html

preventing and combating domestic violence); inefficient mechanism to obtain protective orders for victims of domestic violence as stipulated by the Law on combating domestic violence; the current practice of double victimization and discrimination of women in cases of rape by conditioning the perpetrator's sentence on supporting evidence of the victim's physical resistance and the admission of evidence about the victim's sexual past; sexual harassment - inefficient investigation of cases of violence against women.

Although the Moldovan government has taken radical steps in combating this phenomenon deeply rooted in the country, and adopted and amended many laws in this regard, the main remaining problem is an effective implementation of legal provisions to promote respect for women and equal rights.

With the support of the international community, Moldova has committed to promoting gender equality and has taken concrete steps, including at the legislative level, to establish a favorable environment for the elimination of violence against women. So far, there have been significant results in this chapter, such as the ratification in July 1994 of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) and the Optional Protocol to CEDAW in February 2006. Moreover, the state has taken specific actions in the field of gender equality and preventing violence by approving the Law on Equal Opportunities for Women and Men and the National Programme to ensure gender equality for the period 2010-2015 (adopted in 2009), the Law on Preventing and Combating Domestic Violence (passed in 2008), and adopting relevant amendments to the Criminal Code. The Istanbul Convention/CAHVIO, recently adopted by the Council of Europe (April 2011), is the first global legally binding instrument that creates a comprehensive legal framework for preventing violence, protecting victims and ending the impunity of the perpetrators. It defines and criminalizes various forms of violence against women, including forced marriage, stalking, physical and psychological violence, and sexual violence. Signing to the Convention signals the commitment of the country to continue its fight against violence against women and girls, including by ensuring an adequate legal framework. So far, the Convention has been ratified by eight countries (Albania, Austria, Bosnia and Herzegovina, Italy, Montenegro, Portugal, Serbia and Turkey) and signed by 32 countries (including Ukraine, Italy, Serbia, Turkey, and others).

In this context, we note that the one unresolved issues is the effective implementation of the provisions of the Criminal Code to eradicate impunity in what concerns those who oppose women's personal safety. The trend among Moldovan law enforcement agencies remains to qualify acts of violence against women according to legal provisions for offenses lighter than criminal ones. When domestic violence manifests physically and results in slight injuries or minor health or psychological damage, the law enforcement prosecute the aggressors under Art. 78 or 69 of the Moldovan Contraventions Code, although such actions must be qualified and sanctioned under to Art. 201/1, paragraph 1 of the Criminal Code.

The Association often raised the problem that the law is wrongfully applied in its reports⁸ and during public discussions or various meetings convened by the responsible institutions. Moreover, on December 1, 2013, Promo-LEX lodged an informative note to the Supreme Court of Justice with the request to uniform the jurisprudence on application of Art 201¹ of the Criminal Code and Art 78, 69 of the Code of Contraventions in cases of domestic violence. Promo-LEX attached several contradictory Court decisions demonstrating the issue.

Subsequently, Promo-LEX drafted an approach for the amendment of the Ministry of Internal Affairs Instruction on response of police to prevent and combat cases of domestic violence. The approach was lodged to Ministry of Internal Affairs. In letter from the Ministry of Internal Affairs No. 22/2092 on 30 September 2014, we were informed that the Ministry of Labor, Social Protection and Family initiated a procedure to amend the legal framework which regulates domestic violence (...) and once the new provisions are enforced, departmental documents will also be amended.

Given the fact that the awareness of the population about the seriousness of the problem remains low in Moldova and that domestic violence is a serious violation of human rights, in 2014, Promo-LEX has conducted several outreach and awareness campaigns on the topic of domestic violence.

It is known that human rights are respected only insofar as they are known, and they are known only insofar as they are learned. *Knowledge is power* (Ralph Waldo Emerson).

Sometimes human rights violations are admitted namely because citizens do not possess the necessary information to prevent such violations. The information provided to the right people can play an important role in preventing human rights violations and protection activities in general:

Since 2013, Promo-LEX is conducting information and public awareness campaigns on preventing and combating the very serious human rights violation that is domestic violence.

Promo-LEX set out the goal to change citizens' perceptions of domestic violence and, as a subsequent effect, to change public attitudes and behavior towards it; to determine a more active involvement of citizens in preventing and combating domestic violence through information; to help better inform victims and potential victims of domestic violence of their rights under the law by providing free legal advice; to contribute to the legal protection of victims of domestic violence by increasing their knowledge, but also that of the general public, about domestic violence, the ways of obtaining and using protection orders, and ways to hold the abusers accountable.

⁸ http://promolex.md/upload/publications/ro/doc_1319534121.pdf

http://promolex.md/upload/publications/ro/doc_1332166962.pdf

http://promolex.md/upload/publications/ro/doc_1358771911.pdf

http://promolex.md/upload/publications/ro/doc_1403006808.pdf

- The period between 15 May and 25 June 2013 saw the unfolding of the campaign “**Protection Order**”, in which information flyers and posters were distributed and posted in every police inspectorate, department, sector and station.⁹
- On 25 November - 10 December 2013, Promo-LEX conducted the campaign “**Be Aware, Respond, Stop the Violence!**” The campaign envisaged the production of 9 video clips.¹⁰ Approximately 6353 people watched the clips on the official Youtube channel of Promo-LEX alone.¹¹ The videos were also shown at various public events organized by Promo-LEX.
- The campaign “**The Order Can Protect You from Domestic Violence**” was held between 15 May – 25 June 2013 and 15 October - 25 November 2014. The campaign organized dozens of viewing evenings in several localities of Moldova, which were attended by about two thousand people. They were shown anti-violence films, received topical informational materials, and discussed about domestic violence in the country, and the need to combat and prevent it.¹²
- A photo gallery/exhibition “**Indifference Supports Violence**” was organized between 4 November and 10 December 2014, in the context of the Global Campaign of 16 Days Against Gender Based Violence. A gallery of thematic photos was exhibited in the center of Chisinau, in the square of the monument to Ștefan cel Mare și Sfânt, for over 10 days.¹³

In order to lobby its findings and recommendations on improving the legislation in area of combating domestic violence, Promo-LEX made some partnerships, for example partnership with General Inspectorate of Police.

On 22 and 23 July 2014, the Association participated in a Workshop on Developing the NATIONAL PLAN FOR PREVENTION AND CONTROL OF DOMESTIC VIOLENCE 2015-2018 (PNA).

In December 2014, the Association attended the first meeting of the Civil Society Advisory Group UN Women Moldova, organized with the aim to establish and build an effective partnership with civil society organizations that make important contributions to women's empowerment and gender equality.

4. *What measures and procedures have been put in place to ensure effective follow-up to recommendations regarding your country issued by international or regional human rights mechanisms, and which may contribute to preventing human rights violations?*

⁹ <http://promolex.md/index.php?module=campaigns&item=1217&Lang=ro>

¹⁰ <http://promolex.md/index.php?module=campaigns&item=1371&Lang=ro>

¹¹ https://www.youtube.com/channel/UCvnZ611A2vmSOLp_goy0Fmg

¹² <http://promolex.md/index.php?module=campaigns&item=1583&Lang=en>

¹³ <http://promolex.md/index.php?module=campaigns&item=1629&Lang=en>

On 1 October 2013, in Geneva, Switzerland, an official delegation of the Moldovan Government presented a combined Periodic Review on items 4 and 5 on the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), ratified by Moldova in 1994. Following pre-established procedures, the Specialized Committee on the Elimination of Discrimination against Women submitted to the Government a set of formal recommendations to improve the implementation of CEDAW. The main areas of concern and recommendations to the Government include “*violence against women*”.

Thus, the national reports on the implementation of legislation to prevent and combat domestic violence¹⁴ point to a number of impediments to the effective application and implementation of the legal provisions to guarantee the victim’s safety, prosecution of the perpetrator, and prevention of cases of domestic violence.

In this context, we claim that an effective way to promote human rights is to adjust the legislation in light of the decisions of the European Court of Human Rights on cases pertaining to the Republic of Moldova, and the decisions issued under the UN Protection Mechanism. The approximation of the national legislation with international standards, including those on the basic rights and freedoms, is a primary commitment assumed by Moldova before the EU.

The first cases litigated by Promo-LEX before the ECHR and judgments against Moldova (*Eremia v. Moldova*¹⁵; *Mudric v. Moldova*¹⁶), and which obliged the state to ensure an effective mechanism to remedy the violation of rights guaranteed by the European Convention on Human Rights and to ensure the deterrent effect of the Court’s findings, could serve as an example of a positive practice in the promotion and protection of human rights through the decisions of international courts.

Also, for the first time, a domestic violence case is examined by CEDAW against Moldova. The Committee on the Elimination of Discrimination against Women (CEDAW)¹ has recently informed the Government of Chisinau about the case of R.L. v. Moldova (sent in 2011, registered on November 14, 2012). The applicant, R.L., a victim of domestic violence, alleges complicity of the State in her ill-treatment and gender discrimination in the framework of her protection by law. It is the first domestic violence case communicated by the CEDAW Committee to the Government of the Republic of Moldova. The Government of the Republic of Moldova is invited to develop its stance on the case within six months as of the day of communication thereof.¹⁷

¹⁴ Report: “Evaluation of the implementation of the provisions referring to the protection order under Law 45-XVI in Moldova in 2008-2011”, 2012 conducted by Promo-LEX with the support of Soros Foundation and the Office of the UN High Commissioner for Human Rights.

¹⁵ <http://www.promolex.md/index.php?module=press&cat=0&item=1230>

¹⁶ <http://www.promolex.md/index.php?module=press&cat=2&item=1269>

¹⁷ <http://promolex.md/index.php?module=press&cat=0&item=1313>

Thus, as a result of these decisions, as well as of the periodic CEDAW Committee recommendations, the Government of Moldova was obliged to revisit the relevant legislation and propose amendments to it.¹⁸

The Association believes that bringing the committed violations and irregularities to the attention of the international monitoring bodies helps improve the prevention and protection of human rights in the Member States.

In conclusion, we note that the concept of prevention of human rights violations lies not only in the adoption of legislation, strategies and action plans, but also in the creation of a strong national preventive mechanism, supported by effective activities of NGOs, and complemented by regional and international protection mechanisms, which, in effect, inevitably improve the promotion and respect for human rights.

Executive Director
Ion MANOLE



¹⁸ Advisory note to the draft law on amending and supplementing certain laws on prevention and combating domestic violence: http://particip.gov.md/public/documente/139/ro_1472_Nota-informativa.pdf