

THE NATIONAL COMMISSION ON HUMAN RIGHTS AND FREEDOMS (NCHRF): THE ILLUSION OF HER ROLE IN HUMAN RIGHTS PROTECTION AND PROMOTION IN CAMEROON

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ABSTRACT

A new world order came into being out of the ashes of the World War II in 1945, putting respect for human rights alongside peace, security and development as the primary objectives of the United Nations. Hence, the United Nations General Assembly recommended for the creation of National Human Rights Commission(s) in all member states, charged with the ultimate mandate to promote and protect human rights and freedoms. It is against this backdrop that the National Commission for Human Rights and Freedoms-Cameroon was created. However, the Commission is unable to effectively operate towards the realisation of its goal due to the ambiguous and contradictory nature of certain provisions of the laws creating the NCHRF. In this regard, the paper sets out as main objective to examine the impediments affecting the smooth functioning of the National Commission for Human Rights & Freedoms (NCHRF) Cameroon. In conducting this study, data was collected from primary sources such as legal instruments and reports, while books, articles, and the internet were credible to build our secondary sources of data. The results of our findings reveal that the predominant impediments faced by the NCHRF-Cameroon are the lack of autonomy and executive highjack of the Commission. As a result of these impediments which mar the effective functioning of the NCHRF, some policy recommendations will be proposed for the way forward.

Keywords: National, Commission, Human Rights, Freedoms, Promotion, Protection, Impediments

INTRODUCTION

After the ashes of Second World War (WW II)ⁱ that witnessed an unprecedented high level of gross human rights violations and mass killings such as the Holocaustⁱⁱ, the world manifested its deep concern for Human Rights through the creation of the United Nations (UN).ⁱⁱⁱ Under its umbrella the international community vowed never again to abide the unspeakable atrocities the world had witnessed. In line with that, the UN rapidly worked tirelessly and put in place several international instruments and institutions with the ultimate goal geared towards human rights protection and promotion. The international instruments are; the Universal Declaration of Human Rights adopted on December 10 of 1948. Later on, the UN adopted two Covenants on Economic, Social and Cultural Rights and Civil and Political Rights on 16th December 1966. In an attempt to practically energise the realisation of human rights promotion and respect, the UN General Assembly, Security Council and other specialized agencies continued working on the path to ensure the realization of the UN goal of human rights protection and promotion the world over.

The Republic of Cameroon gained membership in to the UN on the 20th of September 1960.^{iv} As such duly approved or ratified treaties and international agreements pursuant to Section 45 of the Constitution are applicable in Cameroon, so to the required standards.^v It is in line with the above that the Cameroon Constitution has wholly adopted and incorporated some international instruments without any dilution, notably of which are the Universal Declaration of Human Rights, the Charter of the United Nations and the African Charter on Human and Peoples' Rights.

In 2009, the UN General Assembly Resolution 63/172 recognized that National Human Rights Institutes (NHRIs) have a crucial role to play in promoting and ensuring the indivisibility and interdependence of human rights and encouraged Member States to consider the creation or the strengthening of independent and autonomous NHRIs. Equally to develop mechanisms of cooperation between these institutions in order to coordinate their action, strengthen their achievements and enable the exchange of lessons learned. Later on through Resolution 65/207 of March 2011, the General Assembly again emphasized NHRIs' role and encouraged governments to conduct outreach activities at the national level to raise awareness about their NHRIs.^{vi} Furthermore, the General Assembly equally called on the Office of the High Commissioner for Human Rights to strengthen NHRIs by developing support activities for

them. Similarly in July 2012, the Human Rights Council adopted Resolution A/HRC/20/L.15, which specifically recognized NHRIs' role in promoting and protecting human rights and called on UN Member States to create or strengthen existing NHRIs, using the framework that is best suited to its particular needs at the national level in order to promote human rights in accordance with international human rights standards.^{vii}

The above UN General Assembly Resolutions are binding on Cameroon as in other countries being members States of the UN. As a consequence, the mandatory obligation is incumbent on Cameroon to take steps to implement the fore cited UN resolutions. Efforts have been put in place through the creation of a National Human Rights Commission in Cameroon. Nevertheless, the NCHRF has not been able to effectively operate in the realisation of its goal due to the ambiguous and contradictory nature of certain provisions of the laws creating the Commission. In addressing these problems, it is of utmost importance to examine the creation, the mandate and analyse the identified impediments rocking the effective functioning of the NCHRF.

CREATION OF THE NATIONAL COMMISSION ON HUMAN RIGHTS AND FREEDOMS (NCHRF) IN CAMEROON

In line with the recommendations of the UN General Assembly and Security Council, the Republic of Cameroon through a presidential decree in 1990 created the National Commission for Human Rights and Freedoms (NCHRF)^{viii} and subsequently, the Commission was re-established through the enactment of a law in 2004.^{ix} The Commission, as defined in Section 19 of 2004 law was later amended and supplemented by law No. 2010/004 of 13 April 2010.

It should be noted that the UN resolutions did not simply recommend the creation of a National Human Rights Commission in member states but it went further to lay down some guiding rules or principles to be enjoyed by the Commissions(s). The UN General Assembly in 1993 endorsed a set of minimum criteria designed to ensure the independence, effectiveness and pluralism of the national human rights institution in the name of the '*Paris Principles*'.^x Hence the NCHRF created in Cameroon is obliged to respect those principles in order to be able to attain the required mission of human rights protection and promotion.

Indeed, the law setting up the NCHRF stipulates that the Commission shall be an independent institution,^{xi} and that the Commission shall have legal status and financial autonomy.^{xii} However an examination of the functioning of the NCHRF clearly reveals the fact that the Commission is neither independent nor does it enjoy financial autonomy. In fact, shockingly, there are contradictory provisional violations contained in the 2004 law setting up the Commission. As an example; Section 6 (1) of the 2004 law stipulates that; “*the president of the Republic shall through a decree appoint the Chairperson and Vice Chairperson of the Commission*”. This provision therefore clearly makes a mockery of the independence of the commission as stated in Section 1 (2) in the following words; “*The National Commission for Human Rights and Freedom shall be an Independent institution for consultation, monitoring, evaluation, dialogue, consulted action, promotion and protection in the domain of human rights*”. While on the other hand Section 12 (2) of the law stipulates that; “*the amount of monthly remunerations of the chairperson, vice chairperson and General Secretary-General of the Commission and the nature of the special benefits referred to in Section 12 (1) shall be determined by a decree of the president of the Republic on the recommendation of the Prime Minister*”. This provision demonstrates the fact that the financial autonomy mentioned in Section 1 (3) in the following words; “*The Commission shall have legal status and financial autonomy*” is rather an illusion.

THE MANDATE OF THE NCHRF

As an apex national human rights monitoring body and pursuant to section 2 of the 2004 law setting up the NCHRF in Cameroon, the Commission has as mandate to; promote and protect human rights and freedoms. To this end, it shall: Receive all denunciations relating to human rights violations and freedoms, conduct all inquiries and carry out all the necessary investigations on violations of human rights and freedoms and report thereon to the president of the republic. The Commission is required to refer cases of violations of human rights and freedoms to the competent authorities, and as where necessary inspect penitentiary establishments, police stations and gendarmerie brigades in the presence of the competent State Counsel or his representative. Such inspection may entail the drafting of a report submitted to the competent authorities; study all matters relating to promotion and protection of human rights and freedoms. Furthermore, the Commission is required to propose to the public

authorities' measures to be taken in the areas of human rights and freedoms, popularize by all possible means instruments relating to human rights and freedoms and forge a human culture in the people through education, information and holding of conferences and seminars. The collection and dissemination of international documents relating to human rights and freedoms, liaise, where necessary with non-governmental organizations working for the promotion and protection of human rights and freedoms. To maintain where necessary relations with the United Nations Organizations and foreign committees or associations perusing similar goals and inform the minister of external relations thereon.

It is no doubt that the NCHRF has a very broad mandate and literally if adequately implemented the expected impact of the Commission's activities would be a remarkable feature of the thematic areas and vulnerable groups, formation of theme-wise committees to address issues, establishment of links among the different groups of stakeholders, Government, NGOs and UN agencies. As an apex national human rights monitoring body, the NCHRF should be able to successfully create awareness and consensus on basic human rights issues through a series of seminars, workshops and education to elaborate the achievements in respect of its most important mandated goal of raising awareness amongst people of all walks of life. The major areas of success should include, among others, a Mass Awareness Campaign of Working Together for the Promotion of Human Rights, Awareness Creation on Child Rights and Juvenile Justice System, principles and Violence against Women.^{xiii}

Regrettably however, the Commission has been battered predominately by the executive arm of government and left with just little or no powers reason for the high rates of human rights abuses and violations recorded yearly within the country as per several reports. For instance, the Human Rights Watch in their 2020 report has clearly stated instances of exaggerated widespread human rights abuse in Cameroon perpetuated by both armed groups and government forces throughout 2019.^{xiv} Indeed the report went further to state as follows;

"...the Islamist armed group Boko Haram carried out over 100 attacks in the Far North region, since January 2019 killing more than 100 civilians. The conflict between government forces and Boko Haram has killed thousands of Cameroonians and displaced over 270,000 since 2014, leading to the rise of self-defense vigilante groups. In Anglophone regions, violence intensified as government forces conducted large-scale security operations and armed separatists carried out increasingly sophisticated attacks. Over 3,000 civilians and hundreds

of security forces personnel have been killed in the Anglophone regions since 2016, when the crisis started. The unrest in these regions led to the displacement of over half-a-million people. In August 2019, 10 leaders of a separatist group, the Ambazonia Interim Government, were sentenced to life imprisonment by a military court, following a trial that raised concerns of due process and violations of fair trial rights. Government forces and armed separatists have killed, violently assaulted, or kidnapped people with disabilities as they struggled to flee attacks, or because they were left behind.^{xv}

Furthermore, the 2019 Country Reports on Human Rights Practices in Cameroon made public by the US department of State, Bureau of Democracy, Human Rights, and Labour also reveal that; Significant human rights issues including: unlawful or arbitrary killings, by security forces, armed Anglophone separatists, and Boko Haram and ISIS-West Africa (ISIS-WA) fighters. These attacks have caused the torture of civilians, arbitrary detention perpetrated by security forces and non-state armed groups. Prisoners have been subjected to harsh and life-threatening prison conditions. Although the government took some steps to identify, investigate, prosecute, and punish officials who committed human rights abuses, it did not do so systematically and rarely made the proceedings public. Some offenders, including serial offenders, continued to act with impunity.^{xvi}

In fact, the normative view of the 2017 annual report of the NCHRF^{xvii} has detailed out serious and heinous human rights abuses recorded within the country. The report revealed that some 1113 complaints of human rights violations were received by the Commission in the year 2017 alone. However, the report failed to detail the engagement of the Commission in investigating all of the complaints received, neither did the report project any judicial remedy granted to any of the victims. The Commission reiterated the re-occurrences of human rights violations of the civil, political, economic and cultural rights as indicated in the high number of complaints lodged at the NCHRF in the 2017 annual report. It therefore goes without say that the Commission is not effectively operating at its maximum, or in line with the UN standards for human rights promotion and protection, reasons for the high rate of human rights violations and abuses in Cameroon. We shall proceed to examine the impediments that have marred the effective functioning of the NCHRF in Cameroon.

IMPEDIMENTS FACED BY THE NCHRF IN THE PROTECTION AND PROMOTION OF HUMAN RIGHTS IN CAMEROON

There have been some visible efforts employed by the government in collaboration with some foreign developmental partners in improving the human right situation in Cameroon. One of such visible efforts is the setting up the National Commission for Human Rights and Freedoms, with the ultimate mandate to protect and promote human rights. However, it is not an illusion that the institution over the years has not been operating at its optimal due some challenges. This explains why such an important agency is not taking the lead in the protection of human rights and the condemnation of human rights abuses in Cameroon. The challenges that prevent the optimal functioning of the Commission are many; some of which are as follows;

A) Executive Influence over the NCHRF

The NCHRF is the main national body charged with the promotion and protection of human rights in Cameroon. To objectively function, the Commission is supposed to be independent as contained in section 1 (2) of the 2004 law creating the Commission which states; “*the Commission shall be an independent institution for consultation, monitoring, evaluating, dialogue, concerted action, promotion and protection in the domain of human rights*”.^{xviii}

Regrettably, the independence proclaimed by the a fore cited section of the law is only on paper, given that NCHRF is highly influenced, controlled and monitored by the executive arm of the government.^{xix} The procedure for the functioning and implementation of the law creating NCHRF is laid down by a presidential decree,^{xx} hence the Commission is solely accountable to the president of the Republic who has powers to appoint and dismiss the members of the Commission at his discretion.

Furthermore, as demonstrated since 2004, the president’s decision on the appointment of commissioners is mostly influenced by political inclinations rather than competence. Despite the appointment of some civil society activists and other academicians into the Commission, the influence of NCHRF has remained unchanged since its creation. The tight grip of the executive over the Commission has hindered the objective functioning of the Commission and her resultant slumber irrespective of the escalating human rights abuses notably in the North witnessing the fight against the Boko Haram since 2014 and in the Northwest and South West Regions witnessing an armed crisis since 2016. Some of the human rights abuses perpetuated

particularly in the above-mentioned crises regions are so heinous and qualify as war crimes and crimes against humanity and genocide yet the NCHRF is silent or in some cases makes a statement that fails to project the reality on the ground. The investigative role of the Commission is professed mostly on paper, that is so because in the North West and south West Regions, gruesome extra judicial killings of individual and groups of persons, looting and wide spread destruction of properties is carried out in several instances. Regrettably the Commission is not prompt in taking action to visit the crime sites and to conduct an independent investigation to ensure the perpetrators face the law. All these are principally caused by the grip of the executive in the activities of the Commission hence a huge hindrance for the Commission to meet up with her mission, thus affecting the degree of human rights protection and promotion in Cameroon.

Article 8 of the presidential decree creating the Commission stipulates that the NCHRF cannot release its annual report on the state of human rights and summary of its activities to the public, but must submit this only to the head of state. In fact, the Commission can do no more than make recommendations to the competent authorities; which recommendations are not binding. The fact that the role of the Commission is limited to making recommendations only to the president of the republic and to other competent authorities simply go to demonstrate that the legal instruments for its creation and functioning in Cameroon has been designed in a way that the Commission is made to function under the whims and caprices of the executive control and influence.

B) Limited power and Autonomy of the NCHRF

For NCHRF to effectively perform its functions, its independence ought to be guaranteed. Hence, the Commission should enjoy an independent authority to investigate human rights violations in collaboration or with the assistance of other agencies such as the police and the gendarmes. In fact, all other state institutions ought to be obliged to render such assistance to the Commission as it may require in carrying out its task, even if the government or government authorities are the subject of such an independent investigation. On the contrary, the NCHRF's power in performing its function is so limited as it is being controlled by the executive arm of government. The commission has been battered and left only with an observer status which frustrates its role of a human rights institution empowered to work towards human rights promotion and protection.

The NCHRF is neither bestowed with the powers of search and seizure; nor can she subpoena any one to testify in an investigation on an alleged human rights abuse without seeking the assistance of the judicial authority. To compound issues, even in a situation where the NCHRF seeks the assistance or cooperation to undertake an investigation be it from the police, courts or any other executive or judicial organ, such an organ is not bound or obliged to render such assistance thereby weakening and making a charade of the NCHRF. As a result, some government organs notably the security forces have capitalized on the weakness of the Commission to often use excessive power which has resulted to unspeakable human rights abuses as those contained in some reports released by NGOs such as Amnesty International and the Human Rights Watch.^{xxi} In fact their reports and footages show massive extra judicial killings, torture, force imprisonment, rape and denial of an opportunity for fair trial and many other abuses perpetuated by the government security forces on suspected Boko Haram fighters or sympathizer in the Northern region and the situation is not different from that in the North West and South West regions of Cameroon.

C) Inadequate Financial Resources

Insufficient financial resource is another problem faced by the NCHRF. As per section 1(3) of the 2004 law, “*the commission shall have legal and financial autonomy*”. It is worthy of mention that contrary to the above provision, the Commission does not enjoy financial autonomy in any way. As per the Annual report of the NCHRF in 2008,^{xxii} of the budget forecast of close to two billion FCFA, they only received a budgetary allocation of five hundred million for the year 2011, and this amount was insufficient with regards to the activities of the Commission. This constitutes an obstacle to the proper functioning of the Commission to carry out its activities and achieve its mission of promoting and protecting human rights in Cameroon.

In line with the impediment of inadequate financial resources faced the commission, the little amount of money disbursed to the Commission by the executive arm of government is habitually received late. Usually, the money is always received towards the end of the year. As a result of this, the Commission is often financially handicapped to effectively execute its annual plan of action or to promptly respond to urgent situations or reports brought to her attention. As an example, a delay in an investigation will certainly cause the evidence to have been thwarted and some vital witnesses to leave the scene. Hence lack of adequate income

timeously is undoubtedly a serious blow preventing the Commission from attending her mission.

D) Inadequate material and Logistic resources

As a result of the insufficient and delayed funds disbursed to the Commission at the end of each year, the Commission is left with inadequate materials and logistic resources needed for its smooth running. This hinders the institution from trading on its route map of planned activities for the year and as a result, the Commission cannot promptly respond to emergency situations. In fact, during the inauguration ceremony of a branch office in the South region, the former director of the NCHRF Dr. Chemuta Banda said “*we have the intention to do more, but resources are insufficient to carry out our projects. It is difficult to acquire land or even old house to refurbish them*”.^{xxiii} The above declaration by the former director of the NCHRF comes to buttress the fact that the Commission suffers from a serious setback due to inadequate material resources in the realization of its objectives.

Specifically, in terms of logistics, the lack of adequate vehicles and other independent mode of transport is an obstacle to the execution of various activities of the NCHRF out of their offices. It should be noted that most of the work of the Commission has to do with field investigation and education. Generally due of the low budget allocation to the Commission, it suffers from shortages of other required materials or logistic to enable it meet its objectives.

E) Limited human resources

NCHRF is operating below the necessary human personnel and is a set back on their optimal performance. The NCHRF has insufficient employees both for the head office and six other regional branch offices in the North, Adamawa, Northwest, Southwest, Littoral and South regions to help promote and protect human rights in Cameroon.

Data revealed that as at 2015, the Commission had only 63 employees in Cameroon, certainly little or no changes with the staff situation today. Comparing the NCHRF of Cameroon in terms of human resources with that of other countries, we notice that with such a low capacity, the Commission is bound to be ineffective. The National Commission on Human Rights of Ghana, for example a country with 19.7 million people inhabited on a surface area of 240,000km² has 750 workers.^{xxiv} It is therefore obvious that the personnel size of NCHRF Cameroon is too

small considering the land surface size (475,000km²) and population (estimated 22 million people) of the country. As a consequence, the Commission is unable to meet up with its vision of human rights protection and promotion in Cameroon.

CONCLUSION

The preceding discussion gives an inside of the UN efforts in guaranteeing global human rights protection the world over, ever since its creation in 1945. Fundamental instruments such as the Universal Declaration of Human rights, the Convention on Civil and Political rights amongst other international instruments were adopted. The spirit of the instruments has been enshrined in almost all of the various national legal orders and human rights instruments. To achieve its objective, the UN have gone further from mere adoption of Conventions and treaties to making vital recommendations for the creation of national human rights commissions operational in line with the Paris principles.

Cameroon's response to the above UN recommendations has been the creation of the NCHRF which undoubtedly stands out as the main organ charged with the mandate of ensuring human rights promotion, protection and freedoms. Although created, the mandate of the NCHRF has clearly not respected the principles outlined in the Paris principles, notably the commission's independent and statutory institution aimed at affirming its efficiency.

The scenario in the arena of Human rights in the country is a revelation of an underperforming Commission due to the identified and examined impediments that have resulted in the role of NCHRF in human rights promotion and protection to be more of an illusion.

These impediments have, therefore, necessitated the proposition of some policy recommendations for the way forward.

RECOMMENDATIONS

1) It is recommended that the government of Cameroon should urgently take steps to amend the 2004 Law creating the NCHRF to respect the laid down UN principles of the National Human Rights Commission being strictly independent and autonomous in nature. If this is

incorporated, it will give room to the existence of an active Human Rights Commission in Cameroon that will attain not only the UN goals, but will importantly attain the goals of the citizens being the greater enjoyment, promotion and protection of their rights.

2) Another recommendation is for the government of Cameroon to ease the executive grip on the activities and functioning of the NCHRF notably during the amendment of the 2004 law creating the Commission. This will go a long way to liberalize the Commission and to permit its objective functioning. It should be recalled that all through this study, the main impediment that hinders the NCHRF from objectively attaining its mandate is the suffocating executive grip. As such, if this recommendation is implemented, the Commission will regain its mandate or authority as the main national organ charged with the protection and promotion of human rights and freedoms in Cameroon.

3) It is equally recommended that the findings and annual reports of the NCHRF should be directly transmitted to the United Nations Commission for Human Rights. This will ensure objectivity and confidence in the work and findings of the Commission. Hence, the ultimate goal for the creation of the Commission, which is the promotion and protection of human rights and freedoms, will be greatly attained through the UN objective responses.

ENDNOTES

ⁱ World War II (often abbreviated to WWII or WW2), also known as the Second World War, was a global war that lasted from 1939-1945. The vast majority of the world's countries-including all the great powers-eventually formed two opposing military alliances: The Allies and the Axis. The principal belligerents were the Axis powers- Germany, Italy, and Japan and the Allies- France, Great Britain, the United States, the Soviet Union, and to a lesser extent China. Accessed at <https://www.britannica.com> on the 13/08/2019

ⁱⁱ The Holocaust was the World War II genocide of the European Jews. Between 1941 and 1945, across German-occupied Europe, Nazi Germany and its collaborators systematically murdered some six million Jews, around two-thirds of Europe's Jewish population. The murders were carried out in pogroms and mass shootings; by a policy of extermination through work in concentration camps; and in gas chambers and gas vans in German extermination camps, chiefly Auschwitz, Bełżec, Chełmno, Majdanek, Sobibór, and Treblinka in occupied Poland. See also Martin, G., & Henry H., (1987) *"The Holocaust: A History of the Jews of Europe During the Second World War"* Holt Paperbacks; Reprint edition

ⁱⁱⁱ The United Nations (UN) is a global intergovernmental organization created on October 24, 1945. The UN was second multi-purpose international organization established in the 20th century that was worldwide in scope and membership. Its predecessor, the League of Nations, was created by the Treaty of Versailles in 1919 and disbanded in 1946. The headquarters is in New York City; the UN also has regional offices in Geneva, Vienna and Nairobi. Its official languages are Arabic, Chinese, English, French, Russian and Spanish. In addition to maintain peace and security, other important objectives include developing friendly relations among countries based on respect

for the principles of equal rights and self-determination of peoples; achieving worldwide cooperation to solve international economic, social, cultural and humanitarian problems; respecting and promoting human rights; and serving as a center where countries can coordinate their actions and activities toward these various ends. Accessed at <https://www.britannica.com> on the 13/08/2019

^{iv} Available at <https://www.google.com/search?client=firefox-b-d&q=When+did+Cameroon+join+the+UN>. Accessed on the 21/08/2020

^v Law No. 96-06 of 18 January 1996 to amend the Constitution of 2 June 1972

^{vi} Available at <https://www.ohchr.org/Documents/Countries/NHRI/1950-UNDP-UHCHR-Toolkit-LR.pdf>. Accessed on the 02/09/2020

^{vii} Available at <https://ijrcenter.org/national-human-rights-institutions>. Accessed on the 02/09/2020

^{viii} Available at <https://www.hrw.org/reports/2001/africa/cameroon/cameroon.html>. Accessed on the 02/09/2020

^{ix} No. 2004/016 of 22nd July 2004 which set up the National Commission on Human Rights and Freedoms

^x Principles relating to the Status of National Institutions (The Paris Principles) Adopted by General Assembly resolution 48/134 of 20 December 1993. Accessed at <https://www.ohchr.org/en/professionalinterest/pages/statusofnationalinstitutions.aspx>, on the 05/09/2020

^{xi} Presidential Decree No 90-1459 of November 8th 1990 <https://www.hrw.org/reports/2001/africa/cameroon/cameroon.html>. Accessed on the 21/08/2020

^{xii} See section 17 (1) of 2004 law

^{xiii} Md. Kamruzzaman, Shashi Kanto Das. The Evaluation of Human Rights: An Overview in Historical Perspective. *American Journal of Service Science and Management*. Vol. 3, No. 2, 2016, pp.11 (5-12)

^{xiv} Available at <https://www.hrw.org/world-report/2020/country-chapters/cameroon>. Accessed 02/09/2020

^{xv} *Ibid*

^{xvi} Available at <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/cameroon>. Accessed on the 02/09/2020.

^{xvii} Report on the state of human right in Cameroon in 2017, by National Commission on Human Rights and Freedoms. Accessed <http://www.cndhl.cm/sites/default/files/EDH%202017bon%20version%20anglaise.pdf>. on the 05/09/2020

^{xviii} Op cit Section 2 (1), 2004 Law

^{xix} Progressive Initiative for Cameroon (PICAM), the national commission for human rights and freedom: An epitome of government's contempt for human rights, Press release 2009. Accessed at <http://www.picam.org>, on the 14/08/2020.

^{xx} Decree No. 2005/254 of 7 July 2005 to lay down the procedure for the implementation of Law No. 2004/16 of 22nd July 2004, on the setting up, organization and functioning of the NCHRF

^{xxi} Available at <http://www.cndhl.cm/sites/default/files/EDH%202017bon%20version%20anglaise.pdf>, See also; <https://www.amnesty.org/en/countries/africa/cameroon/report-cameroon>. Accessed on the 05/09/2020.

^{xxii} Available at <https://www.refworld.org/pdfid/4796f9042.pdf>. Accessed on the 05/09/2020

^{xxiii} Available at <https://cameroonpostline.com/new-human-rights.com>. Accessed on the 05/09/2020

^{xxiv} Le Petit Larousse Illustre, 2007. Available at <https://www.amazon.com/Petit-Larousse-Illustre-2007-French/dp/2035824915>. Accessed on the 05/09/2020