

## **Status of Human Rights in Cameroon for the 44<sup>th</sup> Session of the Universal Periodic Review**

### **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 Republic of Cameroon (Cameroon) for the 44th session of the Universal Periodic Review (UPR).

### **Background**

2. Cameroon is located in Central Africa and has an estimated population of 29.3 million people.<sup>1</sup> The country is predominately Christian with 38.3% of the population identifying as Roman Catholic, 25.5% as Protestant, 24.4% as Muslim, 6.9% as other Christian, 2.2% as animist, 2.2% as none, and 0.5% as other.<sup>2</sup>

3. Cameroon's last review was held on May 16, 2018.<sup>3</sup> As a result of the review, Cameroon received 196 recommendations, 133 of which Cameroon accepted.<sup>4</sup> Despite there being no recommendations regarding violence against Christians, in its 2023 World Watch List, Open Doors listed Cameroon as the 45th worst place to live for Christians as they face frequent attacks by Islamic extremists.<sup>5</sup> One recommendation that was made by Chile, and supported by Cameroon, was that the government "[i]ntensify awareness-raising campaigns throughout the territory to eradicate the practices of female genital mutilation and forced marriage, involving all social actors, including religious and community leaders."<sup>6</sup>

### **Legal Framework**

#### *Religious Freedom*

4. Under the Preamble to Cameroon's Constitution, the "freedom of religion and worship shall be guaranteed."<sup>7</sup> Further, as a party to the International Covenant on Civil and Political Rights (ICCPR),<sup>8</sup> Cameroon has a responsibility to ensure that "[n]o one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice."<sup>9</sup>

#### *Female Genital Mutilation*

5. Under the Preamble to Cameroon's Constitution, "every person has a right to life, to physical and moral integrity and to humane treatment in all circumstances. Under no circumstances shall any person be subjected to torture, to cruel, inhumane or degrading treatment."<sup>10</sup>

6. Consistent with these principles, Section 277-1 of the Penal Code of Cameroon provides for imprisonment of up to 20 years for individuals who mutilate "the genital organ of a person, by any means whatsoever."<sup>11</sup> Imprisonment can increase to life in prison if "the offender habitually carries out the practice or does so for commercial purposes" or if the

mutilation “leads to the death of the victim.”<sup>12</sup> Further, under Section 350 of the Penal Code, if the crimes are committed against a person under fifteen years old, the prison sentence is also increased to life imprisonment or death.<sup>13</sup>

7. Cameroon is a party to the Convention on the Rights of the Child (CRC)<sup>14</sup> and the Protocol to the African Charter on Human and Peoples’ Rights on the Rights of Women in Africa (Maputo Protocol).<sup>15</sup> Article 19 of the CRC requires that children be protected from all forms of physical or mental violence.<sup>16</sup> Further, Article 5 (b) of the Maputo Protocol requires States Parties to “take all necessary legislative and other measures to eliminate such practices, including . . . [p]rohibition, through legislative measures backed by sanctions, of all forms of female genital mutilation, scarification, medicalisation and para-medicalisation of female genital mutilation and all other practices in order to eradicate them.”<sup>17</sup>

### *Child Marriage*

8. Under Section 356 of Cameroon’s Penal Code:

1. Whoever compels anyone to marry shall be punished with imprisonment for from 5 – 10 years with a fine of from CFAF 25,000 – 1,000,000 (USD \$45-\$1,700)
2. Where the victim is under the age of 18, the punishment may not be less than 2 years imprisonment, whatever the mitigating circumstances.
3. Whoever gives in marriage a boy or a girl under 18 shall be punished as under the last two foregoing subsections.<sup>18</sup>

9. Further, under Article 144 of Cameroon’s Civil Code, “[a] male and a female may not contract marriage before they have completed their eighteenth year.”<sup>19</sup> However, Article 145 provides that “the Government procurator of the place where a marriage is to be celebrated may grant dispensations as to age for serious reasons.”<sup>20</sup>

10. Child marriage violates international treaties such as the CRC and the Convention of the Elimination of All Forms of Discrimination against Women (CEDAW), to which Cameroon is a party.<sup>21</sup> Article 1 of the CRC defines a child as “every human being below the age of eighteen years,”<sup>22</sup> and Article 16 of CEDAW prohibits child marriages.<sup>23</sup>

11. Additionally, as a member of the African Union,<sup>24</sup> Cameroon ratified the African Charter on the Rights and Welfare of the Child (ACRWC). Article 21 of the ACRWC prohibits the “marriage and betrothal” of those under 18.<sup>25</sup>

### **Religious Freedom**

12. In Cameroon, Christians are targeted and killed by Boko Haram who seek to “rid the country of ‘infidels’ and establish an Islamic state.”<sup>26</sup> Specifically along the northwestern border with Nigeria, Boko Haram carries out attacks on Christian majority villages.<sup>27</sup> As a result, “[s]everal Christian villages have been abandoned completely after recurring attacks, which have included killings, kidnappings, and the burning of houses, schools and churches.”<sup>28</sup> In fact, since 2014, violence being perpetrated against innocent civilians has resulted in 322,000 people being forced from their homes.<sup>29</sup> One villager claimed that “a day hardly goes by without reports of Boko Haram fighters abusing or killing civilians and stealing their food and cattle.”<sup>30</sup>

13. In addition to Boko Haram, Christians also face violence from armed separatist groups, such as the Ambazonia Defense Forces.<sup>31</sup> Armed conflict between separatist forces and the Cameroonian military “has left more than 3,300 people dead and 750,000 internally displaced or having fled to neighboring Nigeria” since 2017.<sup>32</sup> As part of this ongoing conflict, “clergy have been soft targets of kidnappers, torturers and gunmen.”<sup>33</sup>

14. In September 2022, armed separatists abducted “five Catholic priests, a nun, and two worshippers from a church on its western border with Nigeria.”<sup>34</sup> In addition, the separatists set fire to a church before fleeing toward the Nigerian border.<sup>35</sup>

15. In July 2022, “Boko Haram terrorists killed at least four civilians and wounded several others in an attack . . . in the Koza sub-division of Cameroon’s Far North region.”<sup>36</sup> The terrorists took the villagers by surprise and many fled to escape the violence. It was during this chaos that terrorist shot and killed four people.<sup>37</sup> In addition, the attackers looted and destroyed a church.<sup>38</sup>

16. In April 2022, separatists abducted thirty-two Catholic seminarians, along with their driver, as they were traveling to the Seminary’s chapel for Holy Mass.<sup>39</sup> Thankfully, they were released the next day.<sup>40</sup>

17. In November 2021, Boko Haram attacked a village in the Far North region killing at least four people.<sup>41</sup> According to the mayor of Mokolo, “Boko Haram terrorists arrived in Tourou township and shot dead three men and a woman, and wounded four others before leaving for Nigeria.”<sup>42</sup> Boko Haram is notorious for targeting Christians in the Far North region of Cameroon.<sup>43</sup>

18. On October 24, 2021, five armed extremists abducted the congregational chairperson of the Ntamulung Presbyterian Church.<sup>44</sup> The abduction took place at a church following a worship service. Thankfully, she was released the next day.<sup>45</sup>

19. On November 26, 2020, Boko Haram raided a predominantly Christian village in the North of Cameroon at night while villagers were sleeping.<sup>46</sup> Boko Haram proceeded to kill three people and abducted another.<sup>47</sup>

20. On September 18, 2020, Boko Haram killed Joseph, a forty-three-year-old man who was a facilitator from the Bible Society of Cameroon’s literary program.<sup>48</sup>

21. On August 8, 2020, Jonas, a forty-two-year-old man who was an elder in the Union of Evangelical Churches in Cameroon, was killed by Boko Haram while he was outside guarding a church.<sup>49</sup> According to a resident:

Boko Haram usually turn up in the villages at around 10pm so when it got to 11pm those on guard thought they weren’t coming – so they fell asleep. They [Boko Haram] didn’t fire their weapons in the air or light torches, which they usually do, so Jonas was taken by surprise in his sleep. The other two managed to escape but Jonas was shot in the head twice.<sup>50</sup>

22. On January 17, 2020, Boko Haram attacked a village in Far North Cameroon at night, killing five Christians and damaging 195 homes.<sup>51</sup>

23. On May 11, 2019, Boko Haram ransacked a predominately Christian village, burning two churches, “damaging 67 houses and two shops, killing livestock, looting motorbikes and

damaging grain stores.”<sup>52</sup>

24. Due to the ever-growing attacks by Boko Haram and separatist groups, only some of which are highlighted above, Cameroon has begun taking measures to address the growing violence and persecution and ensure the safe return of displaced victims to their homes. In June 2022, Cameroon deployed troops along its border with Nigeria, where attacks from Boko Haram are most prevalent.<sup>53</sup> As a result of these efforts, approximately 10,000 displaced villagers have been able to return home.<sup>54</sup> In order to help those return home, the government has promised that “in addition to ensuring security, it will provide planting seeds to villagers who agree to return.”<sup>55</sup>

### **Female Genital Mutilation**

25. Cameroon has low rates of female genital mutilation (FGM), especially compared with other countries. According to available statistics, approximately 1.4% of women between the ages of 15-49 have undergone FGM.<sup>56</sup> However, in certain regions such as in the north, rates are much higher.<sup>57</sup> The COVID-19 pandemic along with the rise of Boko Haram has hindered the government’s efforts to stop FGM as the government has been unable to conduct effective campaigns.<sup>58</sup>

26. For example, in 2010, 20% of girls around Kousseri, a city in the Far North region of Cameroon, experienced FGM. By 2015, it was drastically reduced to just 2%.<sup>59</sup> However, as of 2020, the number has surged up to 10%.<sup>60</sup> One woman explained how she returned to carry out FGM in order to make money after her business failed.<sup>61</sup> Cameroon’s Minister of Women’s Empowerment further explained why people have returned to carrying out FGM:

It is an income-generating activity, that is what they tell us, and particularly at this moment, coronavirus has brought reduction of income for most people and some find it a way to get a bit of money. So, the practice is real, and we should all join our forces to see the elimination of that practice that is detrimental to the health of women.<sup>62</sup>

27. Further, while FGM has been illegal in Cameroon since 1994, some people travel to neighboring countries to have the procedure done.<sup>63</sup> One 15-year-old victim shared her story of her family taking her to neighboring Chad and the impact FGM has had on her life. She stated: “They circumcised me once I got there and ever since I haven’t been the same. I felt so much pain in the process, and when I came back to Cameroon I went through trauma, endless day and nights of tears, refusal to go back to school . . . .”<sup>64</sup>

28. FGM is an extremely harmful practice that can result in “infection (mainly urinary or vaginal), pain, infertility, bleeding that may lead to loss of life, transmission of HIV/AIDS and complications during childbirth for survivors.”<sup>65</sup> Recognizing these inherent dangers, the Minister of Women’s Empowerment and the Family, Marie-Therese Abena Ondo called for “a concerted effort to end the practice” and stressed that “it must be addressed through a national crusade from the national to the community levels.”<sup>66</sup>

### **Child Marriage**

29. In Cameroon, approximately 31% of girls are married before they turn 18, and 10% are married before they turn 15.<sup>67</sup> There are many factors contributing to the high rates of child marriages in Cameroon. One of the reasons is the cultural belief that “[m]arriage is seen as a girl’s life purpose.”<sup>68</sup> Further, in certain parts of the country, unmarried girls are viewed

as being “infertile, prostitutes or witches.”<sup>69</sup>

30. Additionally, high rates of poverty also contribute to young girls being married off. In fact, girls from poor families are “almost five times more likely to marry before the age of 18 than girls from the richest households.”<sup>70</sup> This is due to the tradition of paying a “bride price” where the girl’s family receives compensation from the groom.<sup>71</sup> For example, among the Becheve people, there is a long history of girls “being married off to men as old as 90 in exchange for food, livestock, cash or to settle debts.”<sup>72</sup> One girl was married at the age of seventeen to her father’s 59-year-old employer for \$50 and a couple of goats.<sup>73</sup> As she explained, “I know he wanted me to get married to ease the pressure on him, but that wasn’t what I wanted for myself . . . I told my father I wanted to complete my education first before getting married but he threatened to disown me if I didn’t follow his orders.”<sup>74</sup>

31. The COVID-19 pandemic has further contributed to the problem of child marriages as families faced increased poverty and were desperate to lower expenses.<sup>75</sup> For example, at sixteen, A was “married off to a 55-year-old cattle herder” because her father “didn’t want one more mouth to feed.”<sup>76</sup> After seeking help from a women’s center when her father began trying to marry her off, A was physically abused by her father.<sup>77</sup> A recognized that “since the pandemic, there have been fewer visits to the area by women’s rights activists or social workers.”<sup>78</sup>

32. At the age of fourteen, B was married to a “47-year-old butcher” who also had other wives; and C, a fourteen-year-old girl, despite yearning to return to school, was forced to marry someone “in his 20s.”<sup>79</sup>

33. Because the law raising the minimum age for marriage for girls from 15 to 18 was enacted in 2016,<sup>80</sup> “[m]any Cameroonian families still cite the old law that allowed girls under 15 to be married. . . . This low level of awareness is not peculiar to the western regions but all across Cameroon.”<sup>81</sup>

34. Child marriage is extremely dangerous and can have long-lasting repercussions.<sup>82</sup> According to an NGO fighting to end child marriages around the world:

Early marriage has devastating consequences for a girl’s life. Effectively, child marriage ends her childhood. Girls are forced into adulthood before they [are] physically and mentally ready. Child brides are frequently deprived of their rights to health, education, safety and participation. What’s more, an arranged marriage often means a girl is forced to wed an, at times significantly, older man.<sup>83</sup>

## **Recommendations**

35. We have seen the type of destruction Boko Haram is capable of carrying out in neighboring Nigeria and in northern Cameroon. Cameroon must take this threat seriously in order to prevent further loss of life. Additionally, we are concerned about the violence that separatist groups are carrying out against Christians, and we urge Cameroon to take immediate and meaningful action against it. We are encouraged by Cameroon’s recent efforts to fight back against Boko Haram and ensure the ability and security for displaced victims to begin returning home. We hope that Cameroon will be successful in its endeavor to fight

back against Boko Haram and provide safety for victims and ensure the safe return of displaced victims. We encourage Cameroon to commit sufficient resources and troops to this battle, but we would also encourage Cameroon to actively identify, arrest, and prosecute the perpetrators.

36. Additionally, in order to effectively combat FGM in Cameroon, the government must enforce its laws as well as provide support services for victims. Further, because FGM is ingrained in the culture, education and awareness campaigns must be carried out to stop this harmful and destructive practice.

37. Further, Cameroon must enforce its laws, which prohibit the marriage of individuals under the age of 18. Once again, because this practice is deeply ingrained in cultural traditions, awareness and educational campaigns must be conducted to show the damage this practice causes, as well as educate the population on the current law regarding marriage.

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<sup>1</sup> *Cameroon*, THE WORLD FACTBOOK, <https://www.cia.gov/the-world-factbook/countries/cameroon/> (Mar. 7, 2023).

<sup>2</sup> *Id.*

<sup>3</sup> *Universal Periodic Review – Cameroon*, OHCHR, <https://www.ohchr.org/en/hr-bodies/upr/cm-index> (last visited Oct. 24, 2022).

<sup>4</sup> *Cameroon Infographic 30th*, OHCHR, [https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/CM/CAMEROON\\_Infographic\\_30th.pdf](https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/CM/CAMEROON_Infographic_30th.pdf) (last visited Mar. 1, 2023).

<sup>5</sup> *Cameroon*, OPEN DOORS US, <https://www.opendoorsus.org/en-US/persecution/countries/cameroon/> (last visited Mar. 1, 2023).

<sup>6</sup> OHCHR, UPR of Columbia (3rd Cycle – 30th Session): Thematic List of Recommendations, <https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session30/CM/MatriceRecommendationsCameroon.docx> (last visited Mar. 1, 2023).

<sup>7</sup> CONSTITUTION OF CAMEROON, pmbi., [https://www.constituteproject.org/constitution/Cameroon\\_2008.pdf?lang=en](https://www.constituteproject.org/constitution/Cameroon_2008.pdf?lang=en).

<sup>8</sup> *Ratification Status for Cameroon*, OHCHR, [https://tbinternet.ohchr.org/\\_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=30&Lang=EN](https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Treaty.aspx?CountryID=30&Lang=EN) (last visited Mar. 10, 2023).

<sup>9</sup> 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].

<sup>10</sup> CONSTITUTION OF CAMEROON CONST., pmbi.

<sup>11</sup> COMMUNITY CENTRE FOR INTEGRATED DEVELOPMENT, FEMALE GENITAL MUTILATION IN CAMEROON 13 (2021), <https://comuceid.org/wp-content/uploads/2021/05/FGM.pdf>.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> *Ratification Status for Cameroon*, *supra* note 8.

<sup>15</sup> Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa, *adopted* July 11, 2003, <https://www.ohchr.org/sites/default/files/Documents/Issues/Women/WG/ProtocolontheRightsofWomen.pdf>.

<sup>16</sup> Convention on the Rights of the Child art. 19, *adopted* Nov. 20, 1989, 1577 U.N.T.S. 3,

<https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>.

<sup>17</sup> Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa art. 5(b), *supra* note 15.

<sup>18</sup> Jude Njikem, *Imagining A Future Free of Child Marriage in Cameroon*, ICRW (Oct. 28, 2016),

[https://www.icrw.org/what-will-a-future-free-of-child-marriage-look-like-for-girls-in-cameroon/#:~:text=The%20new%20Penal%20Code%2C%20under,1%2C000%2C000%20\(USD%20%2445%2D%241%2C700\).](https://www.icrw.org/what-will-a-future-free-of-child-marriage-look-like-for-girls-in-cameroon/#:~:text=The%20new%20Penal%20Code%2C%20under,1%2C000%2C000%20(USD%20%2445%2D%241%2C700).)

<sup>19</sup> Cameroon Civil Code art. 144, <https://www.fd.ulisboa.pt/wp-content/uploads/2014/12/Codigo-Civil-Frances-French-Civil-Code-english-version.pdf>.

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<sup>20</sup> *Id.* art. 145.

<sup>21</sup> *Ratification Status for Cameroon, supra* note 8.

<sup>22</sup> Convention on the Rights of the Child art. 9, *supra* note 16.

<sup>23</sup> Convention on the Elimination of All Forms of Discrimination against Women art. 16, *adopted* Dec. 18, 1979, 1249 U.N.T.S. 1, <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-elimination-all-forms-discrimination-against-women>.

<sup>24</sup> *Member States*, AFRICAN UNION, [https://au.int/en/member\\_states/countryprofiles2](https://au.int/en/member_states/countryprofiles2) (last visited Mar. 9, 2023).

<sup>25</sup> African Charter on the Rights and Welfare of the Child art. 21, *adopted* July 1, 1990, [https://au.int/sites/default/files/treaties/36804-treaty-african\\_charter\\_on\\_rights\\_welfare\\_of\\_the\\_child.pdf](https://au.int/sites/default/files/treaties/36804-treaty-african_charter_on_rights_welfare_of_the_child.pdf).

<sup>26</sup> Int'l Christian Concern, *Boko Haram Terrorists Kill 4 Civilians in Cameroon*, PERSECUTION (Nov. 11, 2021).

<sup>27</sup> The Voice of the Martyrs, *Cameroon*, PERSECUTION.

<sup>28</sup> *Id.*

<sup>29</sup> *Cameroon: Boko Haram Attacks Escalate in Far North*, HUMAN RIGHTS WATCH (Apr. 5, 2021, 12:00 AM), <https://www.hrw.org/news/2021/04/05/cameroon-boko-haram-attacks-escalate-far-north>.

<sup>30</sup> Moki Edwin Kindzeka, *Cameroonian Villagers Protest Renewed Boko Haram Violence*, VOA NEWS (May 9, 2022, 8:55 AM), <https://www.voanews.com/a/cameroonian-villagers-protest-renewed-boko-haram-violence/6563634.html>.

<sup>31</sup> Moki Edwin Kindzeka, *Cameroon Says Separatists are Keeping 8 Abducted Clergy and Christians on Nigerian Border*, VOA NEWS (Nov. 19, 2022), <https://www.voanews.com/a/cameroon-says-separatists-are-keeping-8-abducted-clergy-and-christians-on-nigerian-border/6753291.html>.

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> Chief Bison Etahoben, *Boko Haram Terrorists Kill 4 Persons in Koza Village, Far North Cameroon*, HUM ANGLE (Jul. 18, 2022), <https://humanglemedia.com/boko-haram-terrorists-kill-4-persons-in-koza-village-far-north-cameroon/>.

<sup>37</sup> *Id.*

<sup>38</sup> OPEN DOORS, CAMEROON: FULL COUNTRY DOSSIER (Feb. 2023), <https://www.opendoors.org/persecution/reports/Full-Country-Dossier-Cameroon-2023.pdf>.

<sup>39</sup> Jude Atemanke, *Dozens of Catholic Seminarians Abducted from Major Seminary in Cameroon Regain Freedom*, ACIA AFRICA (Apr. 11, 2022), <https://www.aciafrica.org/news/5640/dozens-of-catholic-seminarians-abducted-from-major-seminary-in-cameroon-regain-freedom>.

<sup>40</sup> *Id.*

<sup>41</sup> Int'l Christian Concern, *supra* note 26.

<sup>42</sup> *Id.*

<sup>43</sup> *Id.*

<sup>44</sup> OPEN DOORS, *supra* note 38.

<sup>45</sup> *Id.*

<sup>46</sup> *Three People Killed, One Abducted in Boko Haram Attack on Christian Village in Cameroon*, BARNABAS FUND (Nov. 27, 2020).

<sup>47</sup> *Id.*

<sup>48</sup> *Two Team Members from Bible Society of Cameroon Killed by Boko Haram*, ETERNITY NEWS (Oct. 8, 2020, 11:40 AM), <https://www.ernitynews.com.au/world/two-team-members-from-bible-society-of-cameroon-killed-by-boko-haram/>.

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> *Five Christians Killed in Boko Haram Repeat Attack on Cameroon District*, BARNABAS FUND (Jan. 30, 2020), <https://www.barnabasfund.org/us/news/five-christians-killed-in-boko-haram-repeat-attack-on-cameroon-district/>.

<sup>52</sup> *Christian Village Ransacked and Church Building Burnt Out in Boko Haram Attack in Cameroon*, CAMEROON INTELLIGENCE REPORT (May 22, 2019), <https://www.cameroonintelligencereport.com/christian-village-ransacked-and-church-buildings-burnt-out-in-boko-haram-attack-in-cameroon/>.

<sup>53</sup> Moki Edwin Kindzeka, *Cameroon Military Asks Civilians Displaced by Boko Haram to Return*, VOA NEWS (Oct. 6, 2022, 9:25 AM), <https://www.voanews.com/a/cameroon-military-asks-civilians-displaced-by-boko-haram-to-return-/6778384.html>.

<sup>54</sup> *Id.*

<sup>55</sup> *Id.*

<sup>56</sup> *Cameroon*, 28 TOO MANY, <https://www.28toomany.org/country/cameroon/> (last visited Mar. 10, 2023).

<sup>57</sup> Moki Edwin Kindzeka, *Cameroon Says Female Circumcision Resurfacing Because of Covid-19, Other Crises*, VOA NEWS (Feb. 7, 2021, 10:27 AM).

<sup>58</sup> *Id.*

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

<sup>61</sup> *Id.*

<sup>62</sup> *Id.*

<sup>63</sup> *FGM Surge Amid COVID-19 Pandemic in Northern Cameroon*, CRTV (Aug. 1, 2022).

<sup>64</sup> *Id.*

<sup>65</sup> *Zero Tolerance for (FGM)*, LUKMEF CAMEROON (Jul. 20, 2019).

<sup>66</sup> *Cameroon Vows to Intensify Fight Against Female Genital Mutilation*, XINHAU NET (Feb. 6, 2021), [http://www.xinhuanet.com/english/2021-02/06/c\\_139724493.htm](http://www.xinhuanet.com/english/2021-02/06/c_139724493.htm).

<sup>67</sup> *Cameroon*, GIRLS NOT BRIDES, <https://www.girlsnotbrides.org/learning-resources/child-marriage-atlas/regions-and-countries/cameroon/> (last visited Mar. 9, 2023).

<sup>68</sup> *Id.*

<sup>69</sup> *Id.*

<sup>70</sup> *See Id.*

<sup>71</sup> *Id.*

<sup>72</sup> Philip Obaji, Jr., “*This is not the Life I Wanted*”: *Child Brides Rise Among Cameroon Refugees*, AFRICAN ARGUMENTS (Sep. 1, 2020).

<sup>73</sup> *Id.*

<sup>74</sup> *Id.*

<sup>75</sup> *Cameroon: Worries About Child Marriages Rise Amid Coronavirus Lockdown*, BARZA WIRE (Jun. 22, 2020).

<sup>76</sup> *Id.*

<sup>77</sup> *Id.*

<sup>78</sup> *Id.*

<sup>79</sup> *Id.*

<sup>80</sup> *Cameroon Launches African Union Campaign to End Child Marriage*, GIRLS NOT BRIDES (Nov. 18, 2016).

<sup>81</sup> Obaji Jr., *supra* note 72.

<sup>82</sup> *See Child Marriage: The Devastating End of Childhood*, SAVE THE CHILDREN.

<sup>83</sup> *Id.*