

**RACIAL DISCRIMINATION FACED BY PEOPLE OF NORTHEAST AND THE
CURRENT LEGAL FRAMEWORK: ESPECIALLY IN RELATION TO COVID TIMES**

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ABSTRACT

The people belonging to the north east region have always been a subject of regional and racial discrimination but the ongoing pandemic has aggravated their problems in a two fold manner – 1. Affected by the hit of pandemic 2. Up surging racial discrimination against them. Recently a Delhi based NGO named Rights and Risks Analysis Group has submitted a report of increasing humiliation and discriminatory instances faced by the northeast Indians during the pandemic which includes instances of being associated with the pandemic and being called as “corona virus” to forcibly quarantined and being stereotyped as the “face of covid” which led to severe human rights violation. The WHO has also highlighted this problem of global stigmatization. The research would be revolving around these issues and the insufficiency of the current Indian legal regime for the protection of the rights.

INTRODUCTION

Racial discrimination in India has not been a recent phenomenon. It is, has been and unfortunately might perennially be attached within the roots of the society and when we take our eyes on the state of affairs of the citizens belonging to the northeast, the pandemic is no less than a torture for most of them. It has aggravated their miseries in a twofold manner a) they are as much affected as we are b) there is a whole range of racial attacks they are being subjected to, from being forcibly quarantined to facing racial slur and being called by names as, “corona” “Chinese” ,“chinki” etc, however their distress is not limited to these instances mentioned above, it goes beyond that. Racism with regard to

citizens of North East India does not only operate on an individual level, it in fact encompasses the structural racism.

The whole geographical area is divided by boundaries of eight states, that we collectively call as the northeast region. The reason why we often discuss (and seek the solution for) the racial discrimination faced by people belonging to these states as a common/collective experience is because of the mongoloid features they share and similar political turbulence faced by them.¹ However this no way makes them any less of an “Indian” than others. In fact according to Herbert Risley’s classification of Indian Races, mongoloid race is of the seven most major races in the country. Despite many efforts by the modern liberals, the ideals are yet to be achieved with ground reality being nowhere close to it. There is a collective notion carried by people living in the other parts of the country that associate the characteristics (eating pattern ,features etc) of northeast citizens with those of chinese people and this becomes even more relevant in these times because of china being the origin of the virus. Incidents of racial attacks are not peculiar to citizens of northeast India but more generally to the people possessing “mongoloid features”. There has been a sharp increase in these anti-asian racism and xenophobia all across the world. However, the paper specifically discusses about the racial discrimination faced by citizens of northeast India.

The ‘othering’ of these people has hollowed their basic rights guaranteed by the constitution specially during the times of pandemic, below are some specific incidents collected through wide range of sources including the ones listed out by the a report submitted by an NGO named Rights and Risks analysis group:

1. A housing society in Ahemdabad, Gujarat , evicted two northeast girls for “bringing coronavirus in India”
2. A man spat on a Manipuri girl studying in Delhi University and addressed her as “corona is here”.

¹ Kamei Samson ,North-east and Chinky: Countenances of Racism in India , Vol 3, The Journal of Development Practice, 20-28,(2017)

3. Activist and lawyer Alana Golmei hailing from Manipur was called as corona at NCERT Campus in Delhi
4. Nine Naga youths were forced to undergo quarantine in Ahemdabad without showing to have any symptoms or travel history.
5. There were also cases of racial profiling and discrimination in the states of Chennai and Punjab.
6. Two Manipuri youths were called “corona” , “chinki” in front of the police at Mahipalpur in South Delhi, who were called by the youths after being harassed and bullied by the other men. There was no action taken by the police on this matter.
7. A similar incident happened in Goa where the police threatened the complainants to withdraw their complaints. The inaction of the law enforcement agencies is a very dangerous form of discrimination which is discussed below.

Most of the cases listed above are from the state of Delhi, in fact the National Human Rights Commission conducted a study few years back in which it was revealed that 54% people from North-East India do not find New Delhi a safe and secure place to live in terms of ethnic tolerance and 67% people from North-East faced ethnic and racial discrimination in New Delhi.²

STRUCTURES OF RACISM

Victim of racial discrimination is what India otherwise feels itself to be and considers it to be a practice popular in the west but the real side of the story is that India is among the top racist countries.³ There are various levels of racial discrimination faced by people from northeast region the most common being footnote racism that includes subtle modes of discrimination that is most often visible in the everyday interaction in the streets , markets etc, it is not experienced directly but are rather felt. Ignorance about the history and the values of the north-easterners and deeply internalised ideas about homogenised "Indianness" are responsible for this form of racism, The

²74% of the North East Indians feel Delhi is the most Unsafe city for them, DNA India, (Dec 6,2014, 8:18 PM) <https://www.dnaindia.com/india/report-74-northeastern-indians-feel-delhi-is-the-most-unsafe-city-for-them-2041607>

³ SWAR THOUNAOJAM, A Preface to Racial Discourse in India: North-east and Mainland, Vol.47, Economic and Political Weekly, 10-13 (2012)

second form of racism is “headline racism” which refers to physical acts of violence and hateful attacks which have been clearly pointed out above, it is the footnote racism that often leads way for headline or front page racism.⁴ An American research scholar, Gilbert Lee also warns about these subtle forms of discrimination which are more dangerous than the overt forms. The deep rooted problem of racial discrimination cannot however be simplified into just two levels of racism but what seems more problematic is another level i.e institutional level which is the stage where the law enforcing agencies can actually work out in solving the issues of other two levels. There have been instances before and during the pandemic where the police brutalities were projected, the recent one being during the lockdown where police officials singled out the North Eastern and were seen beating the them in bangaluru and other parts of India. Apart from these adversities there have been lapses by the officials in appositely dealing with the cases of racial attacks. In view of the same, the National Human Rights Commission in may took suo motu cognizance of the issue specially pertaining to the inaction of the authorities pertaining to the tackling the case of a racial attack in gurugram, the NHRC sent a notice to the Chief Secretary, Government of Haryana and the Commissioner of Police, Gurugram calling for a detailed report on the matter. The commission also expressed it’s disgust over the fact how citizens of the same country are treated differentially when they are themselves as much a part of it as others are. After a list of incidents that happened in the country, Kiren Rijju ,the Chief minister of Arunachal called for national integrity and acknowledged the urgency of handling the social and racial discrimination while addressing a webinar on “issues faced by North Eastern women in metropolitan cities” conducted by the National Commission for Women.

It is difficult to contain the discriminatory predicament into simplified levels of racism. Most of the people become a part of it by the reason of the localised socialization process that internalise some levels of prejudice against certain set of people which is generally covert in nature. There is a whole structural racism that is prevalent in the country, while the main focus has been on the self reported

⁴ THANGKHANLAL NGAIHTE, Nido Taniam and the Fraught Question of Racism in India, Vol. 49, Economic and Political Weekly , 15-17, (2014)

incidents which are generally overt in nature, there is a need to go into the roots which would further uncover other forms of racism.

UN CONVENTION ON ELIMINATION OF ALL FORMS OF DISCRIMINATION

Non Discrimination principle is unequivocally fundamental to international law in all its visages. According to the United Nations Organization, Non discrimination and equality before the law constitutes the fundamental principles of international human rights law moreover principle of racial discrimination finds place in all the nine major international human rights treaties and the regional treaties like article 2 of the African Charter on Human and Peoples' Rights ,article 3 of the African Charter on the Rights and Welfare of the Child ,article 1 of the American Convention on Human Rights etc. The ICJ in Barcelona Traction Case (Belgium v. Spain, 1970)⁵ also opined that, there are some obligations of international character which are so important that all states have an interest in their protection (erga omnes), racial discrimination being one of those casts an obligation on the states to comply with the obligation.

There are many forms of contemporary racial discrimination that are prevalent in currents times , some of which have been discussed above, ranging from the most evident forms which are racial slur, violence to subtle ones. Racial and ethnic profiling in times of covid have been an issue for the people of northeast specially at other regions of the country.

The Convention on Elimination of all forms of Discrimination condemns discrimination in all its forms. Hate speech and calling the people of northeast with different kinds of names have been already discussed above, Article 4 of the convention calls for an obligation to take immediate and positive measure to eradicate incitement and discrimination, the “measure” here means legislative , executive administrative, , budgetary and regulatory instruments including plans, policies ,

⁵Belgium v. Spain, 1970 [1970] ICJ Rep 3

programmes and regimes.⁶ Time and again it has been reiterated by the committee that Article 4 was regarded as central to the struggle against racial discrimination, during the time of adoption of the convention. The international community's clear abhorrence against racial hate speech has been manifested in article 4, which is understood as a form of other directed speech, rejects the core human rights principles and seeks to degrade the standing of individual and groups in the estimation of society. It is true to say that freedom of expression is indispensable for the articulation of the human rights and the convention in some ways silences the right to speech but it is important to note here that, the barrier to these speech is important to prevent the free speech of the victims from being silenced, a fair balance has to be achieved in order to prevent this from being an expression of a zero sum game where priority given to one diminishes the other.⁷ Article 4 puts out an obligation on the states to punish by the medium of law, all dissemination of ideas based on racial superiority, incitement to racial discrimination along with the acts of and incitement of violence. Article 7 on the other hand addresses the root cause of discrimination, it acknowledges the medium of education, culture and information (not being exhaustive) which can help to fight the prejudices that leads to racial discrimination. The committee on elimination of racial discrimination puts a considerable amount of insistence on the usage of education which is aimed at encouraging the knowledge of the history, culture and traditions of racial and ethnic groups A balanced and objective representation of history, remembrance of the atrocities that have been committed and the events associated with the group can help to sensitize the counter population and will promote inter ethnic understanding.⁸ A similar observation has also been made by J. DY Chandrachud by emphasizing on the need to inculcate greater awareness of history and rich culture and traditions of the North East, among other people which will be helpful in eradication of the roots causes that leads to discrimination.⁹

The practice of racial profiling is also prohibited in the Convention under Article 2,4,5 and 7, the

⁶ UN Committee on the Elimination of Racial Discrimination (CERD), General Recommendation no.XXXII, The meaning and scope of special measures in the International Convention on the Elimination of All Forms [of] Racial Discrimination, 24 September 2009, CERD/C/GC/32, <https://www.refworld.org/docid/4adc30382.html> (last visited on 12/12/2020)

⁷ *Id*, General recommendation No. XXXV

⁸ *Id*

⁹ *Karma Dorjee & Ors v Union of India & Ors*, AIR 2017 SC 113(India).

committee in its general recommendation no. 31¹⁰, on the prevention of racial discrimination in the administration and functioning of the criminal justice system, advised that the states should prevent questioning, arrests and searches solely based on the personal appearance of the person.

United Nations Committee on Elimination of all forms of Discrimination has recommended the nations to adopt “National Action Plans against Racial Discrimination”. The plans should lay out the specific approaches to combat racism and discrimination, from enhanced policing of hate crimes to public messaging and education programming to encourage tolerance.¹¹

HOW THE LAW ADDRESSES IT?

India ratified the UN Convention on Elimination of all forms of Discrimination on 9th July 1993, therefore being a signatory to the convention and being a vibrant part of the consensus brought about by the international community puts a duty on it to enforce the obligations laid down under the same. There are multiple legislations that address the problems related with stigmatization on the basis of sex, religion, caste but racial or regional discrimination is a prominent issue that has not been yet efficiently dealt with. It is also important to note here that in the case of Vishaka V state of Rajasthan¹² it was laid down by the court that the international conventions and norms have to be read into the laws in the absence of legislations occupying the field provided there is no inconsistency between the two and there is a void in the domestic law. Thus domestic legislations in India, in fact support the obligations that have been accepted by the country under the Convention on Elimination of all forms of Discrimination.

There are many stereotypes pertaining to northeast citizens that are dwelling into the minds of people, be it easy availability of the women to their eating patterns which have collectively been used as a ground for violence and the practice of “othering”. Even though there haven’t been much progress

¹⁰ General recommendation No. XXXI, *Supra* note 6

¹¹ UN Office of the High Commissioner for Human Rights (OHCHR), Developing National Action Plans Against Racial Discrimination: A Practical Guide, 2014, HR/PUB/13/3, <https://www.refworld.org/docid/5566debe4.html> (last visited on 10/12/2020)

¹² Vishaka V state of Rajasthan, (1997) 6 SCC 241 (India)

from the side of the government but the judiciary has always been triggered by these issues and questioned the state for its inaction. The Supreme Court in 2014 issued notice to the centre and the states, in a PIL seeking for its direction to the government to frame guidelines to protect the people from North East states in various parts of the country against racial discrimination. There were 7 advocates who moved the petition out of which some belonged to the northeast region, they highlighted the recent attacks specially the brutal attack on Nido Tania who got killed by some local shopkeepers of New Delhi. The petition alleged various difficulties faced by these people when they move out of their states in search of better jobs, education and opportunities. The court asked for the set up of a committee to monitor the initiatives taken by the government to deal with the incidents of racial violence, to suggest measures and to ensure strict action, to receive complaints on the issues of racial abuse and forward it to the local police for enquiry or to the National Human Rights Commission.¹³

The Delhi High Court also took suo moto cognizance of the matter and pointed out that the disturbing acts threaten the integrity of the country and violate Article 19(1)(d) and (e) of the constitution of India as it puts a bar on the North Eastern people ,to freely move or reside and settle in any part of the country. It also violates Article 301 of the constitution as these people are being harassed and prevented from carrying out their businesses in other parts of the country.¹⁴ The court suggested for a separate legislation that would deal with these issues for preventing the natives of one state from harassing the migrants and indulging in hate crimes and also pointed out that Indian Constitution does not treat India as a confederation of states that is broken into fragments by narrow domestic walls but as a Union of States.¹⁵ The court further suggested the Delhi Legal Services Authority to take up programmes for making the people belonging to these regions aware of their legal right, render the necessary legal aid to them and to conduct workshops to provide interface between people from northeast and the Delhi Police and to educate other residents for sensitizing

¹³ Supreme Court notice to centre, states on guidelines to protect north east people, The Economic Times, (Feb 14,2014, 4:02 PM), <https://economictimes.indiatimes.com/news/politics-and-nation/supreme-court-notice-to-centre-states-on-guidelines-to-protect-north-east-people/articleshow/30397913.cms>

¹⁴ Court On Its Own Motion vs Union Of India & Ors ,W.P.(C) 5666/2017

¹⁵ INDIA CONST. art. 1

them about the grievance of these people.

In the same year a special committee was formed by the Ministry of Home Affairs to look into these issues pertaining to the citizens of North East , under the chairmanship of M.P Bezbaruah. The committee submitted its report on 11th july,2014 and listed down several recommendations which are¹⁶:

1. To enact a new or a strict law – The committee recommended that either the centre should come up with a wholesome legislation that would deal with issue of racial discrimination or Section 153 of the Indian Penal Code,1860 which punishes, Wantonly giving provocation with intent to cause riot, if rioting be committed or if not committed, should be amended and in any case the offence should be made cognizable and non bailable. A proposal to add section 153 C , IPC was made , which would punish the acts causing and likely to cause fear or feeling of insecurity among the community , with imprisonment up to five years. Another proposed section was Section 509 A which would punish words, acts or gestures that intends to insult a member of any race, punishable with imprisonment up to three years.
2. The major concern of the persons belonging to North East that was put forward by the committee was the ‘discrimination and apathy of the law enforcing agencies’, therefore the committee recommended the completion of the investigation of FIR within 60 days by a special squad and police officer not below the rank of a Superintendent of Police or Assistant Commissioner of Police. The trial should be completed within 90 days , with a special prosecutor handling the cases of atrocities. The committee recommended the formation of North East Special Police Unit so that a single police officer in charge can register the complaints and give directions to other police stations. It is ironic that the city with an incredible number of discriminatory practices against the people of North East (specially in covid times) is the only state that has a separate Special Police Unit for North- Eastern

¹⁶Bezbaruah MP, Report of the Committee under the chairmanship of Mr M.P. Bezbaruah to look into the concerns of the people of the northeast living in other parts of the country, <http://itanagar.nic.in/documents/Bezbaruah.PDF> ,(last visited on 25/12/2020)

region (SPUNER).

3. The committee also recommended the recruitment of 10 male and 10 female police personnel, with each of them belonging to the North East States and police exchange programmes being conducted from the North East states to other metropolitan areas.
4. The other recommendation were the creation of fast track courts for handling of case particularly those which are racially motivated and heinous crimes against women and children. Among others there were also suggestions pertaining to a special helpline specially dedicated to North East citizens and creating awareness by the means of social media and education.

The government did acknowledge the issues and recommendations of presented by the committee but it has been more than 6 years and nothing much has been done about the same. Criminal Law (Amendment) Bill , 2019¹⁷ was introduced in the Rajya Sabha on 7th February ,2020 , it sought to add two sections pertaining to racial abuse- Section 153 C says that whosoever on the ground of religion , race, caste or community, sex gender or identity sexual orientation, place of birth, residence, language, disability or tribe either a) uses gravely threatening words or signs or visible representation with the intention or knowledge that it is likely to cause fear or alarm; or b) advocates hatred by words, signs or visual representation that causes or likely to cause incitement or violence , shall be punishable with imprisonment that may extend to three years or fine or both. The other section is 505 A which prohibits the usage of words in public containing rumour or alarming news or displays any writing, sign, or other visible representation which is or is likely to be gravely threatening, or derogatory and causes fear or alarm or with an intent to provoke or likely to provoke the use of violence against that person or another ,the punishment for the act would be imprisonment for a term that may extend to three years or fine or both. It is important to note that on one hand the bill is yet to become a part of the statutes book on the other hand the rising number of cases of racial abuse, violence and hate speech are constantly rising which needs an immediate action. The Ministry of Home

¹⁷Criminal Law (Amendment) Bill,2019,No. 53 of 2019 (India)

Affairs issued an advisory in march to all the states to ensure sensitization of the law enforcement agencies to take prompt action against harassment of the people of North East amidst rising number of incidents of racial attacks and linking them with corona.¹⁸ It is undeniable that an advisory at this point will not be of much help and a strict law with a proper implementation is the need of the hour.

The current criminal law regime does not address the punishment for racist remarks, section 509, India Penal Code is used for the women, which punishes the words, gestures or acts intended to insult the modesty of a woman but the laws fails when the victim is a male. In fact it has been said by the Additional Commissioner of SPUNER, Hibu Tamang, that “the cases are not properly addressed because the police officers on ground are not aware of what sections under the Indian Penal Code can be used to charge the perpetrators , for women generally section 509, IPC is invoked but there is no section that addresses the racist remarks”.¹⁹ The police officers cannot be blamed under such circumstances , it is the lawmaker who needs to make the desired changes under the law.

It is often argued that the SC/ST (Prevention of Atrocities Act), 1989 contains strict provisions that could be invoked for the protection of the citizens of North East but it is important to take note of a point that not all the citizens belonging to the region are covered under the Act , they are only applicable to the Schedule Tribes and Schedule Castes and does not apply to other communities. In fact when we look at the data/ statistics of the North Eastern Region, produced by the Government the total population of SC and ST in the state of Sikkim is 4.6% and 33.8% respectively, in Assam it is 7.5% and 12.4% and for Manipur it is 3.8% and 35.1%.²⁰ The data produced above makes it evident that there is a small range of people that could get the

¹⁸ Corona Virus outbreak: MHA advises against discrimination of north east people, The Hindu,(March 23,2020, 10:47 PM) ,<https://www.thehindu.com/news/national/coronavirus-outbreak-mha-advises-against-discrimination-of-northeast-people/article31145387.ece>

¹⁹ ‘ Beaten , abused , spat on’ : people from North East endure racist slurs amid coronavirus panic, The Print, (march 25,2020 1:24 PM) <https://theprint.in/india/beaten-abused-spat-on-people-from-northeast-endure-racist-slurs-amid-coronavirus-panic/387716/>

²⁰ Basic Statistics of North Eastern Region 2015, Government of India, <http://necouncil.gov.in/sites/default/files/uploadfiles/BasicStatistic2015-min.pdf> , (last visited on 12/12/2020)

protection of the Act but others are devoid of any comprehensive racial laws that can be used by them for their legal protection. The people who are covered under the Act are also not able to get the fruits of the protection as police personnel often do not invoke the provisions of the Act.²¹ Recently the Supreme Court in the case of Hitesh Verma V State of UttraKhand²² quashed the case pertaining to allegations under the SC/ST (Prevention of Atrocities) Act, 1989. The court said that insulting or intimidating a person belonging to a Scheduled Caste or a Scheduled Tribe will not be treated as an offence under the Act unless such insult or intimidation is on the account of the victim belonging to the SC/ST community. Now considering the strict words of the court can lead to many problems, the consequence of the same is when degrading words like 'corona' or 'wuhan virus' is used against a person, which obviously is not insulting on the ground of affiliation of the person to its community but rather it is a remark used loosely and generally for all the people belonging to the region, the person would be unable to get the proper remedy as he would have to prove that the insult or intimidation is on the ground of his/her affiliation to such caste (Scheduled caste or Scheduled tribe).

A progressive step was taken by MP Shashi Tharoor by introducing the Anti Discrimination and Equality Bill, 2016²³. The bill sought to attack the discriminatory attitudes which have so far skipped the boundaries of law like discrimination on the ground of sexual orientation or marital status. The bill was remarkably comprehensive as it had broadened the safety net and dealt with some subtle forms of discrimination like stereotypical assumptions and prejudices against the protected members by bringing them within the definition of direct forms of discrimination.²⁴ The bill recognized that effects of discrimination could also result by indirectly discriminating and doing acts which can disproportionately impact a group, for example minimum height requirement for jobs, not giving houses to non vegetarians etc. Though the bill does not specifically deal with racial discrimination but it is worth mentioning because of the

²¹ *Supra*, note 16 at 7

²² Hitesh Verma V State of UttraKhand, (2020) 10 SCC 710 (India)

²³ Anti Discrimination and Equality Bill, 2016, Bill No. 289 of 2016 (India)

²⁴ *Id.*, Section 6

acknowledgement it gives to the vulnerability of North Eastern Indians.²⁵ It is unfortunate that the bill could not become the part of the statute books otherwise it would have been a useful tool for dealing with the discriminatory practices that are prevalent in the country in times of pandemic like the eviction of North East people from houses, and passing of racial remarks by the virtue of prejudices formed against them .

The Model National Legislation, released by the United Nations is a useful guide for the countries for the enactment of legislation related to racial discrimination.²⁶ It defined the acts of racial discrimination as “*any distinction, exclusion, restriction, preference, or omission based on race, colour, descent, nationality ethnic origin which has the effect of nullifying or impairing , directly or indirectly the recognition, equal enjoyment or exercise of Human Rights and fundamental freedom recognized in international law*”.²⁷ The framework consists of provision of principles, repressive and preventive actions by the state and provides imprisonment, fines, suspension from public office and community service with a view to promote good relations among various racial groups. The model law also suggests for an independent National Commission which would look after the implementation of the Act and give advisory opinions to the public and private bodies , conduct enquiries, propose amendments, act as a mediator and take legal action either on a complaint or suo moto, on its own behalf. It also deals with racial discrimination in the field of education, employment, housing and provision of goods and services. It can be a useful guide for India.

By the discussion put forward in the preceding paragraphs it is evident that India needs to enact a legislation for dealing with these issues which are so deep rooted in the society that mere advisories and guidelines are not enough to tackle the problem, a much more comprehensive dealing is the need of an hour. However the Committee on Elimination of all forms of Racial Discrimination has pointed out in a case before it that enacting a law and making racial

²⁵ *Id*, Section 5

²⁶ UN Office of the High Commissioner for Human Rights (OHCHR), Model National Legislation for the Guidance of Governments in the Enactment of Further Legislation Against Racial Discrimination, 1996, HR/PUB/96/2, <https://www.refworld.org/docid/46ceb4db2.html> (last visited on 8/01/ 2021)

²⁷ *Id*, part I

discrimination, a criminal act is not enough but proper implementation of the same has to be done.²⁸ The state must investigate the cases with due diligence and expedition when threats of racial violence are made.

CONCLUSION

Racism in India is a very deep rooted problem, the pandemic on top of it has been more burdening on the persons belonging to the North East region. When the whole country is transparent to their own privileges and hiding behind the universal effects of the pandemic on all race, caste, creed, culture, gender etc, there are certain groups who have been and are affected by the pandemic in a multi dimensional manner. There are all forms of discrimination that are being practiced upon them from subtle to grave. It is true that the effects are no way going to vanish over the night, but requires constant efforts from the side of the legislative, executive and judicial bodies. It is high time that India should amend its laws and put into effect the recent developments made in Criminal Law regime. India being a party to the Convention needs to implement the convention in its true spirit. The recommendation of the international organizations and bodies to use education as a means to curb these activities should go hand in hand with the strict penal provision. The authorities should take steps to sensitize the public and the law enforcement agencies. A collaborative effort can bring a lot of change.

²⁸ L. K. v The Netherlands, Communication No. 4/1991, U.N. Doc. A/48/18 at 131 (1993)