



Universal Periodic Review 51<sup>st</sup> Session – Stakeholder's Report

## **Rwanda: Freedom of Religion or Belief**

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**Submission by:**

**The World Evangelical Alliance (WEA)** was founded in 1846 and is a network of churches in over 140 nations that have each formed an evangelical alliance, and over 100 international organizations joining together to give a world-wide identity, voice, and platform to more than 600 million evangelical Christians worldwide.

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## Introduction

1. In 2018, the government of Rwanda established a law regulating faith-based organizations. Under the provisions of that law, thousands of churches and houses of prayer were closed in 2024. In 2025, the government amended the law to increase restrictions on places of worship, with further guidelines issued in June 2025. Under international human rights standards, states may only place restrictions on manifestations of religion in community with others for the purposes of health and safety or the rights of others, and in the least restrictive manner. We believe that the current regulations and restrictions do not meet international human rights standards.
2. Religious organizations are an important part of civil society. They promote peace and reconciliation in society. They provide practical support to the most vulnerable in society, including widows, orphans and refugees. They promote ethical behaviour. Religious leaders are therefore frequently called upon to engage in activities such as anti-corruption monitoring and election monitoring. Restrictions on religious institutions therefore have significant negative impacts on society.

## Guarantees of freedom of religion or belief

3. The Rwandan Constitution establishes the country as a secular state.<sup>1</sup> Article 37 guarantees freedom of religion or belief as follows:

*Freedom of thought, conscience, religion, worship and public manifestation thereof is guaranteed by the State in accordance with the law.*

*Propagation of ethnic, regional, racial discrimination or any other form of division is punished by law.*

4. Article 39 protects freedom of association and Article 40 guarantees freedom of assembly. There is a limitation clause in Article 41:

*In exercising rights and freedoms, everyone is subject only to limitations provided for by the law aimed at ensuring recognition and respect of other people's rights and freedoms, as well as public morals, public order and social welfare which generally characterise a democratic society.*

5. Rwanda acceded to the Universal Declaration of Human Rights (UDHR) and ratified the International Covenant on Civil and Political Rights (ICCPR). Article 18 of both these international human rights documents guarantees freedom of religion or belief, including the right to manifest that religion in community with others.

6. The UN Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief<sup>2</sup> (UN Declaration) provides in Article 6:

*(a): The right to freedom of thought, conscience, religion or belief includes the freedom to worship or assemble in connection with a religion or belief, and to establish and maintain places for these purposes.*

7. We further note that Rwanda ratified the African Charter on Human and People's Rights, which guarantees religious freedom in Article 8 and freedom of association in Article 11.

## 2018 law regulating Faith-based Organisations

8. In 2018, the Rwandan government passed a new law titled *Determining the Organisation and Functioning of Faith-based Organisations*.<sup>3</sup> This law established the regulatory structure for faith-based organisations (FBOs), with the Rwanda Governance Board (RGB) giving oversight and enforcing the law. FBOs, including umbrella organisations, are required to have legal personality as a prerequisite to starting activities.<sup>4</sup> Previous Special Rapporteurs on freedom of religion or belief have made it clear that “registration should not be compulsory” and that “it should not be a precondition for practising one’s religion, but only for the acquisition of a legal personality status.”<sup>5</sup> Therefore, the law’s requirement that churches register before being permitted to hold religious services is not in compliance with international human rights standards.
9. The requirements are quite substantial to apply for legal personality. They include that the legal representative: “possess a bachelor’s degree in religious studies or any bachelor’s degree with a valid certificate in religious studies related matters issued by a recognised institution.”<sup>6</sup> In addition, an organization (i.e., a church), must have “a letter issued by District authorities agreeing collaboration with the organization.”<sup>7</sup>
10. All preachers are similarly required to: “possess a degree of a higher learning institution in religious studies or any other degree with a valid certificate in religious studies related matters delivered by a recognised institution.”<sup>8</sup> Sermons may only be given in designated facilities that comply with the law.<sup>9</sup>
11. There are also substantial requirements for legal personality for umbrellas and ministries.
12. We note that there is a separate law for the regulation of non-governmental organizations (NGO), promulgated in 2024.<sup>10</sup> This law does not require that the legal representative have a university degree. In fact, it does not specify any educational requirements for the legal representative. It also does not require that NGOs have a building, but rather, it only requires that they have a legal address. There is thus a much higher standard for FBOs than for NGOs, such that FBOs are at a disadvantage and face discrimination in registration.
13. In July and August 2024, the RGB conducted inspections of over 13,000 churches and houses of prayer to assess whether they met the required standards. More than 8,000 churches and houses of prayer were closed for non-compliance with the standards.<sup>11</sup> The government of Rwanda estimates that approximately 70 percent of churches were closed for non-compliance.<sup>12</sup>
14. We recognize that governments have the authority to regulate buildings and establish health and safety regulations. However, a former Special Rapporteur on freedom of religion or belief, Asma Jahangir, stated, “On legislation, the Special Rapporteur has conveyed her concerns about legislation unduly limiting the right to manifest one’s religion or belief, in particular through registration requirements or restrictions on places of worship, religious education, religious literature and proselytizing activities.”<sup>13</sup>
15. There has been rapid growth in the number of churches in Rwanda. In addition, many of the new churches are not part of mainline denominations such as Roman Catholic, Anglican, Presbyterian or Lutheran. The government’s response was to enact the 2018 law requiring registration, building standards and educational standards for religious leaders. As seen by the closure of many churches for non-compliance, these regulations are too onerous for many of them to meet.

16. It further appears that the government changes building requirements over time so that a building that was compliant is no longer. There does not appear to be flexibility for buildings that are pre-existing and cannot change the size of their property or parking lot to comply with the new regulations.<sup>14</sup>
17. The government of Rwanda has responded to public criticism of the church closures.<sup>15</sup> It points to unsafe buildings and “preachers engaged in exploitation of people through extorting money and property by promising miracles, encouraging harmful practices such as sowing divisionism, promoting anti-vaccination ideologies and other conspiracy theories” as justification for their intervention. Despite having a rationale for regulation, Rwanda must ensure that its regulation of FBOs meets international standards for freedom of religion or belief. The regulations must relate to the problems the government is trying to resolve and must use the least restrictive means.
18. The enforcement mechanism of closing churches and houses of prayer for violations of health and safety standards is draconian unless the building is completely unsafe. The RGB could instead issue a violation notice and give the church a period of time for compliance. It would be of assistance for the RGB to clarify the applicable standards, which are amended from time to time. In addition to the national building code,<sup>16</sup> there are also separate regulations on fire safety, for example.<sup>17</sup> It further appears that there are local requirements to be met.<sup>18</sup> It is also not clear the process for re-inspections to allow the church or house of prayer to re-open. We have received information that churches closed last September have waited more than six months after requesting a re-inspection. We note the difficulty in raising funds to renovate churches when the churches are closed.
19. With respect to the requirement that pastors have a Bachelor’s degree in theology, Article 6 of the UN Declaration makes it clear that it is the religion’s responsibility to establish qualifications for clergy. The State’s appropriation of responsibility for setting standards for the clergy is not in conformity with international human rights standards.
20. We further note that there are very few university-level theology programs offered at universities in Rwanda. If the government of Rwanda sets mandatory requirements for clergy, it is under an obligation to ensure that they can obtain the required education in the country.
21. It appears that people are gathering in homes to worship when their churches are closed.<sup>19</sup> However, the law prohibits such gatherings and worshipers fear arrests. We note, “the legal prohibition and sanctioning of unregistered activities is incompatible with international standards.”<sup>20</sup>

## **2025 Amendment**

22. The Chief Executive Officer of the RGB promulgated new regulations on 6 March 2025, further increasing regulation and restrictions on FBOs.<sup>21</sup> In addition to the 2018 regulations, this new law requires that congregations can only meet in a house of worship that is exclusively used for this purpose.<sup>22</sup> The house of worship must have a “certificate issued by the District or the City of Kigali, confirming that the building designated for worship activities adheres to the legal construction requirements applicable to the specified location”.<sup>23</sup> They are not permitted to meet outside for worship or events. As well, there is a requirement for the support of 1,000 founding members.<sup>24</sup> There is no health and safety justification for the requirement that people worship only in buildings designated for those purposes.

23. The new amendment appears to have been motivated by President Kagame, who has expressed concerns about rogue pastors who “are just there to squeeze even the last penny from poor Rwandans, as those who own them enrich themselves.”<sup>25</sup> The new law is not targeted at this problem but rather applies to all churches. It certainly does not meet the standard of the least restrictive means to protect the population of Rwanda from such “unscrupulous people,” as stated by President Kagame. We note that fraud is a criminal offence in the Rwanda Penal Code.<sup>26</sup> There is therefore an enforcement mechanism if “rogue pastors” are committing fraud.
24. With respect to President Kagame’s concerns about the negative impact of “rogue pastors,” we wish to note the positive comments about FBOs by the National Public Prosecution Authority and the Rwanda National Policy in 2016.<sup>27</sup> They identified the importance of FBOs in fighting against terrorism<sup>28</sup> and in helping “foster a non-violent culture of conflict resolution in families and communities.”<sup>29</sup> Increasing restrictions on FBOs therefore reduces the contribution these organizations make to Rwandan society.

## **2025 Guidelines**

25. The Chief Executive Officer of the RGB issued three guidelines on 17 June 2025. The first is titled “Guidelines on Religious Preaching that Aligns with Rwandan Values,” and requires that all preaching be consistent with Rwandan values.<sup>30</sup> These “values” include much that is laudable, including “peace, development, and a resilient national identity.” We agree that Christian sermons should not promote division or genocide. However, when the guidelines prohibit “misleading teachings, false or end-times prophecies or miracles,”<sup>31</sup> the state is determining what is a legitimate religious belief or practice and violates international human rights law on freedom of religion or belief and freedom of expression.
26. We are further concerned that the very purpose of the guidelines is to “prevent messages or practices that undermine Rwandan values, national unity, and social harmony.”<sup>32</sup> If it is the government that is enforcing this and determining whether a particular sermon violates this standard, any criticism of the government could be considered illegal.

## **Recommendations**

We therefore respectfully urge the Republic of Rwanda to:

27. Review the 2018 law on Faith-based Organisations, and its 2025 amendment and related Guidelines, to ensure compliance with international human rights standards in the area of freedom of religion or belief noting the above identification of several areas of non-compliance.
28. Uphold neutrality and impartiality in the formulation, enactment, and implementation of laws such that groups suffer neither advantage nor disadvantage on account of their religious identity.
29. Establish more flexible processes for compliance to allow places of worship to remain open while they work towards compliance with regulations and guidelines.

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- <sup>1</sup> Rwanda Constitution, 2003, rev. 2015. Art. 4. Available online: [https://www.constituteproject.org/constitution/Rwanda\\_2015](https://www.constituteproject.org/constitution/Rwanda_2015).
- <sup>2</sup> United Nations General Assembly resolution 36/55, *Declaration on the Elimination of All Forms of Intolerance and of Discrimination Based on Religion or Belief*, 25 Nov. 1981. Available online: <https://www.ohchr.org/en/instruments-mechanisms/instruments/declaration-elimination-all-forms-intolerance-and-discrimination>.
- <sup>3</sup> LAW N°72/2018 OF 31/08/2018. Available online: <https://rwandalii.org/akn/rw/act/law/2018/72/eng@2018-09-10>.
- <sup>4</sup> Ibid., Art. 7.
- <sup>5</sup> Heiner Bielefeldt, *Report of the Special Rapporteur on freedom of religion or belief*, A/HRC/19/60, para. 41. Available online: <https://documents.un.org/doc/undoc/gen/g11/175/41/pdf/g1117541.pdf?OpenElement>. See also Asma Jahangir, *Promotion and Protection of all human rights, civil, political, economic, social, and cultural rights, including the right to development*, A/HRC/10/8, of 6 January 2009, § 23. Available online: <https://docs.un.org/en/A/HRC/10/8>.
- <sup>6</sup> LAW N°72/2018 OF 31/08/2018. Available online: <https://rwandalii.org/akn/rw/act/law/2018/72/eng@2018-09-10>, Art. 20.
- <sup>7</sup> Ibid., Art. 17(11)
- <sup>8</sup> Ibid., Art. 22(7).
- <sup>9</sup> Ibid., Art. 23.
- <sup>10</sup> LAW N° 058/2024 of 20/06/2024. Available online: <https://www.rgb.rw/index.php?eID=dumpFile&t=f&f=102343&token=f3216133e9f2990811c89e30aa85bdb648c94073>.
- <sup>11</sup> Republic of Rwanda, *Frequent Questions on Inspection and Closure of Prayer Houses*. Available online: <https://www.gov.rw/blog-detail/frequent-questions-on-inspection-and-closure-of-prayer-houses>.
- <sup>12</sup> Ibid.
- <sup>13</sup> Jahangir, *Promotion and Protection of all human rights*, § 23. Available online: <https://docs.un.org/en/A/HRC/10/8>.
- <sup>14</sup> “Thousands of Church Closures in Rwanda,” African Pastors Fellowship, 20 September 2024. Available online: <https://africanpastors.org/church-closures-rwanda/>.
- <sup>15</sup> Republic of Rwanda, *Frequent Questions*. Available online: <https://www.gov.rw/blog-detail/frequent-questions-on-inspection-and-closure-of-prayer-houses>.
- <sup>16</sup> Rwanda Building Code – Version 2 2019. Available online: [https://rise.esmap.org/data/files/library/rwanda/Energy%20Efficiency/Rwanda\\_building%20code\\_2019.pdf](https://rise.esmap.org/data/files/library/rwanda/Energy%20Efficiency/Rwanda_building%20code_2019.pdf).
- <sup>17</sup> See National Standards. Available online: [https://www.rsb.gov.rw/fileadmin/Standard\\_Publications/Gazetted\\_Standards/National\\_Standards\\_as\\_published\\_in\\_Official\\_Gazette\\_n\\_Special\\_of\\_08\\_05\\_2024.pdf](https://www.rsb.gov.rw/fileadmin/Standard_Publications/Gazetted_Standards/National_Standards_as_published_in_Official_Gazette_n_Special_of_08_05_2024.pdf).
- <sup>18</sup> Republic of Rwanda, *Frequent Questions on Inspection and Closure of Prayer Houses*. Available online: <https://www.gov.rw/blog-detail/frequent-questions-on-inspection-and-closure-of-prayer-houses>.
- <sup>19</sup> Tonny Onyulo, “Members of Shuttered Rwandan Churches Gather in Homes As Leaders Quietly Protest,” *The Roys Report*, 5 Sept. 2024. Available online: <https://julieroys.com/members-shuttered-rwandan-churches-gather-homes-leaders-quietly-protest/>.
- <sup>20</sup> OSCE ODIHR, *Guidelines on the Legal Personality of Religious or Belief Communities*, 2014, para. 10. Available online: <https://www.osce.org/files/f/documents/9/9/139046.pdf>.
- <sup>21</sup> REGULATIONS OF THE CHIEF EXECUTIVE OFFICER OF RWANDA GOVERNANCE BOARD No 01/2025

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OF 06/03/2025 RELATING TO ADDITIONAL REQUIREMENTS FOR FAITH-BASED ORGANIZATIONS, Official Gazette N° Special of 07/03/20. Available online:

<https://www.rgb.rw/index.php?eID=dumpFile&t=f&f=120621&token=48218a27183ee828b80536211e9d34bf932b921e>.

<sup>22</sup> Ibid., Art. 3(b).

<sup>23</sup> Ibid., Art. 3(a).

<sup>24</sup> Ibid., Art. 4(f).

<sup>25</sup> “Kagame mulls taxing church offering to tame rogue preachers,” *The Star*, 19 August 2024.

Available online: <https://www.the-star.co.ke/news/2024-08-19-kagame-mulls-taxing-church-offering-to-tame-rogue-preachers>; Chinomso Sunday, “Kagame May Impose Tax on Church Collections in Rwanda,” 18 August 2024. Available online: <https://newscentral.africa/kagame-may-impose-tax-on-church-collections-in-rwanda/>.

<sup>26</sup> LAW N°68/2018 OF 30/08/2018, Art. 174. Available online: <https://rwandafda.gov.rw/wp-content/uploads/2022/11/penalcode2018.pdf>.

<sup>27</sup> Rwanda National Policy: Criminal Investigation Department, *Analysis of Causes of Crimes, Challenges and Prevention Strategies in Rwanda*, Kigali, October 2016. Available online: <https://www.nppa.gov.rw/index.php?eID=dumpFile&t=f&f=51610&token=8b776a2b98298402f01e11b97d97acda8a8c0d4c>.

<sup>28</sup> Ibid., p. 109.

<sup>29</sup> Ibid., p. 131.

<sup>30</sup> No. 001/RGB/2025. Available online: <https://ukwelitimes.com/rgb-issues-the-guidelines-on-religious-preaching-that-aligns-with-rwandan-values>.

<sup>31</sup> Ibid., Art. 5(f).

<sup>32</sup> Ibid., Art. 1.