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The Financial Action Task Force
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Dear Sir/ Madam

RE: Follow up letter on the unintended consequences of FATF recommendations to Zimbabwe leading to proposed restrictions to civic space and provision of humanitarian Services in Zimbabwe

Zimbabwe Lawyers for Human Rights (ZLHR) is a law-based not-for-profit organisation that has an objective in fostering a culture of human rights, constitutionalism and upholding the rule of law in Zimbabwe. Kindly note our interest.

This is a follow up to our letter dated 19 January 2022. While we look forward to your response to that letter, we wish to draw your attention to further developments on the issue pertaining to the gazetting of the Private Voluntary Organisations Amendment Bill 2021 (the PVO Bill) on 5 November 2021. As we write this letter, the PVO Bill is now before parliament and the following developments have passed or are scheduled to take place;

1. *Parliament processes*

- The Bill was placed before parliament on 17 February 2022 where it was read for the first time. It was also transmitted to the Parliament Legal Committee which has 26 days to look into the constitutionality of the Bill and present a report to parliament.
- Parliament has announced that it will be conducting public hearings of the Bill and these are set to take place from 28 February to 4 March 2022.
- Thereafter, the bill will be read a number of times in parliament and if passed it will then be presented for signing by the President should it be adopted.

2. *Government of Zimbabwe's position on the PVO Bill under international law*

- During the United Nations Human Rights Council-led Universal Periodic Review (UPR) of Zimbabwe that took place in Geneva on 26 January 2022, the government maintained its mistaken justification of the introduction of the PVO Bill as a requirement for government to respond to its obligations under FATF recommendations 8.
- During the interactive dialogue session of the UPR, the government of Zimbabwe was implored by other United Nations member states to ensure that the PVO Bill amendments did not violate its international human rights obligations. In response the Minister of Justice Legal Parliamentary Affairs again justified the proposed amendments as a way to comply with FATF recommendations.

Fostering a Culture Of Human Rights in Zimbabwe

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