ICELANDIC HUMAN RIGHTS CENTRE

Notes on ECRI's Second Report on Iceland

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FOREWORD

Although the number of non-citizens and persons of immigrant origin residing in Iceland is small by European standards, recent years have seen a significant increase in foreigners moving to the country. Iceland's population is largely monocultural and homogeneous and although overt manifestations of discrimination towards those who are perceived as different are not common, 'hidden' discrimination is rife.

The term 'nýbúi' or 'newcomer' has taken on a negative connotation and there are indications that non-citizens and persons of immigrant origin suffer discrimination in daily life, especially as regards education and employment. Studies indicate that there is a generational difference in attitudes of Icelanders towards immigrants. Younger people tend to have a more negative perception of persons of immigrant origin and here the need for multicultural training and education, which is sorely lacking in Icelandic society, should be emphasized.

In general, there appears to be an underlying tendency to view persons of immigrant origin as an economic resource rather than as full members of Icelandic society, who are entitled to the corresponding rights. Despite recent efforts to address issues of racism and discrimination, gaps still remain in legislative protection. Limited research concerning the situation of persons of immigrant origin and issues regarding discrimination and racism has been undertaken. In their efforts to address issues relating to persons of foreign origin, Icelandic authorities have limited themselves to enacting laws regulating arrival, stay and departure but have neglected putting in place a comprehensive policy to deal with the social reality of newcomers and persons of immigrant origin in Iceland. In the formulation of such a policy it is important to keep in mind the lessons learned in the other Nordic countries, as well as Iceland's particularities. The Government's tendency to copy reactive policies put in place in our neighbouring countries, after problems have arisen, should be avoided at all costs. Furthermore, it is imperative that a comprehensive anti-discrimination legislation be enacted with the view to ensuring effective protection against discrimination and intolerance. The Centre hopes for swift incorporation of EU Council Directive 2000/43/EC of 29 June 2000 on equal treatment irrespective of racial or ethnic origin.

Recently, an 'Icelandic Immigration Council' composed of representatives from relevant Ministries and one immigrant representative has been established. It will be responsible for making recommendations on immigration policy to the Government and for coordinating the provision of services and information to immigrants. As of yet the Council has met once so its work remains to be seen.

LEGAL INSTRUMENTS

International law

Since the Second Report, Iceland has ratified several international instruments relating to human rights, some of which explicitly address racism and intolerance.

On March 2, 2003, Iceland ratified the European Convention on Nationality, which entered into effect 1 July 2003. On February 2, 2004, Iceland signed and ratified the European Convention for the Participation of Foreigners in Public Life at Local Level. Protocol No. 13 to the European Convention for the Protection of Human Rights and Fundamental Freedoms concerning the abolition of the death penalty was signed 3 May 2002 and has Protocol No. 13 to the European Convention for the Protection of Human Rights and Fundamental Freedoms concerning the abolition of the death penalty.

The Framework Convention for National Minorities was signed 2 February 2005. Protocol No. 12 to the Convention for the Protection of Human Rights and Fundamental Freedoms vas signed 4 November 2000. On 30 November 2001 Iceland signed the European Convention on Cybercrime, and, on 9 October 2003, an Additional Protocol to that Convention concerning the criminalisation of acts of a racist and xenophobic nature committed through computer systems. Iceland signed the Convention on Action against Trafficking in Human Beings on 15 May 2005. These instruments have as of yet not been ratified.

Iceland has not signed the European Charter for Regional or Minority languages, the European Convention on the Legal Status of Migrant Workers, the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families or the UNESCO Convention against Discrimination in Education.

The European Convention in Human Rights has been incorporated into domestic legislation but the incorporation of other human rights instruments is not imminent.

Constitutional law

Article 65 of the Icelandic Constitution contains an equality principle providing that everyone shall be equal before the law and enjoy human rights irrespective of sex, religion, opinion ethnic origin, race, colour, property, or birth or other status.

There is no constitutional provision specifically prohibiting racial discrimination on the grounds of race, ethnic origin, *etc*.

Criminal law

Section 233a of the General Penal Code provides that any person who, by mockery, slander, insult, threat or other means, publicly attacks a person or group of persons on the grounds of their nationality, colour, race, religion or sexual orientation shall be liable to a fine or imprisonment for a term not exceeding two years. The Supreme Court has only dealt with one case regarding racial discrimination when it fined the Vice-Chairman of a nationalist organisation for having violated Section 223a with his derogatory remarks about Africans in general. (Judgement of 24 April 2003, No. 461/2001). Recently, a prominent figure publicly pronounced anti-Semitic views but has so far not been charged under the Article.

Article 180 of the Penal Code No. 19/1940, provides that denying a person service, or access to any public area or place intended for general public use, on account of that person's colour, race or ethnic origin, is punishable by fines or imprisonment for up to six years. Incidents of refusal of access to public spaces and harassment are reported but as of present no cases have been decided based on this provision.

The post of a police officer with the role of functioning as a link between police and people of foreign origin has been established. The Icelandic Human Rights Centre is of the impression that the officer's role needs to be further strengthened and publicised, especially as regards allegations of harassment or discrimination. As the Centre is only vaguely aware of these institutions, it may be deduced that people of foreign origin may be even less aware of them. The fact that the police officer has not dealt with cases of harassment or discrimination on account of ethnic origin does not necessarily reflect an exemplary situation in the country.

Civil and administrative law

The equality principle is implemented in several national acts of law.

- Article 11 of the Administrative Procedures Act, No. 37/1993, stipulates that administrative authorities shall ensure legal harmony and equality in decisions, and that discrimination between individual parties based on views relating to, *inter alia*, race, colour, national origin, religion, political opinion, social status, family origins is prohibited.
- Article 29 of the Primary School Act, No. 66/1995, provides that in issuing a general curriculum and organising studies and tuition, and in preparing and selecting study material, care shall be taken that all students receive as possible equal opportunities for study. The objectives of study, tuition and practices in primary schools shall be such as to prevent any discrimination on based on origin, sex, residence, social class, religion or disability.
- Article 1 of the Rights of Patients Act, no. 74/1997, provides that any discrimination between patients on grounds of sex, religion, opinion, ethnic origin, race, colour, property, family origins or other status is prohibited.
- The new Postal Service Act, No. 19/2002, provides that mail service shall be provided without discrimination of any kind, in particular of a political, religious or ideological nature.

The Act on Foreigners, No. 96/2002, with amendments

In 2002, Act No. 96/2002 on Foreigners was enacted covering a range of issues relating to non-citizens. The Act contains a number of provisions that substantially clarify matters relating to foreigners and their legal status such as the procedure in cases of denial of entry and matters relating to seekers of asylum. Furthermore, the Act provides that only the Directorate of Immigration may deny admission to asylum seekers. Many provisions are a significant improvement in comparison to older rules but certain aspects of the Act and subsequent revisions give rise to concern. The Icelandic Human Rights Centre commented to the Althing on the amended Act finding that a number of provisions raised issues under international human rights law. The Act was amended to some extent in 2004 by Act No. 20/2004 and improvements were made but questionable

provisions were also added. The Ministry of Justice has not yet seen fit to translate the amendments and relevant Regulations into English or other foreign languages. In the view of the Icelandic Human Rights Centre this impedes the ability of those to whom its provisions are addressed to avail themselves of the protection they are meant to offer.

Expulsion

Section 20 has been amended to include, as grounds for expulsion of a foreigner, 'if he resides illegally in the country'. Expulsion is a severe measure in cases where the foreigner may be residing illegally in the country unbeknownst to himself or herself. The Icelandic Human Rights Centre is familiar with several cases where employers have led foreign workers to believe that all permits are in order, when, in fact, the foreigners are staying and working illegally in the country. In such instances it is unreasonable that the foreigner face such radical consequences as expulsion and the Act therefore does not adequately take the reality of the experience of foreigners in Iceland into account.

Documents

Article 16 of Act No. 20/2004 amending Section 57 of Act No. 96/2002 h) makes having a fake passport, identification documents or travel visa punishable by fines or imprisonment of up to two years. It is reasonable that being in possession of a number of counterfeit travel documents or the like (as set out in the explanatory notes) should be punishable by law but the way the provision is phrased could result in it applying to refugees or victims of trafficking, in violation of international law. It should be noted that Article 31 of the 1951 Refugee Convention stipulates, inter alia, that penalties shall not be imposed on refugees on account of their illegal entry or presence in a given country. Furthermore, it is common that individuals, victims of trafficking, are in possession of counterfeit travel documents, identification or travel visas. These individuals should not be punished; it could prove even more difficult than it is today to prevent and prosecute cases regarding trafficking if the victims risk imprisonment for their 'crimes'. Notable in this context is the United Nations Convention against Transnational Organized Crime (the Palermo Convention) which stipulates that victims of transnational crime shall be assisted and protected (Article 25) and its Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children sets protective measures for victims of trafficking, stipulating in Article 7, inter alia, that states shall consider adopting measures to permit victims of trafficking to remain in their territory in appropriate cases giving appropriate consideration to humanitarian and compassionate factors. Article 10 furthermore stipulates that states are to co-operate in determining whether individuals attempting to cross or crossing international borders with travel documents belonging to others or without documents are perpetrators or victims of trafficking, implying protection, not punishment of the trafficking victim. In light of the above, the wording is not sufficiently narrow to clearly set out to whom the provision is to apply.

Family reunification

Certain provisions of the amended Act regarding 'family reunification' are worrisome, either because of their wording or possible interpretation by the executive.

MARRIAGE AND THE "24 YEAR RULE"

In order to obtain a permit to stay in Iceland based on marriage or cohabitation with an Icelandic citizen or a foreigner who already has a permit, the partner or spouse must now be 24 years of age or older, and not 18 years of age, which is the minimum age of marriage under the Marriage Act No. 31/1993. According to the explanatory notes to the bill, this new provision is based on the Danish Aliens Act from 2002 and aims, inter alia, to protect those who are more vulnerable to being pressured or manipulated into marriages of convenience or arranged marriages. The explanatory notes do not clarify on what basis the age limit of 24 years was chosen. The provision also stipulates that if there is reason to believe that a marriage has been entered into for the sole purpose of attaining a permit to stay and it is not conclusively demonstrated that this is not the case, the marriage will not be a ground for granting a permit to stay. The same applies if there is reason to believe that the marriage has not been entered into with the consent of both spouses.

The Act does not clarify what these 'reasons' could be or how it is 'conclusively demonstrated' that the marriage is not one of convenience. The explanatory notes to the bill enumerate certain 'indications' implying that a 'marriage of convenience has taken place', these include that the couple has not lived together before marrying, that they do not speak each other's language, that there is a large difference in age between them etc. These criteria are clearly not satisfactory to determine whether a marriage of convenience has taken place; for instance, in most societies, people only live together after marriage; in Iceland and other countries people of different ages marry (definition of a

considerable age-gap is not set out); and it is extremely uncommon for people from foreign countries to speak Icelandic. It should be noted that a definition of a 'marriage of convenience' is not set out in law and the Marriage Act, No. 31/1993, does not specify that marriage may not be entered into for convenience.

Although prevention of forced marriages is an important aim, the Icelandic Human Rights Centre is not familiar with any instances of forced marriages occurring in Iceland. Surely, a less restrictive approach that doesn't limit the right to marry and found a family for others than those allegedly targeted by the provision would be preferable and as effective. Para 3 of Section 13 provides that if there is reason to believe that a marriage was entered into for the sole purpose of obtaining a permit to stay or that if there is reason to believe that a marriage was not entered into willingly by both spouses, then it will not form basis for a permit to stay. Clearly, the age requirement of 24 is superfluous. The Icelandic Human Rights Centre reiterates its view that this requirement should be rescinded.[1]

YOUNGSTERS

Article 13, also sets out conditions regarding age for granting permits to stay in Iceland for family members of foreigners who already have a permit; children under the age of 18 and supported by their parents and parents older than 66 and dependent on their child. The permits for family reunification are also contingent on certain economic requirements, as Article 11 provides that support, medical insurance and housing has to be secured in accordance with rules issued by the Minister of Justice.

Article 13 sets out, *inter alia,* that a foreigner's or Icelandic citizen's descendants, under 18 years of age and supported by them, are entitled to a permit provided that support, medical insurance and housing are assured. Here the means of demonstrating that support is secured are overly stringent; as, in effect, if the descendant has not received a residence permit when he or she reaches 18 years of age, the youth must demonstrate that he or she is capable of sustaining him/herself. However, in general, very few youngsters in Iceland can be expected to support themselves financially, especially while they are in school. If the law is interpreted literally, in the case of immigrants, they may be forced to resort to quitting school and getting full time employment or otherwise risk deportation. In light of the high dropout rate of persons of immigrant origin from high-school, this is particularly unfortunate and could contribute to the formation of an identifiable class of less educated persons of immigrant origin, which in turn risks conspiring against efforts towards greater integration. Although the Directorate of Immigration has generally renewed youngsters' permits to stay if they are full-time students living with their parents, nothing is to prevent this practice from changing as the law stipulates otherwise. Furthermore, problems arise when youngsters are enrolled in the so-called 'new-comer department' at Iðnskólinn College, where Icelandic is taught, as the first semester doesn't offer enough credits to amount to a full-time programme that can form the basis for a permit in the eyes of the Directorate of Immigration.

Clearly economic requirements in relation to permits for 'family reunification' can result in differentiated treatment depending on the economic situation of the persons concerned, which raises issues in terms of equality before the law and, in particular, Article 65 of the Icelandic Constitution and international human rights conventions guaranteeing the right to private and family life, including Article 14 of the ECHR where States undertake to guarantee the rights set forth in the Convention without discrimination as to, inter alia, race, colour, or national origin, association with a national minority or other status, in the enjoyment of, inter alia, the right to respect for private and family life (Article 8) and the right to marry and found a family (Article 12).

WOMEN

Another failing of the legislation relates to a particularly vulnerable group of non-citizens – women who are granted permits to stay in Iceland on the basis of marriage or cohabitation. Studies show that a disproportionate number of women seeking assistance because of domestic violence are women of immigrant origin. Several cases are known where women have suffered domestic abuse in silence since leaving the relationship entailed risking deportation if done within the three years of residence that form the basis for the right to apply for a residency permit. Moreover, these women are often without any means of support and may have nothing to return to in their countries of origin. As Article 42 of the Regulation on Foreigners stipulates that payment of social support from the state or a

[1] See, also *Report by Mr. Alv aro Gil-Robles, Commissioner for Human Rights, on his visit to the Republic of Iceland 4-6. July 2005, p. 14*, and *Concluding observations of the Committee on the Elimination of Racial Discrimination, Iceland, CERD/C/ISL/CO/18, 19 August 2005, para. 12, p. 3.*

municipality may not be considered the secured financial support required for a person to get a permit to stay, these women escaping from abusive relationships can find themselves in a foreign country, unable to fend for themselves. The Directorate of Immigration has in practice renewed the permits of women in this situation but safeguards and protection for these women are not found in the law.

Article 29(b) stipulates that if, when considering applications for permits to stay in relation to family reunification, the Directorate of Immigration considers proof of kinship lacking, it can request DNA or other biological samples from the applicants. This is a serious infringement of privacy and family life, areas to be interfered with only in exceptional circumstances. The Act grants the Directorate, the executive, broad discretion; it is very questionable to provide for such serious interferences by law without clear limitations.

REFUGEES AND ASYLUM SEEKERS

The care of asylum seekers in the hands of the municipality of Reykjanesbær, where asylum seekers stay in a reception centre in a small town close to Iceland's international airport, 50 km away from the capital Reykjavik.

With the enactment of the Act on Foreigners, provisions for granting of refugee or asylum status according to the 1951 Convention Relating to the Status of Refugees and its 1967 Protocol were included for the first time in Icelandic law.

Iceland receives a number of 'quota' refugees, 20 to 30 annually, but is extremely reluctant to grant asylum under the 1951 Convention to 'independent' applicants. Only one 'independent' asylum seeker has been granted refugee status in recent years although a few persons have been granted leave to stay on humanitarian grounds. It should be noted, however, that although the law provides for granting asylum on this basis, it is not clear enough what rights and duties this type of permit entails and on what grounds it can be granted, resulting in the Directorate of Immigration having a wide margin of appreciation in relation to the granting and revocation of permits of this nature. Normally a permit to stay on humanitarian grounds is granted for one year but the law is not clear on the maximum time or minimum time foreigners can stay in Iceland with this permit. Furthermore, the provision on humanitarian grounds permits does not set out whether permit holders are allowed to work. The Icelandic Human Rights Centre is familiar with instances where authorities have revoked the humanitarian grounds permit when the foreigner has applied for a work permit, unreasonably concluding from the application that the person no longer considers him- or herself in need of a humanitarian permit. The result is that provisions regarding 'regular foreigners' are applied to the person, i.e. certain criteria regarding social assistance which do not apply when the person has a permit on humanitarian grounds. Therefore the situation may arise that a person originally granted a humanitarian permit can be expelled because he or she fails to comply with conditions set out for a regular permit. It is not clear what applying for a work permit means for a person holding a permit granted on humanitarian grounds as another authority has interpreted the law to signify that a person cannot hold both a humanitarian permit and a work permit and therefore the application for a work permit cancels the humanitarian permit.

Even more worrisome is the fact that Section 45 of the Act on Foreigners expressly excludes foreigners who present a danger to society from the protection against expulsion to an area where the person may fear persecution capable of giving rise to the legal status of refugee. Here the principle of non-refoulement should be stressed, which always applies even when a person is considered to pose a threat to national security. Here, it should also be noted that concerns have been raised that asylum requests are not always properly handled by border guards. The Committee against Racism and Intolerance recently encouraged Iceland to intensify its efforts to provide -systematic training to border guards, with a view to increasing their knowledge about all relevant aspects of refugee protection, as well as about the situation in the countries of origin of asylum seekers.[2]

According to authorities the Act on Foreigners has significantly improved efficiency as regards the processing of asylum applications and that generally applicants do not have to wait long for a conclusion of their cases. This is relative. For those applicants that fall under the expeditious procedure the waiting period is not long but for applications that go through regular procedures it can take close to a year to get a decision from the Directorate of Immigration and asylum seekers going through the lengthier process

[2] *Concluding observations of the Committee on the Elimination of Racial Discrimination, Iceland, CERD/C/ISL/CO/18, 19 August 2005,* para. 11, p. 5.

complain of the heavy toll months of idleness and uncertainty take on their mental well-being.

Applicants whose asylum applications have been rejected or who are being expelled by the Directorate of Immigration can only appeal that decision to the Minister of Justice as the supervisory authority, whose decision is subject only to a limited court review on procedure rather than substance. Applicants receive five hours of free legal aid to lodge the appeal. The Centre is of the opinion that asylum seekers should be provided with some free legal aid from the outset of the asylum process. This would be beneficial for both authorities and the asylum seekers as improved quality of applications could shorten the waiting period and ease the work of immigration authorities.

It should be noted that the Directorate of Immigration falls under the Ministry of Justice so the independence of the appeals body may be called into question. As of yet only a handful of cases have reached the courts as applicants are expelled before they can get a ruling. International monitoring bodies have stressed the importance of allowing appeal to an impartial, independent body empowered to consider the merits of each case.

Upon the request of a foreigner who has been finally denied asylum or a permit to stay, the Directorate of Immigration may, in cases when implementation of such decision is suspended, grant him or her a provisional permit to stay until the decision is implemented. Each provisional permit can be granted for a period of up to one year and permits of this kind do not form a basis for the issue of a residency permit. In practice, temporary permits are generally granted for a period of six months. Asylum seekers who cannot be sent from the country, for one reason or another, receive this permit for extended periods, for six months at a time. The law does not set out the maximum number of provisional permits a person can get, so in practice a person could be in this provisional situation for many years. It would be reasonable, after a certain amount of time has passed, to provide persons with a more humane arrangement. As temporary work permits for foreigners are issued to employers (see above) who are understandably reluctant to employ a person who might have to leave the country within a few months, the six month permits result in persons spending long periods idle, dependent on social security, with the accompanying mental anguish. In addition, these permits are only granted to individuals whose identify has been verified in some way.

It is a matter of concern that the Government has no fixed refugee acceptance requirements and re-evaluates the refugee situation on an annual basis, *i.e.* no quota refugees were accepted in 2002 and 2004. In the year 2003, three persons (a family) were granted leave to stay on humanitarian grounds but no-one has been granted leave to stay on humanitarian grounds in 2004 and 2005. A handful of applications are pending.

Recently, a Committee for Refugees has been established with the aim of dealing with the integration of refugees and persons who have been granted permits to stay on humanitarian grounds into Icelandic society. It is regrettable that this Committee is not concerned with the issues regarding asylum seekers as originally envisaged.

TRAFFICKING IN HUMAN BEINGS

It is suspected that Iceland is a transit point for trafficking in human beings but also to a smaller extent, a destination. Trafficking in human beings is criminalised in the Icelandic Penal Code, Section 227 (a). The Icelandic Human Rights Centre is concerned the commitment of Icelandic authorities to combat trafficking is somewhat lukewarm. Legal bills providing for victim and witness protection in trafficking cases have been presented to the Althing several times but have not been passed and the CoE Convention on Action against Trafficking in Human Beings has still not been ratified. Furthermore, only very limited research has been undertaken with the aim of tackling this issue.

SPECIALISED BODIES AND INSTITUTIONS

Iceland has a Parliamentary Ombudsperson, an Ombudsperson for Children and the Gender Equality Office. The Icelandic Human Rights Centre has informally exercised certain functions of an independent national human rights institution, until 2005 with the financial support of the Icelandic authorities. The Intercultural Centre in Reykjavik provides various services for persons of immigrant origin as well as the Westfjords Multicultural Centre.

The Parliamentary Ombudsman issues opinions as to whether the action of an administrative authority is contrary to law or accepted administrative standards but, as a non-judicial institution, his opinions are not legally binding. The authority of the Ombudsman has recently

been undermined as his opinions have been called into question by authorities concerned. Furthermore, the Ombudsman has expressed concern that individuals refrain from requesting his opinions for fear of repercussions from the authorities that are being challenged. The Ombudsperson's office has dealt with a number of cases regarding foreigners and persons of immigrant origin, regarding, *inter alia,* expulsion, visas, denial of entry and citizenship. The Children's Ombudsperson has not dealt with any cases regarding discrimination based on race or origin.

The Icelandic Human Rights Centre was founded in 1994 by nine civil society organisations working in various fields of human rights. The purpose and aim of the centre is to collect information on human rights issues in Iceland and abroad and to make this information accessible to the general public. In words of the CoE Commissioner for Human Rights: "*In the main, the centre has assumed the functions of a national human rights institution as set out in the Paris principles, though its powers, independence and financing are not established by statute and are therefore liable to fluctuate. It is regularly consulted by international monitoring bodies and maintains an important human rights website in Iceland."*[3]

Since its founding in 1994 the Althing has supported the activities of the Centre through earmarked allotments in the National Budget from the Ministry of Justice and the Ministry of Foreign Affairs. In the Budget for 2005, however, on the proposal of the Ministers of Justice and Foreign Affairs, the support earmarked for the Centre was eliminated, and instead provision was made for the amount previously dedicated to the Centre to be open to any party upon application to the Ministries of Justice and Foreign Affairs. In the Budget for 2006 the procedure was changed so that all funding for human rights now falls under the Ministry of Justice. For the Centre to have to apply, on *an ad* hoc basis, for funding directly to the Ministries has gravely undermined its ability to plan its activities. Equally importantly, this new procedure raises serious questions regarding the Centre's ability to function independently since it is now in the hands of the executive whether and what activities are funded. The bizarre situation can arise that the Centre has to apply directly for funds to a Minister to comment on a Bill he or she is presenting to the Althing.

When considering the new arrangement for funding human rights work, the authorities implied that the Centre's existence was not being undermined. The result, however, has been catastrophic. Instead of receiving ISK 8,000,000 from the Ministries of Justice and Foreign Affairs, the Centre received a little under ISK 2.5 million in earmarked funds for specific projects from the Ministry of Justice (none having anything to do with monitoring human rights in Iceland). The Centre received a negative response to its application to the Ministry of Foreign Affairs (after waiting for a reply for nearly five months). Fortunately, the City of Reykjavik, several NGO's, as well as Iceland's main labour unions have aided the Centre financial, temporarily in 2005, whilst calling on the Althing to reinstate the system of direct allotments.

During the course of the consideration of the Budget for 2005 and 2006 the main domestic organizations concerned with human rights in Iceland appealed to the Althing to guarantee continued direct allotments to the Centre, but to no avail, with the Government parties supporting the Ministers' proposals.

A number of international human rights institutes also expressed their support for the Centre, including AHRI, the Association of Human Rights Institutes. The High Commissioner for Human Rights expressed her concern, the issue was raised in the Human Rights Committee, the Committee against Racism and Intolerance raised the issue in its concluding observations on Iceland's 17. and 18. report. Most recently the CoE Commissioner for Human Rights urged the Government of Iceland to: "*take measures to ensure that Iceland continues to benefit from the services of an independent national human rights institution either through supporting and developing existing structures or by the establishment of a statutory institution fully in line with the Paris principles.*"[4]

[3] *Report by Mr. Alvaro Gil-Robles, Commissioner for Human Rights, on his visit to the Republic of Iceland 4-6. July 2005*, para. 10, page 29.

[4] *Report by Mr. Alv aro Gil-Robles, Commissioner for Human Rights, on his visit to the Republic of Iceland 4-6. July 2005*, para. 11, page 29.

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