

CHAPTER - I

I N T R O D U C T I O N

BACKGROUND

In the Indian democratic polity, the Judiciary plays an important role towards achieving social justice. The subordinate judiciary is not an exception to this holy mission. It plays a pivotal role towards providing security and protecting the rights and liberties of common people who are basically ignorant, down-trodden, under privileged, backward and exploited. Articles 233 to 237 of the Constitution of India deal with the Subordinate Courts starting from the District and Sessions Judge to the Magistrates. Article 323-B deals with establishment of Tribunals etc. for adjudication of specified disputes.

The preamble to the constitution of India speaks for the goal it wants to achieve. It speaks "WE THE PEOPLE OF INDIA, having solemnly resolved to constitute India into a SOVEREIGN, SOCIALIST, SECULAR, DEMOCRATIC, REPUBLIC and to secure to all its citizens : JUSTICE, social, economic and political; LIBERTY of thought, expression, belief, faith and worship; EQUALITY of status and opportunity; and to promote among them all FRATERNITY

assuring the dignity of the individual and the unity and integrity of the nation". Besides, the Fundamental Rights and the Directive Principles of State Policies enshrined in Parts-III & IV of the constitution are the substantive rights and guidelines respectively for the state machineries to protect the basic rights and liberties of the people who composed the constitution.

The Constitution of India and other relevant legislations provide for different types of courts which are devoted and committed for ensuring justice to the litigants who are victimized either by the state action or by individual action. The judiciary comprises of the Supreme Court of India¹ at the highest level, the High Courts² in the State or states level and the Districts Courts³ comprising the court of District and Sessions Judge, Civil Judges and the Magistrates Courts in the district as well as sub-division level. Apart from the common category of courts, some Special Courts and Tribunals⁴ are also established so as to enable the common people to have easy and expeditious access to justice.

Most of the cases wherein the victims are sufferers in the hands of the state as defined in Article 12 of the Constitution of India⁵ approach the Hon'ble High Court concerned or the Supreme Court of India or the National or State Human Rights Commission⁶,

as the case may be, for getting redress. In the cases in between individuals, people seek resort to the Subordinate Judiciary. It is a place where live law is seen working. Herein, common people come for filing or defending the cases, for facing examination or cross-examination as a witness, for hearing the open court judgment of acquittal or conviction, dismissal or allowing of a suit, allowing of divorce or rejection thereof, allowing or disallowing compensation to a retrenched worker or the *bonafide* customer, and so on. Production of the accused after arrest by the police in genuine or false accusations, remand of the accused to police custody or judicial custody, bail of the accused after hearing the counsel or *suo moto*⁷ are also found working in the subordinate judiciary.

ROLE OF A JUDGE DURING COURT PROCEEDINGS

During the trial, the presiding judge has the primary responsibility to see that justice is carried out in its real perspective. The judge has a duty not only to protect the interests of the defendant or of an accused, but also to protect the interests of the plaintiff or petitioner as well as of public, and also to ensure that the guilty are convicted and the innocents are released forthwith. The judge controls all the proceedings during the trial,

and limits the introduction of evidence and arguments of counsel to relevant and material matters, with a view to the expeditious and effective ascertainment of the truth. The Judge must control the conduct of the defendant and the spectators; determine the competency of witnesses and the admissibility of evidence; rule on objections made to questions asked by the attorneys; protect witnesses from harassment during cross examination; interpret for the *jury* the laws involved in the particular case; and in some jurisdictions, comment on the weight of the evidence presented and the creditability of witnesses. In many jurisdictions, the judge sentences the defendants after conviction. If the trial is a court trial, the judge renders a verdict of guilt or innocence.⁽⁸⁾

One of the most important functions of a judge is to conduct the proceeding in a fair, orderly and dignified manner. Finding the truth of contested issues of fact is the first concern of a judge. Based on facts ascertained, the judge is to apply the law and to give his decision on guilt or innocence, liability or immunity etc. in between the parties. For ensuring 'fairness' in truth ascertainment and minimizing subjectivity in the process, procedural law gives rights and privileges to litigants and witnesses. It is the function of the judge to give maximum protection to these rights and privileges

to the parties so that justice is not only done but appears to have been done.

While presiding over the proceedings of the court, the judge has certain role to play. Although the judge is not a party to case and cannot interfere the parties in placing their cases before it, yet, in appropriate cases, the judge has to interfere. The judge can interfere if it is seen that the interest of a party is affected due to wrong exposition of facts or law. The judge can also interfere if it is observed that the right of the accused or that of the witness or that of the victim is infringed deviating them from getting appropriate redress. The Hon'ble Supreme Court of India in the case of *Prithipal Singh etc. v. State Of Punjab & Ors.*⁹ in strong words held that the court cannot be a silent spectator where the stinking facts warrant interference in order to serve the interest of justice. In the fact-situation of a case, if the court remains oblivious to the patent facts on record, it would be tantamount to failure in performing its obligation under the law.

In the case of *Zahira Habibulla H. Sheikh and anr. v. State of Gujarat and Ors.*¹⁰ the Hon'ble Supreme Court of India while emphasizing the role of a court in dispensing justice held :

“The Courts have to take a participatory role in a trial. They are not expected to be tape recorders to record whatever is being stated by the witnesses. Section 311 of the Code and Section 165 of the Evidence Act confer vast and wide powers on Presiding Officers of Court to elicit all necessary materials by playing an active role in the evidence collecting process. They have to monitor the proceedings in aid of justice in a manner that something, which is not relevant, is not unnecessarily brought into record. Even if the prosecutor is remiss in some ways, it can control the proceedings effectively so that ultimate objective i.e. truth is arrived at. This becomes more necessary the Court has reasons to believe that the prosecuting agency or the prosecutor is not acting in the requisite manner. The Court cannot afford to be wishfully or pretend to be blissfully ignorant or oblivious to such serious pitfalls or dereliction of duty on the part of the prosecuting agency. The prosecutor who does not act fairly and acts more like a counsel for the defence is a liability to the fair judicial system, and Courts could not also play into the hands of such prosecuting agency showing indifference or adopting an attitude of total aloofness.”

In brief, the objectives and functions of the judge while delivering justice is :

- (a) to ensure that all persons are able to live securely under the Rule of Law;
- (b) to promote, within the proper limits of the judicial function, the observance and the attainment of human rights; and
- (c) to administer the law impartially among persons and between persons and state.

In many situations, such as in the matter of remand of an accused to police or judicial custody; bail of an accused in non-bailable offences; sentencing an accused to imprisonment or fine; releasing an accused on probation of good conduct, allowing adjournments at the instance of the parties; examination of a witness who is not enlisted, allowing production of documents at the later stage of proceedings etc. the court is required to apply its 'discretion'. The term judicial discretion is not defined anywhere. It does not mean acting at one's own whims. It cannot be exercised capriciously. Rather, it must be acted judiciously. The term judicial discretion is explained in the judgments of the higher courts. Hon'ble Justice V.R. Krishna Iyer^{10.a} in the case of *Gudikanti Narasimhulu v. Public Prosecutor*¹¹ quoted Benjamin Cardozo¹² who stated : "*The Judge, even when he is free, is still not wholly free. He is not to innovate at pleasure. He is not a knight-errant roaming at will in pursuit of his own ideal of beauty or of goodness. He is to draw his inspiration from consecrated principles. He is not to yield to spasmodic sentiment, to vague and unregulated benevolence. He is to exercise a discretion informed by tradition, methodized by analogy, disciplined by system, and subordinated to "the primordial necessity of order in the social life". Wide enough in all conscience is the field of discretion that remains.*

Even so it is useful to notice the tart terms of Lord Camden that the discretion of a Judge is the law of tyrants: it is always unknown, it is different in different men; it is casual, and depends upon constitution, temper and passion. In the best, it is oftentimes caprice; in the worst, it is every vice, folly and passion to which human nature is liable...”.

CONCEPT OF VICTIMOLOGY

Till date, the justice delivery systems in the district level are basically concerned about the rights of the accused persons. The courts are concerned about the fact that the basic human rights of an accused either in police custody, in judicial custody and during trial are not prejudiced. Undoubtedly, the court is to see that an innocent is not punished in any manner. But, at the same time, the fact that in genuine cases the accused persons who are before the court have also violated the rights of others. Unfortunately, in the absence of statutory powers the subordinate courts are not of much concerned about the rights of victims. As a result of which, the victims unless he or she filed a complaint case¹³ remain unaware about the progress of investigation as well as decision of the case. The victim who became vagrant at the hand of the culprits have no role to play and in this manner most of the cases end in acquittal of the accused. As on today, the investigation process is exclusively a police function and the victim has a role only if the police consider

it necessary. Though it appears there are administrative instruction given by police department of certain States to give information on progress of investigation to the victims when asked for. Otherwise till police final report is filed and many times even thereafter the victim does not know what is happening to the case initiated by him or her.

Dr. Justice V.S. Malimath Committee,¹⁴ in its report emphasized that "quest for truth" should be the motto, guiding star and fundamental duty of the investigation agency and the courts. But unfortunately as commented by the Committee, the basic need is to have well trained, well equipped and more importantly, independent investigating agency. Secondly, if criminal proceedings have to be fair for both the parties, that is, victim and the accused, it is not sufficient only to protect innocents from punishment or punishing the culprits, the aim and object must be basically to give justice to the victim of the crime also. But, unfortunately, as noted above, once criminal investigation starts rolling, the victim has no major role to play to get justice for the wrong done to him or her.

Since statutorily, the victims have a very nominal role to play in the administration of criminal justice, many victims

suffered a lot mentally, physically as well as economically. In genuine accusations also the accused gets clean-chit due to the poor performance of the negligent investigating agencies. Jurists, judges including people started thinking on the matter seriously. The concepts of 'victimology' and 'victims right' have started emerging. In the case *George Muthoot v. State of Kerala*¹⁵ while dealing the role and rights of the victim of crimes the Hon'ble Kerala high Court observed in para 32: "*Though we find that as victims of crime are important players in criminal justice administration both as complainant/informant and as a witness, it is unfortunate that despite the system being heavily dependent on the victim, criminal justice has been concerned only with the offender and his interest almost subordinating or disregarding the interests of victim.*"

The Hon'ble Kerala High Court while emphasizing the role of victims during investigation of a case further held "*In our view, the recommendations made by Dr. Justice V.S. Malimath Committee in this regard requires immediate implementation. Some of the recommendations of the committee like active participation of victim in the progress during investigation especially in heinous crimes, his participation at the time of consideration of grant of bail and being represented by a counsel even during trial are worth considering.*"

As such, we hold that the victim has every right to question the correctness of the investigation, especially in heinous crimes, indicating not imaginary but definite suspicion about the veracity of the investigation.

The Hon'ble Supreme Court of India in the case of *Zahira Habibulla's* case (supra) while dealing with the rights of the victims against the mal-activities and inadequate investigation of the famous bakery murder case held

“The principles of rule of law and due process are closely linked with human rights protection. Such rights can be protected effectively when a citizen has recourse to the Courts of law. It has to be unmistakably understood that a trial which is primarily aimed at ascertaining truth has to be fair to all concerned. There can be no analytical, all comprehensive or exhaustive definition of the concept of a fair trial, and it may have to be determined in seemingly infinite variety of actual situations with the ultimate object in mind viz. whether something that was done or said either before or at the trial deprived the quality of fairness to a degree where a miscarriage of justice has resulted. It will not be correct to say that it is only the accused who must be fairly dealt with. That would be turning Nelson's eyes to the needs of the society at large and the victims or their family members and relatives. Each one has an inbuilt right to be dealt with fairly in a criminal trial. Denial of a fair trial is as much injustice to the accused as is to the victim and the society. Fair trial obviously would mean a trial before an impartial Judge, a fair prosecutor and atmosphere of judicial calm. Fair trial means a trial in which bias or prejudice for or against the accused, the witnesses, or the cause which is being tried is eliminated. If the witnesses get threatened or are forced to give false evidence that also would not result in a fair trial. The failure to hear material witnesses is certainly denial of fair trial.”

Similar view has been made by the Hon'ble Bombay High Court. The Hon'ble Bombay High Court in the case of *Balasaheb Rangnath Khade v. The state of Maharashtra & Ors.*¹⁶ held that “The

criminal justice system has been designed with the State at the center stage. Law and order is the prime duty of the State. It fosters peace and prosperity. The rule of law is to prevail for a welfare State to prosper. The citizens in a welfare State are expected to have their basic human rights. These rights are often violated. The law and order is breached. A citizen is harmed, injured or even killed as a result of the crime. He/she is a victim of an act termed an 'offence' in the criminal justice system. He/she seeks recourse to law and justice. Justice is given to him/her upon upholding the rule of law. It is denied to him/her upon any breach by the perpetrator of the violation or even by the defender of his rights - the State."

The court further held *"The machinery of the State is set in motion by the victim, either upon his/her own complaint which is a private complaint, when he, as a complainant, seeks to prosecute the case of harm done to him/her. He/she may require the State to prosecute the case of harm done to him/her by informing the State of the act of offence. He/she would then be only the first informant the State would prosecute such crime."*

HUMAN RIGHTS IN DOMESTIC LAW AND INTERNATIONAL LAW

Human Rights, in its broader sense, implies the natural rights which are inherent to a human being for leading a dignified life. These rights are inalienable in view of the fact that the holder of these rights cannot divest himself of them. These rights are neither derived from the society nor conferred upon the individual by the

society. They are independent of any 'legal system', 'philosophy' or 'ism'. The human rights were tried to be codified in the Universal Declaration of Human Rights, 1948 and two international Covenants viz- the International Covenant on Civil and Political Rights, 1966 and the International Covenant on Economic, Social and Cultural Rights, 1966 which are popularly known as International Bill of Human Rights. Besides, some other Conventions, Declarations, Protocols have also been resolved by the international community nationally, regionally and globally to enlarge its scope, and, everyday the scope is changing with the need of the hour covering many new aspects within the ambit of the term 'human rights'. Human rights also connote amongst others, rights relating to life, liberty, equality and dignity of a human being. It includes right to speedy trial, right against arbitrary arrest and detention, right against torture, right to free legal aid, right against unnecessary handcuffing, right to humane living in the detention places, right to know, right of the women for camera trial, right of the juveniles to be treated separately. Each of these phrases have, again, wider meaning and particularly while added with the term 'human rights' they become more elastic and give rise to several dimensions. These also include right to have access to justice by all irrespective of rich or poor, haves or haves not, ruler or the ruled.

Article 51(c) of the Constitution of India provides that the state shall endeavor to foster respect for international law and treaty obligations in the dealing of organized people with another. Although this is not a substantive law, yet, nonetheless, it is a commitment that India will respect the international law. As stated above, the concept of human rights have been emerging with the change of time, and accordingly, human rights treaties and conventions are also resolved by the international community. There may be certain rights which are enumerated in the international human rights treaties but are not available to the people, citizen in particular of our country. In such a situation, also the Hon'ble Supreme Court of India played significant role. The court had developed the doctrine of interpretation according to which rules of international law and municipal law should be construed harmoniously. The Supreme Court repeatedly held that in interpreting the fundamental rights provisions of the constitution, that courts can rely on those provisions of the International Covenant on Civil and Political Rights, 1966 that elucidate and to effectuate the constitutional fundamental rights.

The First National Judicial Pay Commission Report, Vol-II commonly known as Justice J. Shetty Commission Report^{16.a} in Chapter-13 titled JUDICIAL EDUCATION AND TRAINING in Para 13.2.6 observed that the emergence of human rights in its varied dimensions in substantive and procedural laws makes varying demands from the trial judge particularly in criminal trials, environmental adjudication, family dispute settlements, juvenile justice and wholesome understanding of human right jurisprudence as developed by international instruments and constitutional law.

In the case of *Vishaka v. State of Rajasthan*¹⁷ the Hon'ble Supreme Court of India held that "*The meaning and content of the fundamental rights guaranteed in the Constitution of India are of sufficient amplitude to encompass all the facets of gender equality including prevention of sexual harassment or abuse. Independence of judiciary forms a part of our constitutional scheme. The international conventions and norms are to be read into them in the absence of enacted domestic law occupying the field when there is no inconsistency between them. It is now an accepted rule of judicial construction that regard must be had to international conventions and norms for construing domestic law when there is no inconsistency between them and there is a void in the domestic law.*"

Similarly, in the case of *People's Union for Civil Liberties v. Union of India*¹⁸ the Hon'ble Supreme Court of India following *Nilabati Behera v. State of Orissa*¹⁹ held that killing of persons in

fake encounters is clear violation of the rights guaranteed by Article 21 of the Constitution of India. In that case, the Hon'ble Apex court while considering the right to compensation to victims held that Article 9(5) of the International Covenant on Civil and Political Rights, 1966 which provides compensation to the victim of unlawful arrest is enforceable in India.

Thousands of people are to come to the court to assist the justice delivery system towards conclusion of the pleadings advanced by the contesting parties. These people are comprised of the petitioner or the Opposite party, the complainant or the complained, general witness or expert, Medical Officer or Police Officer and so on. How far these people in their respective capacity are aware of their human rights which they are entitled to avail in the court during the proceeding and how far the courts of law are trying to protect their human rights is a subject of concern in the modern human rights regime.

In accordance with the scheme of the Protection of Human Rights Act, 1993, the National Human Rights Commission at the center²⁰ and some state Human Rights Commissions²¹ have been established in the states and they are discharging their functions as provided under the Act. Although there is provision for designating

or establishing Human Right Court in the district²² but shockingly due to non-defining the powers and functions of such court nobody is knocking the door of such court and till date the ambiguities in the Act has not been clarified. As understood, the common people think that it is only those Commissions who have their power to protect human rights of the common people. But, in fact, the Hon'ble Supreme Court of India, the Hon'ble High Courts and other Courts Subordinate thereto are also empowered to protect the human rights of the common people.

In this study the investigator has endeavoured as to which human rights can be protected by the subordinate courts in the country with special reference to the State of Assam. To sum up, the objectives of the proposed study, amongst others, are as follows:-

- (i) *Whether the subordinate judiciary has any role in protecting human rights?*
- (ii) *Whether the people coming in subordinate judiciary are aware of their relevant human rights?*
- (iii) *Whether the relevant human rights of the people are protected in the subordinate judiciary?*
- (iv) *If not, what are the obstacles?*

- (v) *What can be the appropriate measures for protecting the human rights of the people through the subordinate judiciary ?*

RESEARCH DESIGN AND METHODOLOGY

Human rights must be protected everywhere; either in the court or in the police station or in the jail or else where. Human beings carry it wherever they go. Therefore, in subordinate courts also human being either as an accused or as a witness or as a party in the proceedings must get his human rights protected. In this study the investigator has endeavored to highlight as to how far such people are enjoying their human rights in the courts of law. And thereafter provided appropriate suggestions to mitigate the problems.

Being a student of law and citizen of this country, the investigator has proposed to undertake research on this topic and to this end, attempt to go through the books published in India and abroad, judgments of the Higher Courts, law journals, other journals touching the topic, approved websites, reports from different institutions, true information from media including websites have been surveyed as referred in the references. Besides,

the practical problems of the litigants coming to the subordinate courts have also been collected which are given in detail in chapters VI and VII. In other words, both primary and secondary sources have been taken recourse to in the work. To work out on the subject the investigator has taken up the hypothesis as follows :

HYPOTHESIS : Human Rights need to be protected in subordinate judiciary.

*Fons Coomans*²³ who currently holds the UNESCO Chair on Human Rights and Peace at the Department of International and European Law at Maastricht University in his article *Methods of Human Rights Research: A Primer* published in *HUMAN RIGHTS QUARTERLY*, very logically stated that the method chosen to answer a given research question may, for example, be quantitative or qualitative, be inductive or deductive, be a case study or an attempt to draw general conclusions, cover just one country or compare several countries, be based merely on written sources, or may be based on field study and interviews. A combination of methods, if expertly employed, may produce more reliable results.

The research work is mainly doctrinal- in systematizing the legal propositions recognized in India and abroad. It also includes

non-doctrinal methodology so as to investigate the functions of the legal propositions in the actual field by the subordinate judiciary in the state of Assam. It is also analytical in nature by collecting the data from the field to find out the true picture and lacunae, if any, in protecting human rights of the people who use to come in the subordinate court for different purposes.

R E F E R E N C E S

1. Article 124 of the Constitution of India.
2. Article 214 of the Constitution of India.
3. Articles 233 to 237 of the Constitution of India.
4. Article 323-B of the constitution of India.
5. Article 12 of the constitution of India defines the term state as ‘the state includes the government and parliament of India and the government and the legislature of the each of the states and all local or other authorities within the territory of India or under the control of the government of India.
6. Sections 3 and 21 of the Protection of Human Rights Act, 1993 provide for establishment of the National Human Rights Commission and State Human Rights Commission in the states. At present the NHRC has been working at the national level. It is situated at Delhi. In Assam, the State Human Rights Commission has also been established and the same is also in function.
7. Section 436 Cr.P.C. provides, inter alia, that when a person accused of an offence which is shown as ‘bailable’ in the first schedule of the Cr.P.C. be enlarged on bail with or without sureties. The court or police has no power to detain a person in custody if he is accused of a ‘bailable offence’. Similarly, section 167 (2) Cr.P.C. provides that if the investigation of an incident cannot be completed within a period of 60 days in case the offence alleged is punishable with imprisonment up to 10 years, and 90 days in case the offence is punishable for more than 10 years, then the accused person gets unfettered right to be released on bail.
8. Procedure in the justice system, third Edition, Gilbert B. Stuckey.
9. Prithipal Singh v. State of Punjab and anr etc., (2012) 1 SCC 10.
10. (1978) 1 SCC 240.
- 10.a Vaidyanathapura Rama Krishna Iyer (born November 1, 1915), popularly known as Justice V. R. Krishna Iyer, is a former judge in the [Supreme Court of India](#). He was born at Vaidyanathapuram near Palakkad, in [Malabar](#) region of [Kerala](#) in a Tamil Brahmin family, but grew up at [Kovilandi](#), also in the erstwhile [Malabar district](#). In 1952, he was elected to the [Kerala Legislative Assembly](#); in 1957, he became a minister in the first Communist government in Kerala, serving until 1959. Having been the minister of law, power, prisons, irrigation and social welfare in the [Government of Kerala](#), he was instrumental in bringing about many significant changes in these sectors. In 1973, he was sworn in as a Judge of the [Supreme Court of India](#); as of 2011, he is the last Supreme Court judge to have previously served as a politician. He was conferred with [Padma Vibhushan](#) in the year 1999.
11. Benjamin Nathem Cardozo (May 24, 1870 July 9, 1938) was a great American jurist who served on the New York Court of Appeals and later as an Associate Justice of the Supreme Court. He is remembered for his significant influence on the development of American

common law in the 20th century. He is also known for his modesty, philosophy and vivid prose style.

12. AIR 2004 SC 346.
13. Section 2(d) of the Cr.P.C. defines the term complaint. It means any allegation made orally or in writing to a magistrate, with a view to his taking action under this Code, that some persons, whether known or unknown, has committed an offence, but does not include a police report. In a case instituted on a complaint, the complaint is required to take steps in accordance with law. The complainant has the option to choose the witnesses and production of documents, which the complainant loses (as of now) when the same matter is reported before the police.
14. Justice V.S.Malimath was the former Chief Justice of Karnataka and Kerala High Court. He was appointed by the govt. of India to conduct research on the reforms on criminal law and to suggest required amendment. His lordship submitted his report but till date the suggestions are not implemented into action.
15. MANU/KE/0169/2010. (It is a recognized website namely www.manupatra.com).
16. MANU/MH/0551/2012.
- 16.a In pursuance to the directions of the Supreme Court, the Government of India by Resolution dated 21 March 1996 constituted the First National Judicial Pay Commission for the subordinate Judiciary all over the country. The committee was headed by Hon'ble Mr. Justice K. Jagannatha Shetty (former Judge of the Supreme Court of India).
17. AIR 1997 SC 3011.
18. AIR 1997 SC 1203.
19. (1993) 2 SCC 746.
20. Note- 6.
21. Note-6.
22. Section 30 of the Protection of Human Rights Act provides for designating a court of Sessions as a district Human Rights Court in each district. The section is not clear about the powers and functions of the court. The details are given in the following chapter.
23. Professor M.P.M. Coomans(Fons) holds the UNESCO Chair in Human Rights and Peace at the Department of International and European Law. Since July 2009 is the Head of the Department of International and European Law. He is also the coordinator of the Maastricht Centre for Human Rights, and Senior Researcher at the Netherlands School of Human Rights Research. His fields of research include the international protection of economic, social and cultural rights in general and the right to education and food in particular, as well as international supervisory mechanisms in the field of human rights. He is the coordinator of the courses on economic, social and cultural rights of the European Masters Degree in Human Rights and Democratisation in Venice. Presently he teaches Bachelor and Master courses on human rights at the Faculty of Law of Maastricht University. He is also a consultant for UNESCO, an adviser to Foodfirst Information and Action Network (FIAN) and a member of the Dutch Section of the International Commission of Jurists (NJCM).
