

Commission on the Status of Women Sixty-second Session

Challenges and opportunities in achieving gender equality and the empowerment of rural women and girls

INTERACTIVE EXPERT PANEL

The role of rural women's land rights and land tenure security in reaching the SDGs

Rooting Women's Land Rights in Law and Practice

by

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> Friday, 16 March 2018 10:00 am – 1:00 pm

^{*} The views expressed in this paper are those of the author and do not necessarily represent those of the United Nations.

Rural land is more than a synonym for the world's food basket. For rural communities, and rural women in particular, land is a lifeline, the source of income, subsistence, food, medicinal plants, shelter, status, and cultural identity. Nearly half the world resides in rural areas and 1 in 3 people on earth depend directly on agriculture. Most people living in extreme poverty today depend on rural land as their single most important resource and asset, but often enjoy no secure rights to that land. Around 2.5 billion people, including 370 million indigenous people, lack legally recognized rights to their communal lands rendering them vulnerable to abuse by more powerful actors and interests. As available arable land rapidly disappears due to competing demands and environmental harms, rural women with unrecognized and tenuous tenure rights increasingly find themselves, displaced, dispossessed, and destined to extreme poverty.

Landlessness and weak land rights are root causes and consequences of poverty and hunger, conflict, inequality, and environmental degradation.⁴ Widespread and unprecedented rapid degradation of lands, including desertification, threatens food production, water availability and quality, biodiversity and energy security worldwide. Land degradation also contributes to climate change, deepens poverty and induces displacement and migration,⁵ with disproportionate impact on rural women. Unpredictable weather patterns of extreme temperature, droughts, and flooding, have undercut soil productivity. More than half (52%) of land used for agriculture is moderately or severely affected by soil degradation.⁶ Such impact on food availability affects women's role in food production, and intra-family food distribution, reducing the nutritional intake by children and women.⁷ Rural women continue to shoulder most of the unpaid and undervalued work of collecting water, cooking, cleaning, and care-taking of children, the elderly, and the ill.

When rural women have secure land rights and meaningfully partake in decision-making on land and natural resources this can propel progress across multiple Sustainable Development Goals (SDGs): to eradicate poverty (Goal 1), improve food security and nutrition (Goal 2), reach better health outcomes (Goal 3), enhance gender equality (Goal 5), mitigate climate change (Goal 13), conserve land (Goal 15), and improve access to decision-making and justice (Goal 16).

This paper stresses four key vectors for advancing rural women's land rights as a cross-cutting catalyst for realizing myriad SDGs and human rights: 1) filling a normative gap by defining a framework of women's land rights and articulating the attendant duties of governments and non-state actors; 2) reducing the implementation gap between law and reality in rural women's lives; 3) leveraging the SDG land indicators to accelerate progress for rural women; and 4) reconciling tensions between development- and human rights-based approaches to rural women's land rights and empowerment.

1) Filling the Normative Gap

Around the world, unequal access to and control of land between men and women is a prime driver of economic disparity, undercutting women's standing as social and political actors. No binding international instrument provides a comprehensive framework of secure land rights for women or specifies government duties and actions toward their realization. Without global clarity, national laws have shown uneven progress. In about half the world, discriminatory laws and/or biased social norms impose barriers to women's rights to access, use, inherit, transfer, control, benefit from and own land. These laws and social practices may limit women's ability to receive compensation or seek redress over their land and discount their input in decision-making fora that determine the fate of their land. Effective land and natural resource rights reforms depend on harmonizing relevant laws on land, property, investment, inheritance and family law (including marital and non-marital property laws). In the standard of the stand

The urgency of the global rush for land and looming food security crisis¹² compounded by increasingly severe natural disasters due to worsening climate change impacts illustrate the dire need for a clear articulation of the right to access and manage land. Such articulation would outline obligations for states and actors under its jurisdiction, whether companies or family members, and multilateral bodies. A gender-responsive land rights framework would underscore the gendered differences in the way women and men access, use, and control land. Land rights must be defined beyond the right to "own" land, and cover the full bundle of rights, including use, access, control, transfer, exclusion, inheritance, and all decision-making about land and land-related resources.¹³ In many countries, only the government may "own" the land and will grant access and use rights to residents.

While no explicitly-articulated right to land exists in international human rights law, UN treaty-monitoring bodies, Special Rapporteurs, and Working Groups have characterized women's land rights as essential for gender equality and non-discrimination, and as a fundamental precondition to the realization of the rights to an adequate standard of living, including food and housing, health and life, work, cultural identity, and participation in civil and political life. ¹⁴ Despite some impressive gains for indigenous peoples' land rights, ¹⁵ non-Indigenous rural populations, or peasants, remain bereft of comparable legal protections. ¹⁶ The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) stands apart from other international human rights treaties for its explicit recognition of rural women's rights, including a state duty to ensure "equal treatment in land and agrarian reform as well as in land resettlement schemes" (Article 14(g)). The CEDAW Committee recently elaborated that it considers "rural women's rights to land, natural resources, including water, seeds, forestry, as well as fisheries, as fundamental human rights" (General Recommendation No. 34 on the Rights of Rural Women (2016)). ¹⁷

Building on these developments, the UN Working Group on the issue of discrimination against women in law and in practice issued a position paper on women's land rights to provide critical guidance on the key elements of gender-responsive land rights: *quality*, *legality* (*legitimacy*) and *effective implementation*, *participation*, and *enforceability*. ¹⁸ The Working Group defined these elements as follows:

- Quality means that the scope of the land rights is clearly defined and must include all forms of tenure exercised by women and men, including ownership, access and use (e.g., right to use, lease, transfer, inherit, rent, occupation); the rights should be granted for a clear and ideally extended period of time. Land rights must not be terminated or limited due to gender-based legal, cultural or religious norms, or dynamics in a family or community that result from marriage, divorce, widowhood, migration, parenthood, domestic violence or any other change in a woman's social/marital status or a change in the leadership or structure of her community.
- Legality and effective implementation entails that equal land rights must be legally recognized. That means that women's land rights must be guaranteed by law whether or not they are recognized by customary or religious systems, by family members, by a woman's community and its leaders. Customary justice systems are also often dominated by men and therefore tend to perpetuate inequalities and patriarchal interpretations of culture, resulting in discrimination against women. Therefore, the State has an obligation to exercise due diligence to guarantee and protect women's right to equality in plural legal systems. The State must take all appropriate measures to eliminate discriminatory social, cultural, or religious beliefs and

practices that annul or diminish women's enjoyment of these rights. Affirming the primacy of international human rights law is a key step towards ensuring women's equality.

- *Participation* requires the inclusion of women in policy making bodies regarding land ownership and use.
- Enforceability requires that States must ensure that women be fully informed of their land rights and that they have access to justice to enforce them without discrimination, including in official bodies, courts, and other relevant dispute resolution bodies, such as customary institutions. Access to dispute resolution or enforcement mechanisms must not be subject to extra permissions that apply based on gender, social condition, or other status. Land rights enforcement and dispute resolution processes must be available, accessible, affordable and gender-responsive.¹⁹

This recent, vital, and instructive framing can now inform national efforts to achieve women's land rights. ²⁰ Notably, rural women must also themselves perceive that they have such rights and are unhindered by social norms or legal obstacles to enjoy these rights. Land rights must be exercised without being subject to permissions that apply based on gender, social condition, or other status. With greater global clarity and guidance, national laws and their application can be better monitored and reformed. Current advocacy must focus on anchoring States' specific legal obligations to women's land rights in the existing and growing body of international normative standards and jurisprudence to further States' duty to respect, protect, and fulfill such rights.

2) Reducing the Implementation Gap

Even where laws safeguard women's land rights and secure tenure, implementation lags far behind. Women are often relegated to smaller, lesser quality plots, and lack access to requisite agricultural extensions services, credit and financing options. They face lingering gender bias and discrimination within families and communities and by officials implementing land reform schemes, and those overseeing dispute resolution and local decision-making.²¹

Gender bias – fueled by competition over scarce resources - entrench women's insecure tenure. Women may be ejected from their home upon the death of a husband; they lack recourse when an abusive partner evicts them; they are excluded from weighty decisions about the sale or lease of their land; they have no claim to compensation when the land is taken by an investor, corporation, or the government; they lose access to firewood, fibers, food or medicine from forests cordoned off as carbon sinks when their rights are unacknowledged. Many rural women who live in polygamous arrangements or who never formalized their unions lack legal protections, including for inheritance and maintenance, provided for recognized spouses and children. The prevalence in many contexts of a patrilocal system - whereby a woman relocates to her husband's community after they marry - creates inherent challenges for many women who are often seen as "transient" in their natal communities, and "guests" in their marital communities, and as such less deserving than men of full land rights. This inequality is exacerbated by women's exclusion from local decision-making bodies and their lower literacy rates that often mean lower awareness of rights and the avenues for asserting and claiming their rights. While policies increasingly require women's representation in decision-making bodies, their voices remain unaccounted for due in part to weak procedural safeguards such as gender quorum requirements (e.g., a minimum percentage of women required to be present for weighty discussion and votes).

In many cases, where women do not legally own their land or where customs and practices prevent their ownership of land, they are not recognized as farmers or "value-chain" actors. While frequently difficult to separate tasks by gender, women and men often play different roles in agriculture and food production, land use, conservation, land rehabilitation and restoration, water and energy access, household and care responsibilities, and livestock-based livelihood. A recent analysis of existing empirical evidence on gender differentiation in land use found that women tend to favor subsistence crops to feed their families, while men prefer "cash crops" for income security.²² In some communities, women may be prohibited from planting or inheriting "life trees"; some customs exclude certain productive resources and land from inheritance for women, but not men. As a result, women are excluded from access to extension services, inputs (e.g., seeds, fertilizer, and equipment), and new agricultural technology needed to increase land productivity and yields,²³ and face greater hurdles to reaching markets and optimizing returns.

In communities and regions subject to large-scale land acquisitions, or land grabs, even when local leaders are consulted and assent to such deals, women's informed input into negotiations is rarely systematically sought. Moreover, the valuation of lost land and access to resources, such as access to clean water sources, small-scale fishing, and forest foraging, as it impacts women is often ignored.

3) Leveraging the SDG Land Indicators

There is no global or consistent national data on the true scope of land rights, much less on the true disparities impacting women's land rights. The 2030 Agenda for Sustainable Development features several land-related goals and associated indicators that could generate the missing data needed to more accurately and consistently monitor states' progress toward stronger land rights, including for rural women. SDG indicators 1.4.2 (under Goal 1 on ending poverty), and 5.a.1 and 5.a.2 (under Goal 5 on gender equality) provide global guidance to governments on tallying sex-disaggregated data on land rights in law and in practice, both documented and as perceived by their beneficiaries. Indicator 1.4.2, if classified as a top tier indicator, could produce comprehensive, systemic evidence of both state-documented land rights and women's (and men's) perceptions of the security of their land tenure.²⁴

The SDGs can prompt and bolster national and global efforts to document varied demographic realities, including for rural populations, those engaged in agriculture formally and informally, and those engaged in secondary uses of land (e.g., gathering forest resources). Use rights are especially important for women who depend on the land but are not considered farmers in many areas of the world. Data disaggregated by age and marital status is also needed to create visibility for widows, unmarried women, and women in customary marriages (including polygamous unions) or de facto unions unrecognized by the state. The land indicators that seek data about the various members of the household (rather than household-level data that fails to account for women's own tenure and land rights) can be incorporated into or serve to complement national demographic surveys and to add gender-responsive components in SDG implementation plans.

With better data, governments and affected communities would be better positioned to monitor and enforce their land rights. Moreover, data gathered under the SDGs and its land-specific indicators could inform global norm-setting and national-level policy guidance. Information on women's land rights and secure tenure could complement state periodic reports under the UN human rights treaty monitoring system, such as those required under CEDAW and the International Covenant on Economic Social and Cultural Rights, to gauge and monitor state compliance with their human rights obligations to gender equality, and inform better policies and enforcement.²⁵

4) Reconciling Tensions

An effective transformative path to rural women's land rights requires a human rights-based approach to development. Such an approach elevates beneficiaries to leaders over passive recipients, recognizes rights over needs, and seeks to effectively alter power structures rather than merely pragmatically engage them. Land disputes are responsible for some of history's most entrenched conflicts and humanitarian crises. Multiple and complex tensions exist between land claims that affect women as members of communities and as individuals. Tensions include competing land uses (e.g., farming, grazing, conservation), calibrating group (community) versus individual (women's) rights to land and resources, favoring individual titling over customary and collectively-held tenure rights, and debates over redistributive land allocation (and land ceiling laws) versus private property rights. A better articulation of a right to access and manage land could provide a framework to help reconcile and resolve such tensions.

Development goals and human rights protections can and should be aligned, including within the SDGs themselves. By some reports, "most of the world's 6,000 national parks and 100,000 protected places have been created by the removal of tribal and indigenous peoples." More parks and conservation designations are being created every year as countries commit to meeting the UN's Goal 15 to reverse soil degradation and halt biodiversity loss by 2030. SDGs calling for land and environmental conservation must be aligned with goals seeking gender equality and land rights for women. A key to such alignment is in ensuring women and communities hold secure tenure to their collectively-held lands, forests, and natural resources, given their demonstrated record of protecting and conserving such lands. A growing body of research shows that when smallholder farmers, including women, have secure rights to land, they are more likely to preserve the soil, plant trees, and protect forests.²⁷

With tenure security comes greater incentive, stake, and opportunity to invest and sustain climate smart agriculture focused on water conservation and organic fertilizers.²⁸ Secure land rights for forest communities is being touted as the best defense to forest destruction.²⁹ A legal analysis of 30 low- and middle-income countries in Africa, Asia, and Latin America found that communitybased tenure regimes motivated by rights-based land use rather than conservation purposes generally afford women stronger protections and statutory recognition.³⁰ Laws in the countries surveyed that prohibited economic forms of domestic violence, including against women in de facto marriages, reinforced "stronger statutory protections for women's community tenure-specific inheritance rights than do countries reportedly lacking domestic violence legislation." ³¹ The study concluded that "[w]omen ...should not be compelled to choose between the recognition of their own tenure rights and those of their larger communities... [and that] the legal advancement of women and of their communities can, and often do, go hand in hand."32 Initiatives to align community by-laws with gender-equitable national and international laws, bolstered by inclusive, diverse local governance have promoted women's land rights by drawing on local legitimacy and broad community support. Ensuring secure land rights for rural women and their communities could ignite one of the most promising and effective sparks for catalyzing positive development and human rights outcomes.

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¹ UN, Facts & Figures, Goal 15: Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss, at http://www.un.org/sustainabledevelopment/biodiversity/.

² World Bank, *Agriculture and Rural Development*, at http://data.worldbank.org/topic/agriculture-and-rural-development. (accessed January 15, 2017). Landesa, Why Land Rights Matter? at http://www.landesa.org/resources/land-rights-matter/.

⁵ UNCCD, Desertification, Land Degradation & Drought (DLDD)–Some Global Facts and Figure, at http://www.unccd.int/Lists/SiteDocumentLibrary/WDCD/DLDD%20Facts.pdf.

⁶ UN, Goal 15 at http://www.un.org/sustainabledevelopment/biodiversity/. According to the UNCCD Secretariat an average of 12 million hectares of land are lost to degradation annually. United Nations Convention to Combat Desertification (UNCCD), Land Degradation Neutrality: The Target Setting Programme (2016) at http://www.unccd.int/Lists/SiteDocumentLibrary/Publications/4_2016_LDN_TS%20_ENG.pdf.

⁷ Food and Agriculture Organization (FAO) (2016), *The State of Food and Agriculture, Climate Change, Agriculture and Food Security*, p. 9, at http://www.fao.org/3/a-i6030e.pdf.

⁸ A 2017 comprehensive literature review on women's land rights as pathway to poverty reduction found strong evidence for "relationships between [such rights] and bargaining power and decision-making on consumption and human capital investment, and on intergenerational transfers." The study also noted "a high level of agreement" but a need for additional empirical research, on women's land rights link to better food security, natural resource management, greater access to government services and institutions, empowerment and reduced domestic violence and HIV risks. Ruth Meinzen-Dick et al, *Women's land rights as a pathway to poverty reduction: A framework and review of available evidence*, IFPRI Discussion Paper 1663 (International Food Policy Research Institute 2017) at http://ebrary.ifpri.org/cdm/ref/collection/p15738coll2/id/131359.

⁹ FAO, Gender and Land Rights Database, at www.fao.org/gender-landrights-database/en/; Organization for Economic Cooperation and Development (OECD), Social Institutions and Gender Index, at www.genderindex.org. See also, report of the Secretary General, Challenges and opportunities in achieving gender equality and the empowerment of rural women and girls, E/CN.6/2018/3 (Dec. 20, 2017), para. 21 ("Based on data for 161 countries, only in 37 per cent of those countries do women and men have equal rights to own, use and control land. In 59 per cent of those countries, while the law guarantees women and men the same rights, customary and religious practices often discriminate against women and undermine the full implementation of national legal codes").

¹⁰ Tzili Mor, Why Land is a Feminist Issue, Sept. 8, 2016 at http://www.landcoalition.org/en/regions/global-including-europe/blog/why-land-feminist-issue.

Gaps in legal protection further deny land rights to women. For example, women in partnerships not recognized as formal marriages, such as long-term cohabitating unions, may lack legal protections. Committee on the Elimination of Discrimination Against Women (CEDAW), General recommendation No. 29 on Article 16-Economic consequences of marriage, family relations and their dissolution, CEDAW/C/GC/29 (2013), para 30: "Some States provide a legal framework for recognizing de facto unions at some point, such as upon the death of a partner or the dissolution of the relationship. Where such legal frameworks do not exist, women may be exposed to economic risks when a cohabiting relationship ends, including when they have contributed to maintaining a household and to building other assets."

¹² Globally, 108 million people in 2016 were reported to be facing food insecurity or worse, representing a drastic increase compared to 2015 when the figure was almost 80 million. Food Security Information Network, *World Food Programme, Global Report on Food Crisis* 2017, March 2017, Executive Summary, p. 4, at

http://documents.wfp.org/stellent/groups/public/documents/ena/wfp291270.pdf?_ga=2.22311163.1918544708.1507831311-877180677.1507831311.

13 Land Rights include some or all of these rights: access (the right to be on the land); use (the right to plant crops and produce food); withdrawal

¹³ Land Rights include some or all of these rights: access (the right to be on the land); use (the right to plant crops and produce food); withdrawa (the right to take something from the land, such as water, firewood, fibers, or produce); management and control (the right to change the land in some way; make decisions about land use); exclusion (the right to prevent others from using the land); alienation (the right to transfer land to others through rental, bequest, or sale). Based on Doss C. et al. *Land, Gender, and Food Security. Feminist Economics* 20:1 (2014): 1-23. Realization of the right to land would also include a gendered analysis of laws and policies – including gender neutral ones – that impact women's land rights, and the eradication of gender-based discrimination.

¹⁴ For an overview of international bodies' statements establishing the links between land rights and human rights in the ICCPR, ICESCR, and CEDAW and other instruments, *see* Office of the High Commissioner for Human Rights (OHCHR), Land and Human Rights: Standards and Applications, HR/PUB/15/5/Add.1 (2015), at http://www.ohchr.org/Documents/Publications/Land_HR-StandardsApplications.pdf; Report of the UN High Commissioner for Human Rights, a human rights analysis of land-related issues, E/2014/86 (2014), at

http://www.hlrn.org/img/documents/G1407501.pdf; UN OHCHR and UN Women, Realizing women's rights to land and other productive resources, 2013, available at http://www.unwomen.org/en/digital-library/publications/2013/11/realizing-womens-right-to-land.

¹⁵ See e.g., International Labour Organization (ILO) Convention concerning Indigenous and Tribal Peoples in Independent Countries (No. 169) of 1989 recognizes the ownership and possessory rights "of the peoples concerned over the lands which they traditionally occupy." The principle of free, prior and informed consent allows these communities to grant or withhold their consent to projects impacting their lands. Adopted in 2007, the UN Declaration on the Rights of Indigenous Peoples (UNDRIP), in article 26, recognizes indigenous peoples' rights to "the lands, territories and resources that they possess..." Further, it calls on States to legally recognize and protect these rights. Article 44 equally guarantees to all individual indigenous men and women all the rights recognized in UNDRIP. See at http://www.un.org/esa/socdey/unpfii/documents/DRIPS en.pdf.

¹⁶ A Draft UN Declaration on the rights of peasants and other people working in rural areas, A/HRC/WG.15/3/2 (March 8, 2016) has been under consideration but has yet to be adopted. See Third session of the open-ended intergovernmental working group on a United Nations declaration on the rights of peasants and other people working in rural areas, May 17-20, 2016, at http://www.ohchr.org/EN/HRBodies/HRC/RuralAreas/Pages/3rdSession.aspx.

17 CEDAW, General Recommendation No. 34 on the Rights of Rural Women, CEDAW/C/GC/34 (2016), para. 56, at http://tbinternet.ohchr.org/Treaties/CEDAW/Shared%20Documents/1_Global/INT_CEDAW_GEC_7933_E.pdf. The Committee on Economic, Social and Cultural Rights is considering the articulation of a right to access land under its namesake covenant.

¹⁸ UN Working Group on the Issue of Discrimination Against Women in Law and in Practice, Position Paper: Insecure land rights for women threaten progress on gender equality and sustainable development (July 2017) at http://www.ohchr.org/Documents/Issues/Women/WRGS/Womenslandright.docx.
¹⁹ Ibid.

²⁰ The "participation" element could be read to include full and meaningful participation in decision-making, management, governance, and dispute resolution bodies addressing land and natural resources. The "legality" element may be further defined to cover both legal and social legitimacy, meaning that women's land rights are recognized by formal and customary law, as well as by a woman's family, community, and social context.

³ International Land Coalition, Oxfam, Rights & Resources Initiative, *Land Rights Now, Why a Global Call for Action?* (2018) at http://www.landrightsnow.org/en/why/. Around 2.5 billion people, including 370 million Indigenous people, depend on land and natural resources that are typically held, used, or managed collectively. Communities that steward more than half the globe's land surface have formally recognized ownership over just 10%. *Ibid.*

⁴ R. Prosterman, R. Mitchell and T. Hanstad, *One Billion Rising* (2009); M.R. El Ghonemy, G. Tyler and Y. Couvreur, Alleviating Rural Poverty through Agricultural Growth, 29 Journal of Development Studies, 358-364 (1993). A study on the relationship between land access and poverty in 21 developing countries found that land concentration and a corresponding lack of land access explained 69% of the variation in poverty levels.

²⁴ Indicator 1.4.2 calls for the: Proportion of total adult population with secure tenure rights to land, with legally recognized documentation and who perceive their rights to land as secure, by sex and by type of tenure.

25 Human rights treaty-monitoring bodies could instruct States to report on such information, including the data produced in compliance with the

²⁶ John Vidal, The tribes paying the brutal price of conservation, The Guardian (Aug. 28, 2016) at https://www.theguardian.com/globaldevelopment/2016/aug/28/exiles-human-cost-of-conservation-indigenous-peoples-eco-tourism.

27 Landesa, Inforgraphic, Land Rights, Climate Change, and Environmental Stewardship (2015) at http://www.landesa.org/resources/climate-

change/.

²⁹ World Resource Institute, Securing Tenure, at http://www.wri.org/our-work/project/securing-rights.

²¹ FAO, The State of Food and Agriculture 2010-2011. Women in Agriculture: Closing the Gender Gap in Development, p.23, at http://www.fao.org/docrep/013/i2050e/i2050e.pdf.

22 Villamor, G. et al, "Gender Differences in Land-Use Decisions: Shaping Multifunctional Landscapes?" *Current Opinion in Environmental*

Sustainability, vol. 6. (February 2014) at http://www.sciencedirect.com/science/article/pii/S1877343513001760#bib0045.

23 BRAC & Landesa, Issue Brief: Land Tenure as a Critical Consideration for Climate Change-Related Displacement in Slow-Onset Disaster

Zones (2017) at http://prizecoalition.charity.org/wp-content/uploads/2017/05/HPC_CollaborativeIssueBrief_Landesa_BRAC_053117.pdf.

SDG land-related indicators, and as relevant to treaty provisions related to equal access to resources.

²⁸ Landesa, endorsed by Internal Land Coalition, Namati, CGIAR, and the Global Initiative for Economic, Social, and Cultural Rights, Women Gaining Ground: Securing Land Rights as a Critical Pillar of Climate Change Strategy (2015), at $\underline{https://24756\text{-}presscdn-pagely.netdna-ssl.com/wp-content/uploads/LCWLR_WomenGainingGround.pdf.}$

³⁰ Rights and Resources Initiative (RRI), Power and Potential: A Comparative Analysis of National Laws and Regulations Concerning Women's Rights to Community Forests (May 2017) at http://rightsandresources.org/wpcontent/uploads/2017/05/Power and Potential Final EN May 2017 RRI-1.pdf. 31 Ibid.

³² *Ibid*. at p. 9.