



During the armed conflict, religious places of worship were destroyed both by Albanian extremists and the Macedonian forces, including a mosque in Prilep (see also p. 222).

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IHF FOCUS: international humanitarian law; freedom of expression; judicial system and independence of the judiciary; torture, ill-treatment and police misconduct; conditions in prisons; right to privacy; religious intolerance; national minorities; refugees and internally displaced persons; rights of the child; environmental rights.

In 2001, the inter-ethnic tension that had existed in Macedonia for several years escalated into outbreaks of violence and eventually open armed conflict. These developments made the practice, protection and promotion of human rights almost impossible. The Helsinki Committee in Macedonia, which for years had focused international attention on the human rights problems in Macedonia (including violations of minority rights), stated that the rights of persons belonging to minorities in Macedonia were not so seriously endangered as to justify the attempt to secure them through armed force. However, the Committee emphasized the importance of the Ohrid Framework Agreement of 13 August 2001 as a political compromise designed

to initiate the process of settling the crisis, and an imperative prerequisite for the re-institutionalisation of the State, especially in the fields of minority rights and the rule of law. "Only the return of mutual trust and democratic values and proceedings can provide the level of security and stability that will serve as a good basis for the respect and promotion of human rights," the Committee added.

The Helsinki Committee pointed in particular to two dimensions of human rights violations in 2001. Firstly, those regions of the country, which were not under the full jurisdiction of the State even after the disarmament of the ethnic Albanian National Liberation Army (NLA) in late September posed a serious threat to the

realisation of human rights. Violent renegade extremists and criminal groups operated in these regions unhindered. They intimidated the local Macedonian population, vandalised religious buildings, and looted property, disturbing the security of the entire population. Therefore, the re-establishment of the rule of law in these regions was a top priority. Bringing the perpetrators to courts was essential to the continuation of the period of "reconciliation."

The second threat was the state security forces. The Helsinki Committee stated that every abuse of official powers and every case of torture and mistreatment must be recorded and accordingly sanctioned, with the aim of restoring the trust of the ethnic Albanian population in the officers of the Ministry of the Interior. This, in turn, should lead to re-establishing the legal order throughout the entire territory of the Republic of Macedonia.



A Macedonian Orthodox Church in Lesok, destroyed during the armed conflict.

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International Humanitarian Law²

Interethnic tensions between Macedonians and ethnic Albanians culminated in open violent conflict.

Citing violations of the Albanians' basic rights – including their status in Macedonia on the basis of the Constitution, language and citizenship rights, frequent police abuse, the lack of local self-governance and media rights – Albanian extremists launched armed attacks in February. Reports were received of clashes between Macedonian forces and the NLA in northern Macedonia close to the Kosova border. At the beginning of April, fighting spread to Tetovo and surrounding villages.

In the crisis region, human rights were reduced to the bare minimum, with violations of the right to life, privacy, education, property, freedom of expression and thought as well as protection from torture and ill-treatment. Ethnic Albanian rebels, the Macedonian army (ARM) and the police forces committed violations of these fundamental human rights. For example:

- ◆ Ethnic Albanian rebels in Macedonia brutally tortured, sexually abused and mutilated five ethnic Macedonian road workers after abducting them from the Skopje-Tetovo highway on 7 August.³

- ◆ On 10-12 August, Macedonian police carried out an attack on the predominantly ethnic Albanian village of Ljuboten. Two men were summarily executed by police after they were taken out of the basement where they were hiding. Another three civilians were shot dead by police after they attempted to flee their home which had been set afire by police shelling. In total, ten civilians died. Over one hundred men were arrested and taken to police stations in Skopje, where they were severely beaten. Contrary to assertions by the Macedonian Government, a Human Rights Watch investigation on the ground in Ljuboten found no evidence of the presence of ethnic Albanian NLA members.⁴ There were al-

legations that Interior Minister Ljube Boskovski was present in Ljuboten and had directed the operations. An internal police investigation dismissed accusations of police wrongdoing.

The legality of the involvement of the Army of the Republic of Macedonia (ARM) in the armed conflict remained debatable viewed in the light of the Constitution and other legislation. Areas of the country and property were shelled, causing significant material damage, and the lives of civilians were endangered by both parties.

Individuals were kidnapped, they “disappeared” or were taken hostage: some were ill-treated and then released. As of the end of 2001, a considerable number of civilians (both Macedonians and Albanians) were still unaccounted for. Normal warrants for missing persons were not always issued despite the fact that family members reported their disappearance to the competent authorities.

Deliberate ethnic cleansing, which was a result of the brutality of the events during the armed conflict, continued at the end of 2001. The Helsinki Committee in Macedonia warned that without conscious, systematic and comprehensive action by the State and the international community, these processes will lead to fully cleansed ethnic territories, a fact that would further jeopardise to a great extent communication between different ethnic communities.

On the face of it, the Macedonian majority declared other minority communities in Macedonia (Roma, Turks, Vlachs, Serbs) loyal citizen during the armed conflict, as opposed to persons belonging to the Albanian ethnic community who were perceived as disloyal. However, the positive declaration towards other minorities was not put into practice. During the periods of unrest, many houses and shops of Turks and Roma (based merely on the fact that they were Muslims) were set ablaze in Prilep, Bitola, Skopje, and Veles, and many mosques were set afire and Moslem graveyards were de-

molished. In addition, the demands of the Vlachs for additional instruction in their own mother tongue were not met.

The Framework Agreement affords considerable prospects for the settling of the minority rights problem, provided that it is used for the establishment and promotion of democracy and democracy-based values. However, simultaneously with the implementation process of the Agreement – including revision of the Constitution, the amnesty process, the passage of the local self-government bill in the Parliament, etc. – state authorities took measures to institutionally disable this Agreement. This process was manifested most clearly in the activities of the Ministry of the Interior, which controversially established a mono-ethnic special police unit called “Lions” whose symbol is similar to that of the VMRO-DPMNE, the ruling political party. The IHF appealed to the OSCE to react to this measure, stating that “this dangerous policy ought to be opposed by Macedonian political forces committed to human rights and democracy and by the respective international agencies involved in Macedonia.” It stated that the way to deal with the threat of crimes by paramilitary groups was not to sanction other questionable groups or even to legalize them, and emphasized that this policy was inconsistent with the goal of a multi-ethnic civic state governed according to the principle of the rule of law.⁵

Moreover, on 9 November, the Ministry of the Interior declared St. Dimitrija (a Christian Orthodox saint) to be its patron, thereby declaring itself mono-ethnic and mono-religious. This was contradictory to the basic intention of the Framework Agreement, namely the establishment of Macedonia as a multi-ethnic State.

On the other hand, the Albanian political parties failed to publicly condemn the Albanian extremists who were still armed at the end of the year and continued to commit a series of violent incidents that raised concern.

Two IHF teams, comprised of members of the Macedonian, Norwegian and Serbian Helsinki Committees and the IHF Secretariat conducted fact-finding missions to Macedonia from 22 to 27 April and from 19 to 23 May. They concluded that the conflict was primarily grounded on discriminatory practices and human rights abuses. The IHF stated that the conflict fell under the jurisdiction of the International Criminal Tribunal for the former Yugoslavia, and that both parties to the conflict must respect fundamental human rights and humanitarian law. The IHF teams emphasized that the Geneva Convention and its Additional Protocols prohibit attacks on civilians and other non-military objectives and provide for protection of those who do not take an active part in hostilities from serious violations, including torture, cruel treatment and outrages upon personal dignity. The teams noted that the ways in which some villages around Tetovo and Kumanovo had been attacked caused concern as to whether Macedonian authorities had made sufficient efforts to respect these provisions.

The IHF stressed that the crisis cannot be resolved by military means, but only through a peaceful process. It strongly denounced the use of violence as a means to further political demands and stated that the military activities of the NLA endangered the lives of civilians and contributed to widening the gap between ethnic Albanians and ethnic Macedonians. It recommended, among other things, that the Government of Macedonia abstain from declaring a state of war as this may cause further escalation of the conflict and urged it to prosecute and indict persons responsible for any violations of humanitarian law. The IHF also appealed to both parties to respect the Geneva Convention and its Additional Protocols. Further, the IHF called upon the NLA to demonstrate the genuine will to seek a peaceful, political solution to the crisis, by displaying readiness to immediately end their illegal and illegitimate use

of force. The IHF also appealed to the international community to put pressure on the involved parties to implement the above recommendations and to send an international corps of observers to Macedonia.

Freedom of Expression and Media

During the armed crisis, journalists displayed a very low level of professionalism, ethics of journalism, and awareness of human rights and freedoms. All newspapers, in both Macedonian and Albanian languages, were affected by nationalist euphoria. Most of the information was composed in the interest of the ethnic group of the journalists writing the articles.

When the crisis reached its peak, there was an increase in the number of newspaper articles presenting ethnic prejudices and hate speech. The media did not take into consideration the rights and freedoms of the people, they violated the presumption of innocence and the dignity of people, and they incited ethnic and confessional hatred and intolerance.

Violations of human rights made the news only when the interests of the writer's own ethnic community were jeopardized. Such an approach disabled any attempt to exercise influence on the public opinion based on the concept of human rights, tolerance, and respect of diversity.

On several occasions during the crisis, the Government obstructed freedom of information by conducting direct raids of the offices of the Albanian-language media. One female journalist was physically assaulted while at work. There were also signs of indirect pressure on some newspapers and reporters.

Judicial System and Independence of the Judiciary

Courts appeared to struggle with the same problems as experienced in previous years, and even added to them.

Dissatisfied with the working conditions and with their salaries, court officers and ad-

ministrative clerks organised a strike that lasted for several months, thereby paralysing the court system completely. All scheduled court hearings were postponed, except for urgent cases. The strike added to the huge backlog of cases and delays in the settlement of the already slow court proceedings.

It appeared that the most serious problem in civil cases continued to be the failure to deliver court notices and documents correctly to the parties to litigation or to other participants in a trial, without which court hearings could not take place. This led to delays in court hearings without any adequate reason and long extensions of court cases.

In cases involving labour disputes, it appeared that courts - sometimes guided by reasons of social deprivation - were more inclined towards workers who demanded annulment by the court of their dismissal documents due to the breach of working discipline. The courts frequently allowed the dismissed workers to return to their jobs. On the other hand, in cases where hundreds of employees appeared as the plaintiff and large, important companies were the defendants, court hearings were typically adjourned, resulting in the cases pending over several years.

In cases involving alleged terrorism, the defendants were often charged without any relevant evidence. The courts accepted the practice of bad or unlawful police procedure, which did not provide sufficient evidence obtained through legal means. Despite the lack of well-substantiated evidence, the courts rendered effective prison sentences.

A particular cause for concern was the unequal sentencing policy used towards Macedonians and ethnic Albanians for the same criminal acts. In most cases, these actions violated Article 396 of the Criminal Code relating to illegal possession of arms and explosives. Many cases proved that ethnic Albanians received heavier sentences than ethnic Macedonians. Such a biased sentencing policy led to legal insecurity and distrust in the judicial system.

Upon signature of the Framework Agreement, President Trajkovski granted immunity from prosecution and detention for former NLA combatants, who were disarmed by 26 September. However, persons suspected of war crimes subject to the jurisdiction of the International Criminal Tribunal for the former Yugoslavia (ICTY) at The Hague were not covered by this immunity provision. In December, the Macedonian Government pardoned 64 persons out of 88 detained for crimes committed as members of the NLA.

Torture, Ill-Treatment and Police Misconduct

Despite the fact that the constitutional provisions on police conduct during arrests, raids, wiretapping, and interrogation were strictly in line with international human rights standards, violations of the code of conduct for the police force remained a source of numerous problems.

The maximum length of pre-trial detention was 180 days. Many detainees were held in custody on the basis of weak evidence. Some pre-trial detainees were held in detention for 2 to 3 months before being tried.

Many ethnic Albanian males were arrested arbitrarily during the conflict period, particularly at roadblocks. They were moved from one police station to another, in order to circumvent the 24-hour detention rule. Many detainees were beaten severely and then released without charges.

Laws and by-laws did not define precisely police powers, and there were no control mechanisms and effective sanctioning of breach of procedures and rules. In such a context, police officers felt that it was morally justifiable to ignore or even violate the law if the declared aim of the activity was to promote the discovery of crimes and their perpetrators.

For Macedonian police officers, it was normal and acceptable to arrest suspects, search them and seize their personal ob-

jects without a court warrant, even though in doing so they violated the Constitution. Similarly, suspects were not immediately brought before a judge; they were held at a police station often for more than 24 hours. Also, police officers did not inform the suspects of their right to remain silent or to have a lawyer with them during the interrogation. Sometimes when detainees were advised of their rights, the information was incomplete and incorrect. Many were held *incommunicado*.

The problem of incomplete police files on those arrested and detained at police stations – a fact criticized previously by human rights organizations – was “solved” through not keeping records at all. This omission resulted in many violations of the law and in the inability to provide evidence to prove police misconduct, especially in cases involving torture and inhuman treatment at the time of arrest and while in police custody. Moreover, three cases of inadequate treatment and procedure involving ethnic Albanian minors were recorded.

◆ On 13 August, police officers guarding Skopje’s main hospital arrested four ethnic Albanians who had come to the hospital to pick up an elderly Albanian relative undergoing kidney dialysis treatment. The police searched their car and claimed to have found a bullet in the trunk. The police then proceeded to beat the four men first in the street and then in the hospital grounds for several hours with heavy metal cables, baseball bats, police truncheons, and gun butts. Following this, the four men were taken to the “Beko One” police station, where they were subjected to more beatings, had urine and burning cigarettes thrown at them, and were threatened with execution. Following interventions from their ethnic Macedonian lawyer and a police officer who knew the men, they were released the next morning. One of the men, twenty-nine year old Nazmi Aliu, died that day at the hospital from the injuries he had received from the police beatings.⁶

◆ From 10-12 August, Macedonian police carried out an attack on the predominantly ethnic Albanian village of Ljuboten. Ten civilians died and more than 100 men were arrested, many of whom were severely beaten while in police custody. Contrary to assertions by the Macedonian Government, a Human Rights Watch investigation on the ground in Ljuboten found no evidence of the presence of ethnic Albanian NLA members.⁷ There were allegations that Interior Minister Ljube Boskovski was present in Ljuboten and had directed the operations. An internal police investigation dismissed accusations of police wrongdoing.

As of the end of 2001, there was no adequate legal recourse for unlawful and irregular police activities. The frequent cases of beating and intimidation of suspects to extract information or confession did not lead to criminal charges.

The involvement of officers of the State Security and Counter-Intelligence Division in the apprehension of suspected terrorists and their interrogation raised special concern. The conduct of those officers was totally out of line with the prescribed police procedures. The fight against extremist and terrorist groups was used as a pretext for the erosion of the fundamental guarantees of basic rights and freedoms. Murders of many security force members led to open “revenge.” The cases involving abuse of police powers such as those in the village of Ljuboten, in the State Hospital in Skopje and others, also raised concern in view of police breaking the law allegedly for the sake of more efficiency. The fact that also the Macedonian media, the Office of the Public Prosecutor and the courts displayed “tolerance” towards the police misconduct when dealing with Albanian extremists raised concern as well.

On the other hand, the complexity of the human rights situation in Macedonia was also reflected in human rights violations towards those police officers with special duties and powers. Many law enforcement

officers who were killed, were victims of negligence and unprofessional attitudes on the part of their senior police commanders.

The average working time of an officer with special duties and powers was supposed to be 208 hours a month. However, in practice, since March, these officers worked approximately 280 hours a month, plus another 32 hours overtime. About 80% of police officers did not make use of their annual vacation in 2001.

Moreover, regular education and training were fully neglected. Police reservists did not receive training in the field of police law, police tactics, or legislation. Training on human rights and on building ethnic sensibility was non-existent. On no occasion, not even in situations involving great losses of lives, was special psychological and psychiatric treatment available. As a result, this category of police officers very easily resorted to violence in solving the everyday situations in their police work.

The legal institutionalisation of the special police unit "Lions" was also of concern. This police unit was mono-ethnic and allegedly included many former criminals. In addition, the training of the "Lions" in issues regarding the powers of the police was unsatisfactory.

Conditions in Prisons

In the Skopje Idrizovo prison, inmates placed in solitary confinement for violating prison regulations had to live in extremely poor conditions. The solitary cells were about 10 by 12 m² large and had no heating, and the only window was permanently open. A prisoner was only provided with a bucket to use as a toilet. Foreigners and elderly persons who were not fit to work were accommodated in separate wards to which other prisoners had no access and their right to move around outside the cells was restricted.

The kitchen was located in the closed section of the reformatory prison. Food was prepared under extremely unhygienic con-

ditions. The dispensary was located right next to the closed section of the prison where conditions were also humiliating. The conduct of the newly engaged physician was disrespectful and arrogant.

There was no properly functioning heating in the dispensary even in the winter months, despite the fact that sick inmates were treated there. Moreover, the prisoners' requests for medical examination were simply ignored, and there was virtually no contact between the prisoners and the instructors in charge of their rehabilitation. The premises were dirty and permeated with bad odour, and the walls and the floors were almost in ruins. When the prisoners arrived, they were given bed linen but these were not changed for them. It was thus up to the prisoners to wash them without having the proper facilities to do so.

Drug addicts received regular treatment, but 14 of them were usually accommodated in one room. Their right to move about was restricted to two hours a day. The prison physician seldom visited them even if the inmates asked to see him.

The women's ward was positively different from that for men: the hygiene standards were high, the normal daily routine was respected, there was heating, the telephone booth could be used without restrictions, the physician visited the inmates on a regular basis, and there was frequent, daily contact with the. The problem pointed out by female prisoners was the lack of work, education or any activities within the prison premises.

Right to Privacy

The opposition accused the Government of tapping their telephones and not bringing those responsible to justice, even though many of them were fired. An investigation into the problem was initiated at the end of the year.

The Albanian-language newspaper *Fakti* also claimed that its telephones had been tapped by authorities.

Religious Intolerance

The 1997 Law on Religious Communities and Religious Groups favoured "traditional" denominations, i.e., in practice the Macedonian Orthodox Church. It was widely criticized for discriminating against other religious communities. In 2001, a new "Law for the Macedonian Orthodox Church, Other Religious Communities and Groups" was being formulated. The new working version of the law, which was distributed to many religious organizations at the end of 2001, if adopted, would be a serious setback for religious freedom in Macedonia. It would, among other things, provide for significant privileges for the Macedonian Orthodox Church virtually making it the "state church" and discriminate against other religious communities.

The law would, for example, prohibit the involvement of foreign citizens in religious activities without the prior "opinion" of the Macedonian authorities (Article 6, thereby prohibiting missionary work); restrict their activities to certain places of religious worship (Article 13) and prohibit providing religious education for children (Article 20); and allow authorities too wide a discretion to close down religious associations (Articles 25-26). Those violating the provisions of the new law would be subjected to fines of up to 30,000-100,000 denars (483-1,610 Euro). In general, the draft law is vaguely defined, thereby opening too many doors for potential misconduct.⁸

National Minorities

Roma, ethnic Albanians, ethnic Turks, and ethnic Serbs faced discrimination in all sectors of life. The problem was addressed by the Framework Agreement, which contains constitutional and legislative reforms focused on greater minority rights, as well as increased minority participation in the police force and other governmental institutions.

According to the Framework Agreement, Albanian has to be recognized as a second official language in areas where more than 20% of the population speak it as their first language. This standard should also be applied for any other languages, which meet the population requirement. In areas in which Albanian is used as an official language, Albanian-speaking citizens are to receive personal documents in Albanian and receive translation of all judicial documents and proceedings at state expense if accused of crimes.

Higher education in fields other than pedagogy has been available in the Albanian language only since November 2000, when the private Southeast European University opened in Tetovo. Ethnic Albanians demanded that legal status be granted to the Tetovo University, an unaccredited Albanian-language institute.

Officially, Roma made up 2% of the population, but, according to their own information sources, the genuine number was much higher. Roma organizations accused the police of taking side with ethnic Macedonians when trying to solve disputes with Roma.

The Roma population was subjected to discrimination and ill-treatment also by various local authorities, including social workers, police officers and officials of local self-governments.

◆ In November, the local self-government of Strumica had 11 Roma houses destroyed, letting Roma families living outdoors in temperatures at -15°C.

Refugees and Internally Displaced Persons

During the armed conflict, approximately 72,000 persons were internally displaced (IDPs). Most of them were ethnic Macedonians from the towns of Tetovo, Kumanovo and the villages around these two towns. In addition, more than 58,000 refu-

gees (mostly ethnic Albanians) found shelter in Kosova, southern Serbia and Turkey.

Following the signing of the Framework Agreement, most of the refugees (more than 35,000) and a large number of the IDPs (40,000) returned to their homes. The Government adopted a strategy for the full and rapid return of all displaced persons. Contrary to international standards, collective and individual pressure was exercised upon IDPs to return – irrespective of their own free will – to their native villages and towns, where their safety could not be secured because armed groups of Albanian extremists still operated, where the rule of law was still not practiced and where there were not even the minimum infrastructures necessary for return: houses were damaged or destroyed, dispensaries and schools were ruined and there was a lack of drinking water and electricity. Such measures resulted in strong resistance among the IDPs and created further tension. Many IDPs were not properly sheltered and most of their fundamental human rights were violated, including the right to education, social security, medical care and family reunification.

Rights of the Child

During the armed conflict, several fundamental rights of the child in the crisis regions were violated. The children were abused for political purposes. They were forced into situations, which endangered their lives and were also given arms and forced to become involved in the armed activities. Children were exposed to torture and ill-treatment by the security forces, they were illegally arrested, detained and sentenced by the courts. Many children were exposed to traumatizing incidents and left without the basic conditions for living, including food, drinking water, medication, home, etc. Children were even incited to ethnic and religious hatred. During the entire crisis period, the realisation of the right to education was made difficult

for the children living in the regions where fighting took place.

At the legal level, there was still need for reforms for the protection of the rights of the child. In particular, children should be defined as persons having rights, who should be protected from discrimination and whose best interest should always be a priority, stated the Helsinki Committee in Macedonia. Children should also be provided with the right to take part in solving their own problems and exercising influence on the decisions relating to them.

In addition, the statistics on family violence against children, their sexual abuse, the problem of street children etc., indicated the absence of the necessary transparency when dealing with issues concerning children.

Environmental Rights

The most hazardous areas in relation to environmental rights were the facilities of HEK “Jugohrom” in the village of Jegunovce, REK “Bitola” in the town of Bitola, MHK “Zletovo” in the town of Veles, the lead and zinc mines in the town of Probitip, and the OHIS factory in Skopje.

The dump yard for chrome refuse in “Jugohrom” polluted the river Vardar and the ground water and so threatened the quality of drinking water near the village of Rasce. Also Skopje, the capital, obtained its drinking water from this source. In Veles, the results of the project on the “Biochemical Profile of the Fetuses in the Region of Veles” proved that MHK “Zletovo” was a serious concern for the health of the population. The coal power plant in Bitola emanated tons of sulphur dioxide, dust and ash into the air; all of them contained both heavy metals and uranium compounds.

The three natural lakes in the Republic of Macedonia (Lake Ohrid, Lake Prespa, and Lake Dojran) were subjected to drainage, resulting in the slow death of a unique ecosystem that was characteristic for these territories.

In addition, pollution caused by the armed activities in the neighbouring countries and the armed conflict in the territory of Macedonia contributed to environmental problems.

Endnotes

- ¹ Unless otherwise noted, based on the Helsinki Committee for Human Rights of the Republic of Macedonia, *The 2001 Annual Report on the Practice of Human Rights in the Republic of Macedonia*, January 2002.
- ² Based on *The 2001 Annual Report on the Practice of Human Rights in the Republic of Macedonia* and the IHF and Helsinki Committees in Macedonia, Norway and Serbia, Fact-Finding Missions Regarding the Ongoing Crisis and Human Rights Violations in the Republic of Macedonia, 22-27 April 2001 and 19-23 May 2001.
- ³ Human Rights Watch (HRW), "Torture, Kidnappings by Albanians in Macedonia," press release, 11 August 2001.
- ⁴ HRW, *Crimes Against Civilians: Abuses by Macedonian Forces in Ljuboten, August 10-12, 2001*, 5 September 2001, at www.hrw.org/reports/2001/macedonia/#_Toc524249181
- ⁵ Open letter to the OSCE delegations, 4 December 2001. See also the IHF memorandum "The Special Police Force 'Lions' Places the Peace Process in Macedonia at Risk," at www.ihf-hr.org/appeals/011204mem.htm
- ⁶ HRW, "Police Abuse Against Albanians Continues in Macedonia, Peace Agreement Doesn't End Violence," press release, 22 August 2001. See also the IHF open letter to Mr. Stavre Dzikov, Public Prosecutor of the Republic of Macedonia, 14 September 2001.
- ⁷ HRW, *Crimes Against Civilians: Abuses by Macedonian Forces in Ljuboten, August 10-12, 2001*, 5 September 2001, at www.hrw.org/reports/2001/macedonia/#_Toc524249181
- ⁸ "The Law for Macedonian Orthodox Church, Other Religious Communities and Groups, Working Version," and opinion of Dr Reinhard Kohlhofer, attorney at law, 31 January 2002.