

Introducing the Practice of Breast Ironing as a Human Rights Issue in Cameroon

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Abstract

Breast ironing is a form of violence that takes place in certain regions of Cameroon. It is a violent practice which is forced upon young girls who have just entered puberty, and is mostly performed by mothers on their daughters. It is one of the most widespread and systematic violations of the universal human rights to personal integrity committed against the girl child in Cameroon, abusing their physical, sexual and psychological integrity. Cameroon has ratified a number of international and regional human rights instruments that protect women and girl children from all forms of violence. However, despite Cameroon's obligations under international law, this practice continues to be widespread.

This article introduces the practice of breast ironing as a human rights issue, and will look at its history, social context, prevalence, rationale and consequences. It will discuss and analyse relevant international and African regional human rights instruments to which Cameroon is a party to and which protects women and girl children from violence. It will also look at the existing normative framework in Cameroon and examine steps taken to regulate this practice.

Introduction

Gender-based violence is a problem that affects millions of girls and women, cutting across boundaries of culture, religion, socio economic class, education, age and other diversity. It has been recognized as a human rights issue that manifests itself in physical, psychological, social, and cultural forms. This form of violence has been regarded by many as one of the most pervasive of human rights violations, denying women and girls' equality, security, dignity, self-worth, and their right to enjoy fundamental freedoms. Such violence is highly prevalent within the family, remains widely socially tolerated and is often a cycle of abuse that manifests itself in an endless variety of forms [1]. Various forms of such violence have been recognized globally, such as female genital mutilation and forced marriages. However there exists other form of violence which has been rendered invisible due to silence. A prominent example includes the understudied practice of breast ironing.

This article seeks to provide information necessary for a clear understanding of how, why, where and by whom breast ironing is practiced and also aims at discussing the history, prevalence, manifestation and social context of the practice. Furthermore, the fact that this practice continues to exist despite Cameroon's ratification of international and regional human rights treaties raises the question whether Cameroon has taken adequate measures in protecting the rights of women and children.

Context

The West African Republic of Cameroon is one of the most culturally diverse states in Africa and is situated in the gulf of Guinea. It has an estimated population of 17 million inhabitants and shares its borders with Nigeria, Chad, Gabon and Central African Republic [2]. Its population is unevenly divided among over 250 ethnic groups with eminent languages and cultures that embrace differing trends and characteristics [3]. Nevertheless, based on cultural similarities, the ethnic groups can be grouped into the Cameroon Highlanders who make up 31 per cent; the Equatorial Bantu 19 per cent, the Kirdi 11 per cent, the Fulani 10 per cent, North western Bantu 8 per cent, Eastern Nigritic 7 per cent, Other African 13 per cent; and non-African who constitute less than 1 per cent of the total population [4]. Indigenous

beliefs account for 40 per cent of religious practice in the country and Christians make up 40 per cent while 20 per cent are Muslims [5].

This nation known as 'miniature Africa' as a result of its complex demographic profile has in recent times been receiving attention due to a harmful practice imposed on the nation's girl children, that is, breast ironing [6]. The term harmful practice denotes all practices done intentionally on the body or psyche of other human beings for no therapeutic purpose but instead for cultural or socio-conventional reasons which have an adverse effect on the health and rights of the victims [7]. As argued by Kouyate, these practices which usually have 'irrational' and vague reasons and also have remote and mysterious origins, amount to violence against women and have proved rather difficult to eliminate [8].

Defining Breast Ironing

Breast ironing, usually referred to as another form of mutilation, is a practice whereby a young girl's developing breasts are pounded, pressed or massaged with an object usually heated in a wooden fire, to make them stop developing, grow more slowly or disappear completely [9]. This is performed on girls between the ages of eight and fourteen who have started developing breasts. It is usually done by a female relative close to the victim (mother, aunt, grand mother, sister or guardian) [10].

The objects used in carrying out this practice vary. They include objects such as grinding stones, black fruits, plantain peels, mortar pestles, coconut shells or hammers, all carefully heated over burning coals. With these objects, mothers press and iron their daughters

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developing breasts to destroy any indication of emerging womanhood [11]. The massage could last from one week to several months depending on how resistant the breasts are and also depending on how resistant the victim or her body is to the practice. Sometimes, the heated objects are used twice a day for weeks or months to crush the budding breast [12].

Ngo'o illustrates the practice carried out using a hot stone from a qualitative study she conducted in Bafia in 2008:

The object is placed on the coals in the fireplace and when well heated, it is placed and pressed on the breasts of the girl who has previously been sleeping on the bed, kept there by one or more than one individual strong enough to be able to immobilize her during the operation. It is important to immobilize the girl, otherwise at the first contact with the heated stone she could [try to] flee because of the extreme pain it causes. The massager extracts the tool from the fire, taking care to protect her hands with a towel before pressing and turning on each breast of the girl... When the stone is not hot enough, it is replaced in the fire and massaging recommences three or four times each session [13].

By fortuity or design, the methods and tools used for the flattening of breasts are the same used in preparing certain traditional foods [14]. An example includes a grinding stone which is used in Cameroon to crush hot peppers and other spices into a smooth paste. Tapscott describes the practice of breast ironing as 'warming and softening the tissues of the breast so they could be dispersed or spread flat [15].' From the above it may be inferred that women in Cameroon believe that the preferred tool used in breast flattening can reconstruct breast tissue in the same way it transforms spices.

Breast ironing was first publicly written about in 2006 [16], and as a result research was conducted by Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) in collaboration with Réseau National des Associations des Tantes (RENATA) in all the ten regions in Cameroon. The GIZ study is important to any understanding of this practice. Major findings of this study include data on prevalence of the practice by region, female perceptions of puberty and breast development, who conducts the practice and on whom it is conducted, tools used, and perceived long and short-term impacts [17].

The study found that on average for Cameroon; approximately, 25% of all girls and women had experienced some form of breast ironing in their lives, although the prevalence rates differ depending on location [18]. It also shows that breast ironing was performed most often by the girl's mother (nearly 60% of the time), but also by a nurse or caretaker, aunt, older sister, grandmother, the girl herself and, in a minority of cases, by a traditional healer, father, brother, cousin, friend, or neighbour [19]. Taku however states that most often men or fathers are ignorant of what is being done to their daughters since it is usually done in the kitchen by females [20].

It is important to note that the prevalence rate, method, rationale, and reported outcomes differ significantly by region and individual, and have no definite correlation with socio-economic status, urban or rural living, religious affiliation, or ethnicity [21]. However the GIZ report states that breast ironing is most prevalent in the Littoral region, where 53% of women have undergone the practice. The West and Center regions follow at 31%; the Adamawa region has a prevalence of 30%, with the Northwest following at 18%, East at 17%, South at 14%, and Southwest at 11%. The North and Extreme North have the lowest rates at 7% prevalence [22]. The RENATA study also confirms

the above, stating that the practice is more common in the Christian and Animist South than in the Muslim North.

Although there is no reported reason for a difference in the prevalence rate in the various regions of Cameroon, Tap scott argues that the relatively low rate observed in the North and Extreme North is due to the higher frequency of early marriage, which in turn removes the need to maintain illusions of a girl's youth [23]. The prevalence of early marriages in this region was further confirmed by the United States Department of State human rights report on Cameroon [24]. This in turn implies that the frequency of breast ironing is dependent on the age at which the girl is to get married. This is because as stated above, in the North where early marriage is customary, a lesser percentage of the girls undergo this harmful procedure, while in the South where marriage takes place later, a larger percentage of the girls endure this procedure [25]. However, Ngushi is of the view that the reason for the lower prevalence rate in the North where the population is primarily Muslim can be attributed to the religious dress code which governs this group of people, as men are less attracted to girls who are fully covered [26].

As was stated above, the practice of breast ironing has no correlation with religion, ethnicity, wealth or formal education. This practice is not limited to rural areas or poor families where women are perceived to be uneducated, ignorant or unexposed to women's equality or children's rights, but is also reported to be prevalent in urban areas where women are more educated and exposed. Tapscott states that wives of parliamentarians and ministers also iron the breasts of their daughters without the knowledge of their husbands [27].

Origin of the Practice

The question that arises in respect to the origin of this practice is whether it is historically part of a particular culture or whether it is merely a practice that has acquired the status of culture over time. A further question that arises is whether it is a practice that was abandoned and is re-emerging or a practice that has been on-going but is now more visible.

In theory, a distinction has been made between culture as a system and practices deemed to be culture. Sewell asserts that most theoretical writings on culture have presumed that the concept of culture as a system is in conflict with the concept of culture as practice [28].

Analysts working in favour of culture as a practice insist that culture is a 'sphere of practical activity shot through by will ful action, power relations, struggle, contradiction and change [29].' While proponents in favour of culture as a system argue that culture is a system of norms, values and social relations [30].

However, I am of the view that culture as a system and culture as practice should be regarded as one concept. This view is reinforced by Sewell who argues that culture as a system and culture as a practice are complementary theories [31]. This is premised on the fact that to engage in a cultural practice means to use existing cultural norms to accomplish an end [32]. Hence practice implies system. On the other hand, a cultural system has no existence apart from the succession of practices that reproduce or transform it [33]. Hence, system implies practice.

From this it can be inferred that both concepts are inseparable. As a result, Sewell argues that the important theoretical question should not be whether culture should be regarded as practice or as a system but instead how to conceptualize the expression of system and

practice. Therefore, I am of the view that the term 'culture' in this thesis encompasses culture as a system of norms and culture as practice.

The inquiry into the origin of breast ironing prompts the question: what is culture? The term culture has been defined in various ways. It has been described as a prime source of one's identity and has also been regarded as the source of 'self-definition, expression and sense of group belonging' [34]. Therefore, culture can be said to indicate a way of acting, thinking and doing things that is distinctive to a certain group of persons [35].

Anthropologists generally use the term culture to refer to 'a society or a group in which many people live and think in the same way' [36]. According to this definition, culture includes 'inherited ideas, beliefs, values and knowledge which constitute the shared basis of social action' [37]. Therefore, an inherited idea or belief through usage and transfer to succeeding generations can be regarded as culture.

From the above, it can be argued that for certain beliefs or behaviours to be viewed as culture, it is not a requirement that it be deeply embedded and historically be part of a specific culture. Therefore the mere fact that a specific belief is practiced and passed on from generations to generations can lead to it being regarded as part of culture.

At this point it is worth noting that for tradition to be passed down to succeeding generations, it is also not a requirement that such tradition be in writing. This in turn implies that cultural material and tradition can be transmitted orally from one generation to another. Wilson asserts that oral tradition is the process in which history, stories, religious beliefs are passed on from generation to generation [38]. She further affirms that for the African people, oral tradition is linked to their way of life, in that it is regarded as the primary means of conveying culture and attitudes. Therefore in this way, it is possible for a society to transmit oral history, oral law, oral traditions and other knowledges across generations without a writing system.

Heinge emphasizes that for a material to be regarded as cultural material or tradition that has been transmitted orally, it is important that such material be held in common by a group of people over several generations [39].

It may therefore be argued that the practice of breast ironing is one which can be regarded as cultural material transmitted orally. This is premised on the fact that this practice has been held in common by a group of people over several generations, in that, it is common amongst all 250 ethnic groups in Cameroon and has been passed on through generations. As a result, breast ironing can be said to have met the requirements needed for it to be regarded as a cultural material transmitted orally. Therefore, the absence of written literature does not diminish the oral traditions that speak at length about this practice.

Regarding the question of whether the practice of breast ironing can be regarded as culture, it is worth noting that there is currently no literature on the origin of breast ironing. However, one theory posits that the practice evolved from the archaic practice of 'breast massage' which is a traditional method used to correct uneven breast size and shape, and is administered with a heated object, using similar methods to those used for breast ironing [40]. This ancient practice was also used to induce the flow of breast milk for a new mother or to reduce pressure during weaning [41]. In the case of breast massage, the primary intention is not to crush the mammary gland, but rather to warm and massage the breast so that the breast milk can be heated and purified [42]. This ritual of breast massage was practiced by all

250 ethnic groups in Cameroon, in the same way breast ironing is also practiced by all 250 ethnic groups [43].

Ndonko et al suggests that in recent years Cameroonians may have revived these longstanding traditional practices of breast shaping and massage to flatten girl's developing breasts [44]. The practice of breast massage is being used in a way that is different from its original use, in that the practice was initially done by women on adults to soothe and massage the breasts with the thought of improving a mother's breast milk but this practice has gradually changed and is now inflicted upon 24% of Cameroonian girls as young as the age of nine.

The main problem with the revival of this practice is the fact that previously, the practice of breast massage was performed on adults capable of making an informed decision and therefore being able to refuse or give consent to such practice being performed on them without force or undue influence. However, the same does not apply to the practice of breast ironing, in that, it is being inflicted on children who in legal terms are regarded as having limited or no capacity to make decisions of their own. The decisions of their mothers are imposed on them regardless of the harmful consequences.

Taku asserts that it is difficult to state exactly when this practice began or at what point the motivation behind the practice of breast massage changed [45]. She states that the only evidence as to the history of this practice is the fact that today's elderly women also suffered this treatment. However, it is worth noting that, from other research, older women did not suffer breast ironing but the ancient practice of breast massage [46]. She further argues that this practice is deeply rooted in custom mainly because mothers who tolerated it were told by their own mothers that it was done to protect them. As a result mothers who endured this practice also repeat the gesture to protect their own daughters. She also argues that breast ironing is merely 'a vicious circle that survives through ignorance more than tradition' [47]. From this, it can be deduced that there is oral tradition that speaks at length about this practice.

Tapscott's finding with regard to the history of this practice indicates that breast ironing is not an ancient 'traditional' practice. She asserts that this practice became prevalent in Cameroon with urbanization, in that, women who migrated to cities became concerned about the safety of their daughters. Therefore, the old practice which was used to soothe and massage the breasts was revived and adapted.

Due to the lack of literature on the history of breast ironing, it is not clear whether this practice forms part of a specific culture, or whether it is an old practice that was abandoned and is re-emerging or a practice that has been ongoing but is now more visible. It may however be argued that breast ironing although not historically part of a particular culture, is a practice that has acquired the status of culture over time. This is similar to the practice of female genital mutilation and certain beliefs or behaviours which by usage become part of culture. Therefore the absence of written literature exploring the history of this practice does not imply that there is no oral tradition that attests to the fact that this practice is in fact part of culture.

Furthermore, culture has been defined as inherited ideas and beliefs and researchers have noted that customary practices echo morals and principles held by members of a society for ages often crossing generations [48]. Therefore all social groups globally have particular cultural practices and beliefs, some of which are positive and valuable, while others are detrimental and harmful to a specific group, such as the girl child [49]. These harmful traditional practices include forced marriages, forced feeding of women, female genital mutilation,

nutritional taboos and traditional birth practices. From this it can also be argued that the practice of breast ironing, an inherited belief that has been passed on from succeeding generations be regarded as part of culture.

Effects of Breast Ironing

Thus far, no medical studies have been conducted nationally on breast ironing or its long and short term physical and psychological effects. However research by the U.S. State Department, in its 2010 human rights report on Cameroon reveals that breast ironing exposes girls to numerous health problems such as abscesses, cyst, itching and discharge of milk [50]. It further states that there can be permanent damage to milk ducts, infection, dissymmetry of the breasts, cancer, breast infections, severe fever, tissue damage and even the complete disappearance of one or both breasts [51]. Victims of this practice also end up with marks, wrinkles and black spots on their breasts [52].

Furthermore, according to the GTZ/RENATA survey, breast ironing was reported to be associated with a plethora of illnesses. Among them were severe pains, high fever; abscess in the breast/ breasts pimples on and around the breasts nipples, cysts in the breasts, itching of breasts, severe chest pain, milk infection of breasts as a result of scarification, one breast being bigger than the other, breasts never grow bigger and complete disappearance of the breasts. In addition ten cases of diagnosed breast cancer were identified in women who underwent breast ironing [53].

It can also be inferred that this practice may lead to a complete destruction of the breast gland, as confirmed by Dr. Sinou Tchana, a gynecologist in Yaoundé [54]. She reported numerous cases of edema resulting in overgrown or swollen breasts, severe wounds, and severe pain and also reports observing various cases of second degree burns, one of which required skin graft, and numerous cases of first degree burns. Burns are categorized by depth. A first degree burn is limited to the outer layer of the skin and takes an estimated period of one week to heal, while a second degree burn which damages both the outer layer and the layer beneath takes over three weeks to heal [55]. Burns can cause swelling, blistering, scarring and in serious cases may lead to shock or even death. They can also lead to infections because they damage the skin's protective barrier [56].

Apart from the above mentioned physical impact of breast ironing on the girl child, many girls also suffer emotional distress after experiencing breast ironing. Females are exposed to body image related issues like low self-esteem that may affect them in their career, education and public or social affairs due to missing of one (breast dissymmetry) or both breasts. It may also be inferred that this practice has harmful psychological effects, as it gives a girl the impression that she should not have breasts, which may result in anxiety, shame and frustration when the breasts develops at a later stage [57]. Furthermore, it could result in depression or lead to withdrawal, in the sense that the child decides to close herself off from the outside world for fear of rejection [58]. From this, it can be inferred that, in cases where breast ironing completely destroys the girl's breasts, she is likely to become a social pariah or outcast and lose her self-confidence.

Rationale for the Practice

With all the medical consequences stated above, the question that arises is why do a quarter of Cameroonian girls have to experience this torturous practice?

Societal factors

The most cited motivation for the resurgence of this practice is the improved diets that have resulted in young Cameroonian girls going through puberty at a young age. While the average age of marriage has increased, the age of puberty has decreased and this change has been credited by doctors to improved nutrition and health [59]. As a result mothers believe breast ironing to be an efficient means of protecting the girl from sexual harassment, rape and voluntary sexual activity. Furthermore, women justify this practice by arguing that it is needed to prevent men from pursuing their daughters too soon and to prevent early pregnancies that could tarnish the family name [60]. Consequently, mothers aim at delaying pregnancy by removing signs of puberty as the girls are thought to no longer be sexually attractive to men.

Changing marriage practices

Customarily, females are married in their childhood without consent to much older men, resulting in early marriages, polygyny is common, women lack control over the matrimonial property regime, divorces are unequal and the practice of bride wealth discourages a spouse from leaving her marriage [61]. These traditional marriage practices in Cameroon indicates how young women lack control over when they will get married [62]. This in turn leads to girls gaining the responsibility of a wife and mother but losing the opportunity to obtain skills and knowledge that might foster independence later in their lives. Tapscott argues that while the number of children and husband's socio economic situation determines his social status in Cameroon, females on the other hand have little or no control over the commencement, duration or the end of matrimonial unions. These customs and practices make females reliant on males, but also grant them protection and recognition as members of their father's families and husband's household.

Traditionally, Cameroonian girls were married once they experience their first menstrual period which usually occurs during puberty, or once they are promised for marriage during infancy [63]. These practices made pre-marital pregnancy less common. However, in recent times, there has been a shift in the average age of marriage. In 1976, 44.53% of women between 15 and 19 years of age were married, and this ratio has decreased virtually 10% each decade to a rate of 19.4% in 2004 [64].

Furthermore, traditionally, if a girl did experience pre-marital pregnancy, society would oblige the man to marry her. This custom although not beneficial to women and girls, indirectly addressed the incidence of teenage pregnancies. However, in recent times, these norms have begun to change. This is because most local communities in Cameroon are beginning to dissolve and the cities are continuously expanding with immigrants, therefore, while certain traditional social norms endure, for example, men seeking chaste and virginal wives, other norms deteriorate, for example, a man's obligation to marry a woman whom he has impregnated. Therefore, in the absence of customary law, men are no longer held responsible for philandering behaviour [65]. They are no longer obliged to marry a woman merely because she was impregnated. Researchers have noted that this accountability gap may have arisen as a result of urbanization. Others argue that this lack of accountability may be a matter of practicality [66]. This is because in a busy city it would be challenging to identify the man who is responsible for impregnating a woman, unless he chooses to come forward and in the case where such perpetrator is identified, the law enforcement mechanisms are lacking.

Polygyny is legal in Cameroon and it has strong traditional roots. The government sanctions polygyny, arguing that recognized unions safeguard women and their children by increasing transparency as well as women's rights to claim maintenance, and thereby increasing the possibility of equal wealth distribution amid wives and mistresses [67]. In addition, polygyny is contracted by most men for many reasons; including wealth and status and most women enter into polygamous unions for economic reasons [68]. It can therefore be argued that the Cameroonian government's endorsement of polygyny as a form of social security measure for women signifies the government's weak stand on promoting and protecting women's independence [69].

From the views articulated above on the role of polygyny, age of marriage and pre-marital pregnancy, it can be inferred that changing norms surrounding marriage pose new risks for girls in Cameroon.

Sexuality perspective

Tapscott argues that in practice, girls in Cameroon often submit to men's persistent and aggressive proposition. She attributes this to the unequal power relations between men and women, as both age and gender dynamics places girls at a major disadvantage when relating to men [70]. Breast ironing in its current form may have escalated as a response to a growing social need to discourage pre-marital sexual activity. Breasts indicate physical and sexual maturity; hence, a girl who is well developed is more likely to attract sexual attention from men. This is largely because many Cameroonian men believe that when a girl is physically mature, she is 'ripe' for sex and they harbour the belief that when a girl's breast grows, it reflects her psychological interests, as argued by Tapscott [71]. As a result, Cameroonian women have the perception that the development of the girl should be delayed as much as possible, believing that her physical development shows her maturity and endangers her.

Protective measures

It can be argued that mothers use this harmful procedure as a protective mechanism for their daughters and are not completely unjustified in their fears. Rape is a notable concern for girls in Cameroon. A 2009 report from GIZ found that reported rates of rape have escalated since 1970, with the average age of rape victims at 15 years [72]. A further study found that 37 percent of females and 30 percent of males disclosed that their first sexual encounter was not voluntary [73].

The law criminalizes rape, excluding spousal rape. However, since the police and the courts rarely investigate and prosecute rape cases, it is estimated that only one in 20 accused male rapists is convicted [74]. Cameroon's Penal Code addresses sentences for perpetrators of rape. It states that 'there will be no offence considered where marriage is freely consented between the rapist and the victim where the victim is over puberty at the time of commission of the offence [75].' In practice, this means that the rapist will be absolved of all liability when he marries the rape victim. This in turn undermines the victim's right of access to justice and accountability.

Akenji further asserts that in Cameroon, rape cases are the most under reported due to the stigma and shame together with the culture of the people and the tendency of prolonged judicial proceedings [76]. The GIZ, in collaboration with local NGOs, launched a national campaign against rape. The campaign followed the release of a study that reported the rapes of hundreds of thousands of young girls and women between 1970 and 2008 [77].

Social and cultural realities

Further limiting options for females in Cameroon is the fact that they lack control over their sexual and reproductive rights. In Cameroon, discussions and education about sex is culturally taboo, contraceptives are socially ostracized and abortion is deemed illegal [78]. Tapscott argues that these social and cultural realities tend to heighten the dangers associated with sexual activity. They can lead to an increased risk of contracting sexually transmitted diseases and also a greater probability of pregnancy.

She further affirms that most parents assign the provision of sex education to the public school system. Sex education in public schools has improved considerably over the past decade, nonetheless the quality of such education is still unreliable. This is because, even though the topics of 'HIV/AIDS', 'STIs' and 'sex education' are incorporated in the Cameroon's national syllabus for primary schools, there is no detailed curriculum on what material must be taught [79]. Teachers are therefore given the discretion on what to teach. Whereas some teachers take such lessons seriously, others are reluctant and unwilling to discuss sex education [80]. As a result, many girls learn about sex from personal experience [81].

In addition, parents seldom discuss sex with their children, and if they do, the details are discussed in vague terms [82]. Chastity and virginity are highly valued in Cameroon, and both sex and puberty are taboo topics of conversation. Such values tend to strengthen the social norms that encourage the practice of breast ironing. This is largely because mothers endeavor to protect their daughters from becoming 'ruined' or 'spoiled' but feel unable to provide girls with information that might help them make reasoned decisions about sex [83].

A further explanation behind the practice of breast ironing is the cultural perception of mothers in Cameroon. It is believed that a mother's inability to raise a pious daughter leads to a daughter's delinquent conduct, which then disgraces the family. Therefore, the damage to one girl's reputation can hurt the prospects of other girls in the family [84]. Furthermore, parents are unable to educate their girls about sex because of cultural and religious taboos; they cannot prevent girls from meeting boys, cannot hold boys accountable for sexual activity and also cannot provide girls with options for birth control or abortion [85].

Therefore, due to such cultural and religious perceptions, insufficient sex education at home and in schools, poor access to and stigma linked to contraception, no options for legal or safe abortion results in sexual intercourse often leading to pregnancy. This in turn leaves mothers with few choices. Their prime concern becomes to protect their daughter from sexual abuse, protect their virginity both to ensure a good marriage and also to allow the girl to pursue her education.

It is apparent that the breast ironing phenomena is controlled by adult women with girls subjected to this violation having no power to refuse or resist. Mothers see it as addressing an indirect cause of early pregnancy and child bearing. Therefore, breast ironing can be understood as a way for mothers and caretakers to attempt to enhance and to promote the girl child's future success and that of her family, as well as options for education and a better marriage [86]. While the practice is harmful, the mothers' and caretakers' motivations are to protect their girls.

From the above it can be argued that many mothers perform this practice in order to prevent sexual activity rather than following

tradition, although others also argue that this practice is primarily about controlling sexuality [87]. Therefore, apart from being historically rooted in their culture, breast ironing is justified by Cameroonian women for many reasons, which includes being used to avoid sexual contact between boys and girls. They are of the belief that by preventing girls' bodies from the sign of emerging sexuality; they remain virginal and pure and are prevented from being potential mothers.

Like female genital mutilation, breast ironing not only violates girl's fundamental right to bodily integrity and good health but also infringes on their rights to be free from all forms of violence. Notwithstanding the prevalence of this practice, this violent approach has failed to impede an epidemic of pre-marital pregnancies. According to local health care workers, the rate of teenage pregnancies has risen to approximately 30 percent of births [88]. As a result it can be argued that this practice which is not only physically agonizing and detrimental to health has also proven to be futile in deterring teenage sexual activity.

International Human Rights Law and Breast Ironing

The United Nations (UN) has made clear that violence against women and girls is a violation of basic human rights [89]. It has promulgated treaties, recommendations and declarations that directly address the rights of women and girls and has also outlined government obligations to protect these rights.

A number of international human rights instruments provide the basis for the legal status of the right to be free from all forms of violence. These international human rights treaties define the norms and set the standards for protection of the girl child against violence. Protection in this case incorporates all activities intended at procuring respect for the rights of the girl child in accordance with the letter and the spirit of the relevant international human rights instruments.

International human rights instruments create binding obligations for States that have ratified them to give effect to them. Therefore treaty responsibility arises when States assume membership in international human rights conventions [90]. Existing international and regional instruments call for the protection of children from all forms of violence in both public and private spheres and call upon States to take measures to secure their prevention and elimination. To achieve this goal, States are required to adopt all necessary legislative and other measures, and to ensure that such measures have full force and effect within their domestic legal system.

Cameroon has ratified all the international and African regional legal instruments relating to the protection of the girl child from violence. These fundamental documents outlining the protection of the girl child against violence under the UN system and regional human rights system will be discussed in this chapter. It is worth noting that protection from violence which has been echoed in various international legal instruments is made visible in the form of different rights. These includes rights such as the right to dignity, the right to life, the right to health, the right to be free from torture and the right not to be subjected to harmful traditional practices.

Violence against children: related treaties and declarations

Global Human Rights Instruments: All UN treaties guarantee the same rights to women and men, which by implication includes children. The right of the girl child to be free from all forms of violence is a component of various other rights which has been recognized in major human rights treaties some of which are of general application. These treaties include the core documents which make up the international

bill of human rights, which include the human rights provisions of the UN Charter, the UDHR, the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR).

The UN Charter, which is the founding document of the United Nations, compasses provisions significant to international human rights. Although it does not contain any direct provision relating to children's rights, it however sets out its purposes and principles. The purposes highlighted in the UN Charter are 'the observance of human rights and fundamental freedoms of all without distinction to race, sex, language or religion' [91]. Furthermore, the UN Charter requires State parties to 'pledge themselves to take joint and separate action in cooperation with the Organization for the achievement of the purposes set forth in Article 55' [92]. From this, it can be argued that Member States, of which Cameroon is one, are required to take action to attain a complete observance of human rights and fundamental freedoms for all.

Furthermore, in the preamble of the UN Charter there is a provision to 'reaffirm faith in fundamental human rights' [93]. This notion of fundamentality has also been reiterated in various other conventions, such as the European Convention on Human Rights and Fundamental Freedoms. Van Beuren argues that at the very least this concept of fundamentality embraces rights which are viewed as inalienable and may not be derogated from by States, such as freedom from torture [94]. She further argues that by inference these privileges must equally be applicable to all children and does not give rise to questions such as maturity or capacity.

Similarly, the UDHR proclaims a list of fundamental human rights which apply to all human beings and by implication also applies to children [95]. One basic principle laid in the UDHR is that all human beings are born free and equal in dignity and rights [96]. This in turn implies that human rights such as the right to life and the right to dignity are inherent and indisputable in human beings simply by reason of their being human. The UDHR although not a treaty is argued to have been explicitly adopted for the purpose of defining the meaning of the words 'fundamental freedoms' and 'human rights' appearing in the UN Charter, which is binding on all member states [97]. For this reason the UDHR is a fundamental constitutive document of the UN. This document is also binding on all States, in that it is regarded as forming part of customary international law.

The UDHR which is arguably the most prominent and fundamental UN human rights instrument also provides a general foundation for the protection of the girl child from all harmful traditional practices. This is evident in Article 3 which states that 'everyone has the right to life, liberty and security of person'. It also states that 'no one shall be subjected to torture or to cruel, inhumane or degrading treatment or punishment'. Further, Article 25 provides that 'childhood is entitled to special care and assistance' [98]. This in turn shows that the right of the girl child to be free from all forms of violence is one which is protected by the UDHR.

The ICESCR to which Cameroon is a party contains such basic guarantees as the right to the highest attainable standard of physical and mental health. This covenant further applies to all 'men and women' and therefore by implication applies to children. It may however be argued that simply because an international instrument is capable of being applied to children does not automatically imply that it contains a clear child-centered approach setting out all rights that are essential to safeguard the basic dignity of children [99].

The preamble of the Covenant acknowledges that human rights 'derive from the inherent dignity of the person' [100]. It also establishes the indivisibility of rights, recognizing that all human rights are interlinked and of equal importance. It does this by stating that human beings can only enjoy freedom from fear and want provided that everybody is able to enjoy all rights. The document makes specific reference to children in Articles 10 and 12. Although these provisions do not appear to be applicable to the child's right to be free from violence, it does not mean that this document is irrelevant for this discussion. This is largely because although not explicitly protected from violence, an inference can be made from the article which states that 'State Parties recognize the right of everyone to the enjoyment of the highest attainable standard of physical and mental health' [101]. This specific provision was further expanded upon by the Committee on Economic, Social and Cultural Rights in its General Comment No. 14. It provides that the right to health is closely connected and reliant on the realization of other human rights such as the right to human dignity, the prohibition against torture and the right to life [102]. It further states that the right to health includes the freedom to control one's body and the right to be free from interference such as the right to be free from torture [103]. Therefore the right of children to be free from all forms of violence is one which can be incorporated and read into other rights.

The Covenant further places an obligation on States to 'implement all the rights in the covenant by taking steps to the maximum of their available resources to achieve progressively the full realization of economic, social and cultural rights' [104]. Cameroon has a duty to fulfill the objects and purposes of the ICESCR, which in turn includes taking steps to protect children against the practice of breast ironing. Therefore the responsibility to attain the full realization of these rights is an essential aspect of States' obligations.

The ICCPR complements the ICESCR and children are entitled to benefit from all applicable rights contained in this covenant. This is because Article 2 states that the Covenant applies to all human beings, therefore by necessity applies to children as well. The ICCPR also contains a prohibition against all forms of 'torture, or cruel, inhuman or degrading treatment' [105]. It further states that everyone has the 'right to liberty and security of person' and 'every child shall...have the right to such measures of protection as are required by his status as a minor, on the part of his family, society and state' [106] Therefore, by virtue of article 24, girl children in Cameroon are entitled to special measures of protection from the family, society and the State.

From the above, it can be seen that basic human rights instruments generally recognize the right of all human beings including children to be protected from violence. Therefore, children also enjoy protection by way of general human rights provisions and their relevance should not be underestimated.

Human rights instruments specific to the rights of the child

The 1924 and 1959 Declaration of the Rights of the Child: The 1924 Declaration of the Rights of the Child was the first international instrument to be adopted pertaining to the rights of the child. This Declaration established the claim that 'mankind owes to the child the best it has to give' [107] and this debt is also reiterated in the subsequent Declaration and the CRC. Although this Declaration may be dismissed on the grounds that children were viewed as passive recipients and objects of international law, it however remains important because it recognized internationally the idea of children's rights, thus laying

the foundation for future international standard setting in the field of children's rights [108].

A second Declaration on the Rights of the Child was proclaimed by the UN General Assembly in 1959. This Declaration set out principles intended to provide special safeguards and care for children. This can be seen in Article 2 which provides that special protection be afforded to children to enable them to develop physically in a healthy and normal manner [109]. From this we can see that this Declaration embodied an advancement in the conceptual thinking of children's rights. Although the Declaration may also be dismissed on a number of grounds, it is however noteworthy in the sense that, children were no longer regarded as mere objects of international law but as subjects acknowledged as being able to benefit from specific rights and freedoms [110].

Despite the fact that Cameroon was not a party to the above mentioned Declarations, they however remain significant as they contend the view that the rights of a child is a new concept in international human rights law.

The CEDAW and CAT: CEDAW has been described as the international bill of rights for women and the term 'women' refers to women of all ages, including girl children [111]. This Convention represents a clear consensus that violence against women constitutes a violation of their rights and fundamental freedoms. The Committee on the Elimination of Discrimination against Women in its General Recommendation 19 asserts that violence against women is a form of discrimination against women as set out in Article 1 of the Convention [112]. It states that discrimination in this case 'includes gender-based violence, that is, violence that is directed against a woman because she is a woman or that affects women disproportionately and it includes acts that inflict physical, mental or sexual harm or suffering...' [113]. The Committee also affirms that certain traditional practices preserved by culture and traditions are detrimental to the health of women and children [114]. It can be deduced that these include practices such as female genital mutilation, forced feeding and breast ironing.

CEDAW requires States amongst others to 'take all appropriate measures, including legislation, to modify or abolish existing laws, regulations, customs and practices which constitute discrimination against women' [115]. The Committee in addition to these obligations recommends that 'Member States should identify the nature and extent of attitudes, customs and practices that perpetuate violence against women and take effective measures to overcome such violence' [116]. This in turn places an obligation on Cameroon to take steps towards the elimination of the cultural practice of breast ironing which constitutes a form of gender based violence inflicted on girl children.

CAT proscribes torture. The Convention defines torture as 'any act by which severe pain or suffering, whether physical or mental is intentionally inflicted on a person . . . for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity' [117]. From this definition, it may be argued that the practice of breast ironing does not constitute torture. This is largely because the definition of torture requires that such act be performed by someone acting in an official capacity. This in turn means that where such act is performed by private individuals without the consent of a public official, such act will not be regarded as torture for the purposes of CAT. Despite the above, women's rights advocates have also argued that violence against women, such as breast ironing, contravenes CAT when the government fails to deter such violence from taking place and does not prosecute or

punish perpetrators of the violence [118]. Therefore, it may be argued that the practice of breast ironing constitutes torture for the purposes of CAT.

Furthermore, CAT requires Member States to 'take effective legislative, administrative, judicial or other measures to prevent acts of torture in any territory under its jurisdiction' [119]. Therefore Cameroon is required to take measures to end and criminalize the practice of breast ironing within its jurisdiction as this act amounts to torture.

The CRC: The CRC is regarded as the most comprehensive document on children's rights and the most extensively ratified human rights instrument [120]. It also forms the international foundation for the protection and promotion of human rights and fundamental freedoms of all children. Furthermore, it has created new rights for children which previously did not exist in international law.

The Convention represents an international consensus on the rights of children to be brought up in the spirit of peace, dignity, security, equality, freedom and tolerance [121]. The common overall classification of the rights in the Convention is regarded as the four Ps, which stands for provision, protection, participation and prevention rights [122]. Of particular importance to this thesis is the protection and prevention right. These rights are aimed at protecting children from harmful traditional practices and preventing them from being exposed to such acts.

Furthermore, although the Articles of the CRC are interrelated, the Committee on the Rights of the Child has however identified four general principles which are essential to the implementation of the Convention. These principles are non-discrimination, [123] the best interests of the child, [124] the right to life, survival and development, [125] and the respect for the views of the child [126]. This section will entail a discussion on the best interest principle, the right to life survival and development and the respect for the views of the child as they are of particular importance in analyzing Cameroon's obligations in protecting its girl children from the practice of breast ironing.

The idea that society should respect the best interests of the child is seen as fundamental in all cultures [127]. Mahery asserts that the CRC is not responsible for discovering the best interest principle. She affirms that this principle was also recognized in the 1959 Declaration which stated that 'the best interests of the child shall be the paramount consideration' in the enactment of laws relating to children, as well as 'the guiding principle of those responsible for the child's education and guidance' [128]. Furthermore, several international human rights instruments have also recognized this principle. One of them is CEDAW [129].

However, the CRC transforms this principle beyond its initial scope by providing a broad framework for determining the best interests of children. It does this by extending the principle to cover all actions affecting the child. The best interests of the child shall now be a primary consideration in all actions concerning children – not just actions taken by State authorities, parliamentary assemblies and judicial bodies but also those taken by relevant private institutions.

This principle contained in various articles in the Convention has also been developed by the Committee in its General Comments. The Committee explains that the best interest of the child should be applied systematically when considering children's rights and interests [130]. Therefore whenever decisions are being taken which may have a bearing on the child, the best interest of the child has to be taken into

account at all stages. This applies to the family as well as to state action [131].

Academics have analyzed this principle and there have been heated debates as to its meaning as contained in Article 3. Hammarberg asserts that this article has been criticized as being vague and general. Other academics raise the argument that the best interest of the child is dependent on the particular culture, era and development stages of the country [132]. Although the Convention does not provide a clear definition of this concept, it however provides a normative framework for its application. Article 3 is one of the general provisions of the CRC and therefore should be used in interpreting other provisions in the Convention. The other substantive provisions of the CRC give a clear direction and limits on how children should and should not be treated.

For example, Article 19 places an obligation on States to protect the child from all forms of physical or mental violence, abuse, neglect, and injury. Therefore, it will not be in the best interest of the child to be exposed to such forms of violence. Furthermore, throughout the Convention there is an appreciation and respect for the religious and cultural life of children, however the Convention also obligates States to take measures to eliminate traditional practices harmful to the health of the child [133]. Article 37 also guarantees children's rights not to be subjected to torture or other cruel, inhuman or degrading treatment. From this it can be argued that the definition of what is indeed in the best interests of the child is embedded in the Articles of the Convention itself.

Governments and individuals have used the best interest principle as a defense for certain violations of children's rights. Any overview of the history of adult treatment of children shows the extent to which adults have frequently acted towards children, under the guise of their best interests, in ways which have been harmful- such as using physical and humiliating punishments and imposing female genital mutilation [134]. These have all been defended to be acceptable and beneficial to children. Breast ironing has also been defended by mothers with the argument that it protects them from sexual harassment and is therefore for their own good in the long run. Such actions are not a genuine concern for the children's interests as they have no support in the CRC.

Furthermore, the best interest principle does not trump other rights contained in the CRC and for that reason should not be used to override the child's right to express views [135]. Therefore the child's views must be an essential part in deciding what is in the child's best interests. This concept of respecting the views of the child is one which also entails a respect for the evolving capacities of a child [136]. This principle is contained in Article 5 which states that 'direction and guidance, provided by parents or others with responsibility for the child, must take account of the capacities of the child to exercise rights on his or her own behalf' [137]. Lansdown asserts that this principle has intense implications for the human rights of the child [138]. This principle recognizes that as children attain greater capabilities there is a reduced need for adult direction and a greater capacity to be accountable for their actions [139]. The Convention further recognizes that children from diverse backgrounds and cultures who are confronted with different life experiences will acquire competencies at different stages [140]. It also allows for the fact that children's abilities may vary depending on the nature of the rights that have been infringed [141].

As stated above, there is a relationship between the principle of evolving capacities of a child and the concept of respect for the views of the child enumerated in Article 12. This concept enforces the individual autonomy of children which has been emphasized in various

provisions of the Convention. This Article obliges States to ensure that 'children who are capable of forming their own views are given the right to express those views freely in all matters affecting them' [142]. This serves as an appreciation of children as 'active agents', entitled to participate in decisions affecting them [143].

However, despite these provisions, it remains difficult to ascertain what is actually meant by 'participation' in the context of children's rights [144]. Lansdown asserts that children especially girls, younger children and those with disabilities are frequently deprived of the chance to express their views [145]. He also states that a free expression of views will lead to a world whereby adults begin to acknowledge the need to listen and respect children. It is worth noting that this right guaranteed to children is to be carried out 'in all matters affecting them'. Most facets of decision making ranging from family to the State to international level are likely to have an impact on children and therefore may be regarded as 'legitimate matters of concern' [146].

Furthermore, the CRC requires that due weight be given to such views in accordance with the age of maturity of the child. This implies that it is not enough to listen to the child but such opinions must be accorded serious thought when making decisions affecting the child. By requiring that age and maturity be taken into account, the Convention makes it clear that age is not a sole defining factor and therefore should not be used as a limitation to the views of the child [147]. Lansdown asserts that 'children's level of understanding is not uniformly linked to age, information, experience, social and cultural expectations and levels of support' and that all these factors are instrumental to the development of children's capacities [148]. It is therefore important to examine the environment or setting in which a child develops. Furthermore, research has shown that adults regularly undermine the capacities of children to express their views in decisions affecting them but are more likely to recognize such capacities when it involves the child taking on high levels of social and economic responsibilities [149].

It has been established that the practice of breast ironing is performed on girls between ages eight and fourteen. It is worth noting that there is a variability of children's responsibilities in Cameroon, influenced largely by culture and the economic activities of adults. However, taking these factors into account, it may be argued that a number of children in Cameroon are required to be alert and active at a very young age. This is premised on the fact that Nsagha asserts that in Cameroon, parents are often unable to cater for their children due their socio-economic situation and also a number of other factors including the rapid increase in the rate of HIV resulting in death of parents [150]. These factors result in children as young as 10 years taking up adult responsibilities of decision making, care of siblings, cooking and carrying out various household chores [151]. From this it may be implied that due to the context in which most children are brought up in Cameroon, children who are subjected to the practice of breast ironing may be considered to have acquired the necessary capacity to make certain decisions. Furthermore, since the child's abilities may vary depending on the nature of rights being infringed, in the case of breast ironing, the rights being infringed are basic rights which do not require a child with high level of capabilities to recognize that such infringement is prejudicial to her health and body.

It is worth noting that the Convention does not confine the ways in which the views of the child can be expressed. Lansdown asserts that such views are not limited to formal language but can also be in the form of emotions, painting, drawing, and singing. He further states that there should be no age limit on the right to participation;

therefore children with learning difficulties, even babies are capable of expressing their opinions. From this it can be argued that children between the ages of eight and fourteen are capable of expressing their views. Furthermore, since these views are not required to be formal, gestures made by the child should be a sufficient way of expressing such views. Therefore, the fact that a child whose breasts are in the process of being ironed screams or attempts escaping should be regarded as having expressed her views with regard to that practice.

It is however important to note that this principle does not necessarily mean that the child can take complete responsibility for every decision concerning him/her. The spirit of Article 12 is rather to ensure consultation and growing participation than to relinquish all power to the child [152]. For the best interests of the child to be determined, it is vital that the child himself/herself be heard. With increased age and maturity, children should be able to influence decisions that affect their lives.

It is my inference that the child's right to be free from all forms of violence is inextricably linked to the right to life, survival and development. This latter right is one that forms the basis of the Convention. Article 6 requires every 'Member State to ensure, to the maximum extent possible, the survival and development of the child' [153] by, inter alia, providing access to health care and education, and by protecting the child from abuse. Mahery is of the view that the right to survival includes all measures taken to guarantee the healthy development of the child [154]. The Committee on the Rights of the Child explains that 'development should be looked at in the broadest sense, embracing the child's physical, mental, spiritual, moral, social and psychological development' [155]. The Committee further asserts that 'ensuring survival and physical health are a priority, but States are reminded that Article 6 encompasses all aspects of development and that a young child's health and psychosocial well-being are interdependent' [156]. Both may be put at risk by adverse living conditions, neglect and abusive treatment [157].

From this, it can be argued that the practice of breast ironing violates the child's right to survival and development. This is largely because, as was previously stated, the practice of breast ironing not only causes pain and discomfort but also impedes the normal development of the breasts of the child and also affects her psychologically. It is therefore submitted that Cameroon has a legal obligation to harmonize its national laws to standards contained in the CRC. Effective measures are to be taken to eliminate the practice of breast ironing as it clearly goes against the principles contained in the CRC.

Regional instruments specific to the rights of the child

The African Charter on Human and People's Rights (ACHPR) and the Protocol to the African Charter on Human and People's Rights on the Rights of Women in Africa (Women's Protocol): The ACHPR preserves civil, political, economic, social and cultural rights and is concerned with both the rights of individuals and peoples. It also contains several provisions to uphold and protect the rights and welfare of vulnerable groups such as persons with disabilities, the elderly, refugees, displaced persons, persons living with HIV/AIDS and children.

The ACHPR gives little direction to children's rights as a whole; however its general provisions are by implication also applicable to children. Article 4 of the Charter states that everyone, which includes children, is entitled to respect for his life and integrity of person. It also states that everyone is entitled to have his or her dignity respected and prohibits all forms of exploitation and degradation of man particularly

slavery, torture, cruel, inhuman or degrading punishment or treatment [158]. Furthermore, the Charter provides that every individual is entitled to the best attainable state of physical and mental health [159]. From this it can be argued that the Charter by implication guarantees the protection of children from all forms of violence.

Although the Charter does not include any additional specific rights relating to children, Article 18 however makes specific reference to children. It provides that 'the State shall ensure the elimination of every discrimination against women and also ensure the protection of the rights of the woman and the child as contained in international declarations and conventions' [160]. This in turn implies that the rights of children provided for in other international declarations and conventions are by incorporation part of the ACHPR. From this it may be argued that although the Charter gives little direction to children's rights as a whole, its drafters were however aware of major international human rights documents giving protection to children.

The Women's Protocol however provides a more detailed guidance to States on their obligation with regard to violence against women, which also includes girl children. The Protocol highlights in its preamble that 'practices which hinder or endanger the normal growth or physical and psychological development of women and girls should be condemned and eliminated' [161]. The Protocol further defines harmful practices as 'all behaviour, attitudes and/or practices which negatively affect the fundamental rights of women and girls, such as their right to life, health, dignity, education and physical integrity'. From this, it becomes clear that the practice of breast ironing is one which is condemned by the Protocol.

Article 4 of the Protocol states that 'every woman is entitled to respect for her life, and the integrity and security of her person' and as a result all forms of cruel, inhuman or degrading punishment or treatment should be prohibited [162]. This Article also provides more detailed guidance to States in this regard. It does this by expressly mandating States to 'adopt legislative, administrative, social and economic measures as may be necessary to ensure the prevention, punishment and eradication of all forms of violence against women' [163]. This Protocol also specifically requires States to outlaw and eradicate harmful practices, explicitly including female genital mutilation, which in turn includes other harmful practices like breast ironing. Article 4 goes on to provide the necessary measures which States may use to eliminate such harmful practice. These measures include the creation of public awareness, legislative measures and the provision of necessary support to victims of such harmful practices through services such as health care, judicial support, emotional and psychological counseling.

From this, it becomes evident that the Women's Protocol is a step forward from the African Charter in protecting girls from violence. Therefore, there is an obligation placed on Cameroon to take steps necessary to eliminate the practice of breast ironing.

The African Charter on the Rights and Welfare of the Child: Like the CRC, the ACRWC is a comprehensive document that lays out the rights and general principles as regards the status of children. It however aims to complement the CRC. It does this by addressing matters of specific significance to African children. This Charter was adopted in light of the critical condition in which nearly all African children find themselves in terms of their socio-economic, cultural, traditional and developmental circumstances, armed conflicts, exploitation and hunger [164]. Hence, in its preamble, the Charter draws attention to the fact that children require particular care and legal protection, and that they

are entitled to freedom, dignity and security due to their mental and physical development [165]. Therefore, there is an acknowledgment that children need protection and deserve to be treated with dignity. This also hints at an appreciation for the autonomy of the child which is emphasized in the CRC.

It is argued that although there was a need to take into account African traditional values in considering matters relating to the rights of children, it was however significant that this be done without compromising the child's best interests through harmful cultural practices [166]. From its provisions, it becomes evident that the ACRWC challenges African customary values that conflict with children's rights. It does this by expressly requiring State Parties to adopt legislation protecting children and also discourage customs, traditions, and religious practices that are inconsistent with the rights and obligations contained in the Charter [167]. Therefore the strength of the Charter is argued to lie in the fact that it clearly 'proclaims its supremacy over customs and traditions' in conflict with its provisions [168].

The principle that the best interest of the child is of paramount importance is also reiterated in the ACRWC. It states that in all actions concerning the child undertaken by any person or authority, the best interest of the child shall be the primary consideration' [169]. The ACRWC therefore shadows the CRC in entrenching this principle. However, Chirwa is of the view that the ACRWC takes a step forward by affirming that the best interest of the child must be 'the' primary consideration in all actions regarding the child and not merely 'a' factor to be considered amongst other factors [170].

The ACRWC also guarantees the child's right to survival and development. It requires States to ensure to 'the maximum extent possible the survival, protection and development of the child' [171]. The Charter also provides that the child is entitled to 'enjoy the best attainable state of physical, mental, and spiritual health' [172]. It further outlines the specific measures State Parties have to follow in order to fully execute this right. State Parties are required in Article 16 to take specific legislative, administrative, social and educational measures to protect the child from all forms of torture, inhuman or degrading treatment and especially physical or mental injury or abuse...while in the care of a parent, legal guardian...or other person who has the care of the child' [173].

Article 21 deals with the protection of children against harmful social and cultural practices. This Article requires 'States to take appropriate measures to eliminate harmful social and cultural practices affecting the welfare, dignity, normal growth and development of the child' [174]. Although the CRC also prohibits such harmful practices, the ACRWC is argued to be a step forward in this regard, in that, its prohibition is more extensive as it includes a reference to the child's dignity [175]. The Charter also provides guidelines to be used in determining whether a specific practice is harmful. It states that for such customs and practices to be deemed harmful, they must be prejudicial to the health or life of the child; and discriminatory to the child on the basis of sex or other status. From this, it becomes evident that the practice of breast ironing is one which is prohibited by the Charter as it meets the above requirements by being prejudicial to the health of the child and discriminatory in the sense that it is only carried out on girl children.

This section has shown that the right of girl children to be free from all forms of violence has extensively been addressed in international law. A number of treaties have afforded protection to this right in the

UN system and also in the African regional system. These documents have placed obligations on States and set standards on how this right is to be protected. Therefore, a practical implication of ratifying international child protection laws is its domestication in the ratifying States legal system.

Consequently, as result of Cameroon's membership in all the above mentioned instruments, it is required to take appropriate legislative and other measures to put the right of the child to human dignity, physical and psychological integrity and equal protection of the law into effect. Cameroon is therefore required to provide an enabling environment for the effective realization of these rights according to international standards.

The Normative Framework for the Protection of the Girl Child from Violence in Cameroon

Children's rights to respect for their human dignity, physical and psychological integrity and to equal protection of the law have been recognized in major international and regional human rights instruments. States are required to adopt all necessary legislative and other measures, and to ensure that such measures have full force and effect within their domestic legal system. This necessitates political will on the part of governments and includes clear national legislative provisions that put into effect the relevant treaty.

The Committee on the Rights of the Child (the Committee) issued a general comment on Article 19 of the Convention on the Rights of the Child (CRC). This comment aims at guiding Member States in understanding their obligations as reflected in this Article. It also highlights the measures and strategies required to eliminate and address all forms of violence in the context of the CRC [176].

General comment on article 19- interpretation guideline

Article 19 of the CRC provides that 'States shall take all appropriate legislative, administrative, social and educational measures to protect children from all forms physical or mental violence...while in the care of parent(s)...or any other person who has the care of the child' [177].

As a result of the alarming rate at which violence is being perpetrated against children, the Committee decided to issue a general comment on Article 19 [178]. This comment is an interpretative guideline and it outlines the legislative, judicial, administrative, social and educational measures that States are required to take in order to ensure an effective protection of children from all forms of violence[179].

In interpreting Article 19, the committee affirms that all forms of violence against children, irrespective of how 'light' it is, are unacceptable [180]. To achieve an effective prohibition of all the various forms of violence committed against children in all settings, States are required to adopt a clear legal definition of what acts constitute violence [181]. These acts range from neglect or negligent treatment, physical and mental violence, harmful practices, corporal punishment, torture and inhuman or degrading treatment or punishment. States are also required to take effective measures, such as taking all appropriate legislative, administrative, social and educational measures to implement their obligations.

It is worth noting that legislative measures are not limited to only the adoption of legislation. The Committee asserts that this also includes the provision of adequate budget allocations for the implementation of legislation [182]. Legislative measures must also include the adoption of child specific legislations, the review and amendment of existing legislations and other provisions and the establishment of

comprehensive policies on child rights in order to ensure a complete prohibition on all forms of violence against children [183].

With regard to administrative measures, the Committee recommends that such measures should indicate the government's duty to establish 'policies, programmes, monitoring and oversight systems' necessary to protect the child from all forms of violence [184]. States are also advised to implement a 'systematic and transparent budgeting process in order to make the best use of allocated resources for child protection' [185].

Unlike legislative and administrative measures, social measures can be implemented by both the State and civil society actors. These measures include 'poverty reduction strategies; improved access to health, social welfare and justice services; childcare, early child development and after school care programmes; counseling support for children; and 24 hour toll-free child helplines with trained personnel' [186].

States are further required to take educative measures which should tackle 'traditions, attitudes, customs and behavioural practices' which overlook and advance violence against children [187]. There is also a need to foster open discussions about violence, inclusive of the media and civil society. States are also required to embark on public information programmes, including campaigns aimed at creating awareness through the media, to tackle negative societal attitudes and practices which overlook or promote violence [188]. In addition, States are to ensure that the provisions of the CRC are made part of the educational curriculum of all experts required to work with and for children[189].

Article 19 (2) also provides for protective measures which States are required to adopt in protecting children from all forms of violence. These measures include, amongst others, prevention, reporting, referral, investigation, treatment and judicial involvement.

The Committee emphasizes that child protection commences with an active prevention of all forms of violence against children [190]. States are therefore obliged to embrace all methods needed to make certain that adults responsible for the care, guidance and upbringing of children will respect and protect children's rights [191]. Prevention also includes other measures 'to positively promote respectful child-rearing free from violence for all children, and to further target the root causes of such violence at the levels of the child, community, institution and society' [192]. It also requires States to provide shelter and crisis centers for children who have experienced violence.

Reporting entails States developing 'safe, well publicized, confidential and accessible support mechanisms for children, their representatives and others to report violence against children, including through the use of 24-hour toll-free hotlines' [193]. The Committee further emphasizes that such reporting mechanism must be combined with and regarded as help-oriented services offering social support and that processes must be in place to ensure the protection of persons making such report [194].

Where violence has been reported by a child or a representative, States are required to put measures in place to ensure an effective investigation by competent experts who have received ample training and who follow a 'child-sensitive approach' [195]. Furthermore, the Committee places emphasis on the treatment of child victims of violence. It states that 'treatment is an essential service necessary to promote a physical and psychological recovery and social integration of children who have experienced violence' [196].

It is worth noting that the Committee considers that resource constraint is not a justification for failure of States to implement the measures necessary for effective child protection. It therefore makes provision for 'international cooperation and assistance of developing States to fulfill their obligations in relation to Article 19.

From the above it can be inferred that current measures taken by States must be reinforced and expanded in order to put an end to practices which undermine children's development. Therefore, the question that needs to be answered is how well Cameroon has used this interpretative guideline in implementing measures that are effective in protecting girl children from violence.

General legal framework for the protection of human rights in cameroon

The protection of human rights in general and more specifically the rights of children is one that has been safeguarded in Cameroon through a variety of instruments, ranging from international conventions, protocols, charters, national legislations and policies. In accordance with the obligations undertaken by Cameroon in terms of international legal instruments, this section contains information on the legislative, judicial, administrative and other measures, if any, taken by Cameroon in order to implement the provisions of these instruments, with specific focus on rights affected by the practice of breast ironing.

The main sources of law in Cameroon are the Constitution, legislation, judicial precedents and customary law [197]. The efforts taken by Cameroon, to provide an environment which encourages an adequate protection of the rights of girl children will be made visible through these sources of law.

Legislative Measures: Since the independence and amalgamation of the former British Southern Cameroons and the French Cameroun, the country can be said to have had at least three different Constitutions and several constitutional amendments [198]. The principal Constitution was the Constitution under which the French Cameroun became independent in 1960. The second Constitution was in reality merely an amendment of the 1960 Constitution of the French Cameroon in 1961 when the British and French administered parts of the country were reunited [199]. This latter Constitution which ushered in a highly centralised federal system was regarded as the Constitution of the Federal Republic of Cameroon. However another Constitution was adopted in 1972 and the name of the country was changed to the 'United Republic of Cameroon' [200]. This Constitution was subject to a large number of amendments and these led to the adoption of the Constitution that is currently in force, the 1996 Constitution of the Republic of Cameroon (hereafter referred to as the 1996 Constitution).

It is worth noting that despite the numerous amendments made prior to the adoption of the current Constitution, a large part of the text remains the same. A majority of the amendments are related to administrative issues rather than the provisions on human rights. However, on the issue of human rights, the development taken towards fundamental rights changed with the different Constitutions. The Federal Constitution, 1961 stated that 'the Federal Republic of Cameroon ... affirms its adherence to the fundamental freedoms set out in the Universal Declarations of Human Rights ...' [201] This provision had the effect of incorporating the Declaration as an important part of the Constitution. However, in 1972, the drafters of the Constitution downgraded this Article to the preamble of the Constitution. This was also reiterated in the current 1996 Constitution.

Cameroon has in its Constitution continuously emphasized the

supremacy of international law over incompatible national law. Article 45 provides that 'duly approved and ratified treaties and international agreements shall, following publication, take precedence over national laws' [202]. This implies that international instruments have been given force in Cameroon at national level. Thus, treaties ratified by Cameroon have force and are not required to be domesticated into enabling legislations before acquiring status in the country.

Therefore, international instruments upon 'publication' become laws and do not require legislative implementation to be effective in Cameroon. The question that arises in this regard is, are these ratified treaties therefore deemed justiciable in Cameroonian courts? Can individuals complain in a domestic court about a breach of Cameroon's international human rights obligation regardless of the fact that such rights are not being incorporated into domestic law? In this regard, it is uncertain as to what constitutes 'publication' and it has been argued that the process of incorporating international law into domestic law in Cameroon is muddy [203].

Manga however asserts that despite the fact that the Constitution gives ratified treaties precedence over national laws, these treaties need to be enshrined in the Cameroonian law before they can be rendered justiciable [204]. This is premised on the fact that in reality, national law takes precedence over international law. Therefore, victims of human rights violations may only seek redress from a domestic court about a breach of Cameroon's international human rights obligation when such international law has been given force in national legislation [205]. Judicial protection is necessary for the effective realization of the rights contained in international human rights instruments. Therefore, despite this provision contained in the Constitution, it is still important that legislation be enacted putting into effect the various rights guaranteed to girl children by international human rights instruments.

The Constitution which is regarded as the supreme law of the land was expected to provide a firm foundation for the advancement of democracy, good governance and the protection of human rights. As most of the fundamental rights acknowledged and protected by the Constitution are contained in the preamble, it can be inferred from these provisions that there has been an attempt to ensure an effective protection of human rights.

The 1996 Constitution like the CRC explicitly prohibits violence in any form and in all circumstances. It does this by guaranteeing in its preamble the right to life, survival and development. It states that 'every person has the right to life, to physical and moral integrity and to humane treatment...under no circumstances shall any person be subjected to torture, to cruel, inhuman or degrading treatment' [206]. By guaranteeing this right to 'every person', girl children are expressly afforded protection and as a result, this provision should be implemented in all areas concerning children.

Furthermore, some other provisions in the 1996 Constitution can be deemed to protect aspects of the right to be free from violence. The preamble provides that 'The State shall provide all its citizens with the conditions necessary for their development' [207]. From this provision it may be implied that the State recognizes its obligations to ensure the right to survival and development of the child. This right is one that forms the basis of the CRC [208] and therefore entails the provision of access to health care, food and protection of the child from any form of abuse. The Committee further recommends that 'development should be looked at in the broadest sense, embracing the child's physical, mental, spiritual, moral, social and psychological development' [209]. Therefore, the Constitution by placing an obligation on the State to

provide its citizens, including children with conditions necessary for their development, implicitly prohibits all practices that impede the normal development of the child, both physically and psychologically.

The 1996 Constitution also explicitly affords protection to 'women, the young, the elderly and the disabled' [210]. Protection in this case can be interpreted to include protection from all forms of violence. It also enshrines the 'freedom of opinion for all citizens, freedom of communication, expression, association...' [211] which can be construed to mean a guarantee for a respect of the views of the child, which is one of the fundamental principles underlying the CRC and the African Charter on the Rights and Welfare of the Child.

There has been lengthy debate as to whether provisions stipulated in preambles amount to legally enforceable rights [212]. Fombad is of the view that such provisions do not amount to enforceable rights [213]. However, it can be inferred that although these human rights guarantees are contained in the preamble, they are however rendered justiciable by virtue of Article 65 of the Constitution which provides that 'the preamble shall be part and parcel of this Constitution' [214]. This view is confirmed by Fuo et al who argue that by incorporating Article 65 into the Constitution, it can be inferred that the 1996 Constitution intended that all fundamental rights contained in 'the Universal Declaration of Human Rights, the Charter of the United Nations, the African Charter on Human and Peoples' Rights and all duly ratified International Conventions' [215] be incorporated into the Constitution as legally enforceable rights [216].

Nevertheless, I am of the view that in matters relating to human rights, the 1996 Constitution is inadequate. Its human rights provisions are of a limited scope as they fail to provide a comprehensive framework for the protection of children. The Constitution makes only one specific mention of the rights of children. It provides in its preamble that 'the State shall guarantee the child's rights to education and that primary education shall be compulsory'. Therefore other rights apply to children only by inference. This view is also confirmed by Fombad who is still of the opinion that the 1996 Constitution is at its weakest in matters relating to the protection of fundamental human rights [217].

Despite the above, it may also be submitted that the preamble to the Constitution affirms Cameroon's commitment to promoting and protecting universal values and principles which are guaranteed to all citizens by the State. Furthermore, it is worth noting that in addition to the preamble, there exists other legislative and regulatory measure which may be used to ensure the realization of the rights contained in the Constitution and other international and regional instruments.

For example, the government has enacted legislation [218] to amend various provisions of the Cameroon Penal Code by reviewing section 132 and 133 relating to torture. This was done in order to comply with the standards provided for in the Convention against Torture (CAT). This Code now criminalizes all acts of torture using the definition of torture contained in CAT [219].

The Criminal Code also prescribes strict measures against the perpetrators of physical violence against children in various ways. It does this by explicitly prohibiting any act which results in a permanent deprivation of the usage of the whole or part of another's body [220]. It also prescribes punishment on anybody who uses physical or any other method to cause serious or simple injuries on another person [221]. It further makes these provisions on violence applicable to children and doubles the punishment where committed against a child [222].

Furthermore, after embodying the provisions of CAT into

domestic law by criminalizing torture, the Criminal Procedure Code (CPC) was promulgated [223]. As argued in preceding chapters, breast ironing can be considered as a form of torture. Therefore, this Code by prohibiting any act of torture and inhuman or degrading treatment significantly improves the guarantees of human rights [224]. The CPC also contains provisions relating to the best interests of the child in criminal proceedings.

Two other bills, including the Draft Code of Child Protection (hereafter DCCP), the Draft Code of Persons and Families, containing provisions relating to the best interest of the child are still to be adopted. These bills which are still in the course of completion will strengthen legislation on the family and on the protection of children in the family and the community.

The DCCP if enacted into law may be regarded as the single most comprehensive piece of legislation on children in Cameroon. This Code extensively addresses a number of issues ranging from the best interests of the child principle to the supremacy of the family environment. It further spells out more details on the rights of the child and also introduces various novel concepts [225]. This Code also provides extensively for the right to health and classifies deprivation of health as ill-treatment from which children must be protected [226].

Regarding harmful traditional practices, this Code makes no specific reference to the practice of breast ironing which has been on steady increase in Cameroon. It has been established in previous chapters that this practice has harmful effects on the physical and psychological health of the child. It was also established that the State is a member State to the CRC which explicitly protects the child's rights to human dignity, physical and psychological integrity and equal protection of the law. Therefore, by failing to provide an express provision prohibiting this practice in its DCCP, this omission may be regarded as a shortcoming in its law reform efforts. Furthermore, it is worth noting that this Draft Code is one that is still in the process of being enacted into law and therefore currently carries no weight in protecting and enforcing the rights of children.

As recommended by the Committee, Cameroon has also attempted to adopt a clear legal definition of what acts constitute violence. It has done this by stating in its Constitution and other legislations various acts which are deemed violent. These include 'neglect or negligent treatment, inhuman or degrading treatment' [227], torture [228], and harmful practices [229].

Regulatory and Other Measures: In addition to the above-mentioned legal framework, a number of initiatives with a direct impact have been conducted by the State and by other stakeholders.

As part of efforts to integrate the principle of child participation in Cameroon, the government created a 'Children's Parliament' to deliberate on and bring to the attention of the government matters relating to children [230]. Despite the non-binding effects of its decisions, Parliament has deliberated on and disseminated information regarding issues ranging from the need to make the subject of human rights part of school education, including the need to improve on support systems for victims of child abuse [231].

As one of the social measures recommended by the CRC Committee, a Department of Social Protection of Childhood was established in order to advance the promotion and protection of the rights of the child [232]. This department was mainly created to supervise the scheme, operation and follow-up of 'promotion policies and programmes on the rights and social protection of children and

the supervision of early childhood' [233]. They are also required to ensure that as essential partners in realizing the rights of children, their undertakings are in line with government policies [234].

Furthermore, in the absence of a programme for psychological and social assistance for children who are victims of violence and other forms of abuse, physical and psychological rehabilitation and social reintegration are all guaranteed by local social workers, including the personnel of social assistance centers, listening centres across the country and welfare services at police stations, courts and hospitals [235].

With regards to the fight against practices and customs that are derogatory to women, including girls, the government adopted a strategy that integrated judicial measures, sensitizing activities, training and information, as well as studies aimed to improve the current policies [236]. The organizational capacities of women's organizations were also reinforced, as was the fight against violence against women. In response to these practices, some NGOs such as RENATA [237] has with the support of donors embarked on actions by way of educating communities on gender based violence. Other NGOs have also been involved in advocacy and outreach efforts.

Another step taken by Cameroon is the transformation of the National Human Rights Committee into the National Commission of Human Rights and Freedoms in 2004. This Commission covers all aspects of human rights, including the promotion and protection of child rights [238]. Furthermore, Cameroon has introduced human rights, including child rights in the primary and secondary school curricula [239]. Teaching modules on combating all forms of violence, elaborated by the Ministry of Education, is currently being taught as from the beginning of the 2006 school year and studies are also under way on violence against children [240].

It can therefore be inferred from the above mentioned provisions that the government of Cameroon has attempted to adopt policy and programmatic measures to ensure the implementation of the right of the child to be protected from some forms of violence. It is however unacceptable that progress made in the DCCP makes no specific reference to breast ironing, an issue which is already in the public domain and one which the government is aware of.

Inadequacies of measures

Despite the above measures taken by Cameroon in combating violence against women and children, some difficulties remain in terms of implementing the CRC Committee's recommendations, as regards both the legislative and regulatory measures.

Although the 1996 Constitution guarantees certain rights to individuals, the effectiveness of these human rights provisions is dependent on the language in which it is couched. The rights contained in the Constitution have been criticized as being couched in vague language [241]. This is premised on the fact these rights are 'expressed in the language of hope and aspiration which is typical of preambles' [242]. As a result, these provisions are merely declarations of rights which are no more than 'solemn proclamations of principles' [243]. Therefore the attempt of Article 65 to make the preamble 'part and parcel' of the Constitution maybe regarded as futile [244]. Furthermore the rights guaranteed in the Constitution are not expressed in a way that imposes any obligations on the State [245]. This is because, it fails to state who guarantees these rights, when and how they are guaranteed.

Cameroon has also failed to adopt a child specific legislation adequately ensuring the effective protection of children from violence

as required by general comment 13. As previously stated, the DCCP is still under review and has not been adopted as law. There has been a long delay in the finalization of this Code.

With regard to the practice of breast ironing Cameroon has failed to put in place measures to strengthen its legislative and institutional framework in that regard. It has failed to expressly prohibit or adopt a national strategy for the prevention of this practice.

Furthermore, the Government has failed to take measures to strengthen the activities of civil society organizations and non-governmental organizations working with children affected by breast ironing. It has also failed to take measures aimed at ensuring victims of this practice have access to confidential health and counseling services as required by the Committee.

The government has similarly failed to implement programmes to sensitize the population about the harmful effects of breast ironing. It has likewise failed to provide access to legal remedies and medical services, establish counseling services for victims, train legal, health and police personnel, and launch public-awareness campaigns in order to achieve zero tolerance with regard to all forms of violence against women and girls.

The State has also failed to establish reporting systems that are just, secure and transparent that ensures the right of victims to be heard. Such systems include mechanisms such as toll-free telephone lines, Vigilance Committees, protocols of support for child victims of violence and the creation of an active advocacy and protection network so that all children are safe and protected [246].

The Criminal Code although covering various types of injuries fails to contain a law against discrimination and violence against women and also does not contain a specific provision for prohibiting the practice of breast ironing. Also, no measure has been taken to date to investigate cases of torture or abuse of children, to compensate and rehabilitate the victims or to set up a complaints mechanism [247].

Furthermore, although Cameroon has taken steps to protect children against all forms of violence, including torture and abuse in the new CPC, there are still some difficulties such as the silent complicity of the community, ignorance of parents and the climate of impunity surrounding the phenomenon of violence against children. Additionally, there are very few listening centers which cater for child abuse victims across the country [248].

Therefore, although the government has made attempts at protecting children against all forms of violence by adopting legislation and taking other regulatory steps, it can be inferred that the State has not taken any action to eliminate this practice. This is largely because the provisions against violence and abuse in the Constitution, the Penal Code and other legislations are not interpreted as prohibiting breast ironing.

Conclusion

The aim of this article has been to assess and critically examine the practice of breast ironing and its implications on the rights of girl children. To achieve this goal, the first task was to highlight and give a background of the breast ironing situation in Cameroon. It showed that there is a need for an intervention and total eradication of this practice. The article further gave a clear understanding of how, why, where and by whom breast ironing is practiced and showed that although it is being used in a way that is different from its original form, this practice is one which has acquired the status of culture overtime.

The article also discussed the steps taken by Cameroon to regulate this practice. It examined its legal framework to determine whether the obligations vested on it by international human rights instruments have been translated into national policies.

However, the measures taken by Cameroon were regarded as insufficient. This is largely because the provisions against violence and abuse in the Constitution, the Penal Code and other legislations are not interpreted as specifically prohibiting the practice of breast ironing. Cultural obstacles in Cameroon are deeply entrenched and the State has not adopted immediate and effective measures, particularly in the fields of teaching, education and information, to combat all forms of violence against children. It can therefore be inferred that the State has not taken any measures to eliminate this practice.

The use of breast ironing as a preventive measure is one which is steadily increasing in Cameroon and the lack of legal prohibition or national strategy for its prevention is contrary to the provisions of the CRC and ACRWC. Therefore, it is necessary that Cameroon adopt measures relating to the situation of all children who are likely to be affected by the practice of breast ironing.

The inclusion of the rights for 'everyone' as contained in the Constitution and other relevant legislations is not adequate to afford protection to girl children against this form of violence. This inclusion does not automatically ensure respect for the rights of children. Therefore, it is important that such a vulnerable group, not only be guaranteed wide ranging rights contained in general provisions, but also be granted specific protection against this practice.

It is therefore recommended that Cameroon adopt legislation or include a provision in its Criminal Code prohibiting this practice. To this end, the Ministry of Justice needs to propose an amendment to the current Criminal Code to introduce measures to both prohibit and punish this act. The adoption or amendment of legislation in this regard is important to ensure that children are able to invoke the provisions of such legislation before a court of law. This is necessary so that victims may have access to effective remedies in order to redress violations which occur in this regard.

However, although criminalization of this act could act as a deterrent and help increase awareness of the adverse effects of the practice, this alone is likely to be ineffective in curbing it. It is therefore equally essential that the State also implement programmes to sensitize the population about its harmful effects. This is important because, breast ironing is practiced by most mothers in Cameroon and it is done with the best interest of their children at heart as a means of protecting and promoting the child within the community and following social norms. Therefore, at the onset, a direct criminalization of this act without measures taken by the State to discourage this practice may lead to the arrest of numerous women.

A key question that arises is what is the underlying dynamics that makes breast ironing as a major obstacle in children's human rights in Cameroon so difficult to change? The answer to this question is, the practice of breast ironing is one that is deeply entrenched in Cameroon and the State has failed to adopt immediate and effective remedies to combat this practice. It is time for the State to take all appropriate measures to combat all forms of violence against children. To achieve this, it is essential that certain social and cultural patterns of conduct be eliminated. It is therefore necessary that Cameroon give urgent attention to the general duty imposed on it by international legal instruments.

Ssenyonjo asserts that 'however high the barriers, change is possible' [249]. Regardless of how deeply rooted this practice is, it can be uprooted or transformed, mainly through public education: 'stereotypical gender roles can be challenged through textbooks, academic instruction and patterns of participation in the education processes' [250]. Sustained education will help encourage the participation of women and men and will help in overcoming the entrenched form of resistance and transform this cultural practice. Furthermore, prevention, by making women who practice breast ironing aware that they are violating the rights and physical integrity of their victims, and by holding seminars for opinion makers (traditional and religious authorities) to alert them to the issue will be an effective way of combating this practice.

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