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PREVENTING GENOCIDE BY FIGHTING AGAINST HATE SPEECH

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Abstract

Genocide never happens abruptly. It is a planned crime that involves dynamic participants who must be conditioned to play their roles. Planners of genocide organize campaigns and define target group as being outside human existence, worthless, immoral sinners who pose a threat to mankind. In Rwanda, the genocide against the Tutsi was preceded and prepared by widespread hate propaganda. This paper examines hate speech by Rwandan politicians and media before and during the 1994 genocide against Tutsi and techniques used to incite others to commit genocide. It additionally explores strategies for fighting against hate speech that may be used in genocide prevention. Findings reveal that hate speech played a significant role in the genocide perpetrated against the Tutsi. Accusation in a mirror, euphemism and hateful rhetoric were among techniques used when inciting Hutu to commit violence and genocide against the Tutsi. Finally, the paper highlights several strategies for fighting against hate speech, such as; reinforcement of laws criminalizing hate speech, awareness campaigns through formal and informal education, use of media, involvement of civil societies and political organizations.

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Introduction

Hate speech is one of the gravest tools used in the incitement to commit mass atrocities and genocide. As stated by Henry Maina et al., hate speech or incitement to violence by politicians, community leaders or journalists has resulted in massive violence and mass killings in many countries across the world (Maina, et al. 2010). In Rwanda, the incitement to ethnic violence was reinforced through public speeches by political figures that urged Hutu to kill Tutsi and political opponents (Prosecutor v. Ruggiu, 2000). Further, writings in *Kangura* and the broadcasts of Radio Television Libre des Milles Collines (RTL) conditioned the Hutu population and created a climate of fear and mistrust thereby stimulating the extermination of Tutsi (Prosecutor v. Nahimana et al, 2003). This paper focuses on hate speech by Rwandan political figures such as Joseph Habyarimana Gitera, Gregoire Kayibanda and Léon Mugesera. In addition, the paper analyzes hate propaganda disseminated by *Kangura* newspaper, Radio Television Libre des Milles Collines (RTL) and Radio Rwanda, as well as strategies used when inciting people to commit genocide. Finally, the paper highlights strategies for fighting against hate speeches for genocide prevention.

1. Hate speech

There are various definitions of hate speech, but in general, the term is usually used to refer to expressions that are abusive, insulting, intimidating or harassing and/or which incite violence, hatred or discrimination against groups identified by a specific set of characteristics¹.

According to the Council of Europe Committee of Ministers, the term hate speech covers all forms of expression which spread, incite, promote or justify racial hatred, xenophobia, anti-Semitism or other forms of hatred based on intolerance, including: intolerance expressed by aggressive nationalism and ethnocentrism, discrimination and hostility against minorities, migrants and people of immigrant origin (Council of Europe Committee of Ministers, Recommendation N° R (97) 20). The American Bar Association defines hate speech as “speech that offends, threatens, or insults groups, based on race, color, religion, national origin, sexual orientation, disability, or other traits”². Referring to the case of Ferdinand Nahimana³ et al, the trial chamber of the International Criminal Tribunal for Rwanda (ICTR) defines hate speech as discriminatory form of aggression that destroys the dignity of those in the group under attack (Prosecutor v. Nahimana et al, 2003, par. 1072).

In his article “Fighting Hate and Bigotry on the Internet”, Raphael Cohen-Amalgor defines hate speech as “bias-motivated, hostile, malicious speech aimed at a person or a group of people because of some of their actual or perceived innate characteristics” (Cohen, 2011, p. 1). As Cohen notes, hate speech involves discrimination, intimidation, antagonism and prejudicial attitudes towards characteristics of people, which include gender, race, religion, ethnicity, colour, national origin, disability or sexual orientation. Hate speech is intended to injure, dehumanize, harass, intimidate, humiliate, degrade and victimize the targeted groups and to foment insensitivity and brutality against them.

As there is no common definition of hate speech, this paper takes hate speech to be all forms of expression which spread and promote hatred, incite or induce others to commit violence or genocide against a group of people based on their racial, national, ethnic and religious affiliation.

2. Hate Speech by political figures before the 1994 Genocide against the Tutsi in Rwanda

Hate speech regularly precedes and accompanies ethnic conflicts, and particularly genocidal violence. Without such incitement to hatred and the exacerbation of xenophobic, anti-Semitic, or racist tendencies, no genocide would be possible (Timmermann, 2008, p. 353).

In Rwanda, hate speech was disseminated through speeches addressed to the public at political rallies by eminent personalities who played a significant role in spreading hatred leading to the 1994 genocide against the Tutsi. This paper has been focused on hate speech by Joseph Habyarimana Gitera, Grégoire Kayibanda and Léon Mugesera.

Joseph Habyarimana Gitera, a founder of the “Association for the Social Promotion of the Masses” (APROSOMA), which became a political party on February 15th 1959, is among political figures who spread hate propaganda. During APROSOMA meeting on February 15th 1959, Gitera spread hate speech against the Tutsi, instructing the Hutu on discriminatory and divisive practices. He further called on his partisans from separate with Tutsi in their daily activities: “*Dear brothers present here, I can't say all what I have in my heart! Get rid of the enemy; emancipate yourself from the Tutsi's bonds in any way possible. The relationship between a Hutu and a Tutsi is like gangrene on the leg, a leech in the body, and pneumonia in the ribs*” (Bizimana, 2014, p. 16).

¹Responding to Hate Speech against lesbian, gay, bisexual, transgender and intersex (LGBTI) people, retrieved from <http://www.refworld.org/pdfid/525b9eb64.pdf>, June 3, 2015

²Talking back to hate campaign resources: Defining hate speech and Bullying, retrieved from http://www.uri.org/files/resource_files/TB2H%20Resource%20-%20Hate%20Speech%20Definitions.pdf, June 3, 2015

³Ferdinand Nahimana was co-founder of the radio station, Radio Télévision Libre des Mille Collines (RTLM), which before and during the genocide against the Tutsi broadcasted information and propaganda that helped coordinate the killings and fuel the hatred against Tutsi. Ferdinand Nahimana, Jean Bosco Barayagwiza and Hassan Ngeze were charged on counts of genocide, conspiracy to commit genocide, direct and public incitement to commit genocide, complicity in genocide, and crimes against humanity (persecution and extermination).

Gitera established rules for each Hutu wishing to free himself from the bonds of Tutsi leadership in what he called the “Ten Commandments governing Hutu ethnic group”. According to these commandments, Hutu are not allowed to have relationships with Tutsi. Gitera described Tutsi as dishonest and dangerous people. He further described them as people full of hatred. In commandment six, Gitera prohibited adultery and fornication with Tutsi women qualifying promiscuity with them as a curse.

Another political figure who spread hatred was Grégoire Kayibanda, the first president of the Republic of Rwanda, elected on October 26th 1961. Kayibanda served as President of Rwanda from 1962 until July 5, 1973, when he was overthrown in a military coup by his defense minister Major General Juvénal Habyarimana. Before Kayibanda was elected as president, he was virulent against Tutsi and his hatred against them characterized his political actions. In a general meeting of PARMEHUTU⁴ and APROSOMA⁵ members held in Hotel Faucon in Butare (Southern Province) on September 1959, Kayibanda released a statement for the political line of PARMEHUTU replete with hatred and divisionism: “*Our party is concerned with the interest of the Hutu who have been dominated and scorned by the Tutsi who invaded the country*⁶. *We have to be the light of the mass, we have to capture back the country and return it to the true owners. The country belongs to the Hutu*” (Bizimana, 2014, p. 22). In 1960, Kayibanda addressed a request to the United Nations asking them to divide Rwanda in two parts, one for Tutsi (Tutsilands) and another for Hutu in order to avoid killing of Tutsi (Hutulands) (Bizimana, 2014, p. 22).

During his tenure as president of the Republic of Rwanda, Kayibanda released a speech on March 29th 1964 in which he warned the Tutsi people about the danger they could face if they attempted to oppose his government. He said that if Tutsi continued to rebel against him, it would be total and precipitated end of Tutsi race: “*assuming that, by the impossible, you come to take Kigali by assault, how will you measure chaos of which you will be the first victims? I do not insist, you guess how you’ll be desperate! As you know, it would be a total and precipitated end of the Tutsi race*” (Rwanda Carrefour d’Afrique, N^o 31 Mars 1964).

Although Kayibanda was warning Tutsi, the process of eliminating them had already begun. For example, in Gikongoro province, located in the southern region in Rwanda, more than twenty thousand Tutsi were killed in December 1963 (Bizimana, 2014, p. 23). In January 1963, in Kayove Commune, Gisenyi Prefecture, every Tutsi male was arrested and deported to unknown place to be killed. According to eyewitness who survived at that time, Tutsi male were arrested by councilor of sectors with the help of the army, deported and killed at unknown place⁷.

On November 22nd 1992, Léon Mugesera, at that time the Vice-Chairman of the National Republican Movement for Democracy and Development (MRND) in Gisenyi prefecture, held a meeting in Kabaya, Gaseke Commune, Gisenyi prefecture. There, he gave a public speech that encouraged the Hutu to kill the Tutsi. He called upon Hutu members of MRND to arrest and exterminate Tutsi parents who sent their children to join the Inkotanyi⁸. He said: “*Why these parents who sent their children to join the Inkotanyi are not arrested and exterminated. Why not arrest those people who help them to join the Inkotanyi? Really, are you waiting for the moment they will come back to exterminate us?*” (Mugesera speech on 22 November 1992). He further denied Tutsi as Rwandan; therefore they should go back to their country, Ethiopia, through Nyabarongo River:

”...Recently, I told someone who pretended to be a PL⁹ member: “*our mistake in 1959..., is to have allowed you escape.*” I asked him if he didn’t learn the history of the Falachas who returned back home Israel from Ethiopian, he answered that he don’t know it. I retorted: “*You can’t never listen, nor read, I inform you that your home is Ethiopia, and we shall throw you in Nyabarongo, the shortcut to get back home quickly*”.

⁴ PARMEHUTU (Party of the Hutu Emancipation Movement) was founded by Gregoire Kayibanda in June 1957 as the Hutu Social Movement and later was transformed into a political party 1 25 September 1959

⁵ APROSOMA (Association for the Promotion of the Mass)

⁶Because of the ideology of hatred, divisionism and sectarianism that characterized Kayibanda and his political party, he always mentioned that Tutsi are invader. He did not recognize them as Rwandan.

⁷ Interview with ZG, Kayove Commune, 14/9/2013

⁸ Mugesera wanted to say “Rwanda Patriotic Front-Inkotanyi (RPF)”, a political organization that started a liberation war on 1st October 1990.

⁹ PL (Parti Liberal) or Liberal Party is a political organization founded on July 14th 1991.

Therefore, if I request you to stand up, we have to stand up effectively to combat the enemy” (Mugesera v. Canada, Minister of Citizenship and Immigration, 2005, par. 90).

Mugesera’s speech encouraged ethnic hatred, murder and extermination and created in its audience a sense of imminent threat and the need to act violently against Tutsi population and political opponents. As pointed out by the Canadian Minister of Citizenship and Immigration, the Mugesera speech is “frighteningly virulent, a window into the angry, paranoid, and radical mindset that ultimately led the hardliners to unleash the genocide in April 1994” (Mugesera v. Canada, Minister of Citizenship and Immigration, 2003, par.17).

Mugesera’s speech constitutes the earliest evidence of genocidal discourse expressed by a member of the incumbent political party in Rwanda in a public forum and, as such, it has often been regarded as offering a blueprint for the practical implementation of the genocide (Hintjens, H. 1999, p. 255). The Canadian court points out that at the time of Mugesera’s speech, a systematic attack directed against Tutsi and moderate Hutu was taking place in Rwanda. Thus, the speech encouraged hatred and violence against targeted groups, the Tutsi (Mugesera v. Canada, Minister of Citizenship and Immigration, 2005, par. 148). Further, the Court stated that the speech “not only objectively furthered the attack, but also fit into a pattern of abuse prevailing at that time”, and consequently was part of “a systematic attack directed against a civilian population that was occurring in Rwanda at the time” (Mugesera v. Canada, Minister of Citizenship and Immigration, 2003. par.163).

3. Hate propaganda through Rwandan Media

Before and during the 1994 genocide against the Tutsi in Rwanda, the media played a major role in supporting and inciting ethnic hatred and violence against Tutsi and moderate Hutu. Public and some private media were used in distilling hate, inciting violence and encouraging Hutu to kill their countrymen Tutsi. The hate propaganda was accompanied by direct calls for the extermination of the Tutsi (Timmermann, 2005, p. 258).

3.1. Hate propaganda through Kangura Newspaper

Kangura was a newspaper founded by Hassan Ngeze¹⁰ in May 1990 written in both Kinyarwanda and French. The paper ran until 1995, with its final issues published outside Rwanda (Prosecutor v. Nahimana et al, 2003, par. 122). *Kangura* spread hatred and incited Hutu to exterminate Tutsi. For example, in an article published in January 1991 (Issue No. 54), Hassan Ngeze wrote: “*Let’s hope that the Inyenzi [cockroaches] will have the courage to understand what is going to happen and realize that if they make a small mistake, they will be exterminated; if they make the mistake of attacking again, there will be none of them left in Rwanda, not even a single accomplice*” (Nahimana v. Prosecutor, 2007 par.771).

In November 1991, the newspaper *Kangura* issued an article in which a machete was drawn next to the title. The author, Hassan Ngeze stressed on the traditional weapons, such as machetes, that could be used to overcome the enemy. “*Which arms should we use to vanquish Inyenzi forever? If the Hutu 1959 revolution should be brought back for us to vanquish Inyenzi-Intutsi*” (*Kangura*, N° 26 November 1991). Here, Ngeze recalls the so called 1959 revolution in which Hutu killed Tutsi using machetes and other rudimentary weapons. As he stated, the RPF-Inkotanyi who attacked Rwanda were Tutsi who want to restore the monarchy. In this regard, the author suggested the mass killings of accomplices who supported the enemy: “*You Rwandans, do you accept that the Rwandan Armed Forces continue to wait for enemy who will come from Uganda while they left enemies in Kigali and in others towns? The Inkotanyi and “virgile” (accomplices) must know that they don’t bleed milk, because now we are angry for the Rwandans (citizens and soldiers) who are being killed by Inkotanyi*”(Kangura, N° 26 November 1991, p. 15).

In a 1993 *Kangura* editorial, Ngeze again called on Hutu to kill Tutsi living in the interior of the country before going to fight them on the borders, arguing “There is no way that you can send soldiers to go and fight Inyenzi on the border while you left some others one in the interior of the country. Why not search for accomplices and Kill them?” (*Kangura* N°41, March 1993).

In order to disseminate hatred against Tutsi, *Kangura* published an article entitled “Appeal to the Conscience of the Hutu” containing the Ten Commandments that should govern every Hutu (*Kangura* N° 6, December 1990)¹¹. The

¹⁰ Hassan Ngeze was born on 25 December 1957 in Rubavu Commune, Gisenyi Prefecture

¹¹ *Kangura*, issueNo6, December 1990, available at <http://www.rwandafile.com/Kangura/kanguralist.html>

"Ten Commandments" described the Tutsi as "thirsty for blood and power, seeking to impose their hegemony over Rwanda by rifle and cannon (Schabas, 2000). The goal of the ten Hutu commandments was to ensure that the population understood that all the Hutus must become united and have a single aim of fighting against Tutsi. The article portrays the Tutsi as enemy, evil, dishonest and ambitious, targeting them on the basis of their ethnicity (Timmermann, 2005, p. 270).

According to the "Ten Commandments", there should be no links or relationships between Hutus and Tutsis. This had impact during genocide, for some Hutu men killed their Tutsi wives. Children born of mixed marriages, whether they had a Tutsi mother or a Hutu father, thought that if they were more Hutu than Tutsi, they should kill their own parents. *Kangura's* call for racial hatred was denounced in February 1991 by the International Commission of Jurists. But when President Habyarimana was confronted on the subject, in April 1991, he defended *Kangura's* "freedom of expression".

With regard to the magazine *Kangura*, the International Criminal Tribunal for Rwanda (ICTR) explained that much of its contents "combined ethnic hatred and fear-mongering with a call to violence to be directed against the Tutsi population". *Kangura* paved the way for genocide in Rwanda, whipping the Hutu population into a killing frenzy (Prosecutor v. Nahimana et al, 2003, par. 905).

3.2. Hate propaganda through Radio Television Libre des Milles Collines (RTLTM)

Radio Television Libre des Milles Collines (RTLTM) was a Rwandan Radio station that broadcast programs from July 8, 1993 to July 31, 1994. Referred to as "Hate Radio Station," it was founded and owned by political actors associated with hardliners within the then ruling regime and who are largely seen as responsible for organizing and implementing the genocide.¹²

The RTLTM led the propaganda efforts by broadcasting inflammatory messages calling for the extermination of the Tutsi ethnic. Radio broadcasts motivated the violence as a necessary pre-emptive self-defense to prevent Tutsi political domination. On December 2, 1993, the RTLTM broadcasted: Tutsi are nomads and invaders who came to Rwanda in search of pasture, but because they are so cunning and malicious, the Tutsi managed to stay and rule. If you allow the Tutsi-Hamites to come back, they will not only rule you in Rwanda, but will also extend their power throughout the Great Lakes Region" (Chretien, 2007).

Hate messages broadcast before and during the genocide referred to Tutsis as "cockroaches" (*inyenzi*) and issued instructions to kill them. For example, in an RTLTM broadcast on June 4th 1994, Kantano Habimana¹³ who equated the *Inkotanyi* with Tutsi described their physical characteristics as a guide to selecting Tutsi for violence. He stated: *Stand up so that we kill the Inkotanyi and exterminate them; look at the person's height and his physical appearance. Just look at his small nose and then break it. Then we will go on to Kibungo, Rusumo, Ruhengeri, Byumba, everywhere. We will rest after liberating our country*¹⁴ (Prosecutor v. Nahimana et al, 2003, par. 396)

RTLTM aired additional calls for the extermination of the Inkotanyi throughout 1994. On May 13, Habimana urged: *"I suspect that among those people, those Inkotanyi (Tutsi), there hides a "devil of a bullcalf that will exterminate the herd of cattle with which it was born" [akamasa kabi kazaca inka kazivukamo] Someone must have signed the contract to exterminate the Inkotanyi...to make them disappear for good (burundu)...to wipe them from human memory...to exterminate the Tutsi from the surface of the earth"*.

¹² Ferdinand Nahimana and Jean-Bosco Barayagwiza were both influential members of the "Comité d'Initiative" (the Steering Committee) which founded *Radio Télévision Libre des Mille Collines* ("RTLTM). Félicien Kabuga was one of the major shareholders and the chair or President of general assembly of all shareholders; Ephrem Nkezabera was responsible for finance.

¹³ Kantano Habimana was a presenter (*animateur*) on the Rwandan radio station "Radio Télévision Libre des Mille Collines" which played a significant role in inciting genocide.

¹⁴ At that time, Kibungo, Rusumo, Ruhengeri and Byumba were already liberated and under control of the Rwanda Patriotic Front-Inkotanyi (RPF-Inkotanyi)

In an RTLM broadcast on July 2nd 1994, Habimana exulted in the extermination of the Inkotanyi¹⁵. He stated: “So, where did all the Inkotanyi who used to telephone me go, eh? They must have been exterminated. ... Let us sing: “Come, let us rejoice: the Inkotanyi have been exterminated! Come dear friends, let us rejoice, the Good Lord is just.” The Good Lord is really just, these evildoers, these terrorists, these people with suicidal tendencies will end up being exterminated” (Prosecutor v. Nahimana et al, 2003, par. 403).

These are few examples selected from RTLM broadcasting. It should be noted that from late October 1993, RTLM repeatedly and forcefully underlined many of the themes developed for years by the extremist written press, including the inherent differences between Hutu and Tutsi, the foreign origin of Tutsi and, hence, their lack of rights to claim to be Rwandan. Furthermore RTLM continually stressed the need to be alert to Tutsi plots and possible attacks, and urged Hutu to prepare and defend them against the Tutsi threat (RTLM transcripts: 25 October; 12, 20, 24 November 1993; 29 March; 1, 3 June 1994).

The role played by RTLM broadcast was asserted by the International Criminal Tribunal in Rwanda (ICTR) in the following terms: “*RTLM broadcasts engaged in ethnic stereotyping in a manner that promoted contempt and hatred for the Tutsi population. It called on listeners to seek out and take up arms against the enemy. The enemy was identified as the RPF, the Inkotanyi, the Inyenzi, and their accomplices, all of whom were effectively equated with the Tutsi ethnic group by the broadcasts. After 6 April 1994, the virulence and the intensity of RTLM broadcasts propagating ethnic hatred and calling for violence increased. These broadcasts called explicitly for the extermination of the Tutsi ethnic group*” (Prosecutor v. Nahimana et al, 2003, par. 486).

In addition to the increasingly virulent propaganda against Tutsi, the radio spewed forth attacks against Hutu who were willing to continue cooperating with Tutsi. In some cases, the radio moved from general denunciations to naming specific people, including the Hutu prime minister, Uwilingiyimana Agathe, as enemy of the nation who should be eliminated in one way or another from the public scene (Rapport Sénat de Belgique, 1997).

3.3. Hate propaganda through Radio Rwanda

Alongside *Kangura* and RTLM, “Radio Rwanda” spread hate propaganda for violence. The radio station which was a reliable organ of the president Habyarimana regime, played a pernicious role in instigating several massacres.

On March 3, 1992, Radio Rwanda was first used in directly promoting the killing of Tutsi in Bugesera region, south of the national capital. Before the massacres, the radio repeatedly broadcast announcements warning that Hutu in Bugesera would be attacked by Tutsi. In this regard, local officials built on the radio announcement to convince Hutu that they needed to protect themselves by attacking first. Led by soldiers from a nearby military base, members of the *Interahamwe*, a militia attached to the MRND party, and local Hutu civilians attacked and killed hundreds of Tutsi (International Commission of Investigation on Human Rights Violations in Rwanda, 1993: 27).

Genocide ideologists made use of the RTLM, Radio Rwanda and *Kangura* newspaper to convey their propagandist language which facilitated incendiary discourse and had a profound effect on the intended audience, those who in turn committed the Genocide. The International Criminal Tribunal for Rwanda (ICTR) found that hate speech through media targeting a population on the basis of ethnicity, or other discriminatory grounds, reached the same level of gravity as the other acts which constituted crimes against humanity, and therefore amounted to persecution (Prosecutor v. Nahimana et al, 2003, par. 1072).

It should be remembered that the genocide propaganda was made possible by means of a so-called freedom of expression. Pretending to be a part of the independent press, media focused on distilling hate, inciting violence and encouraging Hutu to kill their fellow countrymen, the Tutsi (Gasengayire, 2001, p. i).

¹⁵ As said previously, Kantano equated Inkotanyi as Tutsi

4. Dehumanization through hate speech

Before the execution of genocide against the Tutsi in Rwanda, symbolic languages were used to stigmatize and dehumanize the Tutsi. Tutsi were given a set of characteristic labels, each one more horrific than the next: cockroach, feudal lord, snake, subversive, and enemy. All these names aimed at humiliating, scorning and harassing them.

According to Antoine Mugesera, Joseph Habyarimana Gitera was the first person to insult the Tutsi publicly using disgraceful labels like monsters, snakes and all others degrading names (Mugesera, 2014, p. 211). On September 27th 1959, while members of his political party were gathering in a meeting, Gitera called upon the Hutu youth to take hoes and machetes to exterminate the Tutsis, claiming, "If you kill rats you don't spare the pregnant ones". Further, he added that "Tutsi should be shunned and isolated, because in his view, living with a Tutsi was like living with festering wound, or living with a leech on one's skin, or having stomach cancer". Gitera also likened the Tutsi to an awful two-headed dragon, with one head in Rwanda and another abroad, preparing to destroy Rwanda. That monster, as Gitera explained, "hides in the evil heart of Tutsi". For him, Tutsi are cockroaches, snakes, and other subversive elements" (Mugesera, 2014, p. 211).

As stated by Staub, the danger of hate speech lies in the fact that by dehumanizing and denigrating the victim group, it begins a "continuum of destruction" (Staub, 1989). Thus, dehumanization and denigration is achieved by separating and excluding the victims from the community of humankind or the "human commonwealth." The victims are treated as an "out-group," and hate speech thus builds an insurmountable wall between the victim group and those remaining in the "in-group," rendering sentiments of empathy or identification with the victims impossible (ibid). Likewise, Timmermann states that metaphors comparing the victimized group to insects or disease-carrying animals, which regularly accompany this dehumanization, enable human beings to convince themselves that others are not fellow human beings and can turn them into pitiless killers (Timmermann, 2008, p. 354).

In order to execute genocide, planners and/or conspirators always have to organize a campaign that redefines the victim group as valueless, outside the web of mutual obligations, a threat to the people, immoral sinners, and/or subhuman. Such a campaign is a process of social conditioning which gradually, but radically, changes norms of thought and behavior (Benesch, 2008, p. 500).

5. Hate propaganda in preparing the population for mass killings and genocide

Hate speech is an integral part of any state-organized persecution and serves to psychologically prepare the population of a state for certain crimes planned by its leaders (Timmermann, 2008).

In Rwanda, before the execution of genocide, hate propaganda was a political tool mainly used to mobilize Hutu for massive killings. In order to engage massive population in planned massive killings and genocide, former Rwandan leaders regularly persuaded the Hutu population to kill Tutsi as a way of keeping them from being slaves of Tutsi. The Hutu population was mobilized through the deployment of the idea that the problems they had wouldn't be resolved unless Tutsi were exterminated.

As stated by a former sector-level counselor under the Habyarimana regime (Kayove District), the main message conveyed during meetings was to mobilize the whole Hutu population, showing them that the war by Rwanda Patriotic Front (RPF) aimed to take back Hutu to colonial regime. The Hutu population was told that the enemies who attacked Rwanda were Tutsi from Uganda and their accomplices were Tutsi inside the country. Hutu were urged to unite and fight against Tutsi starting by those who live with them in their respective cells and villages.¹⁶ The rejection of the Tutsi from the Rwandan community was achieved by describing them as harmful things aiming to exterminate Hutu population. These descriptions created an environment of fear in which the Hutu were convinced of the need to take pre-emptive action in order to defend them against Tutsi.

¹⁶ AG, Komine Kayove, 21/1/2014

6. Techniques used when inciting ordinary people to commit genocide

Inciters of genocide have similar techniques to use when inciting ordinary people to commit violence or genocide.

Describing victim as subhuman: According to Suzan Benesch, describing the victim group as subhuman, vermin or insects is the foremost technique used when inciting ordinary people to commit genocide. In order to kill many people on massive scale, people who commit genocide are convinced to be superior to a target group. The victims are considered as something less than fully human. Inciters of genocide frequently describe their targets as insects or other vermin, creatures that it is always acceptable to kill (Benesch, 2008, p. 503).

In Rwanda, political figures, editors, and broadcasters famously described Tutsi people as *inyenzi*, or cockroaches. In a *Kangura* article entitled “*A Cockroach Cannot Give Birth to a Butterfly*”, published in 1993, Hassan Ngeze describes Tutsi as biologically distinct from the Hutu and inherently marked by malice and wickedness (Prosecutor v. Nahimana, 2003, par.180).

Accusation in a mirror: Accusation in a mirror is a rhetorical technique whereby inciters claim falsely that one’s enemies are planning to commit atrocities against them. They impute to the adversary their own intentions and plans (Gordon, 2015, p.137). The inciter persuades listeners and honest people that they are being attacked; hence, taking whatever measures for self- defense is accepted (Benesch, 2008, p. 504).

Kangura and RTLM used fear and self-defense arguments as tactics to convince Hutus to take part in the genocide. In *Kangura* N^o 6 (December 1990), Hassan Ngeze warned readers: “*the enemy is still there among us and waiting to decimate us*”. The enemy the author refers to was the Tutsi population. Therefore, the article called upon Hutu to wake up, to cease feeling pity for the Tutsi, and to take all necessary measures to deter the enemy from launching a fresh attack. In 1991, *Echo des Mille Collines*, a newspaper that supported Habyarimana regime, published a cartoon showing a Tutsi massacring Hutu with caption, “Flee! A Tutsi will exterminate the Hutus.” The same newspaper stated that “the Tutsi wanted to ‘clean up Rwanda...by throwing Hutu in the Nyabarongo River’”(Kangura No 6, December 1990).

As mentioned by Charles Mironko, RTLM spread messages warning all Hutu that they were at risk of being attacked, overwhelmed, decolonized and exploited by Tutsi and that appropriate measures should be taken to prevent this (Mironko, 2007, p. 132).

In a speech on November 22, 1992, Léon Mugesera repeatedly claimed that the “inyenzi” are planning to commit genocide against the Hutu. He stated: “*These people called Inyenzis are now on their way to attack us. ... I am telling you, and I am not lying, it is...they only want to exterminate us, they have no other aim. Are we really waiting till they come to exterminate us?*” (Speech of Léon Mugesera, November 22, 1992).

According to Canadian Minister of Citizenship and Immigration, Léon Mugesera conveyed to his listeners in tremendously violent message that they faced a choice of either exterminating the Tutsi, or being exterminated by them (Mugesera v. Canada (Minister of Citizenship and Immigration: 2005, p. 6).

Perverved euphemism¹⁷: Inciters of genocide use perverted euphemisms to communicate violent messages and instructions to perpetrators. William Schabas observed that those who incite to violence speak in Euphemisms (Schabas, 1999, p.530).

In Rwanda, referring to few examples, the word “Gukora”(go to work), “umuganda”(communal work), “gutema ibihuru”(cleaning the bush) which meant killing the Tutsi, were largely used before and during the 1994 genocide against the Tutsi. In a letter dated the January 26th 1991, the Bourgoumestre of Giciye Commune, Charles Bangamwabo, instructed counselors at sectors level to mobilize population in their respective areas in a communal work (umuganda) aiming at cleaning bushes near Gishwati forest so that enemy could not find where to hide them. On 29th January 29th 1991, communal work was done and more than 70 Tutsi were killed (Bangamwabo, 1991).

¹⁷ A Euphemism is a generally harmless word or expression used in place of one that may be found offensive or suggest something unpleasant.

During genocide, the Radio Television des Mille Collines (RTLM) repeatedly appealed Hutu population for a communal work (*umuganda*), a way of inciting them to kill Tutsi.

Hateful rhetoric: Hateful rhetoric, such as proverbs,¹⁸ is largely used by inciters of genocide. In Rwanda, RTLM broadcasters always used proverbs to encourage Hutu to commit violence against and exterminate Tutsi. On June 15th 1994, the RTLM broadcaster, Habimana Kantano, said: “one who coughs and spits diminishes his flu (*ukorora acira aba agâbanya*), to indicate that if one kills Tutsi one by one, one will finally finish them off. Another proverb the journalist used was “*Akimuhana kaza imvura ihise*”, meaning that help from neighbors comes after the rain. Hence, Kantano urged Hutus to kill the Tutsis in their neighborhood instead of waiting for help from others.

7. Strategies for fighting against Hate Speech

Hate speech affects entire communities and therefore response mechanisms need to engage many people through various strategies. In this paper, strategies include reinforcement of laws criminalizing hate speech, awareness campaign through formal and informal education, use of media, involvement of civil societies and political organizations.

7.1. Reinforcement of Laws that prohibit and criminalize hate speech

Hate speech is prohibited and criminalized at the international and national level. At the international level, it is addressed in two primary international instruments; the International Convention on the Elimination of all forms of Racial Discrimination (ICERD) adopted in 1965, and the International Covenant on Civil and Political Rights (ICCPR) adopted in 1966.

Article 4(a) of the International Convention on the Elimination of all forms of Racial Discrimination (ICERD)¹⁹ states that “signatories shall declare an offence punishable by law all dissemination of ideas based on racial superiority or hatred. Public authorities and public institutions are prohibited from promoting or inciting racial discrimination”. Similarly, the International Convention on the Elimination of All Forms of Racial Discrimination (ICERD) obliges governments to condemn and eliminate racial discrimination by both public institutions and officials and private individuals, guaranteeing to everyone without distinction as to race, color, or national origin, “the right to security of person and protection by the State against violence or bodily harm (Parekh, 2012, p. 37).

According to ICERD, three situations constitute offences punishable by law: (a) all dissemination of ideas based on racial superiority or hatred, incitement to racial discrimination, as well as all acts of violence or incitement to such acts against any race or group of persons of another color or ethnic origin. (b) organizations, organized and all other propaganda activities which promote and incite discrimination which must be declared illegal and prohibited and participation in such organizations or activities; (c) promotion or incitement of racial discrimination by public authorities or public institutions, national or local (Parekh, 2012, p. 37).

For the International Covenant on Civil and Political Rights, article 20 (b) requires states parties to prohibit hate speech in the following terms: “Any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence shall be prohibited by law”.

Hate propaganda has been criminalized at the International Criminal Tribunal for Rwanda (ICTR). Referring to the cases of Ferdinand Nahimana, Jean Bosco Barayagwiza²⁰ and Hassan Ngeze²¹, the ICTR trial chamber stated that hate speech targeting a population on the basis of ethnicity, or other discriminatory grounds, constitutes persecution under Article 3(h) of ICTR Statute (Prosecutor v. Nahimana et al, 2003, par.1072).

¹⁸ A proverb is a simple and concrete saying, popularly known and repeated that expresses a truth based on common sense or the practical experience of humanity. They are often borrowed from similar languages and cultures.

¹⁹ ICERD was Adopted and opened for signature and ratification by United Nations General Assembly resolution 2106 (XX) of 21 December 1965 entry into force 4 January 1969

²⁰Ferdinand Nahimana and Jean-Bosco Barayagwiza were both influential members of the “Comité d’initiative” (the Steering Committee) which founded *Radio Télévision Libre des Mille Collines*.

²¹Hassan Ngeze was a founder and chief editor of Kangura newspaper.

As the trial chamber mentioned, the Radio Television Libre des Milles Collines (RTLM) broadcasts aimed at the death and removal of the Tutsi minority from the society in which they live, or eventually even from humanity itself. In this regard, hate propaganda by RTLM constitutes a crime against humanity that warrants persecution. The ICTR characterized such speech as “a discriminatory form of aggression that destroys the dignity of those in the group under attack” (Prosecutor v. Nahimana et al, 2003, par.1071).

At National level, laws criminalizing hate speech differ because most of them do not use the term ‘hate speech’ at all, referring instead to a variety of acts, such as incitement, discrimination, ethnic divisionism, insult, humiliation and degradation.

For example, Britain, Denmark and Australia prohibit speech that humiliates, abuses, insults, degrades, and intimidates individuals or groups. Some states of Australia have laws banning racial that violates the dignity of individual. India and Israel prohibit speech that incites racial and religious hatred (Parekh, 2012).

Bosnia and Herzegovina criminalize hate speech in its Article 30(1) of the Criminal Code; these states declare that “whoever intentionally incites another to perpetrate a criminal offence, shall be punished as if he has perpetrated such offence”.

In Canada hate propaganda is criminalized in Section 318 and 319 of the Criminal Code. The section 319(1) proscribes the offence of incitement to hatred in the following terms: “Everyone who, by communicating statements in any public place, incites hatred against any identifiable group where such incitement is likely to lead to a breach of the peace is guilty of an indictable offence and is liable to imprisonment for a term not exceeding two years or an offence punishable on summary conviction.” Section 318(1) states that, “everyone who advocates or promotes genocide is guilty of an indictable offence and liable to imprisonment for a term not exceeding five years.”

In some East African jurisdictions, laws criminalizing hate speech cover racial, ethnic, national and religious hatred and incitement to commit genocide.

For example, in Kenya, Article 27 of Constitution guarantees equality and freedom from discrimination. Article 33 (1) also guarantees freedom of expression. However, according to Article 33 (2), the right to freedom of expression does not extend to:

- a) propaganda for war;
- b) incitement to violence;
- c) hate speech; or
- d) advocacy of hatred that (i) constitutes ethnic incitement, vilification of others or incitement to cause harm; or (ii) is based on any ground of discrimination specified or contemplated in 27 (4).

In Uganda, the Penal Code Section 41(1) prohibits promotion of sectarianism. It defines an offender of this dictate as:

- ... a person who prints, publishes, makes or utters any statement or does any act which is likely to
- a. degrade, revile or expose to hatred or contempt;
 - b. create alienation or despondency of ;
 - c. raise discontent or disaffection among; or

Promote, in any other way, feelings of ill will or hostility among or against, any group or body of persons on account of religion, tribe or ethnic or regional origin commits an offence and is liable on conviction to imprisonment for a term not exceeding five years.²²

Further, Section 83 of the Ugandan Penal Code, which pertains to incitement to violence states that, “any person who incites any other person to do an act of violence against any person by reason of his or her race, place of origin, political opinions, color, creed or sex commits an offence and is liable on conviction to imprisonment for a term not exceeding fourteen years.”

²² Uganda Penal Code, §41

In Rwanda, different laws criminalizing hate speech, discrimination and genocide ideology were enacted following the 1994 genocide against Tutsi. Section 3 of the Law on the Prevention, Suppression and Punishment of the Crime of Discrimination and Sectarianism states that “the crime of discrimination occurs when the author makes use of any speech, written statement or action based on ethnicity, region or country of origin, colour of skin, physical features, sex, language, religion or idea with the aim of denying one or a group of persons their human rights”. Similarly, Section 3 prohibits use of words and actions that could cause “an uprising that may degenerate into strife among people”.

Article 136 of the Rwanda Penal code states that any person who commits the crime of discrimination and sectarian practices shall be liable to a term of imprisonment of more than five (5) years to seven (7) years and a fine of one hundred thousand (100,000) to one million (1,000, 000) Rwandan francs. Article 4 of Law N° 84/2013 (11/09/2013), which pertains to on the crime of Genocide Ideology and other related offences states that incitement to commit genocide is any act committed in public with the intent to encourage, influence, induce or coerce another person to commit genocide. Therefore, any person who commits these acts commits an offence of incitement to commit genocide; and according to the Article 135 of Rwanda penal code, any person who commits the crime of genocide ideology and other related offences, including incitement to commit genocide as well, shall be liable to a term of imprisonment of more than five (5) years to nine (9) years and a fine of one hundred thousand (100,000) to one million (1,000, 000) Rwandan francs.

Hate speech is prohibited by law governing political organizations and politicians. According to Article 7 of the Organic Law N° 10/2013/OL of 11/07/2013, political organizations and politicians are prohibited from being based on race, ethnic group, tribe, lineage, region, sex, religion or any other division which may lead to discrimination. Political organization must constantly reflect the unity of the people of Rwanda. Further, Article 37(1) of the aforementioned organic law prohibits speeches, writings and actions based in or which might lead to discrimination or divisionism (Official Gazette n° Special of 12/07/2013). As it is stipulated in the Rwandan code of conduct for political organizations and their members, politicians are urged to perform and disseminate practices respectful of democratic ideals and human rights. Political organization is intended to be a catalyst of unity and reconciliation among Rwandans and a place from which to fight Genocide ideology and divisions.²³

7.2. Awareness campaigns through formal and informal education

Education is known as any act or experience that has a formative effect on the mind, character or physical ability of an individual (Burcu, 2012). It can play a great role in a given society for better or worse, as a means of conflict prevention or encouragement (Kambody, 2007). To fight against hate speech, states are urged to establish an education system that develops attitudes and behaviors necessary to counter hatred and prejudice. Through formal education, the education system should be inclusive in its policies and reflect the ethnic, racial and cultural diversity of each state. Further, states should prescribe unbiased schools material, promote the teaching of classes that include the history and positive contribution of minorities, their cultures, languages and traditions.²⁴ States should also promote and provide teacher training on human rights values and principles by introducing or strengthening intercultural understanding as a part of the school curriculum for pupils of all ages (OHCHR, 2011). As stated by Gregory S. Gordon, curricula can instill pluralistic values and appreciation for tolerance (Gordon, 2015, p. 141).

In the aftermath of the 1994 genocide against Tutsi, the policy adopted by the education sector in April 1995 declared that Rwanda would produce citizens free from ethnic regional, national and religious prejudices and who are committed to human rights and the society.²⁵ Since then, the role of the education sector has been contributing to national reconciliation by creating a culture of peace, emphasizing positive values, promoting the universal values of justice, tolerance, respect for others, solidarity and democracy (Bamusananire et al., p. 2006). Additionally, discrimination was eliminated from access to higher levels of education and replaced with student competency in exams, grade point averages and their desire to learn. Teaching peace, reconciliation, tolerance, justice, democracy,

²³ National Consultative Forum of Political Organizations, Code of Conduct for Political Organizations and their members, February 2014.

²⁴ United Nations, Office on Genocide Prevention and Responsibility to protect, op.cit

²⁵ The new policy governing the education sector was adopted on April 1995 in a Conference on Policy and Planning of Education in Rwanda, one year after the genocide perpetrated against the Tutsi.

patriotism, solidarity and national unity became class subjects of great importance in the primary and secondary schools (Mafeza, 2013, p. 5).

Regarding informal education, various campaigns on how to fight against hate speech should be launched all over the world to raise awareness among citizens. As mentioned in the report on “Online Hate Speech” by the Council of Europe and European Law student’s Association, “it is imperative for people to campaign, to act together to uphold human rights, to raise awareness, change attitudes and mobilize community.”²⁶ Education and trainings on human rights are viewed as the best tools for fostering intercultural understanding, mutual respect, empathy and tolerance among population group (UN, A/HRC/28/64, 5 January 2015).

In post-genocide Rwanda, different programs aiming at fighting against the propagation of the genocide ideology while reinforcing common identity among Rwandans have been established. *Ingando*²⁷ and *Itorero*²⁸ are among several homegrown approaches that have been helpful in fostering unity among Rwandan in the aftermath of genocide against the Tutsi. Currently, the *Ndi Umunyarwanda* (I am Rwandan) Program, initiated in 2013, works with the ultimate goal of building a national identity and fostering unity and trust among Rwandans. This program is being taught to all Rwandans and helps to strengthen their solidarity, uphold their moral and spiritual values, restore their unity, getting rid of the genocide ideology as well as make them understand their fundamental rights as Rwandans.

7.3. Use of Media

The media has a key role to play in the promotion of tolerance and peace. As stated by Ljiljana Zurovac, Executive Director of the Press Council in Bosnia and Herzegovina, “If journalists follow ethical guidelines, they will not perpetuate stereotypes and prejudices but rather counter the spread of ignorance, intolerance and hatred.”²⁹ The media can actively engage in fighting incitement to hatred and violence by adopting journalism principles, guidelines and ethical to improve the quality of information and reporting, to avoid bias, prejudice and manipulation.

In countries where media have played a negative role in spreading hate speech, media reform can be an important element in preventing and responding to hate speech. As pointed out in the report on hate speech and group targeted violence by United Holocaust Memorial Museum (UNMM), post-conflict societies often require some media reform, particularly when hate speech, dangerous rhetoric, and media abuses have in part fueled the conflict. Furthermore, media monitoring is a crucial preventative tool for tracking trends in ethnic tensions and violence (UHMM, 2009). Training programs to raise skills and standards of local editors and journalists is of paramount importance. Training for journalists can enable them to understand the root causes, dynamics, and resolution mechanisms of a given conflict. Training can also enhance their understanding of different types of violence and how to identify and explain them. As stated by United Holocaust Memorial Museum, the ways in which journalists frame conflicts can help to humanize the individuals and parties involved, identify underlying issues, and, ultimately, reduce tensions, encourage productive communication, and open the door for building consensus and seeking solutions (UHMM, 2009).

The media community should develop a system of collective self-regulation based on an agreed code of ethics and a mechanism to receive and respond to complaints. The media should also improve ethical standards and establish

²⁶The Council of Europe and European Law Student’s Association, International Legal Research Group on ONLINE HATE SPEECH, retrieved from http://files.elsa.org/AA/Final_Report_OHS_Final.pdf, June 3, 2015

²⁷*Ingando* is a traditional approach for civic education aiming at clarifying the history of Rwanda, analyzing and understanding the origin of divisions among the people of Rwanda and deciding on what should be done to eradicate them.

²⁸ *Itorero* is a platform for educating Rwandans and training them to understand their shared values and taboos in their coexistence and patriotism while contributing to national development.

²⁹ UNESCO, interview with Ljiljana Zurovac on how media can promote a culture of tolerance and peace, retrieved from <http://www.unesco.org/new/en/communication-and-information/resources/news-and-in-focus-articles/in-focus-articles/2013/advancing-tolerance-and-respect-online-the-case-of-bosnia-and-herzegovina/interview-with-ljiljana-zurovac/>, June 8, 2015

credible structures for internal self regulation that will promote the principles of truth telling, impartiality and independent reporting.

In post-genocide Rwanda, alongside the law on the prevention, suppression and punishment of the crime of discrimination and sectarianism and the law on the crime of genocide ideology and other related offences, a Code of Ethics governing Journalists, other media professionals and the media in Rwanda has been set up. Article 4 of the Code of Ethics adopted on June 2011, states that “the journalist and any other media professional shall avoid broadcasting or publishing biased information inciting to racial, tribal, ethnic, religious hatred or hatred based on sex, age, social status, disability, any disease or health status of the people mentioned or anything likely to serve as a basis for stigmatization.” Article 7 claims that journalists and all other media professionals shall avoid broadcasting or publishing scenes of violence or obscene pictures encouraging violence or other illegal activities. Despite this restriction, Article 1 states that all journalists and other media professionals shall defend the universal human values of peace, tolerance, democracy, human rights, social progress and national cohesion respectful of each citizen in accordance with the Universal Declaration of Human Rights. Finally, Article 6 (5) regarding main responsibilities of Media High Council states that “Media High Council has responsibility to build innovative capacities and to produce media content that disseminates and promotes the Rwandan values, culture and products.” (Law N° 03/2013 of 08/02/2013 determining the responsibilities, organization, and functioning of the Media High Council (MHC), Official Gazette n° 10 of 11 March 2013).

7.4. Involvement of civil societies and political organizations

Civil societies and political organizations can play a key role in combating hate speech. Civil society organizations have a great role in the sense that they can contribute to awareness-raising regarding the existence of discrimination, intolerance and hate crime. They can also implement projects and programs which challenges stereotypes and that foster social cohesion (Suzan, B. 2008).

Civil leaders, specifically religious leaders, can play a crucial role in fighting against hate propaganda in preaching love, tolerance and respect for the inherent humanity of all persons. They can also contribute to the consolidation of harmony between people and not of division, rivalry, hatred and conflict. Religious leaders should serve as role model for their followers by demonstrating ethical value of kindness, tolerance, forgiveness and consideration for others in all circumstances.

Political organizations can contribute when influencing their members by encouraging them for tolerance and respect for diversity as well as fostering the use of positive speech and the avoidance of discriminatory language. For effective prevention, political parties should take vigorous disciplinary measures against their members who promote incitement to violence that could lead to atrocity crimes (UN, Office on Genocide Prevention and the Responsibility to protect, November. 2013).³⁰

Politicians should be informed and warned against statements that might promote discrimination and be encouraged to take advantage of their positions to promote tolerance. As stated by Françoise Tulken, former Vice-President and Judge of the European Court of Human Rights, politicians and other political figures have a greater responsibility to speak out about hate speech and to promote a climate where diversity is a value³¹. Politicians have to uphold best practices for combating hate speech and to renounce from using language which could incite hatred or expressions of intolerance. Political parties should adopt and enforce ethical guidelines in relation to the conduct of their representatives, particularly with respect to public speech (OCHCR, 2011).

³⁰United Nations, Office on Genocide Prevention and Responsibility to protect, Preventing Incitement: Policy options for action. New York available at <http://www.un.org/en/preventgenocide/adviser/pdf/Prevention%20of%20incitement.Policy%20options.Nov2013.pdf>

³¹Report of the Council of Europe Conference on "The Hate Factor in Political Speech- Where do Responsibilities lie?" warsaw, 18-19 September 2013, retrieved from http://www.coe.int/t/dghl/standardsetting/media/Belgrade2013/MCM%282013%29002_en_Report_F%20Tulken.pdf, June 3, 2015

For the case of Rwanda, it is important to note that from 1959 to 1994 the country had different political parties that each claimed to defend liberty and the development of Rwandans; however, these parties' actions demonstrated ethnic and regional discrimination, segregation and favoritism.³²

In the aftermath of the 1994 genocide against the Tutsi, political organizations resolved to work together for the good and benefit of all Rwandans. Through the spirit of good functioning and good collaboration, political organizations created a consultative forum known as "National Consultative Forum of Political Organizations." The forum has a code of conduct that aims to encourage political organizations to comply with the forum's internal rules and regulations emphasizing their role in building consensus and national unity.

As it is mentioned in Article 4 of the code of conduct governing political organizations and their members, conduct of political organization leaders and members shall reflect a light and be exemplary in sensitizing the population about politics that respect democracy and human rights. Further, political organizations shall also uphold national security and social welfare of Rwandan citizens.

Conclusion

Hate speech regularly precedes and accompanies ethnic conflicts, and particularly genocidal violence. Hatred is frequently constructed, fuelled and directed by certain individuals or groups against other individuals and communities who are different in ethnicity, language or religion from the dominant majority, often for political reasons or owing to long-standing and entrenched discrimination.

In Rwanda, before the execution of genocide against Tutsi in 1994, hate speech by political figures such as Joseph Habyarimana Gitera, Grégoire Kayibanda and Léon Mugesera encouraged hatred and violence against Tutsi. Techniques such as accusation in a mirror, euphemism and hatred rhetoric were used at political rallies and through media to incite Hutu to commit violence and genocide against Tutsi.

To fight against hate speech, states should implement domestic legislation in accordance with Article 20 of the International Covenant on Civil and Political Rights, prohibiting any "advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence." In post-genocide Rwanda, different laws prohibiting and criminalizing hate speech have been enacted such as the Law on the Prevention, Suppression and Punishment of the Crime of Discrimination and Sectarianism, the law on the crime of Genocide Ideology and other related offences, and laws governing political organizations and politicians. Further, media, political organizations and their members are guided by Code of Conduct.

Alongside laws and codes of conduct, fighting against hate speech requires awareness campaigns that receive support from media outlets, political organizations, civil societies and non-governmental organizations. For effective prevention, there should be a close collaboration between influential institutions and organizations. Dialogue and collaboration between key actors such as governments, policymakers, non-government organizations and international organizations in tackling hate speech is of paramount importance.

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