



Federación Uruguaya de  
Asociaciones de Padres de  
Personas con Discapacidad  
Intelectual



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CONTRA LA VIOLENCIA DOMÉSTICA Y SEXUAL

# UNIVERSAL PERIODIC REVIEW URUGUAY

## JOINT SUBMISSION

*presented by*

**Secular Franciscan Order of Uruguay (OFS)**

**El Paso Civil Association**

**Uruguayan Network against Domestic and Sexual Violence (RUCVDS)**

**Uruguayan Federation of Associations of Parents of Peoples with Intellectual  
Disability (FUAP)**

**Franciscans International (FI)**

*NGO in General Consultative Status with ECOSOC*

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## Introduction

1. Our organizations respectfully present this joint submission of written comments concerning the human-rights situation in Colombia for consideration by the UPR Working Group at its 18<sup>th</sup> session.
2. The full description of the organizations that make up this coalition is included in the Spanish translation of this report.
3. The observation, analysis and recommendation in this report are based on the collective first-hand information that we have based on the continuous work of the different organizations and groups that are part of this coalition organized around the UPR. The report has been drafted following a one-week capacity building session on the UPR (February 2013) and a series of meetings at the national level with the title organizations. As a complement, the group has held a series of interviews on the priority themes, including with representatives of the Ministry of Housing, Territorial Planning, and Environment (MVOTMA), the Supreme Court of Justice, the Catholic University, and several specialized civil society organizations.
4. This report focuses on evaluating the implementation of the recommendations and voluntary commitments assumed in Uruguay's first UPR cycle (2009) and in supplementing the mid-term report submitted to OHCHR in 2012. It also addresses situations that were not addressed in the first cycle but that have had important developments in the past four years.
5. The report will address: (I) trafficking in persons; (II) sexual abuse of children and adolescents; (III) commercial exploitation of children and adolescents; (IV) the rights of persons with disabilities; (V) childhood poverty; and (VI) the right to potable water. It is our hope that the collection and presentation of this information will contribute to **a constructive review of the human-rights situation in Uruguay that responds more closely to the reality of the marginalized and most vulnerable sectors.**

## I. Human Trafficking

6. Human trafficking is still an invisible theme in Uruguay and it is not a priority on the governmental, political or social agendas. Trafficking for the purpose of sexual exploitation is the modality that has the most visibility today, given the work carried out by social organizations that address problems of violence and prostitution. The other modalities of trafficking remain absolutely invisible without concrete strategies for their eradication.
7. Given the nature of the crime, currently there are no official statistics or data that would document the full magnitude of the problem. There are however national and regional investigations that attest to the prevalence of the human trafficking in Uruguay for decades.

8. <sup>1</sup> These identify Uruguay as historically a country of origin for women that trafficked for commercial sexual exploitation. Lately there is evidence that the national territory is being used as a transit corridor toward neighboring countries and to Europe, and also as a destination for trafficking for sexual exploitation and work from countries in Central America, the Southern Cone, and the East. These studies have also identified internal trafficking of adult women for sexual exploitation, as well as the trafficking of adolescents, mainly women and transgender people.
9. Uruguay has several characteristics that are conditions that facilitate the commission of these crimes: permeable borders with countries where this problem exists, growing tourism, important migration flow, and gaps in terms of the distribution of wealth along gender and generational lines.
10. The country has criminalized the conduct related to trafficking since 2007 within the Law on Migration. The Uruguay State has made several advances in its approach to the problem but to date there is no clear and decisive public policy.
11. Together with social organizations and with support of international cooperation, the National Institute of Women (INMUJERES) of the Ministry of Social Development has developed a project<sup>2</sup> with pilot initiatives to attend to women and to adolescents. The women pilot was assumed by INMUJERES but the adolescents' project was not given continuity. Protocols for attention and inter-institutional coordination were drafted but the last has not yet been approved.
12. The inter-institutional and inter-sectorial space for fighting trafficking of women for sexual exploitation has been operating since 2008. It is made up of several ministries, representatives of civil society, and international cooperation agencies. Unfortunately this space remains informal, the representatives have varying levels of decision-making power within their entities, and there is no budget to support its operation. The space has the commitment and short-term objective of creating a comprehensive law addressing trafficking and a national plan of action – neither of which has come to fruition.
13. There are two organized-crime tribunals with respective defense and prosecutorial offices. However, access to justice is still not a reality for victims. The investigation is not carried out in a proactive way and instead in most cases the burden of proof falls to the victims. The police that assist that part of the justice system charged with this category of crimes do not have the resources or training necessary to adequately perform their duties.

#### **14. Our organizations recommend to the Government of Uruguay:**

- a) Include human trafficking as a policy priority relevant to the social cabinet;
- b) Carry out actions aimed at raising social awareness of human trafficking as a social problem in Uruguay;
- c) Formalize and fund the inter-institutional working group on the fight against the trafficking of women for sexual exploitation, strengthening and expanding its mandate to include all forms of trafficking;
- d) Approve and implement a comprehensive law on the fight against human trafficking, including a National Plan, ensuring participation with civil society and sufficient

funding for its implementation. This must be at the national level recognizing the diversity in the different realities of the departments and include elements of prevention, protection, reparation, and criminalization of perpetrators and criminal networks;

- e) Train public service in the diverse entities that have competency related to the problem, and especially the Ministry of the Interior.

## II. Sexual abuse of children and adolescents

15. Intra-family violence is a problem that is deeply entrenched in Uruguayan society. For example, according to data from the Ministry of the Interior's Observatory on Violence and Criminality, between November 2011 and October 2012, every 10 days one woman was killed or had an attempt on her life by domestic violence. The normalization of these practices against vulnerable groups such as children, adolescents or women is engrained through social relations and implies sustained undermining and violation of fundamental human rights. The situation of children and adolescents in this context is very serious but still invisible and rarely addressed.
16. The Comprehensive System of Protection of Children and Adolescents from Violence (SIPIAV) was created in 2007. This system is a centralized inter-institutional coordination strategy and creates a space for determining public policy for a pointed response to the problem. The main advances have been in terms of training and raising awareness among social workers in the different territories of the country as well in determining a model of attention to victims and the creation of 22 local reception committees in 2012.
17. The main entity for the policies on childhood and adolescence, the Institute of the Child and the Adolescent of Uruguay (INAU) carries out agreement with social organizations to provide specialized attention to children victims of intra-family violence as well as their families. The agreements are based in the metropolitan area of Montevideo and INAU transfers funds to organizations on a monthly basis to attend to approximately 360 situations. According to official data, in 2012 there were 435 situations attended in a state setting and 596 through agreements with social organizations. Of the later, 31% of the cases include sexual abuse, in which there is a strong gender component given that 72% of those victims is female compared to 28% male.
18. SIPIAV has an adequate conceptual framework, an interdisciplinary response, highlighting the objectives of protection and care, and seeking to reach the diverse territories in the country but has not been able to do so. The specialized attention has remained concentrated in the metropolitan zone (three departments). Therefore access to services for almost half the country is limited since there are no services in the remaining 16 departments.
19. The responses implemented to address these situations of violence have not been effective in restoring the rights of the children and adolescent victims. The objectives of the local reception committees of the SIPIAV are to welcome, guide, and



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coordinate the request for assistance. The strengthening of local assistance providing guidance shocks with the reality of the institutions, which in general are over-loaded and weak.

20. Because of limitation of resources, too often the response to situation of violence is either non-intervention or actions are generate that result with the child being institutionalized.

21. Access to justice is also limited because of deficiencies in the capacity of operators working in the judicial system.

## **22. Our organizations recommend to the Government of Uruguay:**

- a) Carry out in-depth studies on the prevalence of the different forms of violence against children and adolescents aimed at identifying the magnitude and main characteristics of the problem;
- b) Reconsider and approve the proposed reform to the law about identity crimes and civil status, sexual crimes and intra-family violence;
- c) Include the crime of sexual abuse in the national codification;
- d) Provide attention for child and adolescent victims of violence, with mandates in each department that guarantee strategic interventions including the principles of participation and information for the children and adolescents and with sufficient economic and human resources;
- e) Develop continual training programs for all key sectors (education, medicine, social workers, judicial system) aimed at eradicating the root causes of this violence.

## **III. Commercial sexual exploitation of children and adolescents**

23. Commercial sexual exploitation of children and adolescents is a problem that has only recently begun to be looked at as a problem in Uruguay. There is a social contradiction in that the community sees it, but does not question it; the society sees it as normal, justifies it, or blames the victim. The public administration treats it as a small issue since it does not have data about the prevalence of these crimes. This indicates the low importance given to this problem on governmental agenda, as well as civil society.

24. A recent study by the Catholic University of Uruguay found that in 2011 and 2012 Uruguay had the highest rate of downloads of child pornography online on the 10 Latin American countries studied.<sup>3</sup> In 2011, of every 20,000 residents in Uruguay with internet access, 2.35 downloaded child pornography. In 2012, it increased to every 2.8 per 20,000.

25. The situations of commercial sexual exploitation that are detected and reported are few, but there has been an increase: between 2007 and 2009 there were 20 report; 21 in 2010; 40 in 2011; and 51 in 2012.<sup>4</sup>



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26. There is a specific law about the problem, including pornography, prostitution, and trafficking for the purpose of exploitation.<sup>5</sup> It does not include sexual tourism however, which is not codified in Uruguay.
27. The National Committee for the eradication of the commercial and non-commercial sexual exploitation of children and adolescents was created in 2004. This is an inter-institutional space with INAU as its president. However, this committee is very limited because it does not have the budget necessary to operate and, by-and-large, the representatives do not have much influence in their own agency or entity.
28. This Committee has created a National Plan to address the topic, which has already been evaluated and redefined given the little progress made relative to the proposal. The development of the Plan has had great difficulties since it does not have specific resources allocated for its implementation and the entities responsible also have not assigned sufficient resources.

**29. Our organizations recommend to the Government of Uruguay:**

- a) Prioritize and assign resources to the inter-institutional mechanisms in charge of creating the public policy related to commercial sexual exploitation;
- b) Promote quantitative and qualitative studies on the situation of commercial sexual exploitation of children and adolescents;
- c) Implement specialized victims attention services throughout the country according to international guidelines;
- d) Accelerate the implementation of a specialized police brigade that assist the Judicial Branch to investigate crimes of trafficking and sexual exploitation of children and adolescents, with the human and financial resources necessary;
- e) Strengthen the justice system with specialized technical teams to support victims and to train people working in the justice system;
- f) Criminalize sexual tourism.

## IV. Rights of Persons with Disabilities

### A. International Obligations and Legal Framework

30. During its first-cycle UPR, Uruguay accepted the recommendation to continue paying particular attention to vulnerable groups, including persons with disabilities.<sup>6</sup>
31. Before its first UPR Uruguay had ratified the Convention on the Rights of Persons with Disabilities.<sup>7</sup> Other positive advances are that in August 2011 the National Parliament approved the accession to the Optional Protocol to the Convention<sup>8</sup> and the Government has presented in first report to the Committee.<sup>9</sup>
32. In 2010, in compliance with the commitments assumed from ratifying the Convention, the Uruguayan Parliament passed Law 18651 on “Comprehensive protection of persons with disabilities.” However, to date the Law has not been regulated and it is

still under study with the Executive Branch, the responsible body for issuing the regulatory decree that would be needed for the effective implementation of the Law. The failure to regulate this law is a significant obstacle keeping Uruguay from complying more fully with its obligations under the Convention.

## **B. Right to Work and to Just and Favorable Conditions to Work**

33. Article 49 of Law 18651 establishes that State entities are required to hire persons with disabilities for a minimum of 4% of their positions. Article 64 of Law 18651 establishes the exoneration from payment of employer retirement contributions corresponding to persons with disabilities that are hired by private industrial, agricultural, commercial or service companies. However this article does not include a mandatory minimum hiring in the private sector of persons with disabilities.

### **34. Our organizations recommend to the Government of Uruguay:**

- a) Regulate Law 18651 to guarantee its effective application;
- b) Legally guarantee that the provision set out in Article 14 of Law 18651 also applies to the private sector;
- c) Take additional measures to promote equality of access to employment for persons with disabilities and pay particular attention to their access to private sector employment;<sup>10</sup>
- d) Guarantee access to necessary technical assistance that will allow persons to carry out their work according to their abilities;
- e) Provide adequate transportation when needed;
- f) Ratify ILO Convention No. 187 (2006) on occupational health and safety.<sup>11</sup>

## **C. Right to Education**

35. According to data published by UNICEF,<sup>12</sup> generated on the 2011 population census (INE) of Uruguayan children and adolescents: 2.3% report a visual disability; 0.8% an auditory disability; 0.8 a physical disability; and 4% an intellectual disability. In total, children and adolescents with disabilities represent 5.6% of the total Uruguayan population between 0 and 17 years old.

36. The right to education and to lifelong learning must include persons with intellectual disability adequate conditions to be included in mainstream education. Secondary education should be understood as a space of continual learning where curriculum is not rigid but can be adapted to allow persons with intellectual disabilities to complete the basic cycle. A people-centered approach to education demands that personal, individual, and operation learning plans can be designed according to the abilities and aptitudes of each child. The focus should be on adult life, with emphasis on self-sufficiency and preparation for work in accordance with personal interests.

37. Law 18172 of 2007<sup>13</sup> establishes the National Disability Program, which operated under the Ministry of Social Development. However, the actions carried out have been very few and insufficient.









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(teachers, social workers, people inserted in critical socio-cultural contexts) and because of our commitment to the most marginalized sectors. We attest to the violation of rights because of the situation and vicious cycle of poverty.

44. For example, there are zones of metropolitan Montevideo where the poverty rate among children is 60%. A major concern in these areas is the proximity to trash and waste and the illnesses that result and for which children are particularly vulnerable. The most paradigmatic case is the incidence of lead poisoning.<sup>16</sup>

45. Given that “poverty in childhood is a root cause of poverty in adulthood,” the rights of children must be given priority in the efforts to eradicate poverty.<sup>17</sup>

#### **46. Our organizations recommend to the Government of Uruguay:**

- a) Ensure the political and financial support necessary for the Ministry of Social Development’s program “Uruguay Crece Contigo,”<sup>18</sup> to fulfill its mandate to “guarantee the integral development of children and their families, from a perspective based on rights, equity, gender equality, social justice and integral development;”
- b) Promote the participation of children living in poverty, with a special focus on education;
- c) Prioritize civil society consultations and the statistical analysis of progress in the fight against childhood poverty during the State Review before the Committee on the Rights of the Child in June 2015.

## **VI. Right to Potable Water**

### **A. Legal Framework**

47. The Uruguay Constitution reflects international law in its treatment of water as a fundamental human right and sine qua non condition for the exercise of other human rights. Uruguay is exemplary in its legal norms related to the human right to water.

48. It is important to recall that the advanced legal framework is an achievement of the Uruguayan civil society. For years the Commission for the Defense of Water has had a broad popular participation through labor unions, student movements, political parties, human-rights groups and other non-governmental organizations, different churches, intellectual, and citizens. This movement carried out a historic feat that culminated successfully when the Uruguay citizens decided in a popular consultation to approve a reform to enshrine the right to water in the Constitution of the Republic.

49. The result was the revised Article 47, which proclaims: “Water is an essential resource for life. Access to potable water and access to sanitation are fundamental human rights.” This article also defines that national water policy shall be based on the conservation and protection of the environment and the restoration of nature,



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through the sustainable management of hydric resources, in solidarity with future generation. The first priority of water management shall be the provision of water for the people. In this sense, “the provision of potable water and sanitation shall be carried out putting social reasons ahead of economic reasons.” Finally, the article also declares that the surface and subterranean waters constitute a unified resource that is also subordinate to the public interest and the public service of providing water will be done exclusively by State entities.

## B. Undermining the Right in Practice

50. Uruguay’s serious problem regarding the right to water results from the fact that this legal framework is not applied to the full extent in practice. The enjoyment of this human right has been undermined by repeated violations of the Constitution and laws by individuals and corporations. This situation is aggravated by the State’s delayed response to warnings about contamination of aquifer sources and the lack of financial and human resources in the entities charged with defending the human right to potable water.
51. A recent episode illustrates these systemic deficiencies in the safeguarding of the right to water. In March 2013, the tap water in the city of Montevideo and its metropolitan area (where 50% of the total population resides), began to come out a cloudy brown color and had a strong smell and unpleasant taste. Nothing similar had ever happened and people were very concerned.
52. Initially the Government played down the matter and insisted emphatically that there was no risk the people’s health.
53. At the same time, technical and scientific experts came out in the media warning that the problems observed with the water were due to contamination of the Santa Lucía River basin, main water source for the city of Montevideo and its metropolitan area.<sup>19</sup> Scientist had made and specialists had made similar warnings in the past.<sup>20</sup> These experts attributed the color, taste and odor of the tap water to the contamination produced in the river by agro-toxins, chemical waste, livestock excrement and other harmful elements that generate an unnatural reproduction of alga that feed on nutrients that are not found in nature but instead in the are the product of human activity.<sup>21</sup>
54. Diego Martino, the former representative of UNEP in Uruguay, spoke publicly to support the academic experts and asserted that in the country there is a “secretism” about environmental information.<sup>22</sup> He was critical that the government would not release data guaranteeing that the water was safe and that it could oppose academic studies with such vigor without having its own empirical data. Importantly, he noted that the government does not carry out environmental monitoring that goes beyond superficial information and there is also no registry or study of health conditions with possible connections to the environmental problems. Finally, he highlighted the disparate impact of the government’s failure to protect freshwater sources on the poor,



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who could not turn to bottled water and who, together with children, are consistently the sector that are most harmed by environmental damage.

55. On May 21, 2013, the Deans of the Departments of Chemistry, Engineering, Sciences, and Agriculture of the University of the Republic published their joint expert analysis: a “Report on the quality of the water in the Santa Lucía River base: assessment of the situation and recommendations.”<sup>23</sup> The conclusion was clear: the Santa Lucía River and its basin are highly contaminated. The causes of the contamination are 80% a result of agriculture activity and the remaining 20% is due to industrial and urban wastewater.
56. The University report proposes measures to mitigate the problem indicating that it is likely continue into the future. For that reason the report offers a series of recommendations about obtaining alternative sources of water. Some of the precautionary measures proposed include establishing protected areas that surround areas of direct water intake and creating an early-alert system to detect harmful phenomena such as the presence of cyanobacteria in the waterways.
57. Upon release of the report, the government announced that it agreed with virtually the entire analysis of the Deans and noted the seriousness of the matter.
58. A few days before the university report, the Government announced a set of strong and aggressive measures to protect the affected zone and went on to apply sanctions to those responsible for the contamination. According to the Ministry of Housing, Territorial Planning and Environment, 50% of the industries near the Santa Lucía were sanctioned and industrial and agriculture activity were prohibited in certain zones.<sup>24</sup> We are hopeful that this strong action will continue and will become State policy, in accordance with the Constitution of the Republic.
- 59. Our organizations recommend to the Government of Uruguay:**
- Follow the constitutional principle to put social interests above economic interests with regard to the provision of potable water;
  - Ensure the citizen participation at all stages of planning, management and control of water resources, as is required by the Constitution;
  - Prioritize water management in impoverished and marginalized sectors, and especially in favor of children;
  - Assign sufficient human and financial resources to the entities responsible for supervising and guaranteeing the quality of potable water and the environment;
  - Hire independent scientific studies to analyze the possible effect of the contamination of water resources on health;
  - Adopt sustainable policies in defense of potable water and its sources, including superficial and subterranean aquifer resources, aiming at ensuring the full enjoyment of the right to water by future generations.

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<sup>1</sup> Diana González Perrett y Andrea Tuana Nageli, *Invisibles y silenciadas. Aportes y reflexiones sobre la trata de personas con fines de explotación sexual comercial en Uruguay* (2006); Fondo de las Naciones Unidas para la

Infancia (UNICEF) y Red Uruguaya de Autonomías (RUDA), *Historias en el silencio: prostitución infantil y adolescente en Montevideo y área metropolitana* (2007); Cristina Prego Tramuja, *Fortalecimiento de la institucionalidad y la perspectiva de género en el MERCOSUR: Informe sobre la trata de mujeres con fines de explotación sexual en Uruguay* (2011).

<sup>2</sup> “Aplicación de medidas para la elaboración de una política pública sobre trata y tráfico de mujeres, niños/as y adolescentes con fines de explotación sexual comercial.”

<sup>3</sup> Universidad Católica del Uruguay, Informe Descarga de material pornográfica online en Uruguay 2011-2012. (2013).

<sup>4</sup> Crece el comercio sexual de niños, El País, <http://historico.elpais.com.uy/121101/pnacio-673187/politica/-crece-el-comercio-sexual-de-ninos/>.

<sup>5</sup> Ley No. 17.815 Violencia Sexual Comercial o No Comercial Cometida Contra Niños, Adolescentes o Incapaces (204).

<sup>6</sup> Informe del Grupo de Trabajo sobre el Examen Periódico Universal: Uruguay, UN Doc. A/HRC/12/12 (4 de junio de 2009), recomendación 81.

<sup>7</sup> Uruguay firmó la Convención el 3 de abril de 2007; el Parlamento Nacional aprobó la Convención sobre los Derechos de las Personas con por Ley N° 18418 del 4 de diciembre de 2008; y el depósito del instrumento de ratificación con la ONU se hizo el 11 de febrero de 2009.

<sup>8</sup> Ley N° 18776.

<sup>9</sup> Informe Inicial de la República Oriental del Uruguay al Comité sobre los Derechos de las Personas con Discapacidad, versión no editada avanza, CRPD/C/URY/1, p. 2 (informe inicial disponible en: <http://www.ohchr.org/EN/HRBodies/CRPD/Pages/futuresessions.aspx>).

<sup>10</sup> “The Committee is concerned that, despite the adoption of a quota for employing persons with disabilities to fill at least 4 per cent of public sector vacancies and the employment placement programme for the visually impaired, operated in collaboration with the Braille Foundation, persons with disabilities continue to lack access to employment. The Committee is also concerned that programmes of comparable potential impact have not been put in place for the private sector (art. 2, para. 2). **The Committee recommends that the State party take additional measures to promote equality of access to employment for persons with disabilities and pay particular attention to their access to private sector employment.**” Concluding observations of the Committee on Economic, Social and Cultural Rights: Uruguay, UN Doc. E/C.12/URY/CO/3.4 (Dec. 1, 2010), para. 8.

<sup>11</sup> Concluding observations of the Committee on Economic, Social and Cultural Rights: Uruguay, UN Doc. E/C.12/URY/CO/3.4 (Dec. 1, 2010), para. 32.

<sup>12</sup> UNICEF, Estado Mundial de la Infancia 2013: Niños, niñas y adolescentes con discapacidad (Mayo de 2013). El relevamiento de discapacidades visuales y auditivas se realiza para toda la población, en tanto las físicas, a partir de los 2 años de edad y las intelectuales a partir de los 6 años.

<sup>13</sup> Art. 25.

<sup>14</sup> UNICEF, *Observatorio de los Derechos de la Infancia y la Adolescencia en Uruguay* (2012), p. 115. The drop in poverty rates between 2009 and 2011 among children under 6 was significant: from 37.8 to 26.1.

<sup>15</sup> UNICEF, *Observatorio de los Derechos de la Infancia y la Adolescencia en Uruguay* (2012), p. 115.

<sup>16</sup> Plombeia en Uruguay, <http://www.espectador.com/noticias/185864/plombemia-en-uruguay>.

<sup>17</sup> Guiding Principles on Extreme Poverty and Human Rights, UN Doc. A/HRC/21/39 (July 18, 2012), para. 32.

<sup>18</sup> Presidencia de la República Oriental del Uruguay, Oficina de Planeamiento y Presupuesto, Resolución No. 006 2012 (31 de enero de 2012).

<sup>19</sup> See e.g., *Cuenca del Río Santa Lucía – Uruguay: Aportes para la discusión ciudadana* (diciembre 2012), <http://www.redes.org.uy/wp-content/uploads/2013/01/Publicacion-Santa-Lucia-WEB.pdf>

<sup>20</sup> *Informes de la Dinama ratifican contaminación en el río Santa Lucía - En 2011 los técnicos recomendaron hacer monitoreos permanentes*, El Observador, 5 de abril de 2013, <http://www.elobservador.com.uy/noticia/247494/informes-de-la-dinama-ratifican-contaminacion-en-el-rio-santa-lucia/>.

<sup>21</sup> Experto de ONU sostiene que OSE oculta información sobre el agua, El Observador, 4 de abril de 2013, <http://www.elobservador.com.uy/noticia/247413/experto-de-onu-sostiene-que-ose-oculta-informacion-sobre-el-agua--/>.

<sup>22</sup> Experto de ONU sostiene que OSE oculta información sobre el agua, El Observador, 4 de abril de 2013, <http://www.elobservador.com.uy/noticia/247413/experto-de-onu-sostiene-que-ose-oculta-informacion-sobre-el-agua--/>.

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<sup>23</sup> *Informe sobre la calidad del agua en la cuenca del Río Santa Lucía: estado de situación y recomendaciones* (21 de mayo de 2013), available at: <http://www.rapaluruaguay.org/agrotoxicos/Uruguay/143254510-Informe-sobre-la-calidad-del-agua-en-la-cuenca-del-Rio-SantaLucia-estado-de-situacion-y-recomendaciones-21-5-2013-UDELAR.pdf>.

<sup>24</sup> Observa.com.uy, 24/5/13.