Maat for Peace' Mid-term Report on The Implementation of United Arab Emirates' Recommendations from the Universal Periodic Review

The United Arab Emirates (UAE) has reviewed its human rights record four times under the Universal Periodic Review (UPR) mechanism, with the latest review occurring on May 8, 2023. During the fourth review, the UAE received 323 recommendations, of which 198 were supported, representing 61.3% of the total recommendations. The UAE government addressed approximately 125 recommendations. The number of recommendations presented during the fourth review reflects the significant challenges the UAE faces in the field of human rights, necessitating further efforts and positive steps at both legislative and public policy levels to implement the accepted recommendations. The UAE has committed in its fourth periodic report submitted to the UPR mechanism to provide a voluntary mid-term report demonstrating progress in implementing the accepted recommendations from the fourth review.

Based on this, Maat for Peace, Development, and Human Rights has prepared this report to evaluate progress in implementing the accepted recommendations from the fourth review after the mid-term. This report focuses on assessing issues for which the foundation has reliable and credible data verified during the preparation of this report.

1. Accession to International Human Rights Treaties and Associated Protocols

The UAE received a significant number of recommendations urging it to ratify international human rights treaties and conventions to which it is not yet a party, along with the optional protocols associated with some of these agreements. However, the UAE government's response to these recommendations has varied. While the majority of recommendations calling for ratification of the two International Covenants and other agreements not yet acceded to were rejected,[1] the government accepted the recommendation to "consider moving forward with ratifying the relevant international human rights instruments."

Despite accepting this recommendation, as of the submission of this report, the UAE has not yet joined four out of nine core human rights treaties. These include the International Convention for

[1] Report of the Working Group on the Universal Periodic Review, United Arab Emirates, Addendum, https://docs.un.org/en/A/HRC/54/15/Add.1

the Protection of All Persons from Enforced Disappearance, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families. The UAE has also not joined the Second Optional Protocol to the International Covenant on Civil and Political Rights aimed at the abolition of the death penalty, nor the Optional Protocol to the Convention Against Torture.[2] During the fourth review session, the UAE delegation expressed its intention to join the Optional Protocol to the Convention on the Rights of the Child concerning involvement of children in armed conflicts, but as of August 2025, the UAE has not acceded to this protocol.[3]

Recommendations

- Maat encourages the UAE to expedite the implementation of the accepted recommendation from the fourth review concerning moving forward with ratifying the international human rights instruments to which it has not yet acceded.
- Maat urges the UAE to consider ratifying the Optional Protocol to the Convention Against Torture, to which the UAE has acceded.
- Work towards fulfilling the commitment to join the Optional Protocol to the Convention on the Rights of the Child concerning the involvement of children in armed conflicts.

2. Withdrawal of Reservations on International Human Rights Treaties

The UAE accepted two out of five recommendations, urging it to withdraw reservations on the international treaties it has ratified. These recommendations primarily concern the removal of its remaining reservations on the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).[4]

The first accepted recommendation is to "continue implementing the recommendations issued in 2022 by the Committee on the Elimination of Discrimination Against Women." The second recommendation relates to "reducing its reservations on CEDAW in preparation for their complete withdrawal." Following the UAE's fourth review under the UPR mechanism, the UAE government

[2] Ratification, Reporting & Documentation for United Arab Emirates, https://tbinternet.ohchr.org/_layouts/15/TreatyBodyExternal/Countries.aspx
[3] United Arab Emirates Review - 43rd Session of Universal Periodic Review, https://webtv.un.org/en/asset/k1r/k1r2o5gdw1
[4] Universal Periodic Review - United Arab Emirates, Fourth cycle, Matrix of recommendations, https://www.ohchr.org/en/hr-bodies/upr/ae-index

reported that the country is considering the issue of withdrawing its reservations on CEDAW[5] and has formed a working group through the Ministry of Foreign Affairs and International Cooperation to explore the withdrawal of these reservations.

However, Maat has not observed any developments towards the withdrawal of reservations as of August 2025, as the reservations on the Convention on the Elimination of All Forms of Discrimination Against Women remain in place.[6] This is concerning, particularly regarding Article 9, which relates to equality in the transmission of nationality and is essential for achieving gender equality. Article 9 stipulates the right of a woman married to a foreigner to grant her nationality to her children and husband, equivalent to the rights enjoyed by men.[7] Although the UAE amended its Federal Law No. 17 of 1972 concerning nationality and passports to include Article 10 bis via Federal Decree-Law No. 17 of 2017, stating that "nationality may be granted to the children of an Emirati woman married to a foreigner after a period of no less than six years from the date of birth," the reservation on Article 9 remains. Emirati women married to foreigners still face numerous restrictions in transmitting nationality to their children.[8] Maat believes that the continued imposition of these reservations, despite the UAE's commitment to withdraw them, reflects a pattern of formal acceptance without substantial measures to translate international obligations into genuine legislative and institutional reforms. This also indicates a clear gap between announced commitments and actual practices.[9]

Recommendations

- Maat encourages the UAE government to withdraw its reservations on the Convention on the Elimination of All Forms of Discrimination Against Women to implement the accepted recommendations from the fourth UPR review.

3. National Human Rights Plan

The UAE received nine recommendations concerning the adoption of a national plan to promote and protect human rights and to expedite its approval. The UAE government accepted all these

[5] Report of the Working Group on the Universal Periodic Review, United Arab Emirates, Addendum, https://docs.un.org/en/A/HRC/54/15/Add.1
[6] Convention on the Elimination of All Forms of Discrimination against Women, Declarations and Reservations, United Arab Emirates, https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-8&chapter=4&clang=_en#EndDec
[7] Concluding observations on the fourth periodic report of the United Arab Emirates, https://tinyurl.com/47u7wayw
[8] Follow-up decisions adopted by the Committee, page 2, https://tinyurl.com/mrx8eczu
[9] Convention on the Elimination of All Forms of Discrimination against Women, United Arab Emirates, https://tinyurl.com/3waersbz

recommendations. Following the fourth review, the UAE continued to hold consultative meetings to finalize the national human rights plan, led by the Permanent Human Rights Committee of the Ministry of Foreign Affairs. Additionally, the committee conducted a series of workshops and events parallel to the plan's preparation, including a workshop conducted in collaboration with the European Union.

However, despite the UAE's assertion that the national human rights plan will be completed by 2025, Maat notes that as of August 2025, the plan has not yet been approved, and the UAE government has not established a clear timeline for completing the initial draft of this plan.

Recommendations

- Maat encourages the UAE to set a specific timeline for completing and publishing the national human rights plan.
- Maat urges the UAE government to send the draft of the national human rights plan to all stakeholders, including the National Human Rights Institution, for feedback before finalizing the plan.

4. Right to Life

The UAE received thirteen recommendations related to the abolition or moratorium on the death penalty. Maat observes that the UAE generally respects the right to life of all its citizens and residents, as enshrined in the constitution.[10] Since the fourth review in May 2023, the UAE has effectively suspended the application of the death penalty, although it remains legally stipulated, and UAE courts have continued to issue death sentences.

However, the suspension of the penalty lasted only until February 2025, when the UAE executed a woman of Indian nationality, referred to as "Sh.K.", for allegedly killing a child in a household where she was employed as a domestic worker.[11] Maat hopes that the resumption of the death penalty in the UAE does not lead to an expansion of its application and emphasizes the need to limit its use to the most serious and heinous crimes, while considering a reinstatement of the moratorium.

[10] Constitution of the United Arab Emirates, https://uaelegislation.gov.ae/en/constitution
[11] Indian domestic workers executed in UAE for killing baby, https://www.bbc.com/news/articles/c20lne76yp3o

Recommendations

- Maat encourages the UAE to reconsider the voluntary moratorium on the implementation of the death penalty.
- Maat urges the UAE government to amend the legal framework to ensure that the application of the death penalty is limited to the most serious crimes.

5. Freedom of Opinion and Expression

During the fourth review of the UPR mechanism, the UAE accepted five recommendations concerning the enhancement and protection of freedom of opinion and expression, as well as ensuring access to information and reviewing legal provisions that impose restrictions on these freedoms.[12]

However, Maat has observed ongoing challenges that hinder progress in implementing these recommendations. A significant concern is the new media law that came into effect on May 29, 2025, which imposes a licensing system on journalists and online bloggers, along with fines of up to one million dirhams for violations. This law represents an additional restriction on freedom of expression, imposing stringent limitations on the use of digital platforms and social media, and constraining the available space for expressing opinions through vague provisions that can be used to penalize content creators in contradiction to international standards for freedom of expression.[13]

Moreover, Maat has noted the continued restrictions on freedom of expression in the UAE. In October 2024, the UAE arrested a 33-year-old individual, "K.B.," a Northern Irish citizen, due to comments he made about his former employer while in the UAE.[14] He faced charges of defamation under the Cybercrime Law and was threatened with up to two years in prison before his release.[15]

On April 10, 2024, the Abu Dhabi State Security summoned a Jordanian citizen, "K.H.," working in Dubai, for questioning after he posted on Facebook condemning the war in Gaza. He was interrogated without the right to contact a lawyer and remained in custody for three days before

[12] Ibid, https://www.ohchr.org/en/hr-bodies/upr/ae-index
[13] UAE media law now in full force, https://timesofindia.indiatimes.com/world/middle-east/uae-media-law-now-in-full-force-what-you-can-and-cant-say-as-fines-reach-dh1-million/articleshow/122951770.cms
[14] 'It's a Christmas miracle': NI man detained in Dubai for posting negative review returns home, https://tinyurl.com/mr4456f5
[15] Man arrested in the UAE after leaving a negative Google review of his former employer set to spend Christmas in Dubai, Business Insider, 15 December 2024, https://www.businessinsider.com/man-to-miss-christmas-dubai-arrest-uae-jobs-2024

leaving the UAE. This incident illustrates how the use of laws, particularly those against cybercrime, can impose restrictions on freedom of opinion, even in cases that do not involve any form of incitement, hate speech, or threats, highlighting a clear contradiction with the recommendations accepted by the UAE during the fourth review.

Recommendations

- Maat encourages the UAE to reconsider the penalties outlined in the Cybercrime Law by studying amendments to the law.
- Maat urges the UAE to consider abolishing prison sentences in cases related to freedom of opinion and expression, especially online.

6. Respect for Human Rights in the Context of Climate Change

The UAE accepted four recommendations during the fourth UPR review related to enhancing the link between human rights and climate change action. These recommendations pertain to reducing carbon emissions as part of the state's strategic initiative to achieve climate neutrality by 2050, accelerating the use of low-carbon technologies and renewable energy, adopting a human rights-based approach to climate change management and mitigation strategies, and enhancing the implementation of sustainable development goals, particularly Goal 13 related to climate action.[16]

Maat notes that the UAE has demonstrated a commitment to implementing these recommendations, especially through the launch of the UAE Climate Neutrality Strategy 2050, announced in November 2023. According to the strategy's trajectory, the UAE plans to reduce emissions by 60% by 2040, ultimately achieving net-zero emissions by 2050.[17]

Additionally, the UAE has continued to launch massive projects in the renewable energy sector. In November 2023, the Al Dhafra Solar Project was launched, recognized as one of the largest single-site solar power plants globally,[18] alongside green hydrogen projects that have significantly

[16] Ibid, https://www.ohchr.org/en/hr-bodies/upr/ae-index
[17] Emirates Climate Neutral Strategy 2050. Available at the following link, https://al-ain.com/article/uae-gvernment-strategyr-climate-netrality
[18] See the following link: https://masdar.ae/ar/news/newsroom/worlds-largest--single-site-solar-power-plant-inaugurated

reduced harmful emissions. By December 2024, Dubai's production of green hydrogen had cut 450 tons of carbon emissions.[19]

Recommendations

- Continue to implement the outcomes of the United Nations Climate Change Conference "COP 28," held in the UAE from November 30 to December 12, 2023.
- Maintain the execution of the UAE Climate Neutrality Strategy 2050 and establish qualitative and quantitative indicators to measure progress in implementing the strategy.

[19] Dubai production of green hydrogen reduces 450 tons of carbon emissions, available at the following link, https://al-ain.com/article/dubai-green-hydrogen-production