

Dear Sir or Madam,

Please find below the Belgian Federation of Jewish Organizations' comments on the proposed bill with reference: "Þingskjal: 183-114. mál Umsögn um breytingu á almennum hegningarlögum nr. 19/1940 (bann við umskurði drengja"

In my capacity as president of the Belgian Jewish community, I am writing to express my profound concern over the proposed anti-circumcision bill, which threatens religious freedom in Iceland and may constitute a dangerous precedent elsewhere.

This proposed legislation most probably violates the Right to Freedom of Thought, Conscience and Religion (Art. 9 ECHR). Although the ECHR allows for limitations on the grounds of public health, these restrictions must be necessary and proportionate to the objective pursued and have to be balanced against the need to preserve genuine religious pluralism, which is a vital right in any democratic society.

Because of the unbearable burden it poses on Jewish communities, restrictions on Brit Milah on grounds of public health are disproportionate.

In Finland, the Supreme Court ruled in 2008 that male circumcision on social and religious grounds when 'appropriately performed', is not illegal and covered by the right to personal autonomy (as part of the right to privacy) under Art. 8 of the ECHR, the right to family life (also under Art. 8 of the Convention) and the freedom of religion and conscience (Art. 9 of the Convention).

Irrespective of any legal considerations, I ask that you assess the political signal given to Jews worldwide, and draw your attention to the resolution adopted by the Executive of the World Jewish Congress in September 2017 (attached to this email).

Best regards,
Yohan Benizri, President of the Belgian Federation of Jewish Organizations
Member of the Executive of the European Jewish Congress

Resolution EC 170910 -5

Brit Mila

The Executive Committee of the World Jewish Congress, meeting in London on September 11, 2017,

NOTES that circumcision [Brit Milah] of eight-day-old Jewish males is a three-thousand-year-old fundamental tenet of Jewish life, through which the child is recognized as having entered into the ancient covenant of his people with G-d;

NOTES WITH CONCERN that recently, an increasing number of European governments and parliaments have introduced legislation and regulations limiting practices such as non-medical male circumcision, which is performed by Muslims and Jews;

STRESSES that all proposals to ban Brit Milah are unacceptable and constitute an infringement on the basic human right of freedom of religion and belief;

ENCOURAGES the creation of interfaith advocacy coalitions to combat ignorance, intolerance, and discrimination, as exemplified by the July 2017 summit in Amsterdam for European Jews, Muslims, and anti-racism activists, organized by the Organization for Security and Co-operation in Europe (OSCE), on topics including the nonmedical circumcision of male minors.

ADOPTED BY THE WJC EXECUTIVE COMMITTEE, MEETING IN LONDON ON 11 SEPTEMBER 2017