

Exhibit: the model the CRL is copying — state control of religion in Rwanda, Africa, and China

Supporting exhibit to the "Connect the Dots" memo. Compiled June 2026 from FOR SA, the World Evangelical Alliance (WEA, UN UPR submission July 2025), the U.S. Commission on International Religious Freedom (USCIRF), U.S. State Department International Religious Freedom Reports, Open Doors World Watch List, ChinaAid, Bitter Winter, Human Rights Watch, Christianity Today / ChinaSource and reputable news. Figures and which country each belongs to are stated precisely; where a claim is a community analyst's characterisation rather than an official quotation, it is labelled as such.

Why this matters: The CRL Rights Commission has not hidden where it is heading. Its Chair, Thoko Mkhwanazi-Xaluva, confirmed the Commission is **studying other countries that already regulate religion** — and the models it points to are states that license churches, force them into state-supervised umbrella bodies, and close those that will not comply. The flagship African example is **Rwanda**; the ideological parent is **China**. When the regulator names its models, it tells you the destination.

Attribution note (important for any filing): the vivid line that the South African framework is *"a copy page taken out of China's book... complete state control of religion to ensure only one teaching and that is socialism"* is the **analysis of community legal commentator Gavin Eales** (his CRL analysis, 2 Dec 2025, §5 "Intent of the CRL") — it is **NOT** a quotation of the CRL Chair, and should never be presented as one. The China parallel is independently corroborated: religious-freedom scholar **Massimo Introvigne (Bitter Winter)** observes that the CRL's proposed model — forcing religious communities into **state-supervised umbrella groups** — "resembles China's 'patriotic associations.'"

1. Which countries the CRL and its analysts have cited

- In 2017 CRL parliamentary hearings, comparative examples raised included **Ghana, Botswana, Uganda, Kenya, Nigeria, Ethiopia, Zambia, Cameroon, Angola and Rwanda**.
- FOR SA's Executive Director Michael Swain identifies the live models as **Rwanda, Angola, Namibia, Uganda and Kenya** — with **Rwanda overwhelmingly the primary one**, the subject of FOR SA's own analysis *"Is Rwanda the CRL Model for State Religion in South Africa?"*
- **BRICS dimension:** South Africa sits in BRICS alongside **Russia and China**, the two members most notorious for state regulation of religion. Community analyst Gavin Eales reads the CRL push as "a copy page taken out of China's book" (his characterisation — see attribution note above); Bitter Winter independently compares the CRL's umbrella-body model to **China's "patriotic associations."**

2. Rwanda — the flagship model, in detail

The 2018 law ("Determining the Organisation and Functioning of Faith-Based Organisations"): - Churches must **register** with the Rwanda Governance Board and obtain legal status; - **every pastor must hold a university degree in theology**; national/regional leaders a **master's**; later rules add a **minimum 1,200 hours of religious training**; - buildings must meet strict codes — **soundproofing, a parking lot, toilets, smoke detectors, ≥1 acre of land, not a home/business/tent**; - a written **statement of doctrine** for government evaluation.

The closures: - **2018**: ~700 churches closed immediately (rising to **6,000–7,000+** over that period, incl. 714 in Kigali); - **2024**: authorities inspected **13,000–14,000** places of worship and closed roughly **7,700** (estimates range 5,500 to 10,000+) — the government's own estimate is that **~70% of churches were shut down**.

2025 — tightened further (Rwanda Governance Board): - New "**Guidelines on Religious Preaching that Aligns with Rwandan Values**" — all preaching must conform to state-defined "values," and "**misleading teachings, false or end-times prophecies or miracles**" are **prohibited** (i.e. the state decides legitimate doctrine); - congregations may **only** meet in a building used exclusively for worship — **making open-air crusades and door-to-door evangelism illegal**; worship in homes, caves, mountains, rivers or forests is **prohibited**; - "noise pollution" bans used to silence worship.

President Kagame, in his own words: *"If it were up to me, I wouldn't even reopen a single church... many are just thieving; some churches are just a den of bandits."*

3. How Rwanda has targeted Christians

- **The burden falls on independent, Pentecostal and evangelical churches** — small, newer, grassroots congregations that cannot afford the buildings or the theology degrees. (Even large denominations struggle: in the **Kigeme Anglican Diocese, just 23 of 239 churches remain open**.)
- **House-church worship is criminalised**. With churches shut and home worship banned, believers report meeting "**in secret and in silence**" for "**fear of arrest**." Some pastors have **fled to Uganda and Tanzania**.
- **State surveillance of the faith**: Open Doors identifies "*dictatorial paranoia*" as the engine of persecution in Rwanda — the government **monitors church activities, infiltrates gatherings, tracks communications, and interferes in the selection of religious leaders**.
- **Measured deterioration**: Rwanda's Christian-persecution score on the **Open Doors World Watch List** rose from **42 (2021) to 58 (2025)** — now 64th worst globally.
- The **World Evangelical Alliance** told the UN (UPR, July 2025) the law **violates Rwanda's own constitution** and the UDHR, the ICCPR and the African Charter.

4. China — the ideological parent: complete state control of religion

South Africa's CRL push echoes the system in China most directly. China does not ban Christianity — it **nationalises** it: every congregation must join a Party-controlled "patriotic" body, and any church that will not is treated as illegal. That is the same architecture the CRL is building (registration → a state-empowered council → sanctions for non-compliance).

The framework — "Sinicization of religion": - At the **December 2021 National Conference on Religious Affairs**, President Xi Jinping reaffirmed that religion must be **"led by the Party, controlled by the Party, and support the Party,"** and called for a "religious theory of socialism with Chinese characteristics" and for officials to "adhere to Marxist religious views." (*sources/42a*) - The official Protestant bodies' **"Five-Year Plan for Promoting the Sinicization of Christianity (2018–2022)"** directs churches to **"deeply explore the content in the Bible consistent with the core values of socialism"** and to "cultivate love for the Party." A successor plan (2023–2027) continues it.

The registration regime (what the CRL mirrors): - The 2018 **Regulations on Religious Affairs** compel congregations into state-controlled "patriotic" associations (for Protestants, the **Three-Self Patriotic Movement**); **unregistered "house churches" are illegal.** Join the state body, or be persecuted. - In **2025**, China revised its Public Security Administration Punishments Law so that **"illegal religious activities" are explicitly punishable for the first time** — aimed at unregistered house churches.

What enforcement looks like (documented, named cases): - **Golden Lampstand Church** (Linfen, Shanxi), one of China's largest Protestant churches, was **dynamited in January 2018**; - **Beijing Zion Church**, one of the capital's largest house churches, was **banned and its property seized (September 2018)** after refusing to install surveillance cameras; - **Early Rain Covenant Church** (Chengdu): **Pastor Wang Yi was sentenced to nine years' imprisonment (December 2019)** for "inciting subversion of state power"; - **October 2025**: a nationwide crackdown on the Zion house-church network detained **~30 leaders across at least seven cities** (documented by Human Rights Watch).

State control of Scripture itself: - In **Henan province**, churches were ordered to **replace the Ten Commandments** with quotations from Xi Jinping — the First Commandment ("Thou shalt have no other gods before Me") was replaced with **"Resolutely guard against the infiltration of Western ideology."** (*sources/42c*) - The 2018 Sinicization plan instructs leaders to prepare **state-aligned annotations of the Bible** consistent with "the core values of socialism." (*Precise framing: this is an annotation / reinterpretation programme plus isolated substitutions like the Henan case — not, to date, a single published "socialist Bible."*)

The U.S.-government record: USCIRF continues to recommend China as a **"Country of Particular Concern,"** describing Sinicization as the "complete subordination of religion to the CCP's... Marxist vision," and reports that **China holds more religious prisoners of conscience than any other country** (≈810 of 2,300+ documented). The State Department designates China a CPC.

Relevance: every Chinese case turns on a church's **refusal to register with, and submit its doctrine to, a state body** — the exact posture of the Plymouth Brethren. Sinicization's demand that religion **"support the Party and socialism,"** the register-or-be-illegal rule, and state control over Scripture are

the precise endpoints the CRL framework points toward — and the CRL's own analysts (Eales; Bitter Winter) name China as the comparison.

5. The other regimes

- **Angola** — the ex-Marxist **MPLA** has governed since 1975; today it licenses churches through a near-impossible bar: registration requires **~60,000–100,000 adult-member signatures across at least 12 of 18 provinces**, and **no new church has been recognised since 2004**. In the **2018–19 "Operation Rescue,"** the state closed on the order of **900–2,300+ places of worship** (Eales records ~2,308); recent counts put only **~88 churches legally recognised against 1,200+ unregistered**, and provinces such as Huambo have continued closing "illegal" denominations (2024). *A former Marxist liberation-movement government — the political family of the SACP/ANC — using a registration bar to extinguish small churches is the closest political analogue to South Africa short of Rwanda; the 100,000-signature threshold is mathematically impossible for a ~300-member community.*
- **Eritrea:** recognises **only four faiths**; registration for all others is effectively never granted, and Christians of unrecognised groups are **imprisoned without trial** (some pastors held since 2004). A US-designated CPC. *A closed list of approved faiths is the logical end of a registration regime — the Brethren would never be on it.*
- **Vietnam:** a one-party communist state; the **2018 Law on Belief and Religion** requires registration, applications are ignored or refused, and **conscientious non-registrants** face harassment and pressure to recant (worst-hit: Montagnard and Hmong Protestants). US State Department Special Watch List. *The cleanest communist parallel: a neutral-looking statute that, in practice, punishes those who decline to register — the Brethren's exact posture.*
- **Cuba:** religion is licensed by the **Office of Religious Affairs of the Communist Party's Central Committee**; **membership of an unregistered group is itself an offence**. A US-designated CPC.
- **Russia:** the other BRICS state Eales names; "anti-extremism" and the Yarovaya laws heavily restrict unregistered and minority worship and evangelism. (Noted as the BRICS pairing with China.)
- **North Korea:** independent faith is eradicated and even **owning a Bible** is criminalised — cited here only as the *outer bound* of where total state control of religion leads, **not** as an equivalent to present-day South Africa.
- **Kenya (contrast):** after the Shakahola massacre (400+ cult deaths), a task force proposed a Religious Affairs Commission and the **draft Religious Organizations Bill 2024** — but **President Ruto reversed course**, calling for self-regulation instead. Kenya pulled back; South Africa's CRL is pressing forward.
- **Ghana:** recurring debate; the Christian Council and the Charismatic Bishops' Conference (4,000+ churches) **oppose** regulation; pro-regulation voices point to Rwanda; no framework adopted.
- **Nigeria:** a different mechanism — extremist *violence*, not state licensing — so not a regulatory model.

6. Why this is decisive for the Plymouth Brethren

These regimes — Rwanda's licensing, China's "patriotic associations," Angola's signature bar, Eritrea's closed list, Vietnam's and Cuba's communist registration — are, in effect, **purpose-built to suppress exactly the form of faith the Plymouth Brethren practise**: - they have **no formal, degressed clergy** → the **theology-degree requirement** (Rwanda) and clergy-licensing alone disqualify their leadership; - they worship in **homes and halls, decentralised** → **house-church and unregistered-worship bans** (Rwanda, China, Angola) criminalise their gatherings; - they **share their faith publicly** → **bans on open-air and door-to-door evangelism** outlaw their practice; - they recognise **no state arbiter of doctrine** → "**preaching aligned with state values**" (Rwanda) and "Sinicization / support the Party" (China) are incompatible with their convictions; - they **take no name and join no umbrella body** → a system built on **state-supervised umbrella associations** (China's patriotic bodies; the CRL's proposed council) has no lawful slot for them at all.

So when the CRL names Rwanda as its model and its analysts name China as the parent, they are naming systems under which the Brethren **could not lawfully exist**. That is the through-line for the memo: *this is not speculation about intent — the regulator has pointed to the exact regimes that have already closed thousands of churches and forced believers into secret worship.*

Postscript: South Africa already has a domestic tool — the Equality Act (PEPUDA)

The CRL/Rwanda regulatory push does not start from nothing — existing South African law already reaches into church doctrine: - The **Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000 (PEPUDA / the "Equality Act")**, **section 8(d)**, expressly lists as unlawful gender discrimination "*any practice, including traditional, customary or religious practice, which impairs the dignity of women and undermines equality between women and men.*" - Where this is alleged, **the burden falls on the church** to prove the practice rests on "acknowledged church dogma" and survives a court's "context-sensitive balancing" of religious freedom against equality — i.e. the State, via the statutory **Equality Courts**, becomes the arbiter of whether a doctrine may stand. - This is **not theoretical**: South African churches have already been brought before the courts over doctrine — e.g. the **Methodist Church's dismissal of Rev. Ecclesia de Lange** and litigation involving the **Dutch Reformed Church** (*Gaum v Van Rensburg*, 2019; *P v Dutch Reformed Church*, 2019 ZAEQC 3). (*No decided case squarely concerns a male-only ministry under §8(d); the exposure, however, is clear.*) - **Relevance to the Plymouth Brethren**: their conviction that ministry/teaching authority rests with men (1 Tim 2:12; 1 Cor 14:34) is a "*religious practice*" directly within §8(d)'s reach — meaning their core doctrine could be put on trial in an Equality Court, with the community bearing the burden of justifying its beliefs to the State. - **Note on naming**: this is the **Equality Act (PEPUDA, Act 4 of 2000)** — distinct from the **Employment Equity Act (Act 55 of 1998)**, which is the workplace race/gender-quota law.

Key sources

South Africa / model link: FOR SA, *"Is Rwanda the CRL Model for State Religion in South Africa?"*; Gavin Eales, CRL analysis (2 Dec 2025), §5 (*the "China's book" line is Eales' characterisation, not a CRL Chair quote*); Bitter Winter / Massimo Introvigne, *"South Africa: New Dangerous Moves Toward Regulating Religion"* (Apr 2026). **Rwanda:** WEA UN UPR submission (Rwanda FoRB, July 2025); U.S. State Dept 2023 IRF (Rwanda); Open Doors World Watch List (Rwanda 2025); Human Rights Without Frontiers; Anglican Ink; Christianity Today. **China:** on-disk sources/42a (CCP Religion Conference, via Bitter Winter), 42b (house-church shutdowns, via Christian Post/Morning Star), 42c (state annotation of Scripture, via ICC); USCIRF 2025 Annual Report (China chapter); U.S. State Dept IRF (China 2022); ChinaAid; ChinaSource (precision on "Sinicization" / annotation); Human Rights Watch (Oct 2025 Zion crackdown). **Angola:** U.S. State Dept 2023 IRF (Angola); CMI *"Angola: Religion and Repression"*; Freedom House. **Comparators:** USCIRF country pages (Eritrea, Cuba); CSW (Vietnam); Open Doors (North Korea). **SA domestic:** PEPUDA Act 4 of 2000 (justice.gov.za / SAFLII); Equality/Constitutional Court records (de Lange; Gaum v Van Rensburg 2019; P v Dutch Reformed Church 2019 ZAEQC 3); CRL 2017 parliamentary hearings (PMG).

Exhibit expanded 2026-06-22: added the China section (Sinicization, registration regime, named closures, state control of Scripture, USCIRF/State backbone), deepened Angola, added Eritrea/Vietnam/Cuba/Russia/North Korea comparators, and corrected the attribution of the "China's book" line (Gavin Eales' analysis, not a CRL Chair quote). Source brief: research-staging/ANNEX-expansion-China-Africa-2026-06.md.