

Mr. Duncan Walker
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2201 C Street, NW
Washington, D.C. 20520

Submitted via e-mail to: commission@state.gov and walkerdh3@state.gov.

July 24, 2020

Re: Draft Report of the Commission on Unalienable Rights

Dear Mr. Walker,

On behalf of the Jacob Blaustein Institute for the Advancement of Human Rights (JBI), we write to share comments on the draft report of the Commission on Unalienable Rights.

We are concerned by several aspects of the draft report that address the principle of universality of human rights and the scope and content of America's international human rights obligations. In particular, the Commission's draft report subtly but clearly encourages the U.S. to reverse its longstanding position on the universality of human rights, as set out in the Vienna Declaration and Programme of Action (VDPA), and to exercise caution in its foreign policy concerning certain rights claims. It justifies this by claiming that countries' "particularities" and "backgrounds" allow them some "leeway" in the implementation of their human rights commitments and suggests that human rights claims that lack a "clear consensus across a broad plurality of different traditions and cultures" might be illegitimate.

This interpretation at odds not only with the VDPA but also with the text of human rights treaties that the U.S. has ratified, and with which the Commission's draft report unfortunately does not substantively engage. We are concerned that the Commission's analysis will be used to justify U.S. foreign policy positions that would provide tacit support and encouragement to governments that seek to violate the human rights of members of certain historically marginalized groups, including women, LGBTQ people, and racial minorities.

As set out in our detailed comments, available online at <https://www.jbi-humanrights.org/JBI%20Comment%20on%20Commission%20on%20Unalienable%20Rights%20.pdf>, we urge the Commission to amend the text of the draft report to more accurately describe the principle of universality of human rights, reaffirm the approach that the U.S. traditionally has taken with respect to the principle of universality, acknowledge more fully the significance of international human rights treaty obligations the U.S. has voluntarily assumed, and refrain from encouraging the U.S. to reverse its longstanding foreign policy position on the fundamental importance of the universality of rights. Instead, we urge the Commission to encourage the U.S. to conduct its foreign policy in a manner that promotes equal respect for the human rights of all persons.

Thank you for your consideration of these comments.

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Comment on Draft Report of the Commission of Unalienable Rights
Jacob Blaustein Institute for the Advancement of Human Rights
July 24, 2020

Summary

The Jacob Blaustein Institute for the Advancement of Human Rights (JBI) appreciates the opportunity to share comments on the draft report of the Commission on Unalienable Rights prior to its finalization. As explained below, we are concerned by several elements in the draft report that address the universality of human rights and the scope and content of America’s international human rights obligations. We are concerned that the Commission’s analysis will be used to justify U.S. foreign policy positions that will tacitly encourage governments to maintain or expand laws and policies that discriminate against and violate the rights of members of marginalized groups. We urge the Commission to substantially revise its draft report to address these concerns in the following ways:

- describe accurately the principle of universality of human rights;
- appropriately acknowledge the significance of the U.S. decision, made by its democratic institutions, to ratify several international human rights treaties; and
- refrain from encouraging the U.S. to reverse its longstanding foreign policy position on the fundamental importance of the universality of rights and
- alter aspects of the report that can be read to discourage the U.S. from defending the rights of marginalized groups (other than religious minorities) who are denied equal treatment or subjected to practices that constitute discrimination abroad – such as women and LGBTQ people – in its foreign policy. The draft report’s current language could place those groups in even greater danger by rejecting the legitimacy of their rights claims. The Commission should encourage the U.S. to conduct its foreign policy in a manner that promotes equal respect for the human rights of all persons.

Introduction

In 2019, Secretary of State Mike Pompeo created the Commission on Unalienable Rights, an independent advisory body tasked with undertaking “an informed review of the role of human rights in a foreign policy that serves American interests, reflects American ideals, and meets the international obligations that the United States has assumed.”¹ On July 16, the State Department published the Commission’s draft report and initiated a two-week public comment period prior to its finalization.² Secretary Pompeo’s remarks at the launch of the draft report suggested the Department would use the Commission’s report as a “framework” for articulating U.S. foreign policy with respect to human rights.

JBI was established to advance the legacy of an AJC leader who championed the development of universal human rights standards, including at the founding conference of the UN in 1945, and who called for the U.S. to lead efforts to advance respect for human rights worldwide as a key foreign policy priority.³ Since that time, JBI together with AJC has called for the U.S. to defend the principle of universality against challenges from governments claiming that their particular cultures or policy preferences can be invoked as a justification for violations. At the Vienna World Conference on Human Rights in 1993, JBI’s director served as a public member of the U.S. Delegation and the head of AJC’s Office of Government and International Affairs represented AJC at the NGO conference.

While we recognize that the State Department, as part of the Executive Branch, has wide discretion in articulating U.S. foreign policy, we consider the draft report’s conclusions and recommendations dangerous because they can be read to call for the Department to assert foreign policy positions that would undermine principles that JBI has long championed, particularly the universality of human rights.

These are subjects on which JBI has particular expertise. JBI's director, Felice Gaer, served as a public member of the U.S. delegation to the Vienna World Conference on Human Rights and on seven U.S. delegations to other human rights bodies, including to the Commission on Human Rights on follow-up to the Vienna Declaration and Programme of Action (VDPA). She also served for five terms, nominated by Democratic and Republican administrations, as a U.S.-nominated independent expert on the Committee against Torture, the body that monitors governments' compliance with their obligations under a human rights treaty ratified by the U.S., the Convention against Torture.

Our three main concerns about the draft report are as follows:

- 1. The draft report subtly but clearly encourages the U.S. to reverse its longstanding position on the universality of human rights, as set out in the VDPA. It establishes an intellectual argument for the U.S. to exercise caution in its foreign policy concerning certain rights claims by historically marginalized groups including women, LGBTQ people, and racial minorities. This argument in the Commission's draft report is based on claims that human rights law permits a certain degree of discrimination on "moral and political" grounds.**

The draft report affirms that human rights are, "universal, indivisible and interdependent and interrelated"⁴ and rejects the concept of "cultural relativism."⁵ However, it simultaneously concludes that "nation-states have some leeway to base their human rights policy on their own distinctive national traditions,"⁶ and recommends that the U.S. "should respect the independence and sovereignty of nation-states to make their own moral and political decisions that affirm universal human rights within the limits set forth in the [Universal Declaration of Human Rights (UDHR)],"⁷ and should tolerate a "degree of pluralism" in how States implement their human rights obligations, reflecting the principle of "subsidiarity."⁸

The Commission bases its recommendation for the U.S. to respect the notion of "subsidiarity" in promoting human rights abroad on an interpretation of the concept of universality that is rooted in the *first part* of the last sentence of paragraph 5 of the 1993 VDPA,⁹ which reads:

"While the significance of national and regional particularities and various historical, cultural and religious backgrounds must be borne in mind, it is the duty of States, regardless of their political, economic and cultural systems, to promote and protect all human rights and fundamental freedoms."¹⁰

The Commission ascribes particular weight to the first part of this sentence in paragraph 5 of VDPA and emphasizes that countries' "particularities" and "backgrounds" allow them some "leeway" in the implementation of their human rights commitments. This completely reverses the approach that the U.S. traditionally has taken with respect to the principle of universality, and its precise articulation in the VDPA.¹¹ The Commission's report does so without recognizing the important history of that language in the VDPA.

The first half of the last sentence of paragraph 5 of the VDPA is a legacy of what is known as the "Bangkok Declaration," the Final Declaration of the Regional Meeting for Asia that preceded the 1993 Vienna World Conference.¹² This document, the drafting of which was reportedly particularly influenced by the governments of Malaysia and China, is widely interpreted as repudiating the universality of human rights.¹³ The U.S. opposed the position reflected in the Bangkok Declaration at the Vienna World Conference, as reflected in a quote by then-Secretary of State Warren Christopher cited in part in the Commission's draft report.¹⁴ In challenging the relativist, "pick and choose" approach in the Bangkok Declaration, the U.S. proposed and insisted successfully on the inclusion in paragraph 1 of the VDPA that States reaffirm that "the universal nature of these rights and freedoms is beyond question." The U.S. further insisted that this sentence must be read together with the earlier sentence in paragraph 5 which proclaims that "All human rights are universal, indivisible and interdependent and interrelated."

Drawing from a flawed interpolation of this sentence in the VDPA, as often done by States that seek to justify departures from universal rights standards, the draft report then affirms “it is urgent to vigorously champion human rights in foreign policy,”¹⁵ but suggests that the U.S. should generally refrain from endorsing or supporting “new” human rights claims made by “competing groups in society over political priorities,” and should leave such issues to be resolved through “ordinary democratic processes.”¹⁶ Earlier in the report, a reference to “abortion, affirmative action, [and] same-sex marriage” is presented as an example of “divisive social and political controversies” in the U.S. in which “both sides couch their claims in terms of basic rights.”¹⁷ This reference suggests that the report is intended to be read as recommending that U.S. should not engage on these or similar human rights issues – particularly claims about laws and policies that discriminate against women, racial minorities, and LGBTQ people – in its foreign policy. Instead, the report, while noting that the UDHR does not “explicitly” establish a hierarchy of rights, recommends that U.S. foreign policy should be selectively deployed in support of the rights that “most accord with U.S. national principles, priorities, and interests.”¹⁸

We are not aware of a previous instance in which U.S. government has endorsed an interpretation of the VDPA suggesting that it provides a justification for the U.S. to exercise caution about opposing human rights violations perpetrated by actors claiming a cultural or religious justification for doing so, or in cases where they deny that their victims’ human rights claims are legitimate and instead characterize them as “political.” Rather, since 1993 the U.S. has repeatedly invoked the VDPA to reject attempts by governments – including but not limited to Iran – to cite religious or cultural traditions of the majority of their citizens as a justification for denying equal treatment to individuals belonging to marginalized groups.¹⁹ The approach in the draft report is not only inconsistent with past U.S. practice but also with paragraph 1 of the VDPA, which explicitly states that “Human rights and fundamental freedoms are the birthright of all human beings” and in which all governments committed to “promote universal respect for, and observance and protection of, all human rights and fundamental freedoms for all”²⁰ and that, as noted above, “the universal nature of these rights and freedoms is beyond question.”

Recommendation: The Commission should reconsider these aspects of its draft report and revise the way in which it references paragraph 5 of the VDPA. We encourage the Commission’ to reaffirm the longstanding U.S. position that governments must promote human rights for all people, and not allow historical, cultural, or religious beliefs to be used to justify discrimination, violence, or the denial of human rights, a position that is in line with our international obligations and domestic traditions.

2. The draft report arbitrarily disregards the content of human rights treaties that the U.S. has ratified as an important source of guidance on “American ideals and international obligations.”

As noted above, the Commission was tasked with undertaking “an informed review of the role of human rights in a foreign policy that...reflects American ideals and meets the international obligations that the United States has assumed.” As the draft report notes, with the Senate’s approval, the U.S. has ratified three of the core international human rights treaties: the International Covenant on Civil and Political Rights (ICCPR, in 1992), the Convention on the Elimination of All Forms of Racial Discrimination (CERD, in 1994), and the Convention Against Torture (CAT, in 1994); we further note that it has also ratified two protocols to the Convention on the Rights of the Child.²¹ The draft report notes that the Executive Branch has signed but the U.S. has not ratified an additional core human rights treaty; we note that it has actually signed three such core human rights treaties (on the human rights of the child and the elimination of all forms of discrimination against women, in addition to the mentioned International Covenant on Economic, Social, and Cultural Rights).²² Each of these treaties expands upon and clarifies the scope of U.S. international obligations, including permissible limitations on the rights articulated in the UDHR.

However, the Commission’s draft report does not meaningfully engage with the texts of the three international human rights treaties that the U.S. has ratified. The draft report also neglects to mention the

significant engagement of U.S. diplomats in the negotiating and drafting history of those treaties and their support for their adoption at the United Nations. It also does not consider that in approving the ratification of three treaties, the U.S. Senate, and hence our country's democratic institutions, signaled that they largely agreed with the more elaborate articulations of international human rights law in the treaties.²³ The report does not acknowledge that the U.S. Senate thereby supported the notion that, as part of its foreign policy, the U.S. should encourage other States that have ratified these treaties to uphold their obligations.

Since ratifying the ICCPR, CERD and CAT, on numerous occasions the U.S. has submitted periodic reports to and interacted with the independent "treaty bodies" (or committees) they create to monitor States' compliance with their obligations; successive administrations have sent official delegations to engage with those committees and demonstrate where and how the U.S. complies with its obligations under the treaties. Every U.S. administration has nominated U.S. citizens as candidates for election to the treaty bodies. Yet the Commission's draft report only briefly notes this important State practice with respect to the ratification and implementation of international human rights treaties. When it does so, the draft report phrases it in negative terms, as if to diminish the treaties' importance as a source of evidence of "American ideals" or of its international obligations.

Recommendation: The Commission should revise its draft report to reflect the importance of the U.S. participation in negotiations on, support for the adoption of, ratification of, and subsequent reporting on the three international human rights treaties it ratified, with the Senate's approval, as evidence of "American ideals" and "the international obligations that the United States has assumed." Indeed, the decisions of the democratically elected U.S. Senate to approve the ratification of these three treaties more than two centuries after the Declaration of Independence should be an essential part of the report's assessment of contemporary "American ideals" with respect to human rights, as well as of America's international obligations. The Commission's final report should encourage the U.S., in its foreign policy, to promote greater adherence by governments to their obligations as set out in those treaties.

3. The draft report inaccurately describes the "bounds of legitimate pluralism" as broader than international human rights law permits and suggests that the U.S. should not object to actions by foreign governments that discriminate against women, LGBTQ people, and racial minorities if they reflect their "moral or political" preferences.

The draft report incorrectly describes the scope of U.S. human rights obligations – particularly the U.S. obligation to protect the right to equality and non-discrimination – because it disregards the content of human rights treaties that the U.S. has ratified.

Specifically, the draft report suggests that the "bounds of legitimate pluralism" permitted by the principle of universality are often unclear.²⁴ In light of this claimed ambiguity, the report proposes a list of criteria to guide the U.S. in deciding whether or not to oppose a government practice (which it characterizes as "supporting a new claim" of human rights). These criteria include whether the rights claim is widely accepted by elected U.S. officials, whether the rights claim is widely shared within the country in question, and whether there is a "clear consensus across a broad plurality of different traditions and cultures" for the rights claim.²⁵

Neither the Universal Declaration of Human Rights (UDHR) nor the ICCPR support such a regressive interpretation of the principle of universality. The draft report does not acknowledge that article 30 of the UDHR makes it clear that "Nothing in this Declaration may be interpreted as implying for any State, group or person any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein."

Moreover, human treaties the U.S. has ratified provide significant guidance on how to determine whether a rights claim is legitimate. For example, the ICCPR enshrines, in several provisions, a broad right to equality and to freedom from discrimination, without limitation.²⁶ Conversely, the ICCPR also clarifies

that other rights, such as the right to manifest one’s religion or belief may be restricted, so long as the restriction is prescribed by law and is necessary for the protection of public safety, public health or morals or for *the protection of the rights and freedoms of others*.²⁷ The Commission’s draft report does not acknowledge this source of conceptual clarity on how to recognize valid rights claims or ascribe importance to the right to equality and non-discrimination enshrined in the ICCPR, in contrast to its treatment of the right to freedom of religion or belief or property rights.

The draft report suggests other inappropriate criteria to guide U.S. foreign policy determinations as a consequence of its failure to engage with human rights treaties like the ICCPR. At one point, it refers to the concept of a “margin of appreciation,” a doctrine of the European regional human rights system, to which the U.S. does not belong, and which concerns the interpretation of a human rights treaty – the European Convention on Human Rights – that the U.S. has not ratified.²⁸ Yet even in the European human rights system, States are only permitted a very narrow “margin of appreciation” – i.e., deference to implement the European Convention in line with their particular national legal and cultural traditions – in cases where their laws or policies “restrict the rights of particularly vulnerable groups in society who have suffered considerable discrimination in the past.” This narrow “margin of appreciation” reflects the European human rights system’s support for the principle of universality of rights and its recognition that democratic processes alone are not sufficient to guard against the enactment of laws and policies that perpetuate prejudices against marginalized people and violate their rights.²⁹

Recommendation: The draft report’s suggestion that the “bounds of legitimate pluralism” are ambiguous, and its recommendations aimed at addressing this ambiguity, particularly the proposed list of criteria to guide the U.S. in deciding whether or not to “support a new claim” on human rights grounds, should be substantially revised. We are particularly concerned by the draft report’s suggestion that the U.S. should refrain from supporting a human rights claim in its foreign policy unless there is a “clear consensus across a broad plurality of different traditions and cultures” that the claim is legitimate.³⁰ The draft report should recognize that key international human rights treaties that the U.S. supported and freely accepted, particularly the ICCPR, ascribe particular importance to the right to equality and non-discrimination for all, and should recommend that the U.S. consider this and other provisions of the human rights treaties in setting its foreign policy.

Conclusion:

We are concerned that the draft report of the Commission on Unalienable Rights urges the U.S. to adopt a new foreign policy orientation that would undermine the principle of universality of human rights, which JBI has long championed. We consider that this new orientation would result in the U.S. playing a negative role by *de facto* encouraging governments to discriminate against historically marginalized populations, including women, LGBTQ people, and racial minorities, with impunity. We hope the draft report of the Commission on Unalienable Rights will be revised prior to its finalization in a manner that reflects properly the importance of the principle of universality of rights and the U.S. obligation, set out in the UDHR and reaffirmed in the VDPA, to exercise its discretion in advancing U.S. foreign policy in a manner that upholds and promotes respect for the human rights of all persons.

¹ Draft Report of the Commission on Unalienable Rights, 6 (July 16, 2020). Available at <https://www.state.gov/draft-report-of-the-commission-on-unalienable-rights/> [hereafter, *Report*].

² *Id.* See also *Commission on Unalienable Rights; Notice of Open Meeting*, U.S. Federal Register (Jul. 2, 2020), <https://www.federalregister.gov/documents/2020/07/02/2020-14339/commission-on-unalienable-rights-notice-of-open-meeting>.

³ Felice Gaer, *Making a Difference: AJC's Advocacy for Human Rights in the United Nations Charter*, AJC (Jun. 26, 2020), <https://www.ajc.org/sites/default/files/pdf/2020-07/JBI%20REPORT%20ON%20AJC%20UN%20CHARTER.pdf>.

⁴ Report, 7.

⁵ Report, 55.

⁶ Report, 55.

⁷ Report, 57.

⁸ Report, 55.

⁹ Report, 55 (“The Vienna Declaration makes that explicit, stating that while ‘it is the duty of States, regardless of their political, economic and cultural systems, to promote and protect all human rights and fundamental freedoms,’ the ‘significance of national and regional particularities and various historical, cultural, and religious backgrounds must be borne in mind.’”).

¹⁰ Vienna Declaration and Programme of Action, par. 5.

¹¹ Report, 55.

¹² Bangkok Declaration, available at https://www.hurights.or.jp/archives/other_documents/section1/1993/04/final-declaration-of-the-regional-meeting-for-asia-of-the-world-conference-on-human-rights.html (para. 8: “while human rights are universal in nature, they must be considered in the context of a dynamic and evolving process of international norm-setting, bearing in mind the significance of national and regional particularities and various historical, cultural and religious backgrounds;”).

¹³ Elaine Sciolino, *U.S. Rejects Notion That Human Rights Vary With Culture*, The New York Times. p. A1 (15 June 1993). Available at <https://www.nytimes.com/1993/06/15/world/us-rejects-notion-that-human-rights-vary-with-culture.html>.

¹⁴ Warren Christopher, U.S. Department of State Dispatch, 4, 441, 442 (June 21, 1993) <https://babel.hathitrust.org/cgi/pt?id=mdp.39015077200189&view=1up&seq=175> (“We respect the religious, social and cultural characteristics that make each country unique. But we cannot let cultural relativism become the last refuge of repression.... We reject any attempt by any State to relegate its citizens to a lesser standard of human dignity.”).

¹⁵ Report, 54.

¹⁶ Report, 57.

¹⁷ Report, 24.

¹⁸ Report, 9.

¹⁹ See, e.g. *United States Joins Over 50 Nations to Support Human Rights Council Statement on Iran*, U.S. Mission on International Organizations in Geneva (June 15, 2010), <https://geneva.usmission.gov/2010/06/15/u-s-joins-over-50-nations-to-support-hrc-statement-on-iran/> (“We call on the Government of Iran to live up to the commitments it has undertaken through the Vienna Declaration, and to fulfil its obligations ... to ensure equal treatment of women and girls in law and practice...”).

²⁰ Vienna Declaration and Programme of Action, par. 1 (“The World Conference on Human Rights reaffirms the solemn commitment of all States to fulfil their obligations to promote universal respect for, and observance and protection of, all human rights and fundamental freedoms for all in accordance with the Charter of the United Nations, other instruments relating to human rights, and international law. The universal nature of these rights and freedoms is beyond question.”).

²¹ The U.S. ratified the ICCPR on Jun. 8,

1992, https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-4&chapter=4&clang=en;

CERD on Oct. 21, 1994, [https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-](https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-2&chapter=4&clang=en)

[2&chapter=4&clang=en](https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-2&chapter=4&clang=en); CAT on Oct. 21,

1994, https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-9&chapter=4&clang=en; the

Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict on

Dec. 23, 2002, [https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-11-](https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-11-b&chapter=4&clang=en)

[b&chapter=4&clang=en](https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-11-b&chapter=4&clang=en); and the Optional Protocol to the Convention on the Rights of the Child on the sale of

children, child prostitution and child pornography on Dec. 23, 2002,

https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-11-c&chapter=4&clang=en.

²² The U.S. signed the International Covenant on Economic, Social and Cultural Rights on Oct. 5, 1977,

https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-3&chapter=4&clang=en; the

Convention on the Elimination of All Forms of Discrimination against Women on Jul. 17, 1980,

https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-8&chapter=4&clang=en; and the

Convention on the Rights of the Child on Feb. 16, 1995,

https://treaties.un.org/Pages/ViewDetails.aspx?src=TREATY&mtdsg_no=IV-11&chapter=4&clang=en.

²³ The report attributes significant weight to the U.S. reservations, understandings and declarations submitted at the time of ratification of those treaties that articulate where and how the U.S. interpretation of human rights standards

differs from that set out in the treaties as evidencing a lack of support for those instruments, rather than evidence of U.S. support for the vast majority of the content of the treaties. Report, 47.

²⁴ Report, 55-56.

²⁵ Report, 39-40.

²⁶ ICCPR, art. 2. (“1. Each State Party to the present Covenant undertakes to respect and to ensure to all individuals within its territory and subject to its jurisdiction the rights recognized in the present Covenant, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.” ICCPR article 3 requires States parties to ensure the equal right of men and women to the enjoyment of all rights set forth thereafter; and article 26 requires States to legally guarantee all persons equal and effective protection against discrimination.

²⁷ ICCPR, art. 18(3) (“Freedom to manifest one’s religion or beliefs may be subject only to such limitations as are prescribed by law and are necessary to protect public safety, order, health, or morals or the fundamental rights and freedoms of others.”).

²⁸ Open Society Justice Initiative, Margin of Appreciation (Apr. 2012),

<https://www.justiceinitiative.org/uploads/918a3997-3d40-4936-884b-bf8562b9512b/echr-reform-margin-of-appreciation.pdf>.

²⁹ See e.g. Kiyutin v. Russia, App. no. 2700/10, ¶ 63 (Sep. 15, 2011),

<https://hudoc.echr.coe.int/eng#%7B%22dmdocnumber%22:%5B%2282651%22%5D%22itemid%22:%5B%22001-103904%22%5D%22%7D>.

³⁰ Report, 39-40.