UNESCO WORK PLAN ON THE SAFETY OF JOURNALISTS AND THE ISSUE OF IMPUNITY

SUMMARY

This Work Plan is the result of extensive consultations with Member States and other relevant actors, in accordance with the International Programme for the Development of Communication’s (IPDC) Decision on the Safety of Journalists and the Issue of Impunity at its 28th Session (22-23 March 2013), requesting the Director-General of UNESCO to prepare a UNESCO Work Plan for addressing the safety of journalists and impunity of crimes committed against them. This Work Plan has been endorsed by the 191st Session of the UNESCO Executive Board in April 2013 in its 191 EX/Decisions.
Background and Context

1. This document presents the UNESCO Work Plan on Safety of Journalists and the Issue of Impunity. It follows the discussions on the safety of journalists and the issue of impunity during the Intergovernmental Council of the International Programme for the Development of Communication (IPDC) in March 2012.

2. The UNESCO Work Plan is a working document providing action lines to guide the Secretariat on UNESCO's aim to promote the safety of journalists in the exercise of their work by advancing the prevention of violence and combatting of impunity. It complements the work plans prepared for the implementation of the C/5.

3. The Secretariat of UNESCO will maintain a permanent and inclusive dialogue with Member States on the subject of the Work Plan, and report on the use of resources from the regular programme. If extrabudgetary resources are secured and employed, these funds will be managed with transparency regarding their source and purpose, and in full coherence with objectives and priorities of the regular programme contained in future C/5 documents.

4. This UNESCO Work Plan will be implemented in cooperation with relevant and representative stakeholders from all world regions. UNESCO's constitutional mandate and responsibilities will be duly respected, as well as those of its partners. Fundraising will be undertaken in line with UNESCO’s Resource Mobilization Strategic Plan, and bearing in mind UNESCO’s Policy framework for partnerships.

5. This UNESCO Work Plan is in line with the United Nations Plan of Action on The Safety of Journalists and the Issue of Impunity which was endorsed by the United Nations Chief Executives Board on 13 April 2012. It is also aligned with the UNESCO Medium-Term Strategy (2008-2013) 34 C/4 and the 36 C/5 Major Programme V: Communication and Information. Following the adoption of the 37 C/4 and 37 C/5, appropriate adjustments in implementation of the Work Plan will be made, if needed.

6. This UNESCO Work Plan has been prepared based on diverse contributions received following consultation with Member States and other relevant stakeholders. The first draft of this Work Plan was made available to Member States for comments and suggestions in July 2012, which was followed by a further consultation on a second version in October 2012. The third version being presented here has incorporated the comments and suggestions from Member States received by December 2012. As per Member States' inputs, the UNESCO Work Plan seeks to conceptualize journalist safety as part of fostering unhindered access to information and knowledge, which is one of the four key principles underlying the concept of building knowledge societies. Likewise, the Work Plan respects that national sovereignty is a sine qua non condition of the United Nations common country processes. Lastly, the Work Plan starts from the foundation that UNESCO is called to demonstrate its significant and unique contribution within the United Nations system on safety and impunity in regard to freedom of expression issues, while respecting its own mandates and those of other international organizations, as well as taking into consideration its comparative advantages and possible added-value contributions.

I. The UNESCO Work Plan on Safety of Journalists and the Issue of Impunity

(a) Overall Objective

7. To promote a free and safe environment, in both conflict and non-conflict situations, for journalists, with a view to strengthening peace, democracy and development worldwide. In line with the 23 March 2012 IPDC Decision of 23 March 2012, the term “journalists” refers to “journalists, media workers and social media producers who generate a significant amount of public-interest journalism”.

2
(b) Outputs

8. Member States are strengthened in protecting freedom of expression, particularly for journalists in the exercise of their work. Strategic priority is allocated to cooperation in preventing violence and in dealing with the problem of impunity;

9. In the framework of the United Nations Plan of Action, UNESCO is working in close cooperation with other United Nations system organizations on the safety and impunity issues addressed in this Work Plan, and taking full cognisance of the specific mandates and comparative advantages of each body;

10. UNESCO is working transparently with relevant stakeholders worldwide in awareness-raising, capacity-building, fundraising, and other activities.

(c) Work Plan Principles

11. Cooperating with Member States in developing legislation and journalists' protection programmes and mechanisms based on local needs and challenges as well as in supporting the implementation of the existing international standards at national level. Information-sharing on capacity-building and on good practices from different countries aiming at the protection of journalists, as well as those designed for the protection of human rights defenders, which can, where applicable, also be relevant;

12. Working with United Nations system organizations, in accordance with their mandates and comparative advantages, in strengthening cooperation, harmonizing practical actions and developing new common activities as well as leading overall coordination of the implementation of the United Nations Plan of Action on the Safety of Journalists and the Issue of Impunity, as stated in paragraph 6.3 of that document;

13. Partnering with relevant stakeholders worldwide, including other national and regional organizations, in media development programmes, raising awareness campaigns and actions aiming to promote the safety of journalists by preventing violence and combating impunity;

14. Promoting a gender-sensitive approach when working on the safety of journalists, including the safety of women journalists;

15. Fostering South-South cooperation mechanisms and innovative approaches based on the recognition of national and regional specificities with emphasis on Priority Africa, in line with the Resolution on the Safety of Journalists and Media Practitioners in Africa adopted by African Commission on 12 May 2011.

II. Action Lines

(a) Cooperating with Member States

16. Assistance to fully implement existing international norms and principles concerning the protection of journalists in the exercise of the human right to freedom of expression, including fostering where relevant South-South cooperation and regional mechanisms;

17. Assistance in the development of legislative frameworks and institutional arrangements to create a safe environment for journalists to perform their work independently and without undue interference, and by encouraging Member States to put in place voluntary protection programmes for journalists based on identified local needs;

18. Facilitation, in accordance with UNESCO’s mandate, of capacity-building in State institutions dealing with journalists and with threats to safety, with a view to helping Member States to
ensure accountability through the conduct of impartial, speedy and effective investigations into attacks against journalists falling within their jurisdiction, and to bring to justice those responsible, as well as to ensure that victims have access to appropriate remedies;

19. Dissemination through, *inter alia*, publications and workshops, of good practices aimed at promoting the safety of journalists, notably initiatives related to the prevention of violence and to the combat of impunity;

20. Promotion of the creation of a monument, street name, etc. in honour of journalists and which highlights knowledge and good practices relating to the issues of press freedom and journalistic safety.

(b) Work within the United Nations System

21. Overall coordination of the United Nations Plan of Action on the Safety of Journalists and the Issue of Impunity at the global, regional and national levels in cooperation with other United Nations system organizations, United Nations Special Rapporteurs, United Nations Country Teams and within the “Delivering As One” framework. UNESCO will ensure communication and partnership building as key processes for the success of the United Nations Plan, while preserving and respecting its unique mandate and those of other United Nations system organizations;

22. Further contributing information relevant to UNESCO’s mandate in the framework of the Universal Periodic Review, a process which is led by the United Nations Human Rights Council to survey the state of human rights around the world;

23. Mapping of mechanisms, instruments and actions in relation to safety and impunity issues, by United Nations bodies, Member States, international and national NGOs.

(c) Partnering with Other Organizations and Institutions

24. Collaboration with other intergovernmental organizations, institutions, relevant professional and civil society organizations from all world regions, particularly with those bodies that have formal relations with UNESCO and those from developing countries;

25. Promotion of training on safety issues, including developing handbooks and guidelines for journalists, the media industry, policy and law makers, and other political and social actors bearing a relation to the promotion of the safety of journalists;

26. Development of a specific journalism safety module to be included in the UNESCO Model Curricula for Journalism Education, and cooperation with academic institutions, including UNESCO Chairs, and professional associations in promoting journalist safety issues, recognizing the need for appropriate approaches that take into consideration regional and national specificities.

(d) Raising Awareness in Cooperation with All Stakeholders

27. Sensitization of stakeholders through international conferences and thematic debates, participating in international campaigns, conducting surveys and publishing their results;

28. Following 29 C/Resolution 29 of the 29th session of the UNESCO General Conference in 1997, continuation of to work to fulfil the requirement for the Director-General’s public condemnations of the killings of journalists killed in the line of duty or targeted for murder because of their journalistic activities, and on the basis of broad, diverse and relevant range of sources of information;
29. Compilation and dissemination of the Director-General's Report on The Safety of Journalists and the Danger of Impunity, following the IPDC Decision on The Safety of Journalists and the Issue of Impunity of 2012. This Report will include information on the Director-General's condemnations of the killings of journalists, media workers and social media producers worldwide who generate a significant amount of public-interest journalism, and information, as appropriate, on the judicial inquiries and actions taken by Member States to bring perpetrators of crimes against journalists to justice. For the sake of accuracy, the Report will be the result of analysis and comparison of information from a broad, diverse and relevant range of sources;

30. Advancement of research indicators, and continuation of high quality monitoring, of safety and impunity issues, and the ensuring the use of ICT to publish accurate information on the subject. Furthermore, in compliance with the IPDC Decision on The Safety of Journalists and The Issue of Impunity of 2012, and upon request of the Member State concerned, publishing on UNESCO's website information officially provided about the killings of journalists which have been condemned by the Director-General;

31. As per Resolution 53 of the 36th session of the UNESCO General Conference in 2011, provision of a report for presentation at the General Conference on the status of freedom of expression worldwide, including the issue of the safety of journalists, involving Member States, academic institutions, media, NGOs, etc. and based on relevant and transparent criteria;

32. Enhancement of existing information exchange mechanisms in collaboration with relevant professional associations on journalists’ safety issues, from all world regions, with a view to further diversifying the sources of information available for UNESCO;

33. Celebration of World Press Freedom Day (3 May) and ensuring high visibility of the event, in cooperation with Member States, journalism education institutions, professional associations, media houses, NGOs, etc.;

34. Where possible, use of international days that can be related to the issue, for example the World Radio Day (13 February), the International Day for the Elimination of Racial Discrimination (21 March), the International Day Against Drug Abuse and Illicit Trafficking (26 June), International Day of Peace (21 September), International Day for Tolerance (16 November), the International Day Against Impunity (23 November) and the International Anti-Corruption Day (9 December), among others, to raise awareness on the issues of journalist safety;

35. Involvement of the UNESCO/Guillermo Cano World Press Freedom Prize Laureates and Goodwill Ambassadors to promote the safety of journalists and the issue of impunity at the regional level.

(e) Preventing Violence against Journalists

36. Support for existing international alert mechanisms for journalists in danger;

37. Strengthening of preventive mechanisms and policies with a gender-sensitive approach;

38. Promotion of training and awareness-raising actions on the prevention of violence against journalists in the exercise of their work.

Follow-up Mechanisms

39. The implementation of the UNESCO Work Plan will be assessed in transparent and consultative ways, primarily by entry into SISTER and by permanent and inclusive dialogue
with Member States which will take place in the Intergovernmental Council of the International Programme for the Development of Communication (IPDC), the Executive Board, and the General Conference. Reports presented to Member States will be based on objective performance indicators and on transparent criteria regarding actions taken and the use of resources both from the regular programme and from extrabudgetary funds.

III. Conclusion

40. The UNESCO Work Plan on the Safety of Journalists and the Issue of Impunity represents the Organization’s continued commitment to promote the safety of journalists in the exercise of their work by advancing the prevention of violence and combat of impunity. Together with the United Nations Plan of Action on the Safety of Journalists and the Issue of Impunity, UNESCO’s leading role in these issues within the United Nations system has been highlighted and recognized by relevant stakeholders. This Work Plan makes explicit what UNESCO does in this area of fulfilment of our institutional mandate to promote the free flow of ideas by word and image.
Annex

I. LEGACY OF ISSUE AND STATE OF THE ART:

1. UNESCO’s starting point is that the question of the safety of journalists in the exercise of their work and how to prevent violence and combat impunity of crimes committed against them needs to be addressed holistically. Multiple factors determine whether citizens can exercise the right to freedom of expression without fear of harassment, intimidation or physical danger. In particular, journalists, media workers and more recently social media producers play an especially prominent role in the exercise of the human right to freedom of expression. They provide citizens with the necessary information to develop their own opinions and to take informed decisions about their lives and development. UNESCO recognises the need for environments that are conducive in legal and socio-economic conditions, highlighting that journalistic safety is a fundamental prerequisite for achieving freedom of expression and democracy.

2. The traditional concept of the term ‘journalist’ has evolved. According to the description of the UN Special Rapporteur on the protection and promotion of the right to freedom of expression and opinion, journalists are individuals who observe and describe events, document and analyse events, statements, policies, and any propositions that can affect society, with the purpose of systemizing such information and gathering of facts and analyses to inform sector of society or society as a whole. Such a definition of journalists, according to the same report, includes all media workers and support staff, as well as community media workers and so-called “citizen journalists” when they momentarily play that role. Furthermore, as affirmed by the resolution A/HRC/RES/20/8 adopted by the Human Rights Council on 16 July 2012 on the promotion, protection and enjoyment of human rights on the Internet, “the same rights that people have offline must also be protected online, in particular freedom of expression.”

II. UNESCO’S TRACK RECORD ON SAFETY AND IMPUNITY ISSUES:

1. UNESCO is the United Nations specialized agency with a mandate to promote freedom of expression and press freedom, which has meant that the Organization has had a long-standing commitment to foster the safety of journalists in the exercise of their work. UNESCO’s Constitution explicitly states that the Organization’s mission is “to promote the free flow of ideas by word and image”. UNESCO has led, within the UN system, the implementation of a comprehensive strategy aiming at protection and promotion of safety of journalists, both preventing violence and fighting impunity for crimes against journalists.

2. Accordingly, UNESCO supports Member States on issues related to the promotion of the safety of journalists, including preventive measures, and combating impunity. The Organization also works closely with international and regional partners to produce regularly updated practical safety guides in multiple languages and supports safety training courses and workshops for journalists and media workers. Awareness-raising and sensitization campaigns are often carried out involving international, regional and local associations. Furthermore, UNESCO supported the creation of the information sharing networks which monitor freedom of expression worldwide and issue alerts to their members when there is an attack on journalists and media workers.

1 This annex section is the background information for the UNESCO Work Plan on Safety of Journalists and the Issue of Impunity which was made available for consultations with the Member States and other relevant actors beginning in mid-2012. It was not part of the 191/EX/40 document presented to the 191st Executive Board which took place in April 2013.
3. Contributing to the environment conducive to the safe exercise of freedom of expression and press freedom, UNESCO conducts a range of activities. The flagship programme in UNESCO’s global campaign for press freedom has been the World Press Freedom Day which falls on 3 May of each year, as proclaimed by the United Nations General in 1993, and the Guillermo Cano/UNESCO World Press Freedom Prize, intended to honour the work of an individual or an organization defending or promoting freedom of expression anywhere in the world, especially in dangerous conditions. UNESCO’s work in post-conflict and post-disaster (PCPD) and transitional situations has been instrumental in highlighting the power of media in promoting democratic governance. In addition, since 2011, UNESCO has begun to contribute to the Universal Periodic Review, a process which is led by the Human Rights Council to survey the state of human rights around the globe, including freedom of expression.

4. This work has been based on the following decisions of Member States:
   
a. Resolution 29 adopted by the 29th UNESCO General Conference in 1997 which condemns violence against journalists and calls on its Member States to uphold their obligation to prevent, investigate, and punish crimes against journalists. Since then, the Director-General has publicly condemned each killing of a journalist or media worker and now also social media producers.

b. Resolution 53 adopted by the 36th General Conference in 2011 which promote the free flow of ideas by encouraging dialogue between Member States and by sensitizing governments, public institutions and civil society as well as monitor, in close cooperation with other United Nations bodies and other relevant organizations active in this field, the status of press freedom and safety of journalists, with emphasis on cases of impunity for violence against journalists including monitoring the judicial follow-up through the Intergovernmental Council of the International Programme for the Development of Communication (IPDC) and to report on the developments in these fields to the General Conference. Further descriptive information concerning the resolution is available in the oral report of the Chairperson for the Communication and Information Commission.

c. Decisions on the Safety of Journalist and the Issue of Impunity adopted by the Intergovernmental Council of the International Programme for the Development of Communication (IPDC) at its 26th, 27th and 28th sessions in 2008, 2010 and 2012 respectively. These Decisions urged Member States “to inform the Director-General of UNESCO, on a voluntary basis, of the actions taken to prevent the impunity of the perpetrators and to notify her/him of the status of the judicial inquiries conducted on each of the killings condemned by UNESCO”. These Decisions also requested the Director-General to provide an analytical report on the basis of her condemnations and the responses received from Member States concerned. Therefore, since 2008 the Director-General presents every two years the Report on The Safety of Journalists and the Danger of Impunity.

5. Furthermore, many of the declarations issued within the framework of the UNESCO’s World Press Freedom Day, has put the focus on the issue of journalists’ safety, such as the following:

a. The Belgrade Declaration on Assistance to media in Conflict Areas and Countries in Transition (2004) affirmed that “assuring the safety of both local and international journalists should be given the highest priority. There should be an end to a culture of impunity over killings and other attacks on journalists and there should be independent investigations into such killings and attacks".
b. The Medellin Declaration (2007) on Securing the Safety of Journalists and Combating Impunity reiterated the call upon Member States to focus on preventing and securing the safety of journalists and combating impunity in both conflict and non-conflict situations.

c. The Carthage Declaration (2012) called upon all stakeholders “to create a free and safe environment for journalists, media workers and social media producers to produce information through traditional or new media, and to support implementation of the UN Plan of Action on The Safety of Journalists and the Issue of Impunity”.

6. UNESCO’s recent activities on the safety of journalists and combating impunity are guided by the six-year 34 C/4 Medium Term Strategy (2008-2013) and the biennial programming document, 36 C/5. In the current Medium Term Strategy, the issue is addressed in the Strategic Programme Objective 13, which states that “special attention will be paid to the protection of the press freedom and the rights and safety of media and information professionals, especially within the framework of alert monitoring networks for the protection of freedom of expression”.

7. This strategy is further elaborated in the current biennial document, 36 C/5 Biennial Sectoral Priority 1 in promoting freedom of expression and information and the relevant Main Line of Action 1 in promoting an enabling environment for freedom of expression in order to foster development, democracy, and dialogue for a culture of peace and non-violence, which further calls on to the Organization “to continue its efforts to fight impunity for crimes committed against media professionals, including through the IPDC. Strong collaboration with other agencies and programmes within the UN family will aim to ensure that existing conventions in this regard are respected, and capacity-building will be furthered in this area, in particular through the inclusion of safety modules in journalism training curricula”.

8. UNESCO’s future relevant actions are in line with the UN Plan of Action on the Safety of Journalists and the Issue of Impunity, endorsed by the UN Chief Executives Board on 13 April 2012, which provided a framework to harmonize cooperation, especially amongst the various agencies within the UN system, while respecting their own mandates and taking into consideration their comparative advantages and possible added value contributions.

9. The measures in the UNESCO Work Plan include the reinforcement of a coordinated inter-agency mechanism to handle issues related to the safety of journalists, and the involvement of other intergovernmental organizations at international, regional, and national levels to encourage the incorporation of media development programmes focusing on journalists’ safety within their respective strategies. The Work Plan also foresees assisting countries to develop legislation and mechanisms favourable to freedom of expression and information, and supporting their efforts to implement existing international rules and principles. To further reinforce prevention, the Work Plan recommends conducting awareness-raising campaigns on a wide range of issues, as well as capacity building and training initiatives. Emphasis is also given to the importance of disseminating good practices on the safety of journalists and how to prevent violence and counteract impunity. Journalism education institutions will also be encouraged to include in their curricula, materials relevant to the safety of journalists and impunity.

10. According to paragraph 6.3 of the UN Plan, overall coordination of UN efforts on the safety of journalists is entrusted to UNESCO, in cooperation with other UN agencies, in particular with the Office of the High Commissioner for Human Rights (OHCHR) and the UN Secretariat in New York. This role is elaborated in the UNESCO Plan.
III. INTERNATIONAL AND REGIONAL INSTRUMENTS:

1. The United Nations and its family of agencies have at their disposal tools and instruments which can be readily employed to address the issue of the safety of journalists and how to prevent violence and combat impunity. These instruments draw their strength from being internationally recognized as well as being a moral compass and obligation for States. These instruments include mostly international humanitarian laws (IHL) and universal human rights laws (UHL) as well as resolutions and declarations:

   a. The Universal Declaration of Human Rights (UDHR, 10 December 1948). Specifically, Article 19 which states that “everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers” and also Article 3 which secures the “right to life, liberty and security of person”, Articles 5 and 9 which affirm the right not to be subjected to “torture or to cruel, inhuman or degrading treatment or punishment” or “arbitrary arrest”, and Article 8 which maintains that we have the right to an effective remedy for violations of one’s rights.

   b. The International Covenant on Civil and Political Rights (ICCPR, 16 December 1966) which is the binding agreement with all its signatories corresponding to the UDHR. Specifically, the ICCPR clarifies that the State must “undertake the necessary steps, in accordance with its constitutional processes and with the provisions of the present Covenant, to adopt such laws or other measures as may be necessary to give effect to the rights recognized” in the Covenant. In July 2011, Article 19 was the subject of the General Comment 34 by the Human Rights Committee. Adopted by this UN monitoring body, it constitutes an authoritative interpretation by clarifying the scope of States’ obligations, calling on them to adopt adequate laws and practices together with national enforcement mechanisms to protect the right to freedom of expression and opinion.

   c. The UN Commission on Human Rights Resolution 2005/81, and previous Resolutions on Impunity, which calls on all States to put an end to impunity and to prosecute or extradite, in accordance with their obligations under international law, those responsible for all violations of human rights and international humanitarian law that constitute crimes.

   d. The UN Human Rights Council Resolution A/HRC/RES/12/16 on Freedom of opinion and expression, adopted in October 2009. The resolution recognizes that the exercise of the right to freedom of opinion and expression is one of the essential foundations of a democratic society. It expresses concern that violations of these rights continue to occur against persons who exercise, seek to promote or defend these rights, including journalists, writers, and other media workers, Internet users and human rights defenders.

   e. The UN Human Rights Council Resolution A/HRC/21/12 on the Safety of Journalists, adopted by consensus on 27 September 2012. The Council condemned in the strongest terms all attacks and violence against journalists and expressed its concern that there was a growing threat to the safety of journalists posed by non-State actors. It stresses the need to ensure better cooperation and coordination at the international level with regard to ensuring the safety of journalists, and invites UN agencies, programmes and funds, other international and regional organizations, Member States and all relevant stakeholders to cooperate further in the implementation of the UN Plan of Action on The Safety of Journalists and the Issue of Impunity, elaborated by UNESCO and endorsed by the UN System Chief Executives Board for Coordination in April 2012.
f. The Human Rights Council’s Special Procedures mechanisms are the most important mechanisms within the UN System in monitoring, raising awareness and giving advice on human rights issues. The Office of The High Commissioner for Human Rights provides these mechanisms with personnel, policy, research and logistical support for the discharge of their mandates. The most directly relevant contributions to the safety of journalists can be drawn from the UN Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression whose mandate was established in 1993. In 2012 the UN Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions focused his report on the rights of journalists, in response to the alarming number of killings. In 2011, the Special Rapporteur on the Situation of Human Rights Defenders also included a specific chapter on journalists and media workers.

g. The UN Security Council adopted Resolution 1738 (2006) to condemn attacks against journalists in conflict situations. It emphasizes “the responsibility of States to comply with the relevant obligations under international law to end impunity and to prosecute those responsible for serious violations of international humanitarian law” and that “journalists, media professionals and associated personnel engaged in dangerous professional missions in areas of armed conflict shall be considered civilians, to be respected and protected as such”.

h. The Geneva Conventions of 12 August 1949 and the Additional Protocol I which concerns the treatment of civilians, including journalists, and of persons not or no longer taking direct part in hostilities. Article 79 of Protocol I specifically states that “journalists engaged in dangerous professional missions in areas of armed conflict shall be considered as civilians” and thus be protected as such under the Conventions.

i. There are also many regional instruments such as the African Charter on Human and Peoples’ Rights and the Declaration of Principles on Freedom of Expression in Africa adopted in 2002; the American Declaration of the Rights and Duties of Man and the American Convention on Human Rights; the Arab Charter on Human Rights and the European Convention on Human Rights. It is also important to mention the role played by the Special Rapporteur on Freedom of Expression and Access to Information of the African Union Commission (AUC), the Special Rapporteur for Freedom of Expression of the Organization of American States (OAS) and the Representative on Freedom of the Media of the Organisation for Security and Cooperation in Europe (OSCE).

j. A large number of international and regional declarations have been also issued by many stakeholders.