

## Iraq

The information below is based on the Report of the Secretary-General on children and armed conflict (A/72/361-S/2017/821), issued on 24 August 2017<sup>1</sup>

79. One incident of sexual violence was verified, involving a 17-year-old boy who was raped by a member of an unidentified armed group. While concerns of widespread sexual violence perpetrated by ISIL persisted, the violation remained underreported.

The information below is based on the Report of UNAMI Human Rights Office and OHCHR on Human Rights in Iraq, issued on June 2013<sup>2</sup>

### 3.4 Allegations of ill-treatment

Nearly all detainees and prisoners held in MoJ facilities interviewed by UNAMI alleged they had suffered abuse and mistreatment, and on occasions torture, while held during investigation in MoI-run facilities prior to their transfer to the MoJ. Many claimed they were held incommunicado, without access to family members or lawyers, and that they were subjected to interrogations that included beatings, electric shocks to various parts of the body, suspension from the ceiling by the arms, sometimes for hours or for several days at a time, and other forms of sexual and physical abuse. Many detainees recounted how their interrogators threatened to sexually or physically abuse their family members if they did not confess. Many detainees and prisoners, and those subsequently released, who were interviewed by UNAMI, bore scars and physical marks on their bodies that appeared consonant with their claims to have suffered from physical mistreatment in the past. Nearly all individuals spoken to by UNAMI alleged that the abuse and torture had been carried out for the purposes of extracting confessions relating to real or imagined crimes, often terrorist-related. Many claimed that they were forced to sign blank documents that were later filled in by interrogators. A number claimed that the abuse took place in the presence of prosecutors and investigative judges. Once a confession was made, nearly all the detainees said the abuse stopped and they were transferred to the MoJ facilities.

UNAMI followed the fate of approximately 42 persons arrested in January 2012 in a security sweep conducted in a southern area of Baghdad by Iraqi military forces following an IED attack in the area. Many of these men were held up to 12 months, although, as far as UNAMI can ascertain, at least one still remained in detention at the end of December 2012. Subsequent to their release, a number of them were interviewed by UNAMI. All claimed to have been beaten severely and to have been subjected to other forms of torture during interrogation while they were detained in the MoI facility. The men commonly alleged that they had been repeatedly beaten on various parts of their bodies during interrogation. One man stated that his hands had been tied behind his back and he had then been suspended from a ceiling for three days, resulting in the dislocation of his shoulders, for which he was now receiving medical treatment. Others claimed that their interrogators had threatened their family members with physical and sexual violence if they did not confess to criminal acts. A number

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<sup>1</sup> Full text available [here](#)

<sup>2</sup> Full text available [here](#)

of the men said that interrogators or detention centre authorities had told them or their family members that their release would be secured if certain sums of money were paid or certain lawyers were approached and their fees paid. At times these 'fees' had amounted to USD100,000 or more. Many of the men stated that they had been forced to confess to imaginary crimes involving terrorism, including planting IEDs and killing individuals who had not, in fact, been the object of attack and who were still alive. Many were then convicted by the CCCI based solely on these confessions, despite the fact that a number alleged before the Court that their confessions had been made under coercion. It was only as a result of the intervention by lawyers during later court proceedings or during the appeals process that many of the men were released, owing to the fact that the confessions were found to be patently false.

**The information below is based on the 2010 Report on Human Rights in Iraq by the UN Assistance Mission for Iraq and OHCHR, issued on January 2011<sup>3</sup>**

#### **4.2 Treatment in Detention**

Through various visits to detention centres and prisons, UNAMI found evidence that detainees and prisoners had been threatened with beatings if they raised concerns with UN staff. Overcrowding was seen to be a major problem in many facilities. UNAMI obtained information that some prisoners would be removed from their cells before the arrival of UNAMI in order to prevent them from being seen, in particular detainees who had visible marks of torture or abuse. Furthermore, UNAMI obtained evidence that torture and ill treatment routinely takes place at the time of arrest and while in detention, UNAMI staff seeing marks on some prisoners and detainees that in UNAMI's opinion appeared consistent with torture or mistreatment. In addition, several detainees were threatened with the death or rape of their female family members if they refused to sign confessions. Evidence gathered by UNAMI indicated that some detainees had been held for long periods of time – some up to two years – without being told of the charges against them and without access to family members, lawyers, or the courts. Conditions within facilities were often observed to be cramped, with no natural light, and no ventilation. Often there are no toilets in the cells, prisoners being let out intermittently to relieve themselves – adding to the unhygienic condition of the facilities.

#### **4.4 Allegations of torture and mistreatment in detention facilities**

Torture is absolutely prohibited by international law. Article 7 of the ICCPR prohibits torture and cruel, inhuman or degrading punishment. Article 7 cannot be derogated under any circumstances. The Article is now interpreted to impose similar obligations to those required by the United Nations Convention Against Torture, including not just a prohibition on torture, but requiring governments to take active measures to prevent its occurrence and a prohibition on refoulement. As noted, Iraq has acceded to the Convention Against Torture but has not deposited the instrument of ratification as required by the terms of the treaty. Rules of IHL applicable to international as well as non-international armed conflict also absolutely prohibit torture of persons arrested, detained or captured in relation to an armed conflict.

According to the Iraqi Constitution, Article 37 prohibits all forms of psychological and physical torture and inhumane treatment. Any confession obtained through coercion, threat, or torture is

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<sup>33</sup> Full text available [here](#)

not to be relied on in a court of law. Furthermore, where these prohibitions are breached, the victim has the right to be compensated for the material and moral damages incurred.

Section 12 of the CPA Memorandum Number 2 (2003) prohibits the use of restraints, such as handcuffs, irons and strait jackets as punishment. Article 127 of ICPC prohibits the use of any illegal method to influence the accused to extract a confession. Mistreatment, threats, injury, enticement, promises, psychological influence or use of drugs or intoxicants are considered illegal. Furthermore, Article 333 of the ICPC criminalises any public official who tortures or orders torture, or threatens torture, of a person accused of a criminal act, including witnesses, with the aim of compelling a confession. Any statement of the accused during investigation or trial must be recorded in writing by the magistrate or the investigator and should then be signed by the accused and the judge or investigator. If the accused is unable to sign, this and the reasons for it must be clearly recorded in the written record.

Despite the laws of Iraq and international standards binding on Iraq, which absolutely prohibit torture, there is significant evidence that mistreatment, abuse and torture of persons in detention is widespread in Iraq. Iraqi and international NGOs who monitor detention conditions have voiced their opinion that both international human rights law and Iraqi laws are being routinely violated in prisons and detention facilities. Significant numbers of detainees held in prisons visited by UNAMI, alleged torture and physical abuse, particularly during interrogation – and UNAMI received allegations from a variety of sources, including members of the CoR, alleging mistreatment, torture and abuse of prisoners held in al-Taji detention facility, following its hand-over to Iraqi authority by the USF-I in March 2010. UNAMI has recorded numerous allegations of mistreatment and torture of persons at time of arrest, while in remand awaiting trial, and after conviction. Common techniques allegedly include being beaten and threatened with death; being handcuffed and suspended from iron bars in painful positions for lengthy time periods; electric shocks to various parts of the body, including the genitals; cigarette burns to the body; being deprived of food, water, and sleep; having plastic bags placed over the head; and being subjected to threats against family members. From information collected by UNAMI, it appears that a magistrate is not generally present during the taking of statements by accused persons and that different methods of physical and psychological methods of coercion are brought to bear on accused persons by interrogators to obtain confessions and to extract information. UNAMI has received consistent allegations that suspects have been forced often to sign statements, which they had not been permitted to read or had read to them.

According to the MoHR, persons in the custody of MoI (police) or MoD are at particular risk of torture and mistreatment. Information from the MoHR suggests that four persons died from torture while in detention during 2009. The MoHR publicly confirmed on 6 November that it had received 576 complaints alleging torture and mistreatment in Iraqi detention facilities and that 120 cases had been referred to the public prosecutor for investigation and further action. However, the MoHR follows cases where perpetrators are charged only to the conclusion of the criminal trial and does not monitor whether sentences handed down are actually served. In addition, several government officials accused of acts of torture before 2008 subsequently benefitted from the Amnesty Law passed in that same year.

Several cases monitored by UNAMI indicate that victims and survivors are generally reluctant to report any of the violations to which they may have been subjected, primarily because they fear retribution. In the rare instances where investigations were carried out by the responsible authorities, penalties applied to perpetrators were often limited to disciplinary or administrative measures.

**The information below is based on the Report by the UN Assistance Mission for Iraq for the period 1 May-30 June 2006, issued on 30 June 2006<sup>4</sup>**

**Protection Extra-judicial executions, targeted and indiscriminate killings**

16. UNAMI HRO has received several reports indicating that, since 2005, homosexuals have been increasingly threatened and extra-judicially executed by militias and “death squads” because of their sexual orientation. It is believed that such incidents are underreported, because families are unwilling to admit that targeted members were homosexual for fear of further abuse. It has been difficult to independently verify the information received due to the fact that members of this group maintain a low profile, preferring instead to go into hiding or leave the country.

17. From October 2005 to 30 June 2006 at least twelve homosexuals were reportedly killed in targeted attacks. Militias are reportedly threatening families of men believed to be homosexual, stating that they will begin killing family members unless the men are handed over or killed by the family. In March 2006, a 29-year-old man was kidnapped in Baghdad and his family threatened for allowing him to lead a homosexual lifestyle. The family paid a ransom for the man’s release but the mutilated body of the kidnapped victim was instead found dead a few days later. In another case reported a homosexual 5 man was allegedly victim of “honour crime.” It was reported in the press that the man’s father was released without trial once he explained that he had hanged his son after discovering that he was homosexual.

**Children**

47. In one case the body of a 12-year-old Osama was reportedly found by the Iraqi Police in a plastic bag after his family paid a ransom of some 30,000 US dollars. The boy had been sexually assaulted by the kidnappers, before being hanged by his own clothing. The police captured members of this gang who confessed of raping and killing many boys and girls before Osama.

**The information below is based on *The Present situation of human rights in Iraq*, UN Commission on Human Rights (E/CN.4/2005/4), issued on 9 June 2004<sup>5</sup>**

**IV. THE TREATMENT OF PERSONS DURING ARREST, DETENTION AND RELEASE FROM DETENTION**

**A. Introduction**

40. Iraqis interviewed in Amman all spoke about arbitrary arrests and detentions as ongoing since April 2003. Allegedly, in many cases, Coalition forces break front doors or windows and throw hand grenades into the room before they enter a property. Searches are not conducted with care; no search or arrest warrants are shown. There have been cases where soldiers took

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<sup>4</sup> Full text available [here](#)

<sup>5</sup> Full text available [here](#)

money or jewelry found during a raid and did not return it. In others, the behaviour of Coalition soldiers is considered humiliating, for example when they send women outside the house in their nightgowns, or when they show disrespect for the Koran, throwing it on the floor or tearing it apart. When a man they are searching for cannot be found, his wife or son may be arrested in his place. Children are allegedly interrogated during such raids.

41. The international community knew that in the aftermath of the victory of the Coalition forces, many Iraqis were taken into detention. For a long while, no one knew how many people were taken into custody, where they were held, in what conditions they were kept and how they were being treated. From the point of view of international human rights and humanitarian law, there was a major lack of protection and an absence of accountability.

42. The first allegations of ill-treatment of Iraqi detainees by Coalition forces were raised by international human rights bodies, including Amnesty International, in July 2003. The allegations included beatings, electric shocks, sleep deprivation, hooding, and prolonged forced standing and kneeling. As mentioned above, the Special Representative of the Secretary-General had raised concerns about the conditions of detention and the treatment of detainees with the CPA Administrator in a meeting on 15 July 2003.

43. On 28 April 2004, the United States television news channel CBS aired photos showing male Iraqi detainees being humiliated by United States soldiers. The publication of photographs of Iraqi detainees being physically and mentally abused at the Abu Ghraib prison has caused shock and outrage across the world. On 30 April 2004, the magazine The New Yorker published an article on the classified 50-page investigative report of Major General Antonio Taguba, which concluded that the institutional failures of the army prison system raised serious problems. 5 The United States authorities pointed out that this report was prepared after allegations of mistreatment were brought to the attention of United States commanders.

44. On 7 May 2004, The Wall Street Journal published extensive excerpts from a confidential 24-page report that was submitted to the Coalition forces by ICRC in February 2004. 6 The report represented a summary of humanitarian concerns that were regularly brought to the attention of the Coalition forces throughout 2003.

45. The top-level United Kingdom and United States authorities had previously launched investigations into the allegations of torture and ill-treatment and said that they would be intensified, and stated that these were acts of a few soldiers who would be identified and consequently court-martialled.

#### B. The Taguba report

46. On 19 January 2004, Lieutenant General Ricardo S. Sanchez, Commander of Combined Joint Task Force Seven, requested that the Commander of the United States Central Command appoint an investigating officer to investigate detention and internment operations conducted by the 800<sup>th</sup> Military Police Brigade from 1 November 2003.

47. Major General Antonio Taguba was appointed. His report, based on the allegations and his investigation, identified the following practices:

- Punching, slapping and kicking detainees; jumping on their bare feet;
- Videotaping and photographing of naked male and female detainees;



- Forcibly arranging detainees in various sexually explicit positions for photographing;
- Forcing groups of male detainees to masturbate while being photographed and videotaped;
- Arranging naked detainees in a pile and then jumping on them;
- Positioning a naked detainee on a box, with a sandbag on his head, and attaching wires to his fingers, toes and penis to simulate electric shock torture;
- - Writing "I am a Rapist" (sic) on the leg of a detainee alleged to have raped a 15-year-old fellow detainee, and then photographing him naked;
- - Placing a dog leash around a naked detainee's neck and having a female soldier pose with him for a picture;
- A male military police guard having sex with a female detainee;
- Breaking chemical lamps and pouring the phosphoric liquid on detainees;
- Threatening detainees with a charged 9-mm pistol;
- Pouring cold water on naked detainees;
- Beating detainees with a broom handle and a chair;
- Threatening male detainees with rape;
- Allowing a military police guard to stitch the wound of a detainee who was injured after being slammed against the wall in his cell;
- Sodomizing a detainee with a chemical lamp and perhaps a broomstick;
- Using military working dogs (without muzzles) to frighten detainees and threatening to allow the dogs to attack and in at least one case allowing a dog to bite and severely injure a detainee;
- Forcing detainees to remove their clothing and keeping them naked for several days at a time;
- Forcing naked male detainees to wear women's underwear;
- Taking pictures of dead Iraqi detainees.

48. In citing these practices, it is noted that they are being examined within the framework of broader investigations currently under way within the United States.

#### C. The ICRC report

49. The ICRC report drew the attention of the Coalition forces to serious violations of international humanitarian law that had been observed and documented during visits to the detainees between March and November 2003. The main violations of international humanitarian law as described by ICRC in the report included the following:

- Brutality against protected persons upon capture and initial custody, sometimes causing death or serious injury;
- Absence of notification of arrest and detention of persons to their families, causing distress among persons deprived of their liberty and their families;
- Physical or psychological coercion during interrogation to secure information;

- Prolonged solitary confinement in cells devoid of daylight;
- Excessive and disproportionate use of force against persons deprived of their liberty resulting in death or injury during their period of internment;
- Seizure and confiscation of private belongings of persons deprived of their liberty;
- Exposure of persons deprived of their liberty to dangerous tasks;
- Holding persons deprived of their liberty in dangerous places where they are not protected from shelling.

#### D. The legal framework

##### 1. International humanitarian rights law

50. The situation in Iraq involves a military occupation to which international humanitarian law as well as the Hague Regulations of 1907 are applicable. Both the Third and the Fourth Geneva Conventions are also applicable to the conflict. The United States ratified the Geneva Conventions on 2 August 1955. The vast majority of POWs and civilian internees captured during major military operations have since been released. In case of doubt about the status of an individual, a detainee's case has to be considered by a competent tribunal, as required by article 5 of the Third Geneva Convention. Those individuals who commit criminal offences in Iraq, including those suspected of anti-Coalition activities, are normally detained as "criminal detainees". Those held by the Coalition forces fall within a process that requires a probable-cause determination by a military attorney within 21 days of every detention. The Coalition forces provide a second procedure that requires that the criminal detainee be brought before a judge as soon as possible and in no instance later than 90 days from the date of detention.

A criminal detainee has to be distinguished from a civilian internee who has not been found guilty of any infringement of the penal provisions enacted by the Coalition forces, but has been detained for "imperative reasons of security". There has to be an individualized decision linking the detainee to a threat to security. According to the Commentary to the Fourth Geneva Convention, "there can be no question of taking collective measures: each case must be decided separately". As a procedural safeguard in order to ensure that principles of humanity are respected, a security detainee should have the right of appeal and any decision upholding detention should be reviewed every six months.

51. The use of torture and other forms of physical and psychological coercion against any detainee to extract confessions or intelligence-related information is a violation of international humanitarian law and is prohibited. Evidence that has been obtained through coercion cannot be used by the Coalition forces.

52. Wilful killing, torture or inhuman treatment, if committed against detainees protected by international humanitarian law, constitutes a grave breach under the Geneva Conventions and therefore of international humanitarian law and is prohibited at any time, irrespective of the status of the person detained. Such acts might be designated war crimes by a competent tribunal. The requirement that protected persons must at all times be treated humanely is a basic pillar of the Geneva Conventions. The detaining authorities are bound to put in place all measures to pre-empt the use of torture as well as any inhuman and degrading treatment. All States parties are obliged to exercise jurisdiction to investigate, prosecute and punish perpetrators.

## 2. International human rights law

53. The prohibition of torture laid down in international humanitarian law with regard to situations of armed conflict is reinforced by the body of international treaty law on human rights. These laws ban torture both in time of peace and during armed conflict.

54. Any practice of torture or other cruel, inhuman or degrading treatment or punishment violates international human rights standards to which both the United States and the United Kingdom are parties, including the International Covenant on Civil and Political Rights (ICCPR) and the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. There is an absolute prohibition of torture that is applicable in times of conflict as well as in times of peace. The Convention defines torture as any act that is intentional, that causes severe pain or suffering, that is used to obtain information or confession, to punish, intimidate or coerce, and that has been authorized by someone in an official position. In addition to article 7 of ICCPR, which prohibits torture and cruel, inhuman or degrading treatment or punishment, article 10 specifically provides that all persons deprived of their liberty shall be treated with humanity and with respect for the inherent dignity of the human person.

### E. Witness testimony

55. The OHCHR team met in Amman with Saddam Salah Abood Al-Rawi, a 29-year-old former political prisoner under the regime of Saddam Hussein and later detained in Abu Ghraib prison by the Coalition forces from 1 December 2003 to 28 March 2004. He reported that he was arrested without being given any explanation of the charges against him. His release order is reproduced in annex IV. It states, "Whatever crime they have committed has been reviewed and any time required has been served. This individual, barring commission of another crime, has no further need for detention.... There is currently no reason for the continued detention of the individual, and further investigation into the case by way of a formal tribunal is not required." Even at the time of his release, he still did not know whether there had been any charges brought against him.

56. Mr. Al-Rawi described the floor plan and the arrangement of the cells in the prison section (section I A) where he was detained. Many of the cells, including his (No. 42), were solitary confinement cells, but 10 of them, he stated, were set aside for detainees who were, he alleged, tortured. A few days after his arrest, Mr. Al-Rawi was moved from cell No. 42 to one of the alleged torture cells. For the following 18 days he was allegedly subjected to torture which at times lasted for up to 23 hours. After each torture session, loud music was played to prevent him from sleeping.

57. Mr. Al-Rawi gave a detailed account of the torture methods he was allegedly subjected to. These included pulling of teeth from his mouth (two of his teeth were missing), kicking, beatings, guards standing on his hands and infliction of mental cruelty, such as telling him he would first be raped by guards and then sent to Guantánamo Bay if he did not "confess". Following the 18 days of alleged torture, Mr. Al-Rawi was moved back to cell No. 42 where he was kept for approximately three months in solitary confinement until his release. At the time of a Red Cross visit to the Abu Ghraib prison in January 2004, he was warned that if he said anything to the Red Cross visitor which the prison guards did not like, he would not live to regret it. He stated that when he was interviewed by the Red Cross visitor, he did not dare to say anything about the treatment he had suffered and replied to most of the questions with "I



don't know". Following the visit, he stated that torture at Abu Ghraib abated.

58. Mr. Al-Rawi said that the ill-treatment he suffered as a political prisoner under Saddam Hussein was bad, but that during his days in Abu Ghraib as a detainee of the Coalition forces he suffered humiliation and mental cruelty in addition to physical torture.

59. In their comments, the United States authorities stated that they were particularly concerned about these allegations which they considered extreme and inconsistent with other reports. They will be investigating and reporting on the allegations. However, the allegations were brought to their attention only 24 hours before the present report was to be finalized.

60. The OHCHR team also heard allegations regarding humiliation by Coalition forces when releasing prisoners. Among the examples given were that prisoners were released in the middle of the night, handcuffed, with Mickey Mouse drawn on their shirt, and that the personal items that were in their possession during arrest, including identification documents, were not returned to them.

**The information below is based on the statement by the Chairperson-Rapporteur of the Working Group on arbitrary detention of the United Nations Commission on Human Rights 'UN Rights Expert Calls On Coalition Authorities To Allow Iraqi Detainees To Challenge Lawfulness Of Detention', issued on 5 May 2004<sup>6</sup>**

The Chairperson-Rapporteur of the Working Group on arbitrary detention expresses her serious concern regarding the uncertainty of the legal status of many detainees currently subjected to interrogation in Iraq, in the context of reports of torture of people in detention by United States and United Kingdom military officers serving under the Coalition Provisional Authority.

According to the information received by the Working Group, the majority of persons in detention in Iraq have been arrested during public demonstrations, at checkpoints and in house raids. They are being considered "security detainees" or "suspected of anti-Coalition activities". The Working Group's Chairperson-Rapporteur is seriously disturbed by the fact that these persons have not been granted access to a court to be able to challenge the lawfulness of their detention, as required by the International Covenant on Civil and Political Rights (Article 9).

The Working Group calls upon the Coalition Provisional Authority and the Iraqi Governing Council to allow the clarification of the legal status of each person detained in Iraq and to apply the rules and norms enshrined in Articles 9 and 10 of the Universal Declaration of Human Rights and 9 and 14 of the civil and political rights Covenant.

The Chairperson-Rapporteur of the Working Group on arbitrary detention calls upon the Coalition Provisional Authority, the Iraqi Governing Council and all countries with military forces serving in Iraq to respect the principles and norms of international human rights law and, in the case of persons entitled in principle to prisoner-of-war status, to the norms and principles of international humanitarian law, as enshrined in the Geneva Conventions of 1949.

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<sup>6</sup> Full text available [here](#)

**The information below is based on a statement by the UN Secretary General (SG/SM/9283), issued on 4 May 2004<sup>7</sup>**

Secretary-General "Deeply Disturbed" by Media Pictures of Iraqi Prisoners Being Mistreated

NEW YORK, 30 April (UN Headquarters) -- The following statement was issued today by the Spokesman for Secretary-General Kofi Annan:

The Secretary-General was deeply disturbed by the pictures of Iraqi prisoners being mistreated and humiliated by their guards in the Abu Gharib prison. He hopes that this was an isolated incident and welcomes what appears to be a clear determination on the part of the US military to bring those responsible to justice, and to prevent such abuses in the future. In all circumstances, and in all places, the Secretary-General is strongly opposed to the mistreatment of detainees. He reiterates that all detainees should be fully protected in accordance with the provisions of international human rights law.

**The information below is based on the Special Rapporteur on Torture's Statement on the 'Reports of Abuse of Iraqi Prisoners by Coalition Forces', issued on 3 May 2004<sup>8</sup>**

The Special Rapporteur on torture is seriously concerned about recent reports of torture and other cruel, inhuman or degrading treatment of Iraqi detainees by United States of America and United Kingdom military forces serving under the Coalition Provisional Authority

The freedom from torture and cruel, inhuman or degrading treatment or punishment is a non-derogable right. The prohibition of torture is explicitly affirmed in article 5 of the Universal Declaration of Human Rights, article 7 of the International Covenant on Civil and Political Rights, the Declaration on the Protection of All Persons from Being Subjected to Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, and the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, as well as in the Geneva Conventions of 12 August 1949, relating to the treatment of prisoners and protection of civilians, and in the Rome Statute of the International Criminal Court.

The Special Rapporteur calls upon all countries with forces serving in Iraq to take prompt and effective steps to investigate, prosecute and impose appropriate sanctions on any persons guilty of the alleged violations, as well as provide an effective remedy and adequate reparation for the victims of these abuses.

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<sup>7</sup> Full text available [here](#)

<sup>8</sup> Full text available [here](#)