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Human Rights: A Third World Perspective

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Abstract

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Keywords

Third World, human rights, development, decolonization, self-determination, Africa

HUMAN RIGHTS: A THIRD WORLD PERSPECTIVE

*Abdulqawi A. Yusuf**

I will begin with a brief exploration of the title of my lecture, or at least my understanding of this title and the manner in which I wish to address it in this lecture.

First, let me take the second part of the title and consider the etymology of the expression 'Third World'. The origin of the expression lies in the French phrase 'Tiers Monde', coined in 1952 by Alfred Sauvy as a play on the French revolutionary term 'Tiers Etat,'¹ or the 'Third Estate'. In using this phrase to describe the world of the 1950's, Sauvy compared the Cold War confrontation between the West and the Communist world to the fight in pre-revolutionary France pitting the clergy against the nobility.

According to Sauvy, what mattered to both of these groups of States, each fighting for the domination of the planet, was to conquer the Third World, or at least have the Third World on its side. The challenge, therefore, was how to deal with this Third World, which, like the 'Tiers Etat' in pre-revolutionary France, was slighted, exploited and despised by the other powers but simultaneously sought out as an ally. In order to do this, they had to understand what it was exactly that this Third World, this 'Tiers Etat', wanted.

It is my view that during that period, that is, in the immediate aftermath of the Second World War, this Third World wanted to regain its human dignity and to enjoy the 'human rights' which were long denied it.

I will now turn to the first part of the title: 'Human Rights'. What do we mean by that? These are rights which are due to every human being by virtue of his or her humanity, without any requirement of membership of any group or other qualification. As such, they have to be distinguished from citizens' rights or the rights of the inhabitants in a specific territorial State, or the rights of a group of persons belonging to a certain race, religion, sex or nation.

The English Bill of Rights² or the French Declaration of the Rights of Man and the Citizen,³ for example, applied only to the metropolitan citizens of the colonial power. They did not apply to the citizens of third world countries which were colonized, discriminated against and oppressed by these European powers. Therefore, in my view, they did not qualify as human rights instruments.

When we talk about the Third World, we are broadly referring to the shared experience of the peoples of the southern hemisphere of the planet who suffered under extreme colonialism and oppression in the name of a 'civilizing mission'. So, when we say that the Third World wanted, in the aftermath of the Second World War, to regain its human dignity and to enjoy human rights, what we mean is that the peoples of those countries wanted to throw off colonial oppression and subjugation, and to be treated as human beings. How could human rights, in the sense of rights due to each and every human being by virtue of his or her humanity, be upheld under a situation of colonial subjugation? This applies equally to the collective rights of the colonized as a people, as well as to individual rights. So, I will address in the discussion below both peoples' rights and individual rights as human rights.

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¹ Sauvy, 'Trois mondes, une planète', *L'Observateur*, 14 August 1952, n. 118, at 14.

² Bill of Rights [1688].

³ Déclaration des droits de l'homme et du citoyen de 1789.

To conclude my remarks on the title, I will address the last word in the title: 'perspective'. This word denotes the 'prism' through which one looks at an issue; the position or the point from which a person views an issue. The way you see that issue will, to a certain degree, depend on that position.

Two qualifications need to be raised at this point. The first is that to speak of the existence of a third world perspective would be full of pitfalls. There is indeed more than a single perspective⁴. So, the use of the plural 'perspectives' will be better. Secondly, these perspectives have a historical dimension, which cannot be ignored and which I have already referred to. Thus, the perspectives we are looking at do not relate to the position from which the Third World views the issue of human rights today. It is the position from which what was referred to as the Third World in the 1950's viewed human and peoples' rights at that time and the evolution of that position up to the present period, when it has become more difficult to talk about a Third World.⁵ Notwithstanding this difficulty, and despite the fact that the expression 'Third World' does not have today the same importance and relevance it enjoyed a few decades ago, it is important to underline that its historical significance and its bearing on the evolution of international relations has not yet faded away.

Starting with this historical context, I would venture to identify three phases or three periods in the evolution of the human and peoples' rights perspectives of the Third World: a first phase, which coincides to a large extent with the struggle for independence and decolonization; a second phase relating to the post-independence period when pre-eminence was given by those countries to social and economic rights; and a third phase, which may be referred to as that of democratization and good governance that started towards the end of the 20th century.

In substantive terms, these three phases in the evolution of the perspectives of human and peoples' rights in the Third World revolved around three objectives: decolonization, development and democratization. The evolution of these perspectives was thus influenced and inspired by these goals.

Regarding the first phase and the process of decolonization, I will talk generally about third world perspectives without singling out Asia, Africa or Latin America and the Caribbean; but when I will address the second and third phases, I will focus more particularly on the African continent, which is the one with which I am more familiar.

I will therefore start my analysis of 'perspectives' from the decolonization period. How did the third world countries and peoples, those nations lumped together and referred to as the 'Third World' because of a shared colonial experience, view human rights at that time?

I believe that their view was to a large extent coloured by their history and by their position in the international community of the time. Most of the third world countries were still under colonial domination, and many of them — particularly in Africa and Asia — were still engaged in wars of national liberation or in a struggle for independence.

What were, at the time, the legal principles, particularly the human rights standards, that were considered by the peoples engaged in a struggle for independence and decolonization as most important for them and for the realization of their aspirations? Which legal standards could be considered most relevant, from the stand-point of a colonized person or a colonized people, for the realization of the goal of liberation and emancipation?

⁴ Udombana, 'The Third World and the Right to Development: Agenda for the Next Millenium', 22 *Human Rights Quarterly* (2000) 735.

⁵ Berger, 'The End of the "Third World"', 15(2) *Third World Quarterly* (1994) 257.

Much has been written about the human rights perspectives of third world countries being dictated by their cultures or religions, or about cultural relativism with respect to human rights.⁶ Of course, culture is always there, but these perspectives are not culturally-determined, they are rather determined by social realities, such as poverty and oppression. If you are poor and oppressed, the first human rights standards you fight for are those whose application will relieve your poverty and oppression. So, which were those rights during the process of decolonization or which were the rights most strongly advocated by the colonized peoples of the Third World?

At the collective level, we can identify two closely interrelated concepts: the equal rights of peoples and the self-determination of peoples. Relatively little has been written on the equal right of peoples, notwithstanding the fact that this principle has been consecrated in the UN Charter. However, its importance for the peoples of the Third World needs not be overemphasized. It is not by accident that the first full-fledged elaboration of its meaning is to be found in the African Charter on Human and Peoples' Rights.⁷

At the individual level, reference may be made to the importance attached by the colonized peoples to freedom of expression, freedom of thought, freedom of association, and so on.

Three preliminary observations need to be made here. First, these rights were profoundly influenced and I would say largely inspired by the UN Charter⁸ as the foundational document on human and peoples' rights, in the manner in which I defined them earlier.

Secondly, the symbiotic and intimate relationship between the two sets of rights, i.e. individual human rights and collective rights, has to be recognized. Can these two sets of human rights, collective rights and civil and political rights, be compartmentalized? My answer is no.

Self-determination, for example, is not only a collective right, a peoples' right. It is also, as was pointed out by the late Professor Antonio Cassese, 'the synthesis and the summa of human rights'.⁹ When the rights and fundamental freedoms of members of a people as individuals are systematically denied, their collective right to self-determination is breached.

Thirdly, although the Charter of the United Nations did not initially provide for a stand alone right to self-determination as such, the third world nations based their claims to independence and decolonization on the interaction between the two concepts of equal rights and self-determination of peoples consecrated in Article 1 of the Charter. Once the 'equal rights of peoples' was recognized in the Charter, there was no way in which some peoples and their powerful States could be allowed to continue to oppress and dominate other peoples who were much weaker either in terms of military power or in economic and financial terms. By virtue of their equal rights under the Charter, the colonized or oppressed peoples of the Third World claimed their entitlement to self-determination and independent statehood.

These claims gave rise to subsequent practice by the UN, in the form of consensus-based resolutions, particularly Resolution 1514(XV) of 1960,¹⁰ which declared that 'the subjection of peoples to alien subjugation, domination and exploitation' constitutes a denial of human rights contrary to the UN Charter and an impediment to the promotion of world peace and security. Of course, the Universal

⁶ Tharoor, 'The Universality of Human Rights and their Relevance to Developing Countries', 59 *Nordic Journal of International Law* (1990) 139; Engle, 'Universal Human Rights: A Generational History', 12 *Annual Survey of International & Comparative Law* (2006) 219.

⁷ See Art. 19 of the African Charter of Human and Peoples' Rights (27 June 1981), available at <http://www.achpr.org/instruments/achpr/> (last accessed on 31 July 2013).

⁸ Charter of the United Nations, 26 June 1945.

⁹ A. Cassese, *Self-Determination of Peoples: A Legal Reappraisal* (1995), at 298.

¹⁰ GA Res. 1514 (XV), 14 December 1960.

Declaration of Human Rights¹¹ also adopted by the UN General Assembly, equally contributed to the realization of the aspirations of the colonial peoples of the Third World and their civil and political rights. The adoption of these instruments was a milestone in the process of decolonization and in the reflection of third world human rights perspectives in international law

Thus, this first phase was crowned with success by the recognition of the self-determination of peoples as a collective right due to all peoples under colonial domination or foreign occupation. Collective or peoples' rights, such as equal rights of peoples and the right to self-determination, subsequently found clear and concrete expression in other international legal instruments, such as the two UN Covenants on Civil and Political Rights and on Social, Economic and Cultural Rights,¹² as well as in the jurisprudence of the International Court of Justice.¹³

Turning now to the second historical phase relating to these perspectives, I must say — and this is my own personal view — that the 'development-based' approach of third world countries to human rights was not as successful either in producing human and peoples' rights standards or in applying them.

This post-independence approach to human rights emphasized economic, social and cultural rights to promote development and fight poverty, most often at the expense of civil and political rights. This aim was, however, undermined by two factors: first, the lack of full authority and control by the governments of these countries over their own development policies, which were either dictated by the Bretton Woods institutions or by bilateral donors and investors, or by both; secondly, the adverse effect of the denial of basic freedoms on initiative, entrepreneurship and local investment. The attitude of many third world governments was that there was no point in having free speech if your maize, rice or cassava bowl was empty; and that order and stability were more important for development than basic freedoms, and therefore took precedence over civil and political rights. Thus, the freedoms that were fought for during the liberation struggle (freedom of speech, freedom of association, freedom of thought, etc.) were placed in a subordinate position and were often given short shrift or totally denied to the citizens of many of the newly-independent States in the name of nation-building and development.

The adoption of these policies and legal approaches was to some extent, facilitated by the cold war rivalry between the 'First' and 'Second' Worlds where political alliances mattered more than the protection of human rights.

The fallacy and short-sightedness of the so-called 'development-based' policies, claiming to give primacy to social and economic rights at the expense of civil and political rights, were soon laid bare by their failure to deliver development, and by the perpetuation of poverty and economic backwardness in the countries where they were applied.

We can of course ask ourselves and those who adopted those policies: how can a hungry person satisfy her hunger if he or she is not allowed to say that he or she is hungry? How can you have development in the absence of human creativity and the ability to express your views on poverty and other development-related issues and without fear of censorship? How can you have development if people are not allowed to have associations that can study, debate and discuss government policies; or if you have no political opposition or associations that can offer alternative policies? As Amartya Sen argues in his book *Development as Freedom*, the right to free speech and free press is not only compatible

¹¹ GA Res. 217A (III), 10 December 1948.

¹² International Covenant on Civil and Political Rights, 999 UNTS 171, 16 December 1966; International Covenant on Economic, Social and Cultural Rights, 993 UNTS 3, 16 December 1966.

¹³ *Legal Consequences for States of the Continued Presence of South Africa in Namibia (South West Africa) notwithstanding Security Council Resolution 276 (1970)*, ICJ Reports 1971 16; *Western Sahara*, ICJ Reports 1975 12; *Case Concerning East Timor (Portugal v. Australia)*, ICJ Reports 1995 90; *Legal Consequences of the Construction of a Wall in the Occupied Palestinian Territory*, ICJ Reports 2004 136.

with the right to food, but is complementary to it.¹⁴ In other words, economic, civil and political rights are indivisible and mutually reinforcing.¹⁵

This artificial separation of social and economic rights and civil and political rights failed in the post-independence experience of most developing countries. Worse still, in many instances, it led to suffering, misery, underdevelopment and poverty instead of enabling the peoples of the States where it was applied to overcome their economic underdevelopment. This post-independence period came to be characterized — albeit not solely because of the above-mentioned policies — by what was referred to as the ‘lost decades’ in terms of economic development, with the exception of a few Asian countries such as Singapore, Hong-Kong and Korea. It was also marked by regression in terms of the struggle for human rights and the advancement of peoples’ rights in matters of governance.

Following the failure of the so-called ‘development-based’ approaches to human rights which gave primacy to economic and social rights over civil and political rights, it is possible to discern, starting in the last decade of the 20th century and in the early years of the 21st, a wide-spread move towards democratization and the recognition of an internal right to self-determination in many third world countries. This is the third phase of the perspectives I mentioned at the beginning of this lecture. This shift has significantly marked, in the last two decades, the human rights perspectives of third world countries.

Democracy may mean different things to different people. In the context of the present lecture, I use this word in the sense of the freely-expressed consent of the governed and the will of the people as the basis of the legitimacy of governments. In other words, the right of the people to choose freely the form and type of government they consider most suitable for the management of their affairs.

As a result of these new approaches and perspectives based on democratization, it may be noted that while we may not yet be at a point where the existence of despotic and tyrannical governments, not based on the freely expressed will of the people, is considered to constitute an infringement of the internal right to self-determination, we nonetheless seem to be gradually, but clearly, moving in that direction. This is particularly true in Africa and Latin America, following the establishment of certain standards and criteria, whose violation is now bound to give rise to economic and political sanctions against the concerned illegitimate or unrepresentative government, either at the regional or at the global level.

First, we can observe today a return to the notion of collective rights, not in the sense of a right to independent statehood, but of peoples’ rights to internal self-determination, respect for the rights of minorities and indigenous peoples, and an emphasis on popular participation in decision-making and in self-government through universal suffrage. The African Charter on Human and Peoples’ Rights devotes six articles to peoples’ rights, ranging from the right of equality of peoples¹⁶ to the right of self-determination and the protection of the existence of peoples¹⁷ and the rights of peoples to national resources,¹⁸ development,¹⁹ peace²⁰ and to a general satisfactory environment.²¹

¹⁴ A. Sen, *Development as Freedom* (1999).

¹⁵ See UN GA, *Vienna Declaration and Programme of Action*, UN Doc. A/CONF.157/23, 12 July 1993, at para. 5, available at <http://www.unesco.org/education/information/nfsunesco/pdf/VIENNA.PDF> (last accessed on 31 July 2013).

¹⁶ Art. 19, African Charter on Human and Peoples’ Rights.

¹⁷ Art. 20, *ibid.*

¹⁸ Art. 21, *ibid.*

¹⁹ Art. 22, *ibid.*

²⁰ Art. 23, *ibid.*

²¹ Art. 24, *ibid.*

Secondly, a major development in international law is the treaty-based right of the African Union, recognized in its Constitutive Act, to intervene in a Member State to protect the people of that State in respect of grave circumstances such as war crimes, genocide, and crimes against humanity.²²

Thirdly, it may be noted that, in an effort to enforce the will of the people and the consent of the governed, the African Union in its Constitutive Act of 2000 outlawed the unconstitutional change of government in the continent,²³ and has since then suspended from participation in the work of the organization any government brought to power by a coup d'état. Thus, although a military government or a civilian government installed by the army might be effectively in control of the territory of a State, the African Union does not recognize it, nor does it allow it to exercise its membership rights in the organization until such time as it re-establishes, most often with the assistance of the organization, a democratically elected and representative government which assumes power with the consent of its own people through free and fair elections. Similarly, the Heads of State and Government of the Americas, adopted on April 2001 in Québec City, Canada, a 'democracy clause' which establishes 'that any unconstitutional alteration or interruption of the democratic order in a State of the Hemisphere constitutes an insurmountable obstacle to the participation of that State's government in the Summits of the Americas process'.²⁴

Fourthly, the Member States of both organizations have adopted charters on democratic governance. The Inter-American Democratic Charter, adopted on 11 September 2001,²⁵ is in the form of a declaration adopted by the General Assembly of the Organization of American States; nevertheless, it clearly states that '[t]he peoples of the Americas have a right to democracy and their governments have an obligation to promote and defend it',²⁶ and also establishes that '[t]he effective exercise of representative democracy is the basis for the rule of law and the constitutional regimes of the member States of the Organization of American States'.²⁷ The African Charter on Democracy, Elections and Governance, adopted in 2007,²⁸ is in the form of a convention and prescribes binding obligations for all States that have ratified it. This Charter stipulates, *inter alia*, that 'States Parties shall commit themselves to promote democracy, the principle of the rule of law and human rights',²⁹ and that 'States Parties shall recognize popular participation through universal suffrage as the inalienable right of the people'.³⁰

In a similar vein, the Protocol on Democracy and Good Governance of the Economic Community for West African States (ECOWAS)³¹ proclaims among the shared constitutional principles of the Member States of this sub-regional African Organization: (a) that every accession to power must be

²² See Art. 4(h), African Union Constitutive Act 2000, available at http://www.africa-union.org/about_au/AbConstitutive_Act.htm (last accessed on 31 July 2013).

²³ See Arts 4(p) and 30, *ibid.*

²⁴ Declaration of Quebec City, 20-22 April 2001, available at http://www.summit-americas.org/iii_summit/iii_summit_dec_en.pdf (last accessed on 31 July 2013).

²⁵ Inter-American Democratic Charter, 11 September 2001, available at http://www.oas.org/charter/docs/resolution1_en_p4.htm (last accessed on 31 July 2013).

²⁶ Art. 1, *ibid.*

²⁷ Art. 2, *ibid.*

²⁸ African Charter on Democracy, Elections and Governance, 30 January 2007, available at <http://www.africa-union.org/root/au/Documents/Treaties/text/Charter%20on%20Democracy.pdf> (last accessed on 31 July 2013).

²⁹ Art. 4(1), *ibid.*

³⁰ Art. 4(2), *ibid.*

³¹ ECOWAS, Protocol A/SP1/12/01 on Democracy and Good Governance Supplementary to the Protocol relating to the Mechanism For Conflict Prevention, Management, Resolution, Peacekeeping and Security, 21 December 2001), available at <http://www.comm.ecowas.int/sec/en/protocoles/Protocol%20on%20good-governance-and-democracy-rev-5EN.pdf> (last accessed on 31 July 2013).

made through free, fair and transparent elections; (b) zero tolerance for power obtained or maintained by unconstitutional means; and (c) popular participation in decision-making, strict adherence to democratic principles and decentralization of power at all levels of governance.

The above-mentioned African Charter on Democracy and Governance makes it very clear that accession to power through non-democratic means is no longer a matter of domestic jurisdiction but a situation which triggers the adoption of certain measures or sanctions by the organs of the African Union. Thus, according to Article 24 of the Charter:

When a situation arises in a State Party that may affect its democratic political institutional arrangements or the legitimate exercise of power, the Peace and Security Council shall exercise its responsibilities in order to maintain the constitutional order in accordance with relevant provisions of the Protocol Relating to the Establishment of the Peace and Security Council of the African Union, hereinafter referred to as the Protocol.

The types of situations that may draw sanctions from the African Union are described in Article 23 of the Charter as follows:

State Parties agree that the use of, *inter alia*, the following illegal means of accessing or maintaining power constitute an unconstitutional change of government and shall draw appropriate sanctions by the Union:

1. Any putsch or coup d'état against a democratically elected government.
2. Any intervention by mercenaries to replace a democratically elected government.
3. Any replacement of a democratically elected government by armed dissidents or rebels.
4. Any refusal by an incumbent government to relinquish power to the winning party or candidate after free, fair and regular elections; or
5. Any amendment or revision of the constitution or legal instruments, which is an infringement on the principles of democratic change of government.

All these situations are likely to be considered in the future, not only under the instruments of the African Union, but in international law in general, as an infringement upon the right of peoples to freely determine their political status and to choose the form of government most appropriate for the management of their affairs. With the recent entry into force of this Charter,³² such conduct is now outlawed in Africa, and will incur sanctions by the African Union, in the form of suspension of membership of the organization. These sanctions were recently imposed on the governments of Madagascar,³³ Guinea³⁴ and Niger³⁵ following their accession to power through a coup d'Etat, and on that of the Côte d'Ivoire for the refusal of its incumbent President to relinquish power to the winning

³² The Charter entered into force on 15 February 2012, thirty days after the deposit of the fifteenth instrument of ratification by Cameroon, in accordance with Article 48 of the Charter. See African Union, Press Release No. 003/2012, 'Entry into force of the African Charter on Democracy, Elections and Governance', available at <http://www.au.int/en/sites/default/files/Press%20Release-%20Charter%20for%20Democracy.pdf> (last accessed on 31 July 2013).

³³ See African Union, Communiqué of the African Union Peace and Security Council, 17 March 2010, available at <http://www.peaceau.org/uploads/221st-communication-cps-madagascar-eng.pdf> (last accessed on 31 July 2013).

³⁴ See African Union, Communiqué of the African Union Peace and Security Council, 29 October 2009, available at http://www.africa-union.org/root/ar/index/Communique%20Guinee%20_Eng_.pdf (last accessed on 31 July 2013).

³⁵ See African Union, Communiqué of the African Union Peace and Security Council, 19 February 2010.

candidate after elections whose results were certified by the UN Special Representative in accordance with UN Security Council Resolutions.³⁶

Fifthly, we are witnessing a move towards the outlawing of the use of force by an unrepresentative and authoritarian government against its own people, and its obligation to respect the free and peaceful expression of the will of the people, as well as the right of other States, acting collectively in the UN or through regional organizations, to protect such people in order to ensure its existence and its inalienable right to self-determination.

In its Order for Provisional Measures of 25 March 2011 in *African Commission of Human Rights v. the Great Socialist Peoples Libyan Jamahiriya*, the African Court of Human and Peoples' Rights ordered the authorities of the Gaddafi Regime to 'refrain immediately from any action that would result in loss of life or violation of physical integrity of persons, which could be a breach of the provisions of the Charter or of other international human rights instruments to which it is a party'.³⁷

Similarly, there appears to be an increasing recourse by African countries to international criminal justice to hold the political leadership accountable for repressive measures against its own people, particularly when such measures involve massive violations of human rights or humanitarian law, or crimes against humanity. This is clearly reflected in the cases so far referred to the International Criminal Court.³⁸ Recourse by representatives of the peoples concerned, or by non-governmental organizations on their behalf, to human rights jurisdictions, such as the African Commission and the African Court of Human and Peoples Rights, equally appears to be increasing as people seek a judicial or quasi-judicial remedy to situations involving a breach of human rights or massive violations of human rights and humanitarian law.

To conclude, it may be observed that the Third World's promotion of its own perspectives or approach to human and peoples' rights in the international arena has met with success, through the application of the principle of equal rights of peoples and the right of peoples to self-determination to situations of colonial domination or foreign occupation. The recent move to democratization has also succeeded and has given rise to certain perspectives which add value to the concept and observation of human rights, particularly in terms of peoples' rights to internal self-determination, to democracy and to development.

By contrast, attempts to accord primacy to social and economic rights over civil and political rights in the post-independence period appear to have failed, resulting neither in the promotion of development nor in the elimination of poverty. What conclusion, or conclusions, can be drawn from this? First, I would say that human rights are indivisible and fully interconnected, and that it is not only arbitrary, but also counterproductive, to emphasize certain rights at the expense of others. Secondly, collective and peoples' rights are the 'synthesis and summa of human rights', as was so aptly observed by the late Professor Cassese, and individual rights can hardly prosper and succeed without the existence of collective rights and vice-versa. Thirdly, the universality of human rights, despite references to cultural relativism and to Asian values or African traditions, remains solidly anchored on the common values of humanity in general, and on the ineluctable fact that such rights stem from the attributes of human beings and are due to every human being by virtue of his or her humanity.

³⁶ See African Union, Communiqué of the African Union Peace and Security Council, 10 December 2010 .

³⁷ African Court on Human and Peoples' Rights, *African Commission of Human Rights v. the Great Socialist Peoples Libyan Jamahiriya*, Order for Provisional Measures, 25 March 2011, para. 25, available at [http://www.african-court.org/en/images/documents/Orders-Files/Copy%20of%20Order%20for%20provisional%20measures%20Appl%20004-2011%20\(2\)-Copy.pdf](http://www.african-court.org/en/images/documents/Orders-Files/Copy%20of%20Order%20for%20provisional%20measures%20Appl%20004-2011%20(2)-Copy.pdf) (last accessed on 31 July 2013).

³⁸ For a list of current situations and cases before the International Criminal Court, see http://www.icc-cpi.int/en_menus/icc/situations%20and%20cases/Pages/situations%20and%20cases.aspx (last accessed on 31 July 2013).

