

Special Procedures Submission

Joint Urgent Appeal to the United Nations Special Procedures on the Ongoing Smear Campaign and Incitement to Violence carried out by the Israeli Ministry of Strategic Affairs against Al-Haq and its Staff on Facebook and other Public Platforms

Date: 8 August 2019

For the attention of:

- The United Nations Special Rapporteur on the situation of human rights in the Palestinian territory occupied since 1967, Mr S. Michael Lynk;
- The United Nations Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, Mr David Kaye;
- The United Nations Special Rapporteur on the situation of human rights defenders, Mr. Michel Forst; and
- The United Nations Working Group on the issue of human rights and transnational corporations and other business enterprises, Ms. Elżbieta Karska (Chair).

1. Overview

Al-Haq addresses this joint urgent appeal to the abovementioned United Nations (UN) Special Procedure mandates, in addition to other relevant mandates who may be seized of this matter, in relation to the ongoing smear campaign and incitement to violence carried out by the Israeli Ministry of Strategic Affairs against Al-Haq and its staff members on Facebook and other public platforms.

This joint urgent appeal comes in light of several Facebook posts made by or on behalf of the Israeli Ministry of Strategic Affairs on its official Facebook page as part of Israel's wider effort to restrict civil society space in the Occupied Palestinian Territory (OPT).¹ One Facebook post in

¹ The Facebook post in question is available at: <https://www.facebook.com/4IL.org/>



particular is discriminatory and incites violence against a named individual, Mr Shawan Jabarin, the General Director of Al-Haq. In addition to that specific post constituting an act of incitement, the content of the Facebook page encompasses a number of racist and violent comments by Facebook users, some of which directly call for Mr Jabarin to be subjected to violence and include death threats.

The impugned Facebook posts on the Ministry's page occur in the context of ongoing, systemic, and organised attacks amounting to a concerted smear campaign against Al-Haq and its staff members, including its General Director. This smear campaign must be viewed and understood in light of attacks against Palestinian civil society, including human rights organisations, as a whole. Mr Jabarin, as well as other staff members of Al-Haq, has been subjected to numerous attacks over the years and more recently.² The most egregious of these recent smears has come in the form of three reports published by the Israeli Ministry of Strategic Affairs over the past two years, including: "The Money Trail 1" (May 2018),³ "The Money Trail 2" (January 2019),⁴ and "Terrorists in Suits" (January 2019).⁵ Those reports contain a number of defamatory attacks against human rights organisations, including Al-Haq, its General Director, and other named individuals working at Al-Haq.

In view of Mr Jabarin's well documented history of torture in detention at the hands of the Israeli occupying power, and having regard to Israel's long and well-documented history of illegal targeted killings,⁶ we ask that you investigate this as a matter of urgency and consider the

² See, for example, Al-Haq, "Al-Haq Under Attack – Staff Member's Life Threatened" (3 March 2016), available at: <http://www.alhaq.org/advocacy/topics/human-rights-defenders/1026-al-haq-under-attack-staff-members-life-threatened>

³ "The Money Trail: The Millions Given by EU Institutions to NGOs with Ties to Terror and Boycotts against Israel: An In-Depth Analysis", State of Israel Ministry of Strategic Affairs and Public Diplomacy available online: http://eipa.eu.com/publicaffairs/wp-content/uploads/The-Money-Trail_English.pdf

⁴ "The Money Trail: European Union Financing of Organizations Promoting Boycotts against the State of Israel" (2nd edition, January 2019), State of Israel Ministry of Strategic Affairs and Public Diplomacy, available online at: <https://4il.org.il/wp-content/uploads/2019/01/The-Money-Trail-2nd-Edition-January-2019.pdf>

⁵ "Terrorists in Suits: The Ties Between NGOs promoting BDS and Terrorist Organizations", State of Israel Ministry of Strategic Affairs and Public Diplomacy (undated, released January 2019) available online: <https://4il.org.il/wp-content/uploads/2019/02/MSA-Terrorists-In-Suits-English-1.pdf>

⁶ E.g., commenting on Ronen Bergman's book "Rise and Kill First", Foreign Policy cites Bergman's claim that since the Second World War, Israel has assassinated more individuals than any other country in the Western world – some 2,300. See Ronen Bergman, "How Far is Too Far for Israel's Targeted Killings?" (Foreign Policy, 9 February 2018), available at: <https://foreignpolicy.com/2018/02/09/how-far-is-too-far-for-israels-targeted-killings/>



recommendations outlined below. As such, Al-Haq calls on the UN Special Procedures to take immediate and collective action to halt the ongoing online incitement by Israel, the occupying Power, and to intervene directly with Facebook to remove content that violates international human rights law and Facebook's own community standards.

Al-Haq emphasises that the present request for intervention by the UN Special Procedures is urgent pursuant to Article 5 of UN Human Rights Council Resolution 7/36.⁷

2. Context

The impugned Facebook content is included in the form of screenshots annexed to the present joint urgent appeal (*see Annex I* below). Post 4 is of particular concern, as it includes a picture of Mr Jabarin with his face violently torn down the middle. This is pursuant to the Ministry of Strategic Affairs' "Terrorists in Suits" report and associated campaign, which seeks to brand and defame Palestinian civil society leaders as "terrorists".

The text of Post 4, when translated using Facebook's own translation function, reads as follows:

"Meet the [Shawan]-:

former senior activist in the terrorist organization "the people front for the liberation of Palestine"

running a number of prison sentences in the Israeli prison for his involvement in terror acts and against Israel and was involved, among other things, in recruiting activists for training

the supreme court defined-as Dr. Jekyll and Mr Hyde: "in some hours his activity is a manager of the rights organization [man], and in another part he is active in a terrorist organization that does not include murder and attempted murder],

stands at the head of the boycott organization on Israel el and, and is engaged in the organization of additional activists of the people's

⁷ UN Human Rights Council, Resolution 7/36 on the mandate of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, 28 March 2008.



the organization that indicates this month 40 years to its activities, has led the campaign against the orange company in Israel; acts against the banking system; and acts against international infrastructure projects in Israel.”⁸

The comments on the video include the following (again, translated using Facebook’s own translation function):

רונית טויר [User]: “Targeted and immediately elimination! Good luck”.

אליב רפאל [User]: “Every dog his day will come.”

ויצמן מוטי [User]: “Let’s hope we start to say his soul in hell.”

These posts exist in a broader context of widespread incitement against Palestinians on social media. In 2019, 7amleh – The Arab Center for the Advancement of Social Media characterised the widespread online incitement against Palestinians in 2018 in the following terms:

“In 2018, 474,250 inciting posts against Palestinians were written. Legislation about the Nation-State Law was the main engine of racism for hate speech via Facebook. Palestinian politicians and Palestinians Citizens of Israel are most vulnerable to incitement.

[...]

In general, the rate of racism and hate online has increased since 2017 and an inciting post was published every 66 seconds in 2018 (up from every 71 seconds in 2017). In total, there were 474,250 posts that call for violence, racial profiling and insults against Palestinians (compared to 445,000 in 2017) published past year. From all of the posts about “Arabs,” 1 out of 10 contain an insult or an invitation to violence against Palestinians (in 2017 it was 1 out of 9).”⁹

⁸ For the full article, see: <https://bit.ly/2XXcuyD>.

⁹ 7amleh, “The Index of Racism and Incitement in Israeli Social Media 2018: An inciting post against Palestinians every 66 seconds” (11 March 2019), available at: <https://7amleh.org/2019/03/11/the-index-of-racism-and-incitement-in-israeli-social-media-2018-an-inciting-post-against-palestinians-every-66-seconds/>.



The impugned Facebook posts occur in the context of a shrinking space for civil society organisations working for Palestinian rights. Within this context, Palestinian, Israeli, and international non-governmental organisations, including human rights groups, are increasingly prevented from carrying out their work by the Israeli Government and other groups. In March 2016, Intelligence Minister Yisrael Katz advocated engaging in “targeted civil eliminations” of Palestinian civil society leaders with the help of Israeli intelligence, “using language that deliberately evoked the Hebrew term for ‘targeted assassinations’”.¹⁰

Al-Haq submits that the impugned Facebook posts that give rise to this appeal clearly contribute to this worrying and worsening climate of incitement against Palestinians, including human rights defenders and advocates.

3. Legal Framework

In 1993, the UN Commission on Human Rights adopted resolution 1993/45, providing that “the International Covenant on Civil and Political Rights states that any propaganda for war or any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence shall be prohibited by law”.¹¹ Notably, in paragraph 7 of the resolution, the Commission on Human Rights appealed to all States:

“to ensure respect and support for the rights of all persons who exercise the right to freedom of opinion and expression, the rights to freedom of thought, conscience and religion, peaceful assembly and association, and the right to take part in the conduct of public affairs, or who seek to promote and defend these rights and freedoms and where any persons have been detained, subjected to violence or threats of violence and to harassment, including persecution and intimidation, solely for exercising these rights as laid down in the Universal Declaration of Human Rights and, where applicable, the International Covenant on Civil and Political Rights, to take the appropriate

¹⁰ Michael Schaeffer Omer-Man, “Senior Israeli minister: Make BDS activists in Israel ‘pay a price’” (+972 Magazine, 16 June 2016), available at: <https://972mag.com/senior-israeli-minister-says-working-to-make-bds-activists-in-israel-pay-a-price/120084/>.

¹¹ UN Commission on Human Rights, Resolution 1993/45 on the right to freedom of opinion and expression, 5 March 1993, third preambular paragraph.



*steps to ensure the immediate cessation of these acts and to create the conditions under which these acts may be less liable to occur”.*¹²

Moreover, the UN Human Rights Committee considered in its General Comment No. 34 of 12 September 2011 on the freedoms of opinion and expression that “[t]he harassment, intimidation or stigmatization of a person... for reasons of the opinions they may hold, constitutes a violation of article 19, paragraph 1”¹³ of the International Covenant on Civil and Political Rights (ICCPR), which Israel, as State Party,¹⁴ must respect, protect, and fulfil in the OPT. In particular, the Human Rights Committee stressed in its General Comment that:

*“States parties should put in place effective measures to protect against attacks aimed at silencing those exercising their right to freedom of expression. Paragraph 3 [of Article 19] may never be invoked as a justification for the muzzling of any advocacy of multi-party democracy, democratic tenets and human rights. Nor, under any circumstance, can an attack on a person, because of the exercise of his or her freedom of opinion or expression, including such forms of attack as arbitrary arrest, torture, threats to life and killing, be compatible with article 19.”*¹⁵

As the General Director of an award-winning¹⁶ human rights organisation with longstanding commitment to the promotion and protection of human rights and the rule of law in the OPT, Al-

¹² *Ibid.*, para. 7.

¹³ UN Human Rights Committee, General Comment No. 34 on Article 19: Freedoms of opinion and expression, UN Doc. CCPR/C/GC/34, 12 September 2011, para. 9.

¹⁴ Israel ratified the ICCPR on 3 October 1991. *See* UN Treaty Collection, Chapter IV, ‘International Covenant on Civil and Political Rights’, New York, 16 December 1966, available at: https://treaties.un.org/Pages/ViewDetails.aspx?chapter=4&clang=en&mtdsg_no=IV-4&src=IND

¹⁵ UN Human Rights Committee, General Comment No. 34 on Article 19: Freedoms of opinion and expression, UN Doc. CCPR/C/GC/34, 12 September 2011, para. 23.

¹⁶ Al-Haq, “Human Rights groups Al-Haq and B’Tselem to receive the French Republic 2018 Human Rights Award” (5 December 2018), available at: <http://www.alhaq.org/advocacy/topics/human-rights-defenders/1330-human-rights-groups-al-haq-and-btselem-to-receive-the-french-republic-2018-human-rights-award>



Haq submits that Mr Jabarin, as well as other staff members of the organisation, meet the definition of human rights defender, with the protection that entails.¹⁷

In addition to violating international human rights law, Al-Haq submits that the impugned Facebook posts run counter to Facebook's own Community Standards,¹⁸ including *inter alia* the provisions that "content that might not be considered hate speech may still be removed for violating our bullying policies," Facebook's commitment to "removing content that encourages real-world harm", and to "remove language that incites or facilitates serious violence."¹⁹ Relevant extracts of Facebook's Community Standards are contained in **Annex II**.

4. Conclusions and Recommendations

Having regard to the provisions of the various mandates addressed in this communication, and considering any additional mandates that might be thought relevant to the issues raised in this joint urgent appeal, Al-Haq calls on the UN Special Procedures to urgently take the following steps in relation to the ongoing smear campaign and incitement to violence carried out by Israel's Ministry of Strategic Affairs against Al-Haq and its staff members on Facebook and other public platforms:

- i. Scrutinise Israel, as Occupying Power, and the manner in which it is acting, notably through its Ministry of Strategic Affairs, to smear human rights defenders and activists, restrict their work and the right to freedom of expression, among others, particularly online and on social media platforms;
- ii. Gather all relevant information, including by approaching Facebook directly, relating to the present alleged violation of the right to freedom of opinion and expression, in addition to discrimination against, threats or use of violence, and acts of harassment,

¹⁷ See, for example, UN Human Rights Council Resolution 31/32 on the protecting human rights defenders, whether individuals, groups or organs of society, addressing economic, social and cultural rights, UN Doc. A/HRC/RES/31/32, of 24 March 2016, which, *inter alia*, 'urges' at paragraph 4: "...all States to acknowledge in public statements at the national and local levels, and through laws, policies or programmes, the important and legitimate role of human rights defenders, including women human rights defenders, in the promotion of human rights, democracy and the rule of law in all areas of society, in urban and rural areas, as essential components of ensuring their recognition and protection, including those promoting and defending economic, social and cultural rights".

¹⁸ Facebook, Community Standards, available at: <https://www.facebook.com/communitystandards/>

¹⁹ *Ibid.*



persecution, or intimidation directed at Mr Shawan Jabarin and any other staff member of Al-Haq or its affiliates, who are seeking to exercise and promote the right to freedom of opinion and expression;

- iii. Communicate with Facebook to remind the company of its responsibilities to respect human rights and international law, as well as its responsibility to not provide a public platform for incitement, hate speech, discrimination, and death threats, especially against human rights defenders. The Special Procedures should seek information from Facebook as to why such posts and comments continue to be allowed and have not been removed or moderated in any way despite their violation of international human rights law standards, including the right to freedom of opinion and expression;
- iv. Make recommendations and provide suggestions on means to better promote and protect the rights to freedom of opinion, expression, and of association in all their manifestations, and in particular having regard to the role played by social media platforms and companies, such as Facebook, in the context of Israel's prolonged military occupation of the Palestinian territory;
- v. Contribute to the provision of technical assistance or advisory services by the Office of the UN High Commissioner for Human Rights to better promote and protect the right to freedom of opinion and expression in the OPT, including in relation to freedom of speech online;
- vi. Draw the attention of the Human Rights Council and the UN High Commissioner for Human Rights to the overall shrinking civil society space in the OPT and to the present violations of the right to freedom of opinion and expression, which is of particular serious concern; and
- vii. Report on the present instance, in which the abuse of the right of freedom of expression constitutes an act of discrimination, taking into account articles 19(3) and 20 of the ICCPR, and General Comment No. 15 of the Committee on the Elimination of All Forms of Racial Discrimination (CERD), which stipulates that the prohibition of the

Affiliate , International Commission of Jurists - Geneva فرع لجنة الحقوقيين الدولية ، جنيف
تتمتع الحق بصفة استشارية لدى المجلس الاقتصادي والاجتماعي في الأمم المتحدة
NGO in Consultative Status with the Economic and Social Council of the United Nations



AL - HAQ

dissemination of all ideas based upon racial superiority or hatred is compatible with the right to freedom of opinion and expression.²⁰

²⁰ CERD, General Comment No. 15 on Article 4 of the International Convention on the Elimination of All Forms of Racial Discrimination, 42nd session (1993), para. 4.

5. Annexes

Annex I: Impugned Facebook Posts and Comments

Post No.	URL	Date and Time
1	https://www.facebook.com/4IL.org/posts/2236892646621890	19 July 2019 at 9:00 am (local time)
2	https://www.facebook.com/4IL.org/posts/2236206106690544	17 July 2019 at 1:23 pm (local time)
3	https://www.facebook.com/4IL.org/posts/2234828366828318	15 July 2019 at 3:47 pm (local time)
4	https://www.facebook.com/4IL.org/posts/2234827600161728	15 July 2019 at 2:34 pm (local time)

Post 1:



4IL
 July 19 at 9:00 AM

השר לנושאים אסטרטגיים גלעד ארדן | Gilad Erdan בטוויטר: "השבוע חשפתי בפני הממשלה, ש'המחבל בחליפה' אבו מאזן, לא רק מסית לטרור, מממן ומנציח מחבלים, אלא שעכשיו הוא והרש"פ הידקו את התמיכה ב-BDS. אנטישמים כבר אמרנו?
 אז לכל מי שעדיין חי באשליות כדאי לצפות בכתבה וגם לשתף את האמת על ה'פרטנר' "
<https://www.mako.co.il/.../sec.../Article-85e86a2fa2efb61026.htm>

See Translation




MAKO.CO.IL

החדשות - כך הרשות משתפת פעולה עם ה-BDS
 "מחקר ישראלי חדש חושף: "חינוך והסתה לטרור

77

6 Comments 32 Shares


Post 2:

**4IL**
July 17 at 1:23 PM · ⚙




When groups like @hrw give a "well-deserved tribute" to @alhaq_org and their leaders who were senior officials in the PFLP, a designated terror organization, you have to wonder how they can call themselves a "human rights" NGO.

#TerroristsInSuits

<https://www.jns.org/human-rights-watch-gives-well-deserved.../>



JNS.ORG
Human Rights Watch gives 'well-deserved tribute' to PFLP figure's organization | JNS.org

 28

1 Comment 13 Shares

12

Post 3:

4IL

July 15 at 3:47 PM • ⚙

محبלים בחליפות: ארגון החרם הפלסטיני אל-חאק מציין 40 להיווסדו

הארגון הפלסטיני שמקדם חרמות נגד מדינת ישראל במסווה של ארגון זכויות אדם וזוכה למימון של מאות אלפי יורו מאירופה, מציין ארבעה עשורים של פעילות. בג"צ כינה את מנכ"ל הארגון, פעיל ארגון הטרור החזית העממית לשחרור פלסטין, שעאוון ג'ברין "ד"ר ג'ייקל ומיסטר הייד" וכתב בפסיקתו כי בחלק משעות פעילותו הוא מנהל של ארגון זכויות אדם ובחלק אחר הוא פעיל בארגון טרור"

See Translation



4IL.ORG.IL

מحبלים בחליפות: ארגון החרם הפלסטיני אל-חאק מציין 40
להיווסדו - 4IL - האתר הרשמי הצטרפו למאבק ב- BDS

1.2K

174 Comments 298 Shares

13

Post 4:



4IL

July 15 at 2:34 PM • ⚙

הכירו את שעוואן ג'בארין:

- פעיל בכיר לשעבר בארגון הטרור "החזית העממית לשחרור פלסטין"
- ריצה מספר עונשי מאסר בכלא הישראלי על מעורבותו בפעולות טרור ונגד ישראל והיה מעורב, בין היתר, בגיוס פעילים לאימונים מחוץ לישראל.
- בית המשפט העליון הגדיר את ג'בארין כ"ד"ר ג'ייקל ומיסטר הייד: "בחלק משעות פעילותו הוא מנהל של ארגון זכויות [אדם], ובחלק אחר הוא פעיל בארגון טרור שאינו בוחל במעשי רצח ובניסיונות לרצח"
- עומד בראש ארגון החרם על ישראל אל חק, ומעסיק בארגון פעילים נוספים של ארגון הטרור החזית העממית.
- הארגון המציין החודש 40 שנה לפעילותו, הוביל בין היתר את הקמפיין נגד חברת אורנג' בישראל; פועל נגד המערכת הבנקאית; ופועל נגד פרויקט תשתית בינלאומיים בישראל.

לכתבה המלאה: <https://bit.ly/2XXcuyD>

See Translation



👍👎😂 956

142 Comments 196 Shares

14

Annex II: relevant provisions of Facebook's community standards

The following provisions within Facebook's Community Standards are relevant to the question of whether the impugned posts should be taken down, the page suspended or warned, and/or comments on the posts removed. Al-Haq submits that the following provisions of Facebook's Community Standards are engaged and/or breached by the impugned Facebook posts:

"...content that might not be considered hate speech may still be removed for violating our bullying policies."

"Safety: People need to feel safe in order to build community. We are committed to removing content that encourages real-world harm, including (but not limited to) physical, financial, and emotional injury."

"We err on the side of allowing content, even when some find it objectionable, unless removing that content can prevent a specific harm. Moreover, at times we will allow content that might otherwise violate our standards if we feel that it is newsworthy, significant, or important to the public interest. We do this only after weighing the public interest value of the content against the risk of real-world harm."

"Everyone on Facebook plays a part in keeping the platform safe and respectful. We ask people to share responsibly and to let us know when they see something that may violate our Community Standards."

"...we may warn someone for a first violation, but if they continue to violate our policies, we may restrict their ability to post on Facebook or disable their profile."

"While we understand that people commonly express disdain or disagreement by threatening or calling for violence in non-serious ways, we remove language that incites or facilitates serious violence. We remove content, disable accounts, and work with law enforcement when we believe there is a genuine risk of physical harm or direct threats to public safety. We also try to consider the language and context in order to distinguish casual statements from content that constitutes a credible threat to public or personal safety. In



determining whether a threat is credible, we may also consider additional information like a person's public visibility and vulnerability.”

“Do not post [...] Content that asks or offers services for hire to kill others (for example, hitmen, mercenaries, assassins) or advocates for the use of a hitman, mercenary or assassin against a target.”

“[Do not post] Threats that lead to serious injury (mid-severity violence) towards private individuals, minor public figures, vulnerable persons, or vulnerable groups where threat is defined as any of the following:

- *Statements of intent to commit violence; or*
- *Statements advocating violence; or*
- *Calls for mid-severity violence including content where no target is specified but a symbol represents the target; or*
- *Aspirational or conditional statements to commit violence; or*
- *Content about other target(s) apart from private individuals, minor public figures, vulnerable persons, or vulnerable groups and any credible:*
 - *Statements of intent to commit violence; or*
 - *Calls for action of violence; or*
 - *Statements advocating for violence; or*
 - *Aspirational or conditional statements to commit violence”*

“[Do not post] Misinformation that contributes to imminent violence or physical harm.”

[9] “For public figures, we remove attacks that are severe as well as certain attacks where the public figure is directly tagged in the post or comment.”



[11] “We define hate speech as a direct attack on people based on what we call protected characteristics — race, ethnicity, national origin, religious affiliation, sexual orientation, caste, sex, gender, gender identity, and serious disease or disability.”

“Do not post:

Tier 1 attacks, which target a person or group of people who share one of the above-listed characteristics or immigration status (including all subsets except those described as having carried out violent crimes or sexual offenses), where attack is defined as

- Any violent speech or support in written or visual form
- Dehumanizing speech such as reference or comparison to:
 - Insects
 - Animals that are culturally perceived as intellectually or physically inferior
 - Filth, bacteria, disease and feces
 - Sexual predator
 - Subhumanity
 - Violent and sexual criminals
 - Other criminals (including but not limited to “thieves,” “bank robbers,” or saying “all [protected characteristic or quasi-protected characteristic] are ‘criminals’”)
- Mocking the concept, events or victims of hate crimes even if no real person is depicted in an image
- Designated dehumanizing comparisons in both written and visual form”



[12] *“We remove content that glorifies violence or celebrates the suffering or humiliation of others because it may create an environment that discourages participation.”*

[18] *“Reducing the spread of false news on Facebook is a responsibility that we take seriously. We also recognize that this is a challenging and sensitive issue. We want to help people stay informed without stifling productive public discourse. There is also a fine line between false news and satire or opinion. For these reasons, we don't remove false news from Facebook but instead, significantly reduce its distribution by showing it lower in the News Feed.”*

[Additional information:] *“We want our policies to be based on feedback from community representatives and a broad spectrum of the people who use our service, and we want to learn from and incorporate the advice of experts.”*

“the primary focus of our engagement is civil society organizations, activist groups, and thought leaders, in such areas as digital and civil rights, anti-discrimination, free speech, and human rights.”

“In addition, we sometimes convene group discussions, bringing together stakeholders in particular regions or specific policy areas. We've found the group setting to be useful for generating ideas and providing updates to multiple stakeholders.”

“When stakeholder views conflict, we analyze the spectrum of opinion and points of disagreement. We want to identify which views are most persuasive and instructive for us, but we're not necessarily trying to reconcile them; rather, our goal is to understand the full range of opinion concerning the proposal. In some cases we return to stakeholders for additional input as our thinking develops.”