



Received: 15 April 2025

Revised: 22 May 2025

Accepted: 22 May 2025

BEYOND CONSENSUS: QUALIFIED MAJORITY VOTING FOR HUMAN RIGHTS REFORM IN ASEAN

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(This article belongs to the Theme 1: Politics, Policies & Societal Development)

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Abstract

This academic paper examines the limitations of ASEAN's consensus-based approach in addressing human rights issues, despite the establishment of bodies like the ASEAN Intergovernmental Human Rights Commission (AICHR) and declarations such as the ASEAN Human Rights Declaration (AHRD). The reliance on unanimity prioritizes state sovereignty, allowing member states to hinder effective human rights protection. It analyzes the fundamental structures and principles of ASEAN and uses case studies like the Myanmar crisis and the Rohingya situation to highlight these weaknesses. Proposing a model influenced by the EU's double majority principle, this journal suggests that Qualified Majority Voting (QMV) be selectively adopted, particularly for human rights issues. Supported by Article 20(2) of the ASEAN Charter, this modification could strengthen mechanisms like the AICHR by permitting majority-approved investigations, improving the efficacy and responsiveness of ASEAN's human rights framework. It suggests that with the selective adoption of QMV, ASEAN could better fulfill its commitment to the dignity of its citizens while maintaining consensus on sensitive issues.

Keywords: ASEAN, Human Rights, Qualified Majority Voting, AICHR, Consensus

Citation Information: Limsiritong, N., & Sookhakich, P. (2025). Beyond Consensus: Qualified Majority Voting for Human Rights Reform in ASEAN. *Asian Political Science Review*, 9(1), Article 6. <https://doi.org/10.14456/aprs.2025.6>

Introduction

Since the military coup in 2021, the Myanmar junta has led a brutal campaign against civilians. The Assistance Association for Political Prisoners (AAPP) reports that at least 8,000 civilians have been killed, 26,244 people have been arbitrarily arrested, with 20,112 people still in detention (ASEAN Parliamentarians for Human Rights, 2024). These numbers represent the most significant and well-documented human rights crisis in ASEAN. ASEAN has been heavily criticized for its limited effectiveness, especially in handling crises like the Rohingya situation and the military coup in Myanmar, despite having established institutions and an ASEAN Charter aimed at protecting human rights (Office of the High Commissioner for Human Rights, 2023). According to this academic paper, the core challenge is found in ASEAN's traditional consensus-based or ASEAN Way for decision-making (Association of Southeast Asian Nations, n.d.).

This requirement for unanimity has its roots in the principles of sovereignty and non-interference. It allows any one member state to effectively block collective action on human rights issues, putting national interests first and possibly enabling authoritarian governments to breach regional norms (Wahyuningrum, 2024). The ASEAN Human Rights Declaration (AHRD) is non-binding, and the ASEAN Intergovernmental Commission on Human Rights (AICHR), which is frequently referred to as a toothless tiger, has institutional limitations because of this structural weakness (Sharom et al., 2015; Duxbury & Hsien-Li, 2016). To overcome these systemic jams and strengthen its commitment to human rights, the journal proposes that adopting Qualified Majority Voting (QMV) specifically on human rights matters is necessary. In contrast to European Union frameworks, QMV could improve the efficacy and responsiveness of ASEAN's human rights framework by removing the fixed unanimity requirement. This would allow for quicker action and possibly bring the bloc closer to international human rights principles (European Parliamentary Research Service, 2023; Office of the High Commissioner for Human Rights, 2023). This examination outlines the possible advantages and difficulties of implementing QMV, especially for the AICHR, and looks at the shortcomings of the current consensus model in the context of human rights.

Methodology

This academic paper is purely based on documentary and quantitative methods. For data sources, the authors cite various sources, including the ASEAN Charter, ASEAN Declaration, human rights documents, and other academic works and reports, suggesting their analysis is based on existing documentation and scholarship.

The structure and content of its journal involve six steps to consider through a descriptive approach. The first issue is the criticism of ASEAN's human rights protection. The consensus-based or ASEAN Way is recognized as the primary issue. Second, a study of the issue of how the consensus model, which is based on sovereignty and non-interference, runs as a structural obstruction. It focuses on specific problems like (1) the AICHR institutional limitations, (2) the AHRD non-binding nature, and (3) how consensus enables authoritarian governments to violate norms and block enforcement. Thirdly, the consensus principle blocks ASEAN's ability to address these issues and results in inaction. This can be seen through case studies that present human rights crises such as the Rohingya situation and the military coup in Myanmar. Fourth, a potential solution proposal that addresses the possible advantages and difficulties of implementing QMV, including improved effectiveness, responsiveness, overcoming non-interference, strengthening human rights mechanisms, sovereignty, and dealing with political diversity among member states. Finally, a conclusion and recommendation that highlight the limitations of the current consensus model for 21st-century human rights issues and suggest that QMV be adopted selectively for some human rights issues while maintaining consensus for others.

The conclusions reach through a critical examination of the fundamental structures and views of ASEAN, their practical implementation particularly during times of crisis, and a comparative viewpoint based on the EU's decision-making procedures.

Key Challenges to ASEAN's Human Rights Framework

The Institutional Limitations of the ASEAN Intergovernmental Human Rights Commission (AICHR)

The AICHR was established in 2009 as ASEAN's principal human rights body as stated in Article 14(1) of the ASEAN Charter (Association of Southeast Asian Nations, 2015). The establishment of AICHR shows ASEAN's commitment to strengthening regional human rights engagement. The main objective of the AICHR is to promote and protect human rights in ASEAN (ASEAN Secretariat, 2017). However, the AICHR is criticized as the toothless tiger due to their limited ability to protect human rights in ASEAN (Sharom et al., 2015). According to Article 7 of the ASEAN Charter, the AICHR is designed to protect ASEAN's human rights, with the limitation of checking and balancing against the ASEAN Summit's order in all human rights circumstances (Association of Southeast Asian Nations, 2015). It also shows how consensus affects institutional weakness. Because of the consensus-based decision-making mode, the body lacks investigatory abilities, a mandate for individual complaints, and enforcement authority. It is composed of state-appointed members rather than independent experts. During the Rohingya crisis, Myanmar's veto blocked the AICHR from issuing condemnations or coordinating cross-border humanitarian aid, reducing the body to a passive observer (Duxbury & Hsien-Li, 2016). The requirement for unanimous decisions ensures that even basic fact-finding missions require consensus, which enables political interference in appointments.

The Non-Binding Nature of the ASEAN Human Rights Declaration (AHRD)

After ASEAN leaders adopted the AHRD in 2012, 55 prominent organizations related to human rights issued a powerful statement which said that "The people of ASEAN should never accept a lower level of protection of their human rights than the rest of the world.... This Declaration is not worthy of its name. We therefore reject it. We will not use it in our work as groups engaged in the protection of human rights in the region. We will not invoke it in addressing ASEAN or ASEAN member states, except to condemn it as an anti-human rights instrument. We will continue to rely on international human rights law and standards, which, unlike the ASEAN Human Rights Declaration, provide all individuals, groups and peoples in ASEAN with the freedoms and protections to which they are entitled.", this statement powerfully captures the demand for universal human rights standards in ASEAN and the rejection of any regional human rights framework that falls short (Human Rights Watch, 2012). However, the AHRD's adoption in 2012 showed the inherent compromises of consensus-driven norm-setting (Association of Southeast Asian Nations, 2013). It clearly states civil, political, economic, social, and cultural rights in the ASEAN region, which was used by governments like Vietnam and Brunei to justify restrictions on free assembly and LGBT+ rights. Indonesia and the Philippines took these measures at first but finally accepted them to ensure unanimity. It shows how consensus determines that progressive states accept diluted standards (Wahyuningrum, 2024).

In short, it confirms the commitment of ASEAN member states to international human rights documents such as the Universal Declaration of Human Rights (UDHR) (Durmaz, 2023). Nevertheless, just as the UDHR, it is a non-binding status that further reflects ASEAN's unwillingness to yield sovereignty. Unlike the European Convention on Human Rights (ECHR), which establishes enforceable legal obligations, the AHRD operates as a voluntary guideline (Duxbury & Hsien-Li, 2016).

The Failures of Consensus in ASEAN's Human Rights

ASEAN Consensus

The current decision-making process in ASEAN is ASEAN consensus, which is mentioned under Article 20 of the ASEAN Charter (Association of Southeast Asian Nations, 2015). Since the 1967 Bangkok Declaration and then written in the ASEAN Charter, ASEAN's founding principles, which are sovereignty, non-interference, and quiet diplomacy, take first priority. These ideas came straight from the postcolonial context of the area where recently independent nations attempted to avoid internal conflict and outside influence. The consensus process consists of consultations (*musyawarah*) meant to harmonize opposing points of view. Consensus models developed into institutionalized protection against majority rule. This means all member states must agree, which disproportionately empowers smaller states to use veto rights and will lead to slow processes, lowest common denominator effect, and deadlocks, especially in contentious issues like the South China Sea disputes (Lee & Sims, 2024; Suzuki, 2021; Limsiritong et al., 2019). Unlike most voting systems, ASEAN's consensus avoids official vetoes but requires *de facto* unanimity (Limsiritong & Sookhakich, 2023; Koh et al., 2009).

The AICHR mainly serves as a symbolic body due to its present consensus-based decision-making requirement under Article 20 of the ASEAN Charter, because it lacks investigative authority and functions under requirements that require consensus among member states (Duxbury & Hsien-Li, 2016; Singapore Institute of International Affairs, 2014).

There are many human rights cases that ASEAN has failed to address. Two collective failure case studies such as the Myanmar and Rohingya situations of crisis, will be picked to show how consensus negatively impacts ASEAN's human rights issues.

The Myanmar Crisis and the Failed Five-Point Consensus

In 2021, the junta takeover of Myanmar was the most serious test of ASEAN's human rights crisis management. Since the fall of Aung San Suu Kyi's government, the junta has cemented control through common violence such as forced displacement, purposeful denial of humanitarian help, and mass executions against civilians. Over 17,500 arbitrary arrests and 2,940 reported deaths occurred between February 2021 and January 2023. Over 1.5 million people had been forced out by military bombings and village burnings in March 2023. To respond to its human rights situation, the ASEAN Five-Point Consensus (5PC) was first adopted to propose inclusive dialogue and an end to violence. Nevertheless, because of the junta's refusal to cooperate and ASEAN's inability to enforce compliance due to the ASEAN principle, it does not particularly denounce them (Office of the High Commissioner for Human Rights, 2023; Limsiritong, 2017). Stronger measures were demanded by Indonesia and Malaysia, but actions considered to be breaching sovereignty were rejected by Cambodia and Thailand. The subsequent deadlock blocked the 5PC from being implemented and showed that consensus was an obstacle to prompt action (Xie, 2025).

Rohingya Crisis

As previously said and as demonstrated by the Myanmar crisis, the consensus principle allows governments to safeguard domestic political systems without external inquiry. During the Rohingya crisis, Myanmar referred to the non-interference principle to deny regional criticism while ASEAN kept silent on its issues (Xie, 2025; Limsiritong, 2018). This dynamic shows how consensus functions, remaining in harmony while avoiding difficult issues.

Advantages and Challenges of ASEAN's Decision to Replace Consensus with QMV

QMV Model for ASEAN

Compared to the EU system, Qualified Majority Voting (QMV) runs on the basis of the double majority principle. It requires both a majority of member states and a majority representing the

population of the EU. This system differs significantly from consensus, which gives any one member state veto power. Statistical reviews of EU legislation since the Treaty of Lisbon show that QMV reduces the delay in making decisions by approximately 383% compared to consensus (European Parliamentary Research Service, 2023). Following the example of the Organization for Security and Cooperation in Europe (OSCE), it uses majority voting in its human dimension mechanisms, and the Office for Democratic Institutions and Human Rights (ODIHR) conducts election monitoring without host-state consent if a majority of 57 member states approve (Ramcharan, 2010).

Therefore, a possible QMV model for ASEAN could require two thresholds, which are (1) population weighted majority (60% of ASEAN's 690 million people) and (2) geographic equity (approval from at least six member states to limit dominance by Indonesia's 43% population share). This system would mirror the EU's double majority principle while adapting ASEAN's diversity. Sensitive issues such as territorial disputes may continue to be decided unanimously, but human rights sanctions, AICHR mandates, and treaty ratifications related to human rights issues will be decided by QMV. Moreover, Article 20(2) of the ASEAN Charter stated that "where consensus cannot be achieved, the ASEAN Summit may decide how a specific decision can be made", which means that the ASEAN Charter allows for the replacement of consensus with QMV (Association of Southeast Asian Nations, 2015).

But because it directly questioned the core ASEAN principle of non-interference and the veto power of a single member state, this proposed QMV approach would have an impact on the balance of power within ASEAN. If voting weights are solely based on population, adopting the QMV approach would give larger member nations like Vietnam or Indonesia more influence. In order to prevent smaller member nations like Laos or Cambodia from abusing their power, it will be important to take into account both geographic equality and population-weighted majority. Furthermore, unless there is a certain advantage, QMV may encounter opposition due to ASEAN's non-interference and sovereignty principles, which have caused member nations to protect their sovereignty. As discussed later in the advantages and disadvantages of changing from consensus to QMV, the difficulty is in finding a balance between efficiency and equality.

Advantages of Replacing Consensus with QMV

There are three main advantages to replacing consensus with QMV: (1) enhanced effectiveness and responsiveness, (2) overruling non-interference and reduced veto power, and (3) a strengthened human rights mechanism.

1) Enhanced Effectiveness and Responsiveness: To enhance effectiveness and responsiveness, QMV may facilitate responses to human rights crises more quickly. It could get beyond these obstacles by permitting alliances of willing states to forward policies without full consensus. For example, QMV achieved through constructive abstention, even with five states' non-recognition of Kosovo, the 2008 deployment of the EULEX Kosovo mission shows how flexible voting systems allow action despite distinctions (European Parliamentary Research Service, 2023; Office of the High Commissioner for Human Rights, 2023). Applied to Myanmar, QMV may enable sectoral sanctions, International Criminal Court (ICC) referrals, or coordinated prohibitions on arms even in cases of disagreement with states' abstentions. Importantly, the threat of being outvoted would encourage unwilling members to negotiate compromises instead of completely rejecting proposals. With the MQV model, even if unanimity defends national sovereignty, the EU can turn its foreign policy instruments into a flexible force for human rights protection by implementing safeguards against abuse, as shown in previous success cases in Russia and Kosovo (Office of the High Commissioner for Human Rights, 2023).

2) Overruling Non-Interference and Reduced Veto Power: To overrule non-interference and reduce veto power, QMV would prevent a single member state from blocking collective action. With double majority thresholds under Article 16(4) of the Treaty on European Union, QMV mandates two concurrent majorities such as (1) a state-based majority which is 55% of EU member states (15 of 27), and (2) a population-based majority which is 65% of the EU's total population. This double requirement ensures that decisions by the QMV could reflect on both territorial representation and demographic weight.

The key system is a blocking minority threshold, which is an essential part of the system because it requires opposition from at least four member states or more than 35% of the EU's population to block its adoption. For example, Malta, which has a 0.09% population share, cannot prevent a commission proposal from being adopted unless three other states also oppose it (Council of the European Union, 2024).

Applying to ASEAN, with major economies like Vietnam and Indonesia not supporting the junta, a coalition comprising 65% of ASEAN's population could have isolated Myanmar under QMV. Rather than requiring consensus, a single regime was able to prevent regional action, which encouraged more crimes against humanity.

3) Strengthened Human Rights Mechanism: To strengthen human rights mechanisms, the AICHR currently lacks independent investigative powers. The QMV can lead to better enforcement of human rights standards for ASEAN by allowing majority-approved investigations into systemic abuses, such as independent investigations as seen in the UN Human Rights Council's Universal Periodic Review (UPR) process and adopting binding resolutions (Duxbury & Hsien-Li, 2016). So when ASEAN carefully amends implementing QMV, it could emerge as a vital tool for translating universal rights into enforceable standards.

Challenges of ASEAN Against QMV

There are two key challenges of ASEAN against QMV such as (1) sovereignty concerns and (2) political diversity.

1) Sovereignty Concerns: Since ASEAN's consensus-based decision-making model (sometimes referred to as the "ASEAN Way bloc") has long been a defining characteristic of the region, QMV could violate the national sovereignty principle under Article 2 of the ASEAN Charter. This norm is based on the ideas of non-interference and consensus-building, and it also reflects the organization's need to adapt to its highly diverse political environments. However, Article 1(7) of the ASEAN Charter also obligates states to "strengthen democracy, enhance good governance and the rule of law, and promote and protect human rights" (Association of Southeast Asian Nations, 2013). Hence, QMV aligns with these goals by preventing a single state from vetoing collective commitments.

2) Political Diversity: ASEAN consists of member states that have different political backgrounds. Cambodia, Malaysia, and Thailand are constitutional monarchies. Myanmar is a military government. Vietnam and Laos are single-party states. Indonesia and the Philippines are democratic systems. This political diversity is the main reason why a decision-making model under the ASEAN Charter could not be set against any regime type. For example, Indonesia's democratic framework could be more open to human rights mechanisms, whereas Myanmar gives a first priority to non-interference to protect its human rights record. As seen in the Rohingya crisis, ASEAN members showed their collective silence to set standards for internal interference, while Myanmar used non-interference to avoid regional criticism (Xie, 2025).

Conclusion and Recommendation

To summarize, ASEAN's consensus model is still essential for handling its sovereignty concerns and political diversity because it strikes a good balance between democratic and authoritarian systems of government. However, it is clear that ASEAN's consensus principle

was created for a post-colonial community, and it is not fit for the purpose of handling human rights challenges in the 21st century because it creates systemic risks of inaction and systemic jams.

By limiting consensus to areas that are sensitive to sovereignty, QMV would replace consensus without eliminating it and release human rights governance from hostage situations. While treaty amendments and territorial integrity remain on the consensus principle, a reformed ASEAN could only adopt QMV on human rights sanctions, AICHR investigations, and rights declarations.

By reforming AICHR, ASEAN can fulfil its charter mandate due to this model, which strikes a balance between efficiency and sovereignty. All these adjustments would guarantee ASEAN to continue existence as a diplomatic system and protector of the dignity of its citizens as it claimed under Article 1 of the AHRD that “All persons are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of humanity”.

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Data Availability Statement: The raw data supporting the conclusions of this article will be made available by the authors, without undue reservation.

Conflicts of Interest: The authors declare that the research was conducted in the absence of any commercial or financial relationships that could be construed as a potential conflict of interest.

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