

Mr. _____

Chairman, Committee on Economic, Social and Cultural Rights
Office of the High Commissioner for Human Rights
Geneva

__ 2019

Honorable Chairman,

Re: Comments by the State of Israel to the Concluding Observations of the Committee on Economic, Social and Cultural Rights (E/C.12/ISR/CO/R.4)

1. The Permanent Mission of Israel in Geneva wishes to refer to the Concluding Observations of the Committee on Economic, Social and Cultural rights on the fourth periodic report of Israel, dated 18 October 2019.
2. The State of Israel would reiterate its profound regret regarding the text of the concluding observations as presented in document E/C.12/ISR/CO/4 which systematically ignore the extensive and detailed information provided by the State of Israel, not only in its report and response to the List of Issues (hereon: LOI), but also in its very detailed sessions held before the Committee on October 2-3, 2019.
3. Although these recommendations and observations have already been adopted, Israel requests to set the record straight regarding the inaccurate and misleading data included in the document. We would like to emphasize that in this paper Israel does not intend to submit a new report with new information, but rather would like to remind the Committee that this information was presented in writing and orally, and nonetheless, regrettably was not reflected in the Committee's Concluding Observation.
4. Israel notes the Committee's two comments regarding the positive aspects of the efforts made by Israel in promoting implementation of economic, social and cultural rights. Nevertheless, we would like to note many other positive aspects in Israel's report and response to the LOI, which were presented by the delegation during the session on October 2-3, 2019 and were regrettably ignored by the Committee, such as:

in the legislation field: the *Prohibition of Consumption of Prostitution Services Law*, the *Installation of Cameras for the Protection of Toddlers in Day Care Centers*, the *Compensation for Termination of Employment Law*. In addition, the ratification of the 2014 Protocol to the International Labor Organizations (ILO) Forced Labor Convention of 1930, the ratification of several bilateral agreements regarding the recruitment of foreign workers. Moreover, the committee did not mention the three (3) new national human rights institutions established in the recent years, in addition to the existing mechanisms: The Children's and Youth Complaints Commission for Out-of-home Placed Children, The Early Childhood Council and The Unit for the Coordination of the Fight Against Racism.

5. The Committee ignored the work carried out by the Government to promote the eastern neighborhoods of Jerusalem. For example, no mention was made of Government Resolution No. 3790 which aims to reduce social and economic gaps and to promote economic development of the eastern neighborhoods of Jerusalem, projects in the field of Labor and Social Services (such as services for the LGBT population, the Bedouin society in the Negev, etc.) and in the field of health services brought before the Committee were also completely overlooked, despite being presented at length.
6. **The Concluding Observations demonstrate an unfortunate pattern of ignoring positive developments in Israel. In fact, the blunt disregard by the Committee of the Israeli presentation to the Committee raises serious questions as to the value of the entire exercise, in particular, given the enormous intergovernmental efforts invested in this matter.**
7. **Please note that while we are outlining here only our major concerns, the focus on these specific paragraphs does not change Israel's overall strong reservation regarding the Concluding Observations, as detailed in our letter dated 20 October 2019 and above.**
8. Paragraphs 6-7 - The Committee reiterated its previous recommendations that Israel incorporate the rights of the Covenant in its domestic legal order. Although the rights in the Covenant were not directly adopted into Israeli legislation, the fundamental rights protected by the Covenant are effectively protected through legislation, judicial

decisions and otherwise.

9. Furthermore, the Committee ignored the information regarding the training on the implementation of Human Right Conventions taking place in many Government authorities, as detailed in the fourth periodic report.
10. Paragraph 8 - The Committee stated its regrets that the State party refuses to report in relation to the "occupied territories". However, the observations failed to acknowledge that the Israeli delegation reported orally and extensively, replying to all the questions presented regarding the West Bank. These comments were provided, despite Israel's principled opposition to the applicability of the Convention in the West Bank and Gaza. It should be noted that extensive information was presented regarding the allocation of powers and responsibilities between Israel and the Palestinian Authority with regard to the rights mentioned by the Convention (in areas such as health, education, etc.), to highlight but a few:
 - a. Hamas and other terrorist organizations have been waging an ongoing armed conflict against Israel using various means, such as suicide bombings in Israeli population centers, tens of thousands of rockets and mortars launched from Gaza into Israel, cross-border assault tunnels reaching from Gaza into Israel, and various cross-border attacks, to attack both Israeli security forces and the civilian population. The committee has completely disregarded this situation, gave no weight to the military necessities it dictates, and ignored its legal ramifications.
 - b. The committee has also disregarded the many responsibilities transferred in the Interim Agreement to the Palestinian side – both in Gaza and in the West Bank - and the fact that the Gaza Strip has not been under Israeli control since September 12, 2005 when Hamas violently took over the Gaza Strip.
 - c. As a result, the situation on the ground described by the committee, on issues concerning Gaza and the West Bank, as well as the committee's legal conclusions, is unfounded and biased.
 - d. The issues mentioned in Paragraphs 10, 11, 44, 45, 50, 51, 58, 59, 64, 65, 66 and 67 were all addressed orally; unfortunately, the committee neglected to

include those references in its concluding observations.

11. Paragraphs 18-19 - The Committee stated that the State of Israel lacks comprehensive anti-discrimination legislation. As was stated in the response to the LOI, equality before the law and non-discrimination are basic principles of Israel's legal system. *The Basic Law: Human Dignity and Liberty* 5752-1992, serves as a foundation for prohibiting discrimination and as a guiding principle for the creation of new laws promoting equality.
12. Paragraph 20(a) - Note that any person with legal claims for a land in question may bring his/her claims before the courts and prove his/her rights to the land. In all the legal proceedings held thus far regarding ownership claims of Bedouins, the various courts specifically ruled that the lands in question are "Mawat" lands in which the Bedouins have no ownership rights. Despite this, the Government decided to take a pragmatic approach, and has been taking measures to solve the Bedouin housing situation within the Negev. In recent years the Government has accelerated the developments of land in which there is no ownership claim or link to families from the Bedouin community, and has advanced the development of 100,000 housing units for Bedouin residents in the Negev.
13. Paragraph 20(b) – despite the claim of lack of participation, during the drafting of the Government Resolution No. 2397 mentioned above, Government representatives conducted many meetings with the leaders of the Bedouin localities, business entrepreneurs, social activists and the general public. These meetings had a strong impact on the drafting of the Plan. Additionally, Section 13c of Government Resolution No. 2397 establishes a monitoring Committee for the implementation of the Plan; the committee includes all the leaders of the Bedouin localities as well as three (3) representatives of the Bedouin public.
14. Paragraph 20(c) - in relation to evictions of unrecognized villages, the Government facilitates the regulation of the housing for Bedouins with land ownership claims retaining to the land they are residing on, without obligating the withdrawal of their ownership claim, so long as that land is part of a recognized village. Additionally, the Government is acting to expand the recognized villages, for the purpose of regulating the unauthorized villages, in their current location, as part of the expansion of the

recognized villages.

15. Paragraphs 22-23 - As detailed by the delegation during the session, the Population and Immigration Authority (hereinafter: PIA) has been working on changing its procedure regarding the ability of Eritrean and Sudanese asylum seekers to work. We are pleased to update the Committee that on October 10, 2019, the PIA notified that Sudanese citizens who entered Israel illegally through the Egyptian Border will receive temporary residence permits pursuant to Section 2(a)(5) of the *Entry into Israel Law* for a period of one (1) year at a time. Sudanese citizens holding a B/1 visa (temporary employment permit), will receive it for a period of one (1) year at a time. Persons from Darfur, the Blue Nile and the Nuba Mountains will receive temporary residence permits pursuant to Section 2(a)(5) of the law, and the previous notification in their passports will be deleted. Eritrean citizens who entered Israel illegally through the Egyptian Border will receive temporary residence permits pursuant to Section 2(a)(5) of the *Entry into Israel Law* for a period of six (6) months each time and the previous notification in their passports will be deleted. Eritrean citizens holding a B/1 visa (temporary employment permit) will receive it for a period of six (6) months at a time. The updated permits will be issued at the time of renewal of the existing permits.
16. Paragraph 24 - As detailed by the delegation during the session and in the response to the LOI, the Government strives to increase the rate and quality of employment of diverse populations by integrating them into the labor market. The Government has set specific goals to increase the percentage of labor participation of Israeli Arabs, persons with disabilities, Jews of Ethiopian descent, welfare populations, people aged 45+, single parents, Bedouins, ultra-Orthodox Jews and youth at risk. Many of these efforts are already bearing fruit in terms of a rise in labor force participation. This policy is implemented through 47 innovative programs and activities, provided in employment centers nationwide. These include, for example, integrating Arab academics into knowledge-intensive industries, integrating students with disabilities, promoting women in the high-tech field, professional technology education for people with disabilities, the integration of ultra-Orthodox people and more. Over 100 thousand individuals take part in the activities provided by the Diversity in Employment Administration.

17. Paragraph 26 - as was presented during the Committee's discussion, the Ministry of Labor Social Affairs and Social Services (hereon: MoLSAaSS) made special efforts to reduce occupational injuries and fatalities by strengthening labor inspections and through effective enforcement. There are over 14,000 construction sites in Israel and the Ministry is currently implementing a new policy to improve oversight. In recent years there have been substantial improvements in the efforts to reduce occupational injuries and fatalities, and Israel encourages the Committee to take note of the efforts and the significant progress already done, among them: Adding enforcement tools (such as sanctions and the shutting down of sites for an unlimited period until the safety hazards have been fully repaired), mandatory use of EU standard scaffolding, establishment of a joint investigative unit with the Police (enforcement activity which brought about the first arrest of a contractor involved in these type of offenses).
18. Paragraph 28 – The Israeli Government ensures that the rights of migrant workers are protected, and the relevant regulatory framework was presented in the response to the LOI. Israel presented the various platforms available in case of migrant worker complaints, tools which assist vulnerable populations in protecting their employment rights (The Ombudswoman for foreign worker rights, the Authority for Regulation and Enforcement of Labor rights, Labor courts and NGOs). Accessible guidance regarding labor rights and the ways in which the employees can complain in cases in which their rights were infringed – these tools are already in place. Pro-active enforcement procedures are carried out by the inspectors of the PIA and the MoLSAaSS. The inspections ensure the protection of rights and legal obligations of the employers within their enforcement authority.
19. Furthermore, under a bilateral agreement signed in 2019, and as per negotiations underway concerning signing of additional agreements, by the end of 2020, all recruitment for employment of foreign live-in caregivers is to be carried out in the framework of agreements between Israel and sending countries, whose provisions are based on relevant legal standards, to protect the rights of such caregivers. In addition, as per the agreements, live-in foreign caregivers will receive rights booklets and have access to a special Government Call Center in their languages for questions and for filing complaints. The above call center will exist in addition to the current system, which requires constant supervision of the employment of foreign live-in caregivers

by social workers (employed by licensed, bonded recruitment agencies in Israel) under supervision of relevant Israeli authorities, which carry out criminal and administrative supervision and investigation of such. In addition, the Ombudsman for foreign worker rights in the MoLSAaSS will continue to respond to complaints from such caregivers.

20. Paragraph 32 - As addressed during the last session, we are not aware of any legal barriers to employees from this district that want to unionize and be part of a trade union. In order to strengthen employees' awareness of their rights, the Histadrut, the large organization of workers in Israel, is taking measures including publishing accessible information in Arabic, distributing Arabic-language publicity material through social media and various campaigns to raise awareness of their rights. The employees living in the Golan Heights have access to the Labor Courts and can file a complaint in case of any violation of their rights.
21. Paragraphs 34-35 - Regarding the retirement age and the information on the coverage and level of social security benefits - In its fourth report, the State submitted comprehensive information in this issue, please see pages 15-17 to the fourth periodic report and its annexes.
22. Paragraphs 36-37 - As explained in the LOI and by the delegation in its review, the State has been working on this issue. There is a Government bill, with specific reference to the best interest of the child principle, regarding the *Capacity and Guardianship (Amendment - Change of the Tender Years Presumption)* and the Knesset was dispersed before the legislation was finalized.
23. Paragraphs 40-41 - regarding the Citizenship and Entry into Israel Law (Temporary Order), as reported in the LOI, the possibility of family reunification remains available in accordance with the law, the PIA procedures and lack of security preventions. In addition, the possibility of family reunification remains available in the West Bank. Regarding cases of divorce or the death of the Israeli spouse - we would like to clarify that in certain circumstances Israel allows for spouses whose family unification process ended to apply to the committee in order to continue residing in Israel and such requests may be approved, where there is no prevention for humanitarian reasons.

24. Paragraphs 42-43 - Regarding general poverty in the State party - As this issue was not raised by the Committee during the sessions, the state delegation had no opportunity to provide further information, and we will provide it in this document. A review of the most recent Organization of Economic Cooperation and Development's (OECD) data (accessed on October 31, 2019 at <https://data.oecd.org/inequality/income-inequality.htm>) indicates that the Committee's assertion regarding Israel's allegedly having the highest level of income inequality in the OECD is incorrect.
25. According to the latest data available for the 36 OECD member countries, Israel has the 10th highest Gini coefficient for income inequality (0.344), meaning that there are nine (9) countries with higher levels of income inequality within the OECD.
26. The State has conducted multiple comprehensive analyses of the underlying causes of poverty, and the Government's counter-poverty efforts involve programs and policies operated by an array of Ministries. These analyses have been both statistical and qualitative in nature.
27. The MoLSAaSS operates an array of programs to alleviate economic hardship while providing individuals with the tools they need to remove themselves from the cycle of poverty. According to the model of "poverty-based social work" developed by the Ministry, designated social workers are encouraged to build close and beneficial relationships with those receiving assistance, accompany them through their struggles, assist them in exhausting their rights, and provide them with psychosocial and material support. The Ministry's Families First program and its "Otzma Centers" focus assisted disadvantaged families from across 103 local authorities in 2019, at a total cost of 103 Million NIS (approximately 29.2 Million USD). Among the beneficiary localities are 12 Bedouin localities, 13 Druze localities, three (3) cities with a significant ultra-Orthodox population, seven (7) mixed Jewish and Arab cities, and 30 localities with a Muslim population, two (2) with a Christian population and 28 other localities with a mainly Jewish population. Of the 2,818 families that participated in the Families First program in 2018, 1,340 families were Muslim, 186 Bedouin, 202 Druze, and 537 ultra-Orthodox.
28. The Ministry also operates several programs that provide material support to families

suffering from poverty, including its "National Initiative for Food Security" which distributes aid packages worth 500 NIS (140 USD) per month through preloaded cards to impoverished families across 46 localities in Israel. The project, which is run in collaboration with the "Amutat Eshel Jerusalem" civil society association, is designed to help participants to break the cycle of poverty and to earn a decent income through the welfare and support system, which serves as their "safety net". The Ministry allocated 48 Million NIS (13.7 Million USD) to fund the project from January 2017 to December 2019, matching the budget provided by "Amutat Eshel Jerusalem". The initiative supports 36 Jewish and 10 Arab localities, benefitting a total of 80,000 individuals across over 10,000 families. Seventy nine percent of the 45,000 children who benefit from the program come from Jewish families, while 21% come from Arab families, which is proportionate to the size of these populations within the general population.

29. Regarding the Bedouin population specifically, on September 15th 2019, local social service departments were opened in four (4) recently-recognized villages of the Bedouin population (Abu Qrenat, Hawashla, Abu Talul, Bir Hadaj). Each center is operated by a team of social workers four (4) days a week, providing services to the village's population and others based nearby. Members of the Bedouin population living in unrecognized villages receive social services from two (2) regional councils (Al Kasum and Neve Midbar) which are located in Be'er-Sheva but which provide services from five (5) vans staffed with social workers. Most of these social workers are Arabic speakers, and in the rare cases of those who are not, translators are available. The service is fully financed by the MoLSAaSS.
30. Paragraph 46 - there is reasonable access to water to all the Negev population, including the unrecognized villages. As explained in the LOI, the Israeli Supreme Court has ruled that when the residence of an illegal infrastructure requests to be directly connected to water, the State may refuse this request due to the illegality of their housing situation. This is especially true in the event that the State is offering alternative legal housing with these necessities easily available. In any event, the State must ensure reasonable accessibility to water services, even for unauthorized housing, as it does with regards to the unauthorized villages (C.A. 9535/06, *Abdullah Abu Musa'ed, et. al. v. The Water Commissioner et. al.* (5.6.11)).

31. Paragraphs 48-49 - as expanded during the session before the Committee, a more general distinction is made between the homeless population and street-dwellers. The homeless population is constituted by individuals whose main problem is inaccessibility to housing and that are asking the state for help with this matter. Street-dwellers are individuals whose homelessness is symptomatic of a larger functional problem, or usually a cluster of problems, including deep poverty, social alienation or disconnection from support networks, drug addiction, and mental illness. In this context, even if this population were to be given an apartment, there would still remain numerous psychological and social issues in need of treatment.
32. Through its departments based in the local authorities, the MoLSAaSS takes proactive measures to locate street dwellers and treat this population in accordance with the Social Workers Regulations.
33. The Ministry's work with street-dwellers involves taking them off the street, providing them with intensive rehabilitative treatments to improve their mental and physical health, and assisting them to have their situation recognized by all relevant state institutions in order to exercise their rights and benefit from all available state programs. As a result of these efforts, they receive a rehabilitative basket of services from the Ministry of Health, housing assistance from the Ministry of Housing, social security income and psycho-social care by the MoLSAaSS.
34. In order to identify and treat this vulnerably population, the Ministry operates 16 urban ambulatory units, 12 primary-care shelters, and six (6) hostels for long-term, boarding conditions. In 2018, it treated 1,825 Street dwellers, out of whom 227 were integrated into occupational rehabilitation programs and 638 are in independent housing while receiving financial aid from the Ministry of Housing. The budget approved in 2018 for the Ministry's treatment of street dwellers was NIS 16,576,000 (approximately 4.74 Million USD).
35. Paragraph 54 - as previously expanded both in writing during the session before the Committee, Israel enjoys an extremely high annual growth in GDP, much higher than the OECD average, meaning the nominal growth in public health expenses reaches a rate between 3 and 4 percent a year. Israel is a young society and the percentage of population 65+ is amongst the lowest in the OECD, which influences required

investment levels. As mentioned, Israel is increasing its investment by more than 500 Million NIS (147 Million USD) a year in new medications and technologies. The Israeli basket of covered health services and medications is one of the broadest and most comprehensive publicly accessible health schemes among OECD countries. As such, Israel achieves very high results across all health indicators and according to various international ranks such as Bloomberg, Israel is of the 10 most efficient healthcare systems in the world. Additionally, recent data published by the OECD indicates Israeli rise in USD PPP per capita expenditure on health is greater than the OECD average. (please see: https://www.oecd-ilibrary.org/sites/4dd50c09-en/1/2/7/1/index.html?itemId=/content/publication/4dd50c09-en&mimeType=text/html&csp_=82587932df7c06a6a3f9dab95304095d&itemIGO=oecd&itemContentType=book#figure-d1e104).

36. Regarding the claim of extended waiting times, Israel has some of the shortest waiting times for procedures and elective surgeries in the world. Six (6) years ago, the Ministry of Health (MoH) implemented a project to shorten waiting times with an investment of about 700 Million NIS (205 Million USD). As such, the waiting times have decreased both in the hospital system as well as in community care.
37. As submitted to the Committee in writing and stated during the session, at the Israeli delegation's hearing with the Committee, Antimicrobial resistance and hospital-based infections are a major topic in Israel. As such, the MoH has implemented a national project for preventing outbreaks and an office in charge of this subject. The programs have led to the decrease of infections and increase in public awareness. This is one of the most successful programs in the world.
38. The claim of the Committee that the Arab demographic in Israel does not receive sufficient healthcare is blatantly false. The MoH has put disproportionately higher levels of investment into the Arab population than any other, resulting in the most dramatic, positive change in health indicators anywhere in Israeli society over the last ten (10) years. The MoH has also ensured the improved services reach Arab communities even in the periphery of the country, which has led to a 4.3% decrease of IMR (infant mortality rate) among the Bedouin population of the Negev in the last 20 years, which is exactly on par with the rate of decrease of IMR in the rest of the Arab population, and a larger decrease in IMR than amongst the Jewish population

(just 2.4%) in the same amount of time. Moreover, The MoH has worked to improve the basic quality-of-life and health literacy of the Arab population and has made specific efforts to improve the nutritional awareness and practice of the Arab Israeli population, and recently opened social media accounts in Arabic which discuss issues specifically facing this population. Finally, in order to further ensure the Arab population is aware of their rights in healthcare, the MoH operates a 24-hour translation call centre in Arabic, as well as Russian, Amharic and French manned by representatives who were trained to operate as medical translators.

39. Paragraph 56 - the claim that since 2018 children are excluded in the 'Meuchedet' Agreement is simply incorrect and at this point, children are entitled to health insurance in the 'Meuchedet' Agreement. This issue of expanding this program is currently under governmental discussion as well as currently pending before the Supreme Court.

40. Paragraph 60 - unfortunately the Committee has again ignored our written and oral response to this topic and this paragraph is incorrect at its core. We have described, in detail, the legal framework regarding clinical trials on human beings in Israel, which is expanded upon in clear Governmental regulations. Israel not only has clear regulations on this topic, but also an auditing and review Committee to ensure upholding the standards of the framework, and violators are prosecuted to the full extent of the law, both institutionally and criminally.

41. Paragraph 62 - in the education field:

- a. As explained both in writing and orally before the Committee, the national budget for education for 2017-2018 included an increase of approximately four (4) Billion NIS (1.17 Billion USD) in funding education services, an increase of 806 Million NIS (224 Million USD) for higher education.
- b. Dropout rates - as explained by the delegation, the Ministry of Education operates a special department of attendance officers who regularly visit schools in order to maintain school attendance and prevent pupils from dropping out. There are currently 743 attendance officers (an increase of 9.4% compared to 2016), of which 554 operate in Jewish localities, and 189 in Arab localities. In 2018, the total dropout rate in the Arab population was 0.7%,

compared to 2% between 2015 and 2016 the dropout rate among Bedouin pupils was 1.6% (the data pertain to pupils between 1st-12th grades).

- c. The availability of classrooms - in recent years, as described by the delegation, during the session and in the LOI there has been a steady increase in the number of schools in both the Hebrew education system and in the Arab education system. As of September 2019 there are 681 Arab schools in Israel. In 2018, 239.3 Million NIS (66.47 Million USD) was allocated for the establishment of new classrooms in Arab and Bedouin localities (together with additional budget of 178.1 Million NIS (49.47 Million USD) as an authorization for budget obligation).
 - d. The integration of children with disabilities in the education system - as detailed in the LOI, on July 2, 2018, Amendment No. 11 to the *Special Education Law 5758-1998* entered into force, as part of a large-scale reform in the special education system. The Amendment updates the scope of the authority granted to the local placement Committees. According to the amended Law, the pupil's parents, after receiving all the relevant information, shall decide whether their child will be enrolled as a pupil in a general educational institution, or in an institution for special education.
 - e. In July 2018, the Equal Rights Regulations (Individual Access Adjustments for Parent and Child) 5768-2018 entered into force. These Regulations determine accessibility adjustments that pupils with disabilities are entitled to, and stipulates the educational institutions' obligations to perform them. In addition, in October 2018 the *Planning and Construction Regulations (Obligation to make a New Institution Building Accessible)* 5768-2018 entered into force. These regulations were instituted to ensure that every new education facility for children is built including two (2) main accessibility tools; an elevator and an accessible pathway to each classroom.
42. Paragraph 68 - the Committee disregarded initiatives undertaken by Israel for the development of culture, as presented both in its written response to the LOI, as well as orally before the Committee. The Ministry of Culture and Sport supports and encourages various population groups, while according high priority to the promotion of cultural activities among the Arab population. The Ministry supports cultural

activities through roughly 100 projects performed at the periphery, and special support is provided to activities for the Arab population (including the Druze and Circassian populations). The Ministry accords high priority to the promotion of cultural activities among the Arab population, both as creators and as consumers of culture; and to the promotion of qualitative art by Arab artists.

43. Regarding the comment made on the funding allocated to the High Institute for the Arabic Language, there appears to be a misunderstanding in relation to the role of these institutions. The amount of funding allocated to the language institution is not related to the status it enjoys in the country, to the contrary in fact. The purpose of the institutions is for research and preservation of languages not in common use, such as Ladino. As Arabic is commonly used by a wide portion of the population it is less appropriate to promote its use via the institutions. We would note that this issue was not raised before the delegation - had it been brought up, the delegation could have supplied this clarification and avoided the misunderstanding.

44. In conclusion, in light of all the information described above, we express our serious reservations about the entire review process. Despite the serious engagement of the Israeli delegation, which was professional, serious and represented tremendous inter-governmental efforts, most of the relevant information was overlooked and ignored, which raises doubts about the integrity and purpose of the review exercise.

Sincerely,

Ambassador...