



OMCT
Réseau **SOS-Torture**

Gabon: "This is finally our rise toward bliss"
Civil Society's Vision for Effective Anti-Torture Reforms

Summary of the joint Alternative Report submitted under Article 19 of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment

84th session of the Committee against Torture –
Review of the second report of the Republic of Gabon

Avril 2026

Introduction

This document provides a comprehensive summary of the situation regarding the fight against torture and ill-treatment in Gabon, based on information collected by civil society organizations and the State's international commitments, notably under Article 65 of the Convention against Torture (CAT). It highlights a persistent gap between the norms adopted by the government and their effective implementation on the ground.

For over a decade, human rights in Gabon have been marked by a persistent tension between the formal assertion of the rule of law and repressive practices by security forces, including torture, ill-treatment, and arbitrary detention¹.

These practices are particularly pronounced in contexts of political dissent and during election periods, traditionally characterized by heightened social and political tensions. This dynamic was especially evident during the August 2016 presidential election, which pitted incumbent President Ali Bongo Ondimba against opposition candidate Jean Ping². The announcement of the results, closely contested and challenged by the opposition, was followed by massive demonstrations in several cities, aimed at denouncing what political and civil actors perceived as a lack of transparency and fairness in the electoral process. During this period, security forces carried out mass arrests and secret detentions, frequently resorting to excessive force, beatings, and ill-treatment targeting protesters, political activists, and human rights defenders³.

Given the increasingly alarming context, the 2023 coup d'état in Gabon, led by military actors against the sitting government, marked a turning point and opened a period of political transition. The authorities indicated their intention to undertake institutional reforms and strengthen the protection of fundamental rights, particularly in the areas of justice and detention, in response to longstanding concerns regarding torture prevention and respect for legal safeguards. In this context, the transitional authorities announced several legislative and institutional reforms aimed at strengthening the prevention of ill-treatment and improving the protection of persons deprived of liberty⁴. However, observations on the ground indicate that these reforms remain largely theoretical, and significant structural challenges persist, particularly regarding the functioning of the judicial system, detention conditions, and the effective enforcement of fundamental guarantees.

Within this framework, the following analysis seeks to provide a concise examination of the main gaps in the Gabonese system, particularly regarding victims' access to justice, the effective implementation of ex officio investigations, and the protection of human rights defenders. The objective is to identify key leverage points to strengthen the prevention, detection, and sanctioning of acts of torture and ill-treatment in Gabon, while ensuring the protection of the fundamental rights of those affected.

I. An Existing but Imperfect Legal Framework

¹ Amnesty International, *Rapports annuels sur la situation des droits humains au Gabon*, différentes années.

² La Croix, « Au Gabon, une enquête sous le bras mais le silence », 30 septembre 2016.

³ Bureau du Procureur de la Cour pénale internationale, *Rapport sur l'examen préliminaire de la situation au Gabon*, 21 septembre 2018.

⁴ Loi n°023/2024 du 21 novembre 2024 portant réorganisation de la Commission nationale des droits de l'homme et création du mécanisme national de prévention de la torture.

A major concern of civil society relates to the non-compliance of Gabon's legal framework with international standards in the fight against torture. Although torture is criminalized in domestic law, notably under Article 224 of the Penal Code, this provision, while a formal step forward in recognizing the specific gravity of acts of torture, remains insufficient to ensure effective prevention and prosecution in line with international norms⁵.

The definition provided is imprecise and does not fully reflect the constitutive elements set out under international law, particularly regarding the specific purposes of torture or the distinction between physical and psychological suffering. Furthermore, some fundamental safeguards are absent from the legal framework, including the explicit prohibition against invoking superior orders to justify acts of torture and the accountability of hierarchical superiors. Beyond the legal text, the practical enforcement of anti-torture measures appears extremely limited. Civil society observations indicate a recurrent pattern: credible allegations of torture rarely lead to appropriate prosecutions, and the acts in question are often reclassified as less serious offenses, such as assault or battery, reducing the law's deterrent effect.

The report documents several cases, including that of Thomas Glokpon, a detainee who died in 2021⁶. According to collected information, Mr. Glokpon allegedly endured acts characterized as torture, including the so-called "bridge" method and repeated beatings. His relatives requested an autopsy and the opening of an independent investigation to establish criminal responsibility. To date, no public information confirms that an official investigation has been initiated or that any prosecutions or convictions have been carried out in connection with these allegations. This highlights the absence of effective mechanisms to bring perpetrators of torture to justice, even when the facts are severe and documented.

The opacity of the system is further exacerbated by the lack of publicly available statistics on convictions for torture, as well as by the slowness and lack of transparency of judicial proceedings. Even in the most serious cases, including deaths in detention, judicial follow-up remains uncertain or non-existent, perpetuating de facto impunity and severely undermining public confidence in Gabon's judicial system.

II. Inadequate Procedural Safeguards

In light of the deficiencies identified in Gabon's legal framework, procedural safeguards intended to prevent torture and ill-treatment remain very limited. The period of police custody constitutes a particularly critical phase, during which the absence of effective protections significantly increases the vulnerability of individuals deprived of their liberty.

Access to a lawyer is not systematically guaranteed from the outset of deprivation of liberty, and their presence during interrogations is not mandatory. Likewise, medical examinations are not automatic, which limits the timely documentation of abuse and restricts access to effective remedies.

Furthermore, Gabonese law does not explicitly render confessions obtained under torture inadmissible, contrary to international standards, creating a persistent risk of coercive practices during investigations. The role of the judge in overseeing detention conditions remains insufficient, reducing the capacity of victims to challenge violations and seek redress.

⁵ Code pénal gabonais, art. 224 (définition des actes de torture ou de barbarie).

⁶ SOS Prisonniers Gabon (reprise presse) : décès d'un détenu après actes décrits comme torture, demande d'autopsie/enquête indépendante (2021)

In this context, the political transition initiated after the 2023 coup d'état has been accompanied by promises of institutional and legislative reforms aimed at strengthening the prevention of torture and the protection of detainees. These reforms concern, among other areas, the Penal Code, the Code of Criminal Procedure, and the role of the sentence enforcement judge, while also foreseeing the reinforcement of national human rights institutions. The stated objective is to address procedural gaps and ensure effective oversight of places of deprivation of liberty.

In this regard, the National Human Rights Commission (CNDH) is being reorganized to comply with the Paris Principles and enhance its operational capacity. Law n°023/2024 establishes the National Mechanism for the Prevention of Torture (MNPT), composed of three commissioners tasked with conducting regular and unannounced visits to all places of detention. This mechanism is intended to strengthen detainee protection and ensure effective monitoring of practices; however, its implementation remains constrained by legal, administrative, and budgetary limitations.

Thus, despite the expressed political will, the tangible impact of these reforms remains limited at this stage, underscoring the significant distance still to be traveled to ensure procedural safeguards fully aligned with international standards.

III. Violations of the Non-Refoulement Principle and Migrant Vulnerability

The report also highlights concerns regarding compliance with the principle of non-refoulement, which prohibits a State from returning an individual to a country where they risk being subjected to torture. United Nations mechanisms have repeatedly drawn attention to Gabon's shortcomings in the effective implementation of this principle⁷. Under domestic law, Articles 624 to 635 of the Code of Criminal Procedure govern the conditions under which an extradition request may be examined and granted by Gabonese judicial authorities. However, despite the legal safeguards cited by Gabon in its second periodic report to the Committee against Torture (CAT/C/GAB/2, 2024)^[10], civil society reports indicate that the practical effectiveness of the non-refoulement principle remains difficult to ascertain.

The report documents several cases illustrating these gaps. Notably, Steve Akam⁸, a Cameroonian activist known for his critical stance toward his country's authorities, reportedly was handed over to Cameroonian authorities at the Kye-Ossi border without any public record of extradition or expulsion proceedings in accordance with Gabonese legal safeguards. This transfer, carried out despite alleged risks of ill-treatment, raises serious questions regarding Gabon's compliance with the non-refoulement principle and its international responsibility⁹.

⁷ Conseil des droits de l'homme, *Compilation établie par le HCDH pour l'Examen périodique universel du Gabon*, A/HRC/WG.6/28/GAB/2, 28 août 2017

⁸ Conseil des droits de l'homme des Nations Unies – Procédures spéciales. *Communication adressée au Gouvernement du Gabon par la Rapporteuse spéciale sur la promotion et la protection du droit à la liberté d'opinion et d'expression, le Groupe de travail sur la détention arbitraire, le Groupe de travail sur les disparitions forcées ou involontaires et la Rapporteuse spéciale sur l'indépendance des juges et des avocats concernant le cas de M. Steve Akam (alias Ramon Cotta)*. Réf. AL GAB 1/2025, 7 avril 2025. Disponible sur : [OHCHR – Special Procedures Communications Database](#)

⁹ United Nations Committee against Torture. *Concluding Observations on the Sixth Periodic Report of Cameroon*. CAT/C/CMR/CO/6, United Nations, 2023. <https://documents.un.org/doc/undoc/gen/g23/259/02/pdf/g2325902.pdf>

Beyond individual cases “although they are not isolated” the report emphasizes that migrants and refugees are generally highly vulnerable due to the inadequacy of protection and remedy mechanisms. Their vulnerability is further compounded in situations involving human trafficking, another major concern highlighted by international monitoring bodies¹⁰.

Concerns regarding Gabon’s response to human trafficking have been repeatedly raised by international mechanisms, notably during the Universal Periodic Review (UPR) processes of 2017 and 2023¹¹, which stressed the need to strengthen preventive measures, victim protection, and the prosecution of perpetrators. In this context, concrete situations have also been documented by UN mechanisms. For instance, in 2019, the Office of the United Nations High Commissioner for Human Rights (OHCHR) drew attention to the situation of Indian migrant workers in the Nkok Special Economic Zone¹².

According to reported information, these workers were allegedly recruited under false pretenses and transferred to Gabon, where their identification documents were confiscated by the employing company, preventing them from leaving the area or the country. UN experts concluded that these conditions, combined with restrictions on freedom of movement, could amount to contemporary forms of slavery and constitute situations of forced labor or human trafficking¹³.

In response to these allegations, the United Nations called on the Gabonese and Indian authorities, as well as relevant actors, to launch an urgent investigation and take all necessary measures to address the situation. These circumstances once again highlight the persistent gaps in the protection framework for migrants and the challenges Gabon faces in effectively implementing its international obligations.

IV. Conditions of Detention: A Structural Crisis

Detention conditions are among the most concerning issues highlighted in the report. In particular, prison overcrowding in Gabon represents both a structural and humanitarian crisis. This is reflected in the exceptionally high proportion of detainees awaiting trial, with some held in pretrial detention for extended periods, sometimes lasting ten to twelve years.

This situation was confirmed in March 2025 during a visit by magistrates to the Libreville central prison, where it was observed that over 77% of the prison population was held in pretrial detention¹⁴. The abusive use of pretrial detention, including for minor offenses or for individuals whose guilt has not yet been established, directly contributes to the deterioration of detention conditions. This problem is further exacerbated by slow judicial procedures, which

¹⁰ Comité pour l’élimination de la discrimination raciale *Observations finales concernant le dixième rapport périodique du Gabon*. Nations Unies, CERD/C/GAB/CO/10, 23 mai 2025. Disponible sur : <https://undocs.org/CERD/C/GAB/CO/10> (consulté le 09.03.2026).

¹¹ Haut-Commissariat des Nations Unies aux droits de l’homme (HCDH). *Gabon : Compilation établie par le Haut-Commissariat des Nations Unies aux droits de l’homme*. Conseil des droits de l’homme, Groupe de travail sur l’Examen périodique universel, 42e session, 23 janvier-3 février 2023. Nations Unies, A/HRC/WG.6/42/GAB/2. <https://docs.un.org> (consulté le 09.03.2026).

¹² United Nations Office of the High Commissioner for Human Rights (OHCHR). UN Human Rights Experts Raise Alarm about the Situation of Indian Migrant Workers in Gabon Special Economic Zone. 26 Apr. 2019, www.ohchr.org

¹³ *Ibid*

¹⁴ <https://agpgabon.ga/gabon-2759-sur-3566-detenus-toujours-en-attente-de-jugement-a-la-prison-de-libreville/> (consulté pour la dernière fois le 4.03.26)

unduly prolong deprivation of liberty and have severe social, familial, and professional consequences for the individuals concerned.

Adding to these challenges is the state of prison infrastructure, much of which dates back to the post-independence period and is no longer suitable for current needs. This deterioration results in particularly harsh living conditions, marked by overcrowding, poor hygiene, and limited access to water, food, and healthcare.

Medical care in Gabonese prisons remains profoundly insufficient, both in terms of personnel and the availability of medicines, placing detainees' health and dignity at serious risk. This has been confirmed through reports from the Tchibanga central prison, where authorities noted a significant shortage of medicines and a resurgence of malaria. Monitoring activities have further shown that this chronic lack of adequate and timely medical care contributes to multiple preventable deaths in detention facilities.

At Libreville central prison, Jean-Pierre Mapangou died in 2020 after failing to receive proper treatment for a serious illness. Similarly, Pierre Mounguengui, detained at Port-Gentil prison, died in 2019 following an infection contracted while in custody due to insufficient medical care. Far from being isolated cases, these deaths concretely illustrate the structural deficiencies and systemic negligence of the Gabonese prison system regarding detainees' healthcare.

Moreover, restrictions on visits and limited access for civil society organizations exacerbate detainees' isolation and reduce transparency, significantly limiting independent oversight of health conditions and treatment of individuals deprived of their liberty.

V. Torture in Detention

In addition to deplorable detention conditions, multiple reports from human rights organizations, as well as testimonies and press articles, indicate the continued occurrence of torture in prisons, police stations, gendarmerie brigades, and other detention centers under the control of security forces. These formal and informal detention sites appear as spaces where perpetrators of torture can act with impunity, shielded from judicial oversight and independent observers.

Libreville Central Prison, known as "Sans Famille," is one of the main detention facilities where torture and ill-treatment have been documented, reflecting particularly concerning conditions and a lack of effective oversight mechanisms¹⁵. These structural deficiencies are not limited to prison settings but extend to other stages of deprivation of liberty within the criminal justice system.

The case of Bonca Issouf¹⁶, an employee unjustly suspected of theft who died after being tortured during interrogation at the Franceville Central Police Station, tragically illustrates the consequences of these practices on individuals deprived of their liberty, even in the absence of proven guilt.

¹⁵ Amnesty International, « Gabon : un opposant torturé en prison craint pour sa vie », 20 mars 2019. <https://www.amnesty.org/fr/latest/news/2019/03/gabon-un-opposant-torture-en-prison-craint-pour-sa-vie-2/>

¹⁶ <https://lunion-archives.org/web.11/dmdocuments/N12367-08-03-2017-010.pdf>, 8 mars 2017

Torture has also been reported at the facilities of the Directorate General of Research (DGR), the gendarmerie's investigative service. Following the August 30, 2023, coup d'état, several former officials of the previous regime were arrested and detained, with allegations of torture or ill-treatment reported by their lawyers and relatives. According to testimonies from fellow detainees and family members, Nouredin Bongo Valentin, former Coordinator of Presidential Affairs, and former Minister of Petroleum Vincent de Paul Massassa were subjected to severe violence during their detention, highlighting the persistence of coercive practices in certain detention facilities controlled by security forces¹⁷.

Another major concern highlighted is the existence of informal detention centers, including the Directorate General of Counter-Intelligence and Military Security (DGCISM), commonly known as "B2." Initially responsible for collecting and analyzing information related to national security and counterintelligence, this unit has gradually evolved into a service conducting judicial investigations with broad mandates, frequently resorting to the detention of individuals suspected of ordinary criminal offenses.

Civil society organizations and media sources have regularly documented arrests carried out by the B2 in cases of varying scope, ranging from ordinary criminal matters to politically sensitive dossiers. These include cases involving corruption or embezzlement of public funds, administrative and economic disputes, social or labor conflicts, as well as cases involving journalists or political actors. For example, Boris Idima Andjoua was placed in police custody at the B2 for attempted influence peddling before being presented to the public prosecutor¹⁸. Similarly, trade unionist Jean Rémy Yama was arrested in 2022, detained under a remand order, and later brought before a judicial court¹⁹. Collectively, these cases demonstrate that the B2 is regularly used as a site of arrest and detention across a wide range of matters, raising serious questions about the respect of procedural guarantees applicable to the deprivation of liberty.

Several high-profile cases and public testimonies indicate that individuals detained at the DGCISM facilities were subsequently subjected to acts of torture or cruel, inhuman, or degrading treatment. Notably, in April 2024, Gabonese human rights activist Claudine Aïcha Tsoumbou was abducted by military personnel and taken to the B2, where she was reportedly violently beaten before being released a few hours later, only to be arrested again the following day²⁰. Her testimony, collected directly by the World Organisation Against Torture (OMCT), reports physical violence inflicted during her detention at the B2 and severe physical and psychological consequences.

The B2 case highlights a structural flaw in the Gabonese detention system: the existence of parallel detention sites creates spaces where procedural safeguards are virtually non-existent,

¹⁷ Le Monde, « Au Gabon, le purgatoire des Bongo, soupçonnés de détournements de fonds », 14 avril 2025

¹⁸ Abel Eyeghe Ekore, « Tentative d'escroquerie : il promet à sa victime un poste au PDG », *L'Union (Sonapresse)*, 18 janvier 2021.

<https://www.union.sonapresse.com/fr/tentative-descroquerie-il-promet-sa-victime-un-poste-au-pdg>

¹⁹ Gabon Media Time, « Gabon : le syndicaliste Jean Rémy Yama écroué à la prison centrale de Libreville », mars 2022.

<https://gabonmediatime.com>

²⁰ Mondafrique, « Gabon : une militante des droits de l'homme sévèrement battue par les militaires », 9 juin 2024,

<https://mondafrique.com/politique/gabon-une-militante-des-droits-de-lhomme-severement-battue-par-les-militaires/>

the accountability of perpetrators is difficult to establish, and the fundamental rights of persons deprived of liberty are consistently compromised.

VI. Duty to Investigate Ex Officio and the Right to File Complaints in Gabon

These situations take on particular gravity in a context where Gabon suffers from a structural deficit in investigations and judicial procedures. Indeed, the duty to investigate acts of torture primarily rests with the Public Prosecutor, who has the authority to initiate criminal proceedings. However, contrary to the requirements of Article 12 of the Convention against Torture, Gabonese domestic law does not explicitly establish an obligation to investigate ex officio whenever there are credible indications of torture. While judicial police officers may, in theory, initiate such investigations, this possibility remains discretionary and largely dependent on the authorities' judgment. This gap limits the systematic, prompt, and effective conduct of investigations, creating a clear divergence between international standards and their national application, and thereby fostering situations of impunity, particularly when the independence and effectiveness of investigations are not ensured.

These deficiencies are particularly evident in contexts of political crisis. The events following the presidential election of 27 August 2016 serve as a concrete example. After the announcement of President Ali Bongo's victory with 49.80% of the vote, demonstrations in Libreville were violently suppressed, culminating in the assault on the opposition leader Jean Ping's headquarters by security forces, who employed heavy weaponry and carried out mass arrests²¹. While the human toll remains contested (with the government reporting three deaths and civil society citing between 50 and 100 victims²²), numerous testimonies document the use of live ammunition, beatings, ill-treatment, and arbitrary detention. This episode vividly illustrates the absence of reliable mechanisms to investigate and prosecute perpetrators of serious human rights violations in Gabon.

The situation for victims is further complicated when exercising the right to file a complaint. Under Gabonese law, the Code of Criminal Procedure allows victims to join as civil parties and human rights organizations to initiate civil actions. However, effective access to justice is limited by several practical obstacles.

First, the security deposit required to join as a civil party can reach substantial amounts, set case by case by the judge to cover investigative, expert, and registry fees, representing a major barrier for victims with limited resources. Additional procedural costs such as registry fees for administrative formalities, fiscal stamps, reproduction or postage of documents, and lawyer's fees, often necessary for effective case management further restrict access. The legal aid mechanism established by Law No. 019/2014 of 21 May 2015 could theoretically offset these obstacles by covering fees, expert costs, and deposits for disadvantaged individuals. Nevertheless, in practice, access remains limited due to a lack of awareness among litigants, administrative delays, and insufficient budgetary resources.

Finally, the protection of victims and witnesses remains largely inadequate. While Gabonese law penalizes pressures and intimidation aimed at preventing the filing or continuation of a complaint, as provided under Article 223 of the Penal Code, there is no structured witness

²¹ Commission électorale nationale autonome et permanente, résultats officiels de l'élection présidentielle de 2016.

²² La Croix, « Au Gabon, une enquête sous le bras mais le silence », 30 septembre 2016.

protection program in line with international standards. This gap increases victims' vulnerability and further restricts effective access to justice.

VII. Situation of Human Rights Defenders

The report concludes with an examination of the situation of human rights defenders, highlighting the pressures, intimidation, and judicial harassment they face in Gabon, in a context where no specific protection existed until 2025, despite the country's international commitments.

Since 2022, several civil society initiatives, notably through the Central African Human Rights Defenders Network (REDHAC) and its national coalition, have sought to promote the adoption of a specific law protecting defenders. The Ministry of Justice has issued a favorable opinion and mobilized experts to contribute to drafting the text. On 7 March 2025, the Transitional National Assembly placed the examination of this bill on its agenda, marking a formal step in the legislative process toward the adoption of a legal framework for the protection of human rights defenders²³. However, certain provisions remain a cause for concern: Article 5 restricts protection to activities deemed "in accordance with the law," which may limit its scope in practice, while Article 21 fails to clearly define protection mechanisms or establish rapid procedures for their implementation, thereby weakening its potential effectiveness. At this stage, however, the draft law remains at a preliminary phase. Its adoption and effective implementation therefore remain contingent upon the finalization of the text and its formal promulgation²⁴.

In practice, several recent cases illustrate the risks faced by defenders. For instance, on 23 January 2019, Dr. Marie-Claudette Ndagui, President of the Gabonese Association for Social Works (AGOS), was arrested in Libreville shortly after a press conference in which she denounced alleged acts of corruption involving members of the Public Prosecutor's Office. She was detained at the central prison, while searches were conducted at her home and at AGOS offices, with documents and recording equipment seized. On 18 February 2019, she was convicted of contempt of court, defamation, and offense to the honor of the prosecutor, receiving a twelve-month sentence, four months suspended, and a fine of ten million CFA francs. Her detention took place under harsh conditions, resulting in a deterioration of her health²⁵. These cases occur within a broader context of obstacles to access to justice: ex officio investigations into acts of torture or ill-treatment remain rare, filing complaints is complex and costly, and protection of victims and witnesses is insufficient. The report thus underscores that the security and freedom of action of human rights defenders constitutes a key indicator of the

²³ Assemblée nationale de la Transition du Gabon. *Travaux : Jean-François Ndongou préside une réunion du Bureau de la session ordinaire de l'année 2025*. 7 mars 2025. Disponible sur : <https://www.assemblee-nationale.ga/1-actualites-/2499-travaux-jean-francois-ndongou-preside-une-reunion-du-bureau/> (consulté le 05.02.2026).

²⁴ Réseau des Défenseurs des Droits Humains en Afrique Centrale (REDHAC). *Loi portant promotion et protection des défenseurs des droits de l'Homme au Gabon*. Projet de loi, REDHAC, disponible sur : https://redhac1.org/bfd_download/loi-n-portant-promotion-et-protection-des-defenseurs-des-droits-humains-au-gabon/ (consulté le 09.03.2026).

²⁵ Nations Unies, Procédures spéciales du Conseil des droits de l'homme. Communication au Gouvernement du Gabon concernant la détention de Marie-Claudette Ndagui (Réf. AL GAB 2/2019). 29 juillet 2019. <https://spcommreports.ohchr.org> (consulté le 09.03.2026).

effectiveness of human rights in Gabon, highlighting the urgent need for operational mechanisms that ensure their protection and independence.

VIII. Conclusion

The overall analysis highlights a central paradox: Gabon now possesses a legal and institutional framework in development, yet it remains largely ineffective in practice. The reforms undertaken within the framework of the political transition present a historic opportunity for transformation and could address decades of structural deficiencies. However, without effective implementation and rigorous monitoring, these advances risk remaining purely symbolic and failing to materially improve the reality for victims of torture and ill-treatment.

The fight against torture and human rights violations requires a systemic and coordinated approach. This entails not only reforming the judicial system and strengthening procedural safeguards, but also the immediate improvement of detention conditions, the effective protection of victims and witnesses, and the establishment of reliable mechanisms to ensure accountability of perpetrators and prevent impunity.

Ultimately, the ambition of a “rise towards fulfillment,” as envisioned in the context of the transition, can only be realized if it is accompanied by a genuine commitment to human dignity, transparency, and respect for fundamental rights, so that every detainee or victim of violations can have access to justice that is accessible, effective, and protective.