Cultural Heritage and International Solidarity

Patrimonio cultural y solidaridad internacional

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Abstract:
This article reviews and analyzes the national and international legal framework for the safeguarding of Mexico's tangible cultural heritage. As one of the pillars of Mexican identity, the authorities should intervene in the conservation of the country's cultural heritage and protect it from illicit trade.

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Resumen:
En este artículo se revisa y analiza el régimen jurídico nacional e internacional para la salvaguarda del patrimonio cultural material mexicano; éste es uno de los ejes de la identidad de la sociedad mexicana, por ello los poderes públicos deben intervenir en su preservación y su protección ante el tráfico ilícito de los bienes culturales de México.

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Key Words:
Tangible cultural heritage, federalization of the tangible cultural heritage regime, property rights, illicit trade, international cultural treaties.

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Palabras clave:
Patrimonio cultural material, federalización del régimen, derecho de propiedad, tráfico ilícito, tratados culturales internacionales.

Cultural Heritage and International Solidarity[1]

Jorge Sánchez Cordero

Objets inanimés, avez-vous donc une âme…?

Alphonse de Lamartine
Harmonies poétiques et religieuses

Introduction

According to Françoise Rivière, "Inanimate objects, have you then a soul?"—a quote by the French poet Alphonse de Lamartine[2] that takes the form of an oxymoron phrased as a question—clearly suggests that the spirit of individuals, groups and societies is irredeemably tied in with certain cultural objects that have become part and parcel of their identity and, consequently, their essence. Cultural property can be ambivalent: once removed from its origin, it takes with it the spirit of those who created or worshiped it.[3] This ambivalence inherent to the trafficking of cultural objects is accentuated when these are traded on the

[1] Revised version of "Los desafíos de la reforma constitucional en materia de cultura," in *Revista Amicus Curiae*, segunda época, vol. 1, no. 1, September-October 2012, s. p., at *http://www.revistas.unam.mx/index.php/amicus/article/view/35204* (date of access: August 31, 2022).

[2] « Objets inanimés, avez-vous donc une âme », Alphonse de Lamartine, « Milly, ou la terre natale », in *Harmonies poétiques et religieuses*.

[3] Françoise Rivière, "Preface", in Lyndel V. Prott (ed.), *Witnesses to History: A Compendium of Documents and Writings on the Return of Cultural Objects*, Paris, UNESCO, 2009, p. xi.

international art market against the will of their creators or the communities they belong to.[4]

The forging of a nation is a highly complex process,[5] even more so when diverse cultures converge, as was the case with Mexico.[6] The bedrock of Mexican identity can largely be traced back to the idealization of the pre-Columbian world by the Mexican criollos who began the independence movement. This explains the birth of the notion of Mexican cultural heritage and why steps were taken to protect it from day one of life as an independent nation.

To focus this analysis exclusively on national law would surely produce dubious results, given that the crux of the issue of protecting Mexico's cultural heritage is illicit trade.

Defined as the extraction of cultural assets from a country and their sale on the international art market, illicit trade is not limited to Mexico's cultural property, but is an international scourge of immense proportions, whose gravity is illustrated by the battle that had to be waged against the Medici criminal enterprise and that involved museums as prestigious as the J. Paul Getty Museum in Malibu, California, and the Metropolitan Museum of New York.[7]

In an attempt to gain a broader perspective, cultural assets should be viewed as *visual palimpsests*[8] subject to the vicissitudes of time, while the process of creating public memory in the absence of the oral narrative

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4 See Jorge A. Sánchez Cordero Dávila, *Les Biens Culturels Précolombiens. Leur Protection Juridique*, Paris, Librairie Générale de Droit et de Jurisprudence, 2004, p. 1.

5 See Jean-François Poli, « État, nation et identité culturelle », in Marie Cornu and Nébila Mezghan (eds.), *Intérêt culturel et mondialisation. Les protections nationales*, t. I, Paris, L'Harmatan, 2004, p. 35.

6 See Guillermo Bonfil Batalla, "Nuestro patrimonio cultural: un laberinto de significados," in Enrique Florescano (comp.), *El patrimonio nacional de México*, t. I, Mexico, Consejo Nacional para la Cultura y las Artes/Fondo de Cultura Económica, 1997, pp. 19-40.

7 See Peter Watson and Cecilia Todeschini, *The Medici Conspiracy: The Illicit Journey of Looted Antiquities from Italy's Tomb Raiders to the World's Greatest Museums*, New York, Public Affairs, 2006, p. 80.

8 See Andreas Huyssen, *Present Pasts: Urban Palimpsests and the Politics of Memory*, Stanford, Stanford University Press, 2003, p. 7.

traditions of old requires an analysis of the transmutation of milieu of memory (*milieux de memoire)* into places of memory (*lieux de memoire)*[9].

An analysis of tangible cultural heritage must necessarily include a reference to the French writer Victor Hugo,[10] who believed that, whatever property rights the owners of monuments laid claim to, the destruction of those monuments should not be among their prerogatives and that such people have become nothing more than "ignoble speculators," whose spirit has been clouded over with self-interest. According to Hugo, there are two aspects of a monument that can easily be appreciated: their use and their beauty. Their use belongs to their owner; their beauty, to society. Hence the need to neutralize the harmful effects of property rights and avoid the destruction of monuments.

Historic development

The twentieth century saw the Mexican State take measures to reaffirm and extend public ownership of pre-Columbian assets. The laws of 1930,[11] 1934,[12] 1970[13] and the current Federal Law on Monuments and Archaeological, Artistic and Historic Sites (hereinafter the 1972 law)[14] pay testimony to the different formulas proposed to achieve this goal.

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9 See Pierre Nora, «Entre mémoire et histoire», in P. Nora (ed.), *Les Lieux de Mémoire.T. i. La République,* Paris, Gallimard (Quarto), 1997, p. 23.

10 Victor Hugo, « Guerre aux démolisseurs », in *Revue des Deux Mondes*, première série, vol. 5, no. 5, March 1, 1832, pp. 607-622. See André Chastel, « La notion du patrimoine », in P. Norra (ed.), *op. cit*., p. 1444.

11 Ley sobre Protección y Conservación de Monumentos y Bellezas Naturales, *Suplemento del Diario Oficial de la Federación*, January 31, 1930; and Ministry of Public Education, "Aclaración a la publicación de la Ley sobre Protección y Conservación de Monumentos y Bellezas Naturales," *Diario Oficial de la Federación*, March 11, 1930, p. 6.

12 Ley sobre protección y conservación de monumentos arqueológicos e históricos, poblaciones típicas y lugares de belleza natural, *Diario Oficial de la Federación*, January 19, 1934.

13 Ley Federal del Patrimonio Cultural de la Nación, *Diario Oficial de la Federación*, December 16, 1970.

14 Ley Federal sobre Monumentos y Zonas Arqueológicos, Artísticos e Históricos, *Diario Oficial de la Federación*, May 6, 1972.

During the nineteenth and twentieth centuries, Mexican national law gradually developed mechanisms for the protection of cultural assets grounded on diverse laws, but whose common denominator was the strengthening of national identity.

Federalization of the tangible cultural heritage regime

One of the main difficulties encountered in developing a legal framework for cultural assets originated precisely with Mexico's federal regime. The first step was to determine which authority was responsible for managing Mexico's pre-Columbian heritage, *i.e.*, whether it was the Federation or states. The dilemma was much more complex though, for the competent authority would effectively be the custodian of the country's collective memory and therefore responsible for its safekeeping. The Supreme Court eventually ruled that, on historic grounds, the Federation was the heir of the country's tangible cultural heritage.

The precedent for this ruling on the federalist dilemma can be found in the dispute that arose when the state of Oaxaca passed its Law on Dominion and Jurisdiction Over Archaeological and Historic Monuments on February 13, 1932.[15] The Federation claimed this law violated its legislative jurisdiction and demanded it be ruled unconstitutional and subsequently declared null and void.[16] To back up its claim, it cited a series of legislative precedents demonstrating that national antiquities, including archaeological ruins and monuments like temples and pyramids, belonged to the nation, and showing that the Federation had consistently passed legislation on these.

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[15] Article 1 of the Law on Dominion and Jurisdiction Over Archaeological and Historic Monuments passed by the state of Oaxaca states that "Archaeological and historic monuments [...] located on the territory of Oaxaca shall be deemed the property of the state and shall come under the jurisdiction of its authorities." It then outlines guidelines for the protection of assets of this nature and specifies which ones are entitled to protection.

[16] See María del Refugio González, "La protección de los bienes arqueológicos en México y su relación con la jurisprudencia," in Jaime Litvak King, Luis González R. and M. del R. González (eds.), *Arqueología y Derecho en México*, Mexico, Instituto de Investigaciones Antropológicas-Instituto de Investigaciones Jurídicas-UNAM, 1980, 71-82.

For its part, the state of Oaxaca argued that it was entitled to pass laws of this nature and that this in no way infringed upon the powers of the Federation, given that article 73 of the Constitution did not expressly grant such powers to Congress[17] and, in its opinion, to accept the arguments of the Federation would be a "constitutional aberration" that would put the assets of states in a "tremendous centralist deadlock."[18]

In its ruling in favor of the Federation, the Supreme Court argued that, while powers that are not expressly granted to the Federation in the Constitution shall be understood as reserved for states, this argument was not admitted in its entirety by the Constituent Congress: in practice, there are areas in which the Federation and states have concurrent jurisdiction and, in these cases, jurisdiction belongs to the authority "that has already exercised it, and if neither has, it shall be awarded based on the national or local interest of the thing or issue that has given rise to the jurisdictional dispute."[19]

According to the Supreme Court's thesis, the law passed by the state of Oaxaca only dated from 1932. Consequently, it was the Federation that "first exercised jurisdiction over the subject at hand, not the state of Oaxaca, and, as such, pursuant to the aforementioned law, in this case, jurisdiction and legislative powers fall to the former, and not the state of Oaxaca."[20]

The argument made by Oaxaca was rejected on the grounds that not all powers of the Federation "need to be literally or expressly granted by the Constitution... and that... the legislative powers of the Federation are not limited to those expressly conferred it in the much-cited article 73 of the Mexican Constitution."[21]

The Supreme Court ruled that the Federation had indisputably exercised its jurisdiction over the archaeological ruins and monuments on Mexican territory "practically since the founding of the country."

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17 Supreme Court of Justice of the Nation, "Ruinas y monumentos arqueológicos," thesis, registration no. 279362, *Semanario Judicial de la Federación*, Quinta época, tome XXXVI, 1933, p. 10171.

18 See M. del R. González, *op. cit.*, p. 73.

19 Supreme Court of Justice of the Nation, *op. cit.*

20 Quoted in M. del R. González, *op. cit.*, p. 74.

21 *Idem*.

To further support its thesis, the Supreme Court cited many other legal precedents[22] and ancestral traditions, like the Laws of the Indies,[23] according to which assets of this nature were the private property of the Spanish Crown, subject to the principle of *res extra commercium* and, as such, rights over them were inalienable and imprescriptible. Its argument was that on "gaining independence from the Colony, pursuant to the Laws of the Indies, the private property rights of the Kings were transferred in their entirety to the Mexican Nation"[24] and the successor of the assets of the Spanish Crown was the Nation as a whole. Consequently, it could "not be disputed that the archaeological ruins and monuments on Mexican territory were assets that also belonged to the Nation, and not the states of the Republic, whose boundaries had not even been properly defined at the time."[25] Therefore, in its opinion, the law passed by the state of Oaxaca stepped on the constitutional powers of the Federation, which was the authority with the faculty to legislate on this matter.

Finally, the Supreme Court pointed out that in article 20 of its Constitution, Oaxaca itself acknowledged that "assets not originally owned by the Federation shall be deemed the property of the state."[26]

The constitutional reform of December 21, 1965 ended up "federalizing" the legal framework governing Mexico's tangible cultural heritage,[27] thereby ensuring uniformity in its protection nationwide.

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[22] The government decree by which the public administration was divided into six ministries, pursuant to which the Ministry of Justice and Federal Public Education was responsible for all affairs related to libraries, museums and national antiquities; the circular issued by the Secretary of Justice on August 28, 1868, prohibiting excavations and prospecting on archaeological sites by persons not authorized by the Federation; the law of March 26, 1894 on the occupation and disposal of brownfields; the decree issued by Congress on June 3, 1896; the law of May 11, 1897 on archaeological monuments; the decree of December 18, 1902, and the law of January 30, 1930.

[23] See *Recopilación de Leyes de los Reynos de Indias*, t. II, Madrid, Official State Bulletin, 1998, book VIII, section XII.

[24] Quoted in M. del R. González, *op. cit.*, p. 74.

[25] Quoted in *Ibid.*, p. 75

[26] Quoted in *Idem*.

[27] Decreto que declara adicionada la fracción XXV del artículo 73 de la Constitución General de la República, *Diario Oficial de la Federación*, January 13, 1966.

Property rights and the tangible cultural heritage regime

A collision between the existing private property regime and the fledgling cultural property regime was inevitable and would persist throughout most of the twentieth century, until the very concept of property rights underwent a metamorphosis and it was established that the country's cultural heritage legally belonged to the State.

Tension between the orthodox underpinnings of private property rights and the cultural property regime were more than evident in the southeast of Mexico, home to major archaeological sites like Uxmal and Chichén Itzá to which Mexican society did not have access in the late nineteenth and early twentieth centuries because they were located on the private property of large estate owners.

One *cause célébre* was that of the U.S. consul in Yucatán, Edward Thompson.[28] A trained archaeologist, Thompson and had been recommended by the American Antiquarian Society and Harvard University's Peabody Museum. Thompson purchased the hacienda that borders with the ceremonial center of Chichén Itzá and claimed the Sacred Cenote for himself. At Thompson's instructions, Sylvanus G. Morley dredged the cenote, but his lack of professionalism destroyed extremely valuable information on the Maya civilization, forevermore depriving the world of knowledge on its history and transcendence. The Maya artifacts discovered there are currently on exhibit at Harvard University's Peabody Museum and Chicago's Field Museum of Natural History and some have been returned to Mexico. The Mexican government charged Thompson with theft and the illicit exportation of archeological artifacts, but the suit was later dropped. Thompson did not do as much as a day in prison and Mexico was only able to recover part of this cultural heritage, largely as a result of the articles published by Alma Reed in the *The New York Times Magazine*. Thompson confessed to Reed that he had illegally

[28] See file 11/926 in the custody of the Supreme Court of Justice's Casa de la Cultura Jurídica in Mérida, Yucatán.

exported the Maya artifacts he had excavated using U.S. embassy diplomatic pouches, a crime Reed did not hesitate to publicly denounce.[29]

Incidents like these, which we have seen time and time again, not only put our imagination to the test, but seriously call into question the enforcement of laws on cultural property in Mexico.

The 1972 law

One of the most notable principles of the Federal Law on Monuments and Archaeological, Artistic and Historic Sites is the hegemonic nature of the declarations made under it. It is precisely this declaratory system that allows the Mexican State to reserve the right, by means of an act of cultural sovereignty, to determine what constitutes the country's cultural heritage and its scope. Ultimately, under the nationalist model, it is the State that decides what is of cultural value and more, importantly, which cultural assets merit protection.

International cultural treaties

It may seem like stating the obvious to say that national laws do not extend beyond a country's borders, but it is not so obvious when we consider that viable protection of cultural objects and their return to their countries of origin requires the acquiescence of foreign courts or other nation states. International laws for the protection of cultural assets in times of peace are geared toward effective national protection of those assets under international law, especially ones on the trafficking of stolen or illegally exported objects. It should be noted that Mexico has played and continues to play an active role in the promotion of international treaties of this nature.

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[29] See Michael K. Schuessler, "Alma M. Reed 'La Peregrina': estudio preliminar," in Alma Reed, *Peregrina. Mi idilio socialista con Felipe Carrillo Puerto*, Mexico, Diana, 2006, p. x.

Notwithstanding, one of the greatest shortcomings of analyses of Mexico's cultural heritage, both tangible and intangible, has been failure to determine the scope of the international obligations assumed under the various conventions ratified by the country in the last quarter of the twentieth century and the early twenty-first century. As part of ongoing efforts to protect its tangible cultural heritage, Mexico ratified several conventions, including the UNESCO conventions of 1970[30] and 1972,[31] the Cooperation Agreement between Mexico and the United States,[32] and the UNIDROIT Convention on Stolen or Illegally Exported Cultural Objects.[33]

In keeping with the prevalent ideas of the day, the 1970 Convention advocates cultural nationalism, which is based on the relationship between cultural property and the definition of culturality. The protection of cultural objects is inevitably subject to the territorial scope of validity in each nation State.

To have an identity, a people must have historical consciousness, which is represented by cultural objects. These objects are essential to defining culturality and provide cohesion; cultural objects are vehicles of cultural communication that tell a people who they are and where they come from. Preserving the identity of a specific culture helps safeguard cultural diversity. Cultural property makes for more civilized societies, while research and knowledge of its cultural assets enriches a country. A people devoid of its cultural heritage is forever impoverished.

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30 Convención sobre las medidas que deben adoptarse para prohibir a impedir la importación, la exportación y la transferencia de propiedad ilícita de los bienes culturales, *Diario Oficial de la Federación*, January 18, 1972 and April 4, 1973.

31 Convención para la Protección del Patrimonio Mundial, Cultural y Natural, *Diario Oficial de la Federación*, May 2, 1984.

32 Tratado de cooperación entre los Estados Unidos Mexicanos y los Estados Unidos de América que dispone la recuperación y devolución de bienes arqueológicos, históricos y culturales robados, *Diario Oficial de la Federación*, June 9, 1971. This treaty came into force on March 24, 1971.

33 Ministry of Foreign Affairs, "Decreto por el que se aprueba el Convenio de UNIDROIT sobre los Bienes Culturales Robados o Exportados Ilícitamente, hecho en Roma, el veinticuatro de junio de mil novecientos noventa y cinco y sus declaraciones," *Diario Oficial de la Federación*, December 27, 2021, p. 2.

This is what makes the removal of cultural objects from their place of origin, be it by theft or illegal exportation, especially serious. Countries with immense cultural wealth, but severe economic limitations have been particularly affected, with a large number of cultural objects leaving these nation states for places with high purchasing power. Many countries have attempted to prevent this by introducing stricter export regulations for cultural goods, be it by placing bans on specific goods as part of permissive legislation or requiring specific authorizations as part of prohibitive legislation. Both these approaches come up against a wall at the national borders of each country and measures to protect cultural objects are severely limited in cases where the places the goods end up in are not bound by these regulations, meaning they are not recognized either by their governments or courts. Consequently, greater international cooperation is required to ensure the comprehensive protection of cultural objects. This is the purpose of the 1970 UNESCO Convention, which, I repeat, lacked operating guidelines for its implementation. It was not until May 2015 that these were approved by its States Party.[34]

The notion of common heritage of humanity or world cultural and natural heritage—a category to which culture indubitably belongs—was one of the initial points of reference taken into consideration by the international community in the drafting of the UNESCO World Heritage Convention of 1972.

This convention, which reconciles culture and nature, offers a common regime for the conservation and safeguarding of the most significant expressions of human creation and works of nature.[35] Another of its major achievements is the introduction of the concept of *world heritage* in reference to sites, monuments and other cultural and natural assets that, by virtue of their exceptional value, have been declared world heritage by UNESCO and enjoy the special protection that comes with this status. Even though the 1972

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[34] Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, *Operational Guidelines for the Implementation of the Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property (UNESCO, Paris, 1970)*, Paris, UNESCO, 2015.

[35] Francesco Francioni, "The 1972 World Heritage Convention: An Introduction," in F. Francioni and Federico Lenzerini (eds.), *The 1972 World Heritage Convention. A Commentary,* Oxford, Oxford University Press, 2008, p. 5.

Convention does not define world heritage per se, sites must meet the "outstanding universal value" criteria stipulated therein.[36]

The signing of the Cooperation Agreement between Mexico and the United States, which provides for the restitution and return of stolen archaeological, historic and cultural objects, was preceded by one of the most scandalous incidents of looting to ever take place in Mexico.

In the 1960s, pillaging intensified in the pre-Columbian Maya zone and many of the objects stolen are now on display at prestigious museums, like the Cleveland Museum of Arts, the Houston Museum of Fine Arts, the Minneapolis Institute of Art, the Brooklyn Museum, the Nelson Rockefeller Museum of Primitive Art, and the Saint Louis City Art Museum, while others have made their way into private collections and European museums. Among the stolen artifacts were Maya stelae so priceless that the art historian Clemency Coggins, an expert in pre-Columbian culture, said their acquisition by these museums was tantamount to buying Rome's Arch of Titus.[37]

A central argument in the battle against the trafficking of cultural objects is that these lose their meaning when they are "decontextualized." For an archeologist, ethnographer, historian or jurist, the true value of a cultural object can only be appreciated in context, which is what lends it meaning in time and space. No matter how valuable, if removed from its context, a painting literally becomes culturally worthless and a monument mutilated.

In our day and age, the theft of pre-Columbian treasures is not limited to ceramic objects, but extends to artifacts from well-known archaeological sites, including ones classified as archaeological monuments. In the case of the Maya stelae, these were whittled down or in some cases even broken up so they could be transported more easily, resulting in the loss of valuable information. Furthermore, lack of information on the precise location where such artifacts were found further complicates an interpretation of their meaning.

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[36] *Idem*.

[37] Quoted in Paul M. Bator, "The International Trade in Art," in *Stanford Law Review*, vol. 34, no. 2, January 1982, pp. 279-280.

Another relevant issue in the international context is the reaffirmation of the cultural sovereignty of the countries of origin of these artifacts, as is the case of Mexico, which has declared its archaeological heritage the legal property of the State and deems it *res extra commercium,* with the concomitant inalienable and imprescriptible rights. Nonetheless, the fact that we are dealing with largely undiscovered and therefore undocumented cultural objects undermines the consistency of the very notion of heritage and this argument has been used repeatedly as grounds to deny the restitution of cultural property to its country of origin, setting international precedents in the process.

In response, UNESCO and the International Institute for the Unification of Private Law (UNIDROIT) have drafted provisions to strengthen the relationship between States and their undiscovered cultural heritage, especially archaeological artifacts. These ad hoc provisions, based on a proposal by Mexico and approved by the governing bodies of both organizations, are known as Model Provisions on State Ownership of Undiscovered Cultural Objects.[38]

The Convention on Stolen or Illegally Exported Cultural Objects, otherwise known as the UNIDROIT Convention of 1995, was also ratified by Mexico, settling the conflict between the third acquirer, including acquisition from a non-owner, and the dispossessed owner of stolen or illicitly exported cultural objects. A major innovation of this Convention is the inclusion of a mandatory due diligence mechanism for the first time in international law to prevent the acquisition of stolen or illegally exported cultural objects.

This mechanism substitutes the notion of good faith previously considered in international instruments, including the 1970 UNESCO Convention.

On drafting the UNIDROIT Convention, it was concluded that it was technically impossible to define a universal notion of good faith acceptable to the international community. Indeed, the notion of good faith is interpreted very differently by national laws and is a totally alien concept in others.

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[38] Expert Committee on State Ownership of Cultural Heritage, "Model Provisions on State Ownership of Undiscovered Cultural Objects," at *https://en.unesco.org/sites/default/files/unesco-unidroit_model_provisions_en_0.pdf* (date of access: August 31, 2022).

The *due diligence* mechanism is a major step in the right direction because compliance by actors on the international art market will help mitigate illicit trade in cultural objects.

Conclusion

Safeguarding cultural heritage took on new meaning following the cultural vandalism perpetrated mainly by radical Islamic organizations, which forced the United Nations Security Council to adopt a series of fundamental resolutions[39] that deem the protection of cultural heritage a component of peace and international security.

One of the most revealing reports on the operating laxness of the international art market was drawn up by the Analytical Support and Sanctions Monitoring Team of the Security Council's Sanctions Committee.[40] The report shed light on the permissive practices of traders, associations and other actors, particularly the numismatic segment, which accounts for a large portion of illicit trade, while its diagnosis coincided with the conclusion specialized literature had already come to: the divide between the legal and illegal markets for cultural objects is a porous one and the international art market faces manifold challenges.

One of these is the systematic flooding of the market with illegal antiquities and coins. Preventing this requires stringent regulations that are binding on all actors. As things stand, however, this market lacks even minimum compliance mechanisms to guarantee implementation of the resolutions adopted by the Security Council.

But while the road to safeguarding our tangible cultural heritage looks set to remain rocky, we have seen some promising developments in the area of national and international law.

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[39] UN Security Council, "Resolution 1267 (1999)," S/RES/1267 (1999), October 15, 1999; "Resolution 2253 (2015)," S/RES/2253 (2015), December 18, 2015.

[40] UN Security Council, "Resolution 2347 (2017)," S/RES/2347 (2017), March 24, 2017.