



Mapping The Role Of Uniform Civil Code To Achieve The Goal Of Gender Justice

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Abstract

Achieving gender justice in India demands a unified legal framework that guarantees equality and protection for every individual, irrespective of their personal laws. The Uniform Civil Code (UCC), aims to replace religiously based personal laws with a common set applicable to all citizens, plays a crucial role in this endeavor. This paper investigates how the UCC could foster gender justice by addressing the inconsistencies and inequalities embedded in current religious personal laws. These laws often perpetuate gender-based discrimination in areas such as marriage, divorce, inheritance, and adoption. By analyzing the impact of the UCC on gender justice, this study examines how a standardized legal framework could unify these laws and ensure equal rights for women across diverse communities. The UCC has the potential to correct these disparities and apply gender equality consistently, thereby overcoming systemic biases. This study indicates that while the UCC offers significant potential for advancing gender justice, its success hinges on addressing socio-cultural challenges and engaging relevant stakeholders. A carefully crafted UCC could greatly enhance gender equality, though its effectiveness will rely on thoughtful legislative development and strong enforcement.

Key words: Uniform Civil Code, Gender Justice, Personal Laws.

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“Achieving gender equality is not just a mere objective, but rather a necessary condition to effectively address poverty reduction, encourage personal growth, and establish effective governance.” – Kofi Annan.¹

Gender equality is that essence of constitution of India which has always been considered as one of the major objectives envisaging equal rights of women. It is a basic human right to allow a woman to lead a dignified life in equality to men. The Constitution of India has enlisted many provisions ensuring gender equality in terms of fundamental right and directive principles of state policy which are the fundamental directives in the governance of the country. These directives are essential to be incorporated in the governance of the country while imparting any law to that extent. The State has enlisted certain Directive Principles which aimed to assure gender equality and gender neutrality like Art.39 and 42 with enacting legislation however, it has radically failed to take any step for implementing Article 44 that assures uniformity in all personal laws.

The Constitution of India preserve and uphold the principle of Fundamental Rights, that guarantees right to equality ensuring equal protection and equality before law without being bothering about their caste, creed, religion, race, and sex, yet, there is a significant difference in the legal rights granted and the rights enjoyed in true sense.

The real face of humanity still segregate men and women exposing women to many difficulties, problems, and risks only due to her appearance and gender.

Even today the women are unsafe and being irrelevant in the societal periphery. The constitutional promises, global commitments and social security towards women is still shaking as Article 44 is still underneath. The Uniform Civil Code, is a constitutional assurance given to all the genders yet lacking required imposition of law. The Indian Legislature has failed drastically thereby making women, suffer from inequalities in personal laws. The tyranny of India is that women are prima facie identified and governed according to their religion and personal law, causing for our underdevelopment, prejudice, and numerous societal problems.

Now, the time has come to understand the necessity of implementing Uniform Civil Code, that is a tool to bring impartiality in personal laws to achieve the greater interest of gender justice. This era marks its significance in giving equal rights, independence, and the power of self-decision to women modernizing the views on gender equality. The pursuit of justice and equality for women frequently intersects with contemporary concerns about freedom, secularism, and religion.² To ensure empowering of women in all the segments of social status, gender bias, health, education, and security the mandate of Article 44 to establish a uniform civil code must be achieved.

Uniform Civil Code is a proposal to bring the personal laws in uniformity to govern various religious communities with a common set of norms relating to marriage, divorce, inheritance, adoption, and maintenance. A personal law in India has

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² Desai Kumud, *Indian Law of Marriage and Divorce*, N.M. Tripathi Pvt. Ltd, Bombay 1981,4th Edition.

a background of religious faith, traditional scriptures, and cultural backbone. However, many such personal laws prove itself to be bias towards one gender causing unjust to the other gender. For e.g. a Muslim man can practice polygamy, he can divorce his wife with pronouncing talaq e biddat i.e.

unilaterally saying the word talaq thrice without allowing her to get maintenance even after that. Many such provisions of Muslim Personal Law have proven to be discriminatory and derogatory towards women. As such many reforms are initiated in Hindu law as well to avoid such biasness towards women.

RESEARCH METHODOLOGY

In research, an investigation is undertaken to validate a new theory or enhance existing ones with additional knowledge. It serves as a means of advancing and reinforcing various principles acquired through empirical studies to facilitate the research process. Research methodology refers to a systematic approach involving the identification, design, execution, analysis, and dissemination of research studies to address specific questions or topics of inquiry. It encompasses all techniques and tools employed to collect data in a structured and reliable manner, including the underlying philosophy and practices guiding the research process.

This research paper aims to analyze the importance of implementing a Uniform Civil Code and its role in promoting gender justice, as well as its potential to bring about societal changes aligned with contemporary values and principles to meet the evolving needs of Indian citizens. The study also assesses the suitability of a Uniform Civil Code in response to the changing societal needs, ideals, and aspirations. The researcher employed a doctrinal method during the study, gathering materials from secondary sources such as law journals, reports (including All India Reporter and Supreme Court Cases), the Journal of the Indian Law Institute, and other relevant publications. Additionally, facts and implications were drawn from major legislative acts, government publications, and debates in the Constituent Assembly.

CONCEPT OF UNIFORM CIVIL CODE

The concept of Uniform Civil Code (UCC) reassures the idea of a single set of rules and Regulations to ensure governing of personal matters for all citizens of a country, without considering their religious or other affiliations. The aspects governed by personal law includes laws related to marriage, divorce, inheritance, guardianship, adoption, and other personal matters. The Uniform Civil Code aims to standardize the laws of a similar nature to govern all individuals equally to restore and safeguard the rights of citizens without being subjected to distinct personal laws according to their religion or caste.

While it is included within the guidelines outlined in Article 44 of the Indian Constitution, the Uniform Civil Code encompasses several significant elements. Unfortunately, courts are unable to enforce it as these rights are non-justiciable due to apprehensions regarding various challenges. The term "Uniform Civil Code" elucidates three key concepts: first, "Uniform" denotes consistency and uniformity in all circumstances; second, "Civil" is derived from the Latin word "Civilis," which pertains to citizenship; and third, "Code" originates from the Latin word "codex," indicating a compilation of laws. These laws were initially inscribed on wooden tablets coated with wax, later transitioning to parchment or papyrus sheets.³

The adoption of the Uniform Civil Code is viewed as a stride towards secularizing personal laws, devoid of any religious associations. The notion of a Uniform Civil Code in India relates to a comprehensive Civil Law framework that is applicable to all individuals, irrespective of their religious affiliations.

In numerous nations, including India, there has been extensive debate surrounding the proposition of implementing a Uniform Civil Code. Advocates assert that it fosters equality, secularism, and national cohesion by ensuring uniform application of laws to all citizens. They contend that it eradicates discrimination based on religious or cultural practices and advances gender parity. Nonetheless, the implementation of a UCC can provoke considerable controversy, particularly in nations marked by diverse religious and cultural landscapes. Opponents often argue that personal laws are deeply entrenched in religious doctrines and cultural customs, and imposing a single code could encroach upon religious freedoms and cultural distinctiveness. Within the Indian context, Article 44 of the Directive Principles of State Policy in the Constitution recommends the adoption of a Uniform Civil Code. However, it remains a contentious issue fraught with political and social complexities, yet to be fully realized.

TRACING THE BACKGROUND

Article 44 of the Indian Constitution mandates the state to work towards establishing a uniform civil code across the nation. However, the Constitution does not specify whether this entails a single codified law applicable to all communities. The term "uniform" lacks definition within the Constitution, and implementing a single codified law poses challenges given India's vast and diverse population. The essence of "uniform" in Article 44 implies that all communities should adhere to uniform principles of gender and human justice, rather than necessitating a common law. This approach aims to maintain legal diversity while upholding fundamental principles of individual liberty and equality.

Understanding the constitutional background of Article 44 is crucial for grasping the objectives behind its inclusion in the Directive Principles of State Policy. During the Constituent Assembly debates, objections to the Uniform Civil Code were raised, primarily on the grounds of potentially infringing upon the freedom of religion and minority rights. However,

³ Jain Rahul, *UNIFORM CIVIL CODE TOWARDS GENDER JUSTICE*, Ph.D. Scholar, Bennett University, Greater Noida, India International Journal of Legal Developments & Allied Issues, ISSN: 2454-1273

proponents argued that unifying personal laws would promote secularism and national unity, drawing parallels with European countries where a civil code applies uniformly to all citizens. Dr. B.R. Ambedkar advocated for the UCC, emphasizing the need to reform a social system rife with inequalities and discrimination.

During the Constituent Assembly debates, Muslim members raised objections to the Uniform Civil Code on two main grounds:⁴ firstly, that it would violate the fundamental right to freedom of religion, and secondly, that it would oppress minority groups. The first objection was countered by noting that India already had a degree of legal uniformity across a vast geographical area, and while personal laws varied, they were not inherently sacred. It was emphasized that secular activities governed by personal law should be distinguished from religious practices.⁵

K.M. Munshi, a member of the Drafting Committee, addressed the second objection by arguing that the Constitution aimed to consolidate and unify personal laws in a manner conducive to a unified and secular way of life for the entire nation. He cited Europe as an example, where a civil code applies uniformly to all, regardless of origin or minority status, without being perceived as tyrannical.

In support of the Uniform Civil Code, Dr. B.R. Ambedkar expressed confusion as to why religion should exert such extensive control over people's lives, hindering legislative intervention. He emphasized the need to utilize liberty to reform a social system plagued by inequalities and injustices conflicting with fundamental rights.⁶

UNDERSTANDING GENDER JUSTICE AND ITS RELEVANCE

Comprehending gender justice involves recognizing and addressing the systemic inequalities and discrimination that individuals face based on their gender identity or expression. It encompasses ensuring equal rights, opportunities, and treatment for all genders, regardless of societal norms or expectations.

Gender justice involves taking deliberate actions to secure freedom and promote the rights of women, often through judicial reforms and the integration of women into social and economic policies. It extends beyond simply examining the relationship dynamics between men and women, aiming instead for a society where both genders are treated as fully human.

This entails developing strategies to transform society as a whole to ensure fairness and equality, transitioning from arbitrary to well-justified, balanced, and equitable social connections. Gender justice serves as a tool to reduce the disparities resulting from the subordination of women to men, facilitating a clearer understanding of what needs to be achieved and how to accomplish it.

OUTLINING THE GAP IN UNIFORMITY AND PERSONAL LAW

According to the stipulations outlined, there exists a conflict between gender injustice and the Uniform Civil Code within our nation's legal framework. The historical development of our laws, particularly personal laws governing aspects like marriage, divorce, maintenance, succession, minority, and guardianship, reflects evident discrimination. These laws, applicable to Hindus, Muslims, Christians, etc., often exhibit patriarchal tendencies, resulting in unfair and discriminatory treatment toward women.

In the realm of Hindu laws, notable cases such as Gita Hariharan's challenged discriminatory provisions, like Section 6 of the Hindu Minority and Guardianship Act, which placed mothers in a subordinate position as guardians. Additionally, the Supreme Court addressed the matter of the Uniform Civil Code in the case of Sarala Mudgal v.

Union of India, ruling that marriages conducted by Hindu men who converted to Islam with the intent to practice polygamy were invalid. The CARA Guidelines on Adoption Regulations Act, 2017, also imposed restrictions on adoption based on gender and age differences between the child and the adopting parent.

Muslim laws present further examples of gender inequality. For instance, under Muslim law, guardians have authority over contracting marriages for their minor wards, with limited options for repudiation, especially for females. In matters of succession, Shia laws often favor male heirs over females, and before the Muslim Personal Law Act of 1937, women had no inheritance rights.

The Shah Bano case brought significant changes to Muslim personal laws, highlighting the entitlement of divorced women to maintenance.

However, polygamy remains legal for Muslim men, while women are denied this privilege. Even under supposedly secular legislation like the Special Marriage Act of 1954, biases persist, as different religious communities face disparate treatment in matters of succession after entering civil marriages.

NEED OF UNIFORMITY IN LAWS

1. **Universal Adoption of Civil Codes:**

Every modern nation incorporates a unified civil code, symbolizing a departure from caste and religious politics. Despite notable economic strides, India lags in social advancement, exhibiting a cultural and social regression that defies classification as either modern or traditional. Embracing a unified civil code can propel societal progress and steer India closer to its aspiration of attaining developed status.

2. **Enhancement of Women's Rights:**

⁴ Singh Mahendra Pal, *V.N. Shukla's Constitution of India*, 12th edition 2016, Eastern Book Company, Lucknow.

⁵ Jain M.P., *Indian Constitutional Law*, Lexis Nexis, 7th Edition 2015, p.1430.

⁶ Constituent Assembly Debate, Vol. VII, 547-48.

The implementation of a uniform civil code holds the potential to elevate the status of women in India. Our societal fabric is heavily skewed in favor of men, perpetuating oppression, and abuse against Indian women through adherence to archaic customs. A uniform civil code has the capacity to challenge these outdated norms, acknowledging the imperative of equitable treatment and equal rights for women in contemporary society.

3. ****Equality for All Citizens****: India's personal laws exhibit preferential treatment towards specific religious groups, granting liberties such as polygamy to Muslims while penalizing Hindus or Christians for similar practices. This discrepancy undermines the principle of equal treatment for all citizens. To uphold the ethos of equality, laws pertaining to marriage, inheritance, family, and land must be standardized for all Indian citizens, ensuring uniform treatment across the board.
4. ****Advancement of Secularism****: India's secularism is often selective, with certain domains embracing secular principles while others do not. True equality necessitates the adoption of a uniform civil code, transcending religious affiliations to establish a common legal framework for all citizens. This approach fosters impartiality and fairness, safeguarding individual liberties without compromising on the principle of equality before the law.
5. ****Integrity****: Enforcing a uniform civil code in India promises to foster unprecedented cohesion, surpassing the levels achieved since independence. Presently, the perceived favoritism towards specific religious groups within legal frameworks fuels considerable animosity, a situation that could be mitigated through the adoption of a uniform civil code. Such a measure would guarantee that every Indian, irrespective of caste, religion, or ethnicity, adheres to a single national civil code.
6. ****Efficiency****: Having uniform laws can streamline legal processes, making them more efficient and less costly. This is particularly beneficial in areas such as commerce and trade where consistency in laws can facilitate interstate or international transactions.
7. ****Interstate and International Relations****: Uniformity in laws simplifies interactions between different states or countries. It promotes cooperation and harmonization of legal standards, making it easier to resolve disputes and enforce agreements across borders.
8. ****Exploitative Nature of Personal Laws****: The diverse personal laws serve as a means for those in authority to exploit situations. Our panchayats consistently deliver rulings that contradict our constitution, yet we neglect to intervene. Human rights violations like honor killings and female feticide persist across our nation. However, it is essential to balance the need for uniformity with the need for flexibility to address unique local circumstances or preferences. In some cases, variations in laws may be necessary to accommodate diverse cultural, social, or economic conditions.

CHALLENGES IN IMPLEMENTING UNIFORM CIVIL CODE:

1. **Legal Complexity**: India is a diverse nation with multiple religions, cultures, and traditions. Harmonizing these diverse legal systems into a single unified code presents significant legal complexities.⁶
2. **Political Sensitivities**: Introducing a uniform civil code requires navigating sensitive political landscapes, as it involves addressing deeply ingrained religious and cultural practices. Political parties may face opposition from various interest groups and communities.
3. **Social Resistance**: There may be resistance from certain segments of society who are apprehensive about changes to their personal laws and traditions. Resistance could come from religious institutions, conservative groups, and even individuals who fear losing their cultural identity.⁷
4. **Lack of Consensus**: Achieving consensus among different religious and cultural groups on the content and implementation of a uniform civil code can be challenging. Conflicting interpretations of religious texts and differing views on personal freedoms complicate the process.
5. **Enforcement and Compliance**: Even if a uniform civil code is enacted, ensuring widespread compliance and enforcement across the country poses a challenge. Monitoring adherence to the code and addressing violations effectively requires robust institutional frameworks and resources.
6. **Legal Precedents and Jurisprudence**: India's legal system has evolved over centuries, with numerous precedents and established jurisprudence based on personal laws. Introducing a uniform civil code would require reconciling these existing legal frameworks with the new code, which may lead to complexities and conflicts.
7. **Constitutional Amendments**: Implementing a uniform civil code may necessitate amendments to the Indian Constitution, which can be a lengthy and politically contentious process. Securing the necessary legislative support for such amendments can be challenging.⁸

⁶ Sharma Tanya, "Uniform Civil Code: A Detailed Analysis" 5 Journal of India International Centre 12 (2020).

⁷ Ibid.,

⁸ Muslim organisations divided on Uniform Civil code, available at <https://www.thehindu.com/news/national/muslim-organisations-divided-on-uniform-civil-code/article67042429.ece> (last visited on Aug 12, 2023) ¹⁰ IR 1985 SC 556

Addressing these challenges would require careful deliberation, stakeholder consultation, and a gradual approach to implementation to ensure broad acceptance and effectiveness of the uniform civil code.

ROLE OF SUPREME COURT OF INDIA

The Supreme Court acknowledged the challenges in implementing a UCC due to the diverse religious beliefs in India. While the Constitution of India mandates the enactment of a UCC under Article 44, the Court regretted that this provision remained largely unimplemented. It urged the State to take legislative steps towards enacting a UCC, emphasizing the need for national unity and solidarity. Despite judicial recognition of the need for a UCC to ensure gender equality and national unity, successive governments in India have failed to take steps to reform Muslim personal law. Political considerations and the reluctance to offend religious sentiments have led to a neglect of the UCC issue, perpetuating the victimization of women under existing personal laws.

JUDICIAL PRECEDENTS

There have not been many landmark cases specifically addressing the implementation of a uniform civil code in India, as it remains a contentious and largely unresolved issue. However, there have been significant legal cases and judicial pronouncements related to aspects that touch upon the concept of a uniform civil code. Here are a few noteworthy cases:

1. *Shah Bano Case (1985)*¹⁰

This case dealt with the rights of Muslim women regarding maintenance after divorce. The Supreme Court of India addressed the desirability of a Uniform Civil Code (UCC) in the landmark case of *Md. Ahmed Khan vs Shah Bano Begum* in 1985. The Court ruled that a Muslim divorcee was entitled to maintenance beyond the period of Iddat under Section 125 of the Code of Criminal Procedure if she could not sustain herself with the dower received at the time of divorce. However, this decision sparked controversy and led to the enactment of the Muslim Women (Protection of Rights on Divorce) Act, 1986, which excluded divorced women from the purview of Section 125. Despite criticism of this Act for perpetuating gender inequality, the Supreme Court, in subsequent cases like *Danial Latif's case*⁹, liberally interpreted it to ensure provision for the future of divorced wives even after the Iddat period.

2. *Sarla Mudgal Case (1995)*¹⁰

In this case, the Supreme Court addressed the issue of bigamy and conversion to Islam for the purpose of contracting a second marriage. The court held that a Hindu man who converted to Islam solely for the purpose of contracting a second marriage while still being legally married under Hindu law was guilty of bigamy under Section 494 of the Indian Penal Code. Here the Court emphasized the secular nature of marriage, succession, and related matters, asserting that they should not be governed by personal laws based on religion. While Hindu personal law has undergone reforms to make it secular, Muslim personal law remains untouched. Although the Court has not issued a direct order to the government for a UCC, it considers the government's inaction on this matter as serious.

3. *Danial Latifi & Anr vs Union of India (2001)*¹¹

This case concerned the rights of Muslim women in matters of inheritance. The Supreme Court held that Muslim women were entitled to maintenance under Section 125 of the Code of Criminal Procedure, irrespective of the Muslim Personal Law.

4. *Triple Talaq Cases (2017)*¹²

A series of cases challenging the practice of triple talaq (instant divorce) among Muslims were brought before the Supreme Court. In *Shayara Bano v. Union of India* and others, the Supreme Court declared the practice of triple talaq unconstitutional, emphasizing the need for gender equality and justice. This ruling sparked debates about the need for a uniform civil code to ensure equal rights for all citizens.

These cases highlight the challenges and complexities surrounding personal laws in India and underscore the need for comprehensive legal reforms, including the debate over the implementation of a uniform civil code.

CONCLUSION:

India is a welfare state as proclaimed by the preamble of its Constitution, which pledges to uphold principles of liberty, equality, fraternity, and justice. The government is tasked with addressing social and economic inequalities to foster a just social order. The basis to this is the concept of social justice, encompassing gender equality, which prohibits discrimination based on sex in social, political, and economic spheres. The constitution ensures nondiscrimination on grounds such as religion, race, caste, and sex, India has enacted uniform laws across various domains, except for personal laws related to marriage, adoption, and inheritance.

Significant legislative reforms have been initiated, particularly in Hindu personal laws, aimed at rectifying historical injustices. Practices such as untouchability, Sati, child marriage, and polygamy have been abolished, with measures like the Hindu Marriage Act of 1955, Hindu Succession Act of 1956, and Hindu adoption and maintenance laws eliminating discrepancies among different Hindu communities across India. Recent amendments have further enhanced gender

⁹ *Danial Latif Vs. Union of India, (2001) 7 SCC 740,757*

¹⁰ *Sarala Mudgal Vs. Union of India, AIR 1995, SC 1531,*

¹¹ *Danial Latif Vs. Union of India, (2001) 7 SCC 740,757*

¹² *Shayara Bano Vs. Union of India, 2017, 9 SCC 1*

equality within Hindu personal laws. For instance, the Hindu Succession Act was amended in 2005 to grant daughters rights in coparcenary property under Mitakshara law. Similarly, reforms in laws related to marriage and adoption have recognized women's equal rights, reflecting the state's commitment to ensuring gender justice and social harmony.

The state, however, has not made significant revisions to Muslim and Christian personal laws in India. Muslims are governed by the Shariah law, their personal law, while Christians adhere to the Indian Divorce Act of 1869, recognized as their personal law. The Indian Divorce Act has undergone several amendments by Parliament to humanize its provisions.

Despite this, there has been no initiative from the government to reform Muslim personal law. This reluctance stems from concerns that such interference could provoke criticism and be seen as infringing upon religious freedom. Nevertheless, it is incumbent upon the government to foster a healthy public discourse to distinguish between laws and religious practices that affect family matters and may discriminate against women. The enactment of the Special Marriage Act in 1956 was a positive step towards secularizing marriage laws, but it alone is insufficient to safeguard women's rights.

The government's hesitation and inaction have exacerbated the challenges faced by Muslim women, particularly concerning issues like Triple Talaq. Therefore, it is imperative for the state to take proactive measures to reconsider the Uniform Civil Code, recognizing the cultural and traditional diversities that exist. While achieving a uniform civil law for all may be challenging, the state should take concrete steps to codify and modernize personal laws, particularly Muslim personal law, to ensure gender justice and promote equality. Reformation and modernization efforts could pave the way for the practical realization of the constitutional values of gender justice in India.

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