

The Security Council and the Power of the Pen



Delegates in discussion ahead of the Security Council meeting on the situation in the Middle East, including the Palestinian question on 25 March 2024. UN Photo/Evan Schneider

Introduction

The penholder system is one of the Security Council's most consequential informal working methods, shaping not only how Council products are drafted but also who leads negotiations and shapes responses to crisis situations. This system is a central feature of the Council's decision-making process today. It is also an inherent aspect of how power is distributed and wielded in the Security Council. In addition to drafting the Council's decisions and stewarding the negotiations on them, the penholder generally assumes a leadership role in Council activities

on the relevant agenda items such as requesting emergency meetings, organising visiting missions, and speaking first in both the Council chamber and closed consultations—a substantive role that gives it a distinct advantage.

Before the emergence of the penholder system as it is today, there were no clear allocations of drafting or convening responsibilities for issues on the Council's agenda. However, by the late 2000s, the systems of continuous leadership by specific Council members had taken root, with France, the

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UK and the US (P3) holding the pen on the vast majority of country-specific issues.¹

This also led to a two-tier negotiation system where the P3 would share, and often get agreement on, a first draft of a Council product with China and Russia (P2) before it was shared with the ten elected members (E10). Over time, elected members reacted to not being included in the early stages of the negotiation of a draft and began to challenge the P3's dominance of the penholder system.

The E10, who have steadily enhanced their collective identity within the Council, have argued that the concentration of drafting responsibilities in the hands of three permanent members undermines the inclusivity, transparency and effectiveness of the Council's decision-making processes. In this regard, they have called for a more equitable distribution of penholderships, including opportunities for elected members to be co-penholders on specific thematic and country files, as part of ongoing efforts to promote burden-sharing and fairness in a divided Council and reflect the views of the wider membership that elected them in Council products. For their part, China and Russia have raised concerns about the concentration of penholderships among the P3 and have called for a more inclusive and balanced approach to the system. The wider UN membership has also been echoing these sentiments for quite some time in the Council's annual Working Methods open debates.

Demands for diversification of penholding responsibilities continue to grow as heightened tensions amidst geopolitical changes have made it all the more difficult for the Council to play a meaningful role in addressing major conflicts across the globe. As a result, the Council has faced rising criticisms of not carrying out its mandate under the UN Charter to maintain international peace and security and has had its effectiveness and legitimacy increasingly questioned.

The P3 have cited their institutional memory and capacity as the main reason for their prominent role in the penholder system. In recent years, however, they have become increasingly responsive to criticism of the concentration of penholderships in their hands. This has come about as a result of a concerted effort on the part of the E10

in demanding more say in Council outcomes as well as a practical recognition from the P3 that broader support is needed in a divisive political environment to advance Council action. The P3 penholders more frequently now seek the support of other Council members in calling for meetings and, in addition to their engagement with other permanent members, they are consulting with greater regularity with elected members in preparing draft decisions. This is particularly the case on African files where the P3 actively engage with the three African members (A3) whose profile within the Council has risen over the past decade, as they strive to work together to promote issues of common interest on the continent and in other cases as well. (For more, see our November 2025 research report, entitled *From the Margins to the Center: The Rise of the A3 in the UN Security Council*.)

The expansion of co-penholding arrangements also comes in response to a more complex geopolitical environment and the complicated dynamics in the Council, which have at times made it more difficult for the P3 to secure support for drafts. This appears in some cases to have contributed to a greater willingness by the P3 to share the pen on some files, and in general, to collaborate more closely with other Council members, particularly elected members.

Nonetheless, the extent of this evolution should not be overstated. The P3 still pen or co-pen on most files, and they determine when and with whom they share the pen. In practice, they often tend to work with elected members whose positions broadly align with their own priorities and policy preferences. Consequently, while co-penholdership has created additional space for elected members to engage in the drafting process, it has not fundamentally altered the overall distribution of penholdership within the Council.²

This report focuses on recent developments in penholding, focusing largely on the past decade, although some of the analysis predates this. The past decade has been marked by notable shifts in penholding arrangements, key Council decisions on penholding, and active discussions on penholding within the Informal Working Group on Documentation and Other Procedural Questions (IWG). The issue has also

Security Council Report would like to thank the government of Germany for its generous support of this project. We also express our gratitude to all colleagues who generously shared their perspectives on the topics and issues covered in this report.

¹ Security Council Report. The Penholder System, Research report no.3. (21 December 2018), <<https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/Penholders.pdf>>.

² Security Council Report (2025). 2025 Chairs of Subsidiary Bodies and Penholders, <https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/working_methods_penholders_chairs_2025.pdf>.

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remained a recurring theme in the Council's annual debates on working methods, where fundamental questions about the structure and fairness of the penholder system continue to be raised.

The report outlines the mechanics of the penholder system, addressing a range of issues raised by Council members and the wider UN membership on how to enhance both efficiency and effectiveness, including the timely circulation of draft texts, getting inputs from Council members and other key stakeholders, and the allocation of adequate time for negotiations and the organisation of inclusive and transparent consultations.

The report analyses the role of elected members, who have increasingly sought to assert themselves and carve out space in the Council's substantive work by advocating for more equitable burden-sharing and promoting co-penholdership arrangements as a means of broadening their participation and influence in Council

decision-making. The report evaluates the advantages and challenges of co-penholder arrangements by examining examples drawn from recent experiences.

It also examines the evolving Council dynamics around the penholder system over the past decade. In particular, the report considers how broader geopolitical tensions within the Council have shaped discussions on penholdership, including how competition and mistrust among permanent members have impacted the discussion on the penholder system.

The report concludes by presenting a set of observations on the current state of the penholder system and its implications for the Council's effectiveness and legitimacy. It outlines possible options to strengthen the system's transparency, inclusivity, and accountability, while preserving the efficiency needed for the Council to respond to evolving international peace and security challenges.

Key Developments Relevant to the Penholder System

One of the earliest examples of the use of the term “penholder” occurred during an open debate on the Council's working methods on 30 November 2011, when Ambassador Hardeep Singh Puri (India) said:

“We... have the issue of ‘pen holders’. Quite apart from the fact that it takes quite a while to understand what the concept of a pen holder is and which member is holding which pen for which issue, it is difficult to understand why pen holding should basically be a monopoly of permanent members, with concentration in even fewer fingers.”³

While today this concept is more widely known and understood, the P3 remain the penholders on most files. Since the 2011 working methods debate, however—and especially during the past decade—there has been a perceptible, albeit modest, opening up of penholding arrangements.

The 2017 Note 507 for the first time included specific language stating that the penholder system “aims to facilitate timely initiatives to ensure Council action while preserving an element of continuity, with a view to enhancing the efficiency of the Council's work”.⁴ The Note also states that “Any member of the Security Council may be a penholder”, and that all Council members “should be allowed to participate fully in the preparation” of outcomes.⁵

Several factors have contributed to this evolution. In addition to the long-standing frustration of being sidelined, as described above, elected members joining the Council in recent years have increasingly shown a strong desire to play a more active and substantive role on issues of importance to them. They view being a penholder as an avenue for such influence, and have actively pursued co-penholderships, usually with permanent members, but also at times with other elected members. Elected members' advocacy for a more inclusive and equitable Council finally nudged open the door to

co-penholding with the P3 on several issues. The elected members have benefited as well from the support of China and Russia in pushing for the democratisation of the pen.

At the same time, the P3 also appears to see an advantage to broader and more regionally representative co-penholding arrangements. In some cases, collaboration with a regional country or one with a special interest in the issue has been viewed as a way of strengthening the legitimacy of their work and adding an important regional perspective.

Many Council members continue to view the penholdership issue as a matter of great importance. It has been a constant focus of both elected members and the wider membership in the annual Council's working methods debate. The issue also received attention through an Arria-formula meeting dedicated to the issue in August 2022.⁶ In parallel, the IWG has become more active on penholding issues in recent years, culminating in the adoption of a presidential note on the topic in late 2023.⁷

A Rise in Co-Penholdership Arrangements

Co-penholdership arrangements have proliferated in recent years. These have largely been collaborations between permanent and elected members and among elected members. In rare instances, permanent members, including Russia and the US, have collaborated with each other.

P3-E10 Collaborations on Thematic Files

For at least the past decade, P3 and E10 members have often worked together as penholders on thematic issues, a practice that began to take hold even before it was common for them to share the pen on geographical files.⁸ Sievers, for example, references early examples of such co-penholderships between Spain and the UK on resolution

³ UNSC 6672nd Meeting Record (30 November 2011) (S/PV.6672).

⁴ Note by the President of the Security Council (30 August 2017) (S/2017/507).

⁵ Ibid.

⁶ Arria-formula Meeting convened by Russia (11 August 2022). For example, see China's Statement: <<https://webtv.un.org/en/asset/k1r/k1rvk0abfj>>.

⁷ Note by the President of the Security Council (1 December 2023) (S/2023/945).

⁸ Loraine Sievers (2014). “Background on the ‘penholder’ practice for drafting outcome documents (with tables),” Chapter 5: Conduct of Meetings and Participation, Section 6: Motions, proposals and suggestions, in Update Website of Loraine Sievers and Sam Daws, *The Procedure of the UN Security Council*, 4th Edition, Oxford University Press: Oxford, (updated on 14 February 2026), <<https://www.scprocedure.org/chapter-5-section-6b>>.

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2242 of 13 October 2015 on women, peace and security, and Senegal and the US on resolution 2320 of 18 November 2016 on the UN-AU relationship.⁹

More recent examples of such P3-E10 partnerships include Ireland and the US co-penning resolution 2664 of 9 December 2022, which established a cross-cutting humanitarian exception to the asset freeze measures imposed by UN sanctions regimes, and Malta and the US collaborating to draft resolution 2744 of 19 July 2024, which strengthened the mandate of the Focal Point for Delisting from UN sanctions regimes and re-established the Informal Working Group of the Security Council on General UN Sanctions Issues that had been defunct since 2006.

P3-E10 Collaborations on Geographical Files

One of the more significant developments in recent years has been the increase in co-penholderships between P3 and E10 members on geographical files. An inflection point came when Germany joined the UK as co-penholder on issues concerning Libya sanctions and Sudan (Darfur) in 2019. This was one of the first signs of the P3 responding to pressure from the elected members regarding their monopoly on penholderships. There were no new penholding partnerships, however, between permanent and elected members in 2021 after Germany left the Council. One elected member entering the Council in 2021 tried to explore the possibility of being a co-penholder on the Libya issue with the UK but was told that bringing in Germany as a co-penholder had been an exception.

There was a change in the situation from 2022 onwards as P3-E10 collaborations on geographical files opened up. The catalyst appears to have been the Ukraine crisis in February 2022. Although Ukraine had been discussed in the Council since 2014 in connection with Russia and Crimea, there was no clear penholder with both Russia and the US drafting texts and various members requesting meetings. Russia's full-scale invasion of the country in February 2022 created new penholdership needs in the political and humanitarian tracks. The US and Albania became co-penholders on the political aspects of the conflict, with France and Mexico co-penholding on its humanitarian aspects. This pattern of P3-E10 cooperation—with France teaming up with an elected member on the humanitarian track and the US co-penning with an elected member on the political track—endured in the following years but has not continued into 2026.

The US was a co-penholder with an elected member on Ukraine political issues through the end of 2025, although there has been a shift in US policy on Ukraine since the Trump administration came into office in January 2025. Slovenia and the US were co-penholders on the Ukraine political file in 2024-2025. In 2024 and January 2025, before the new administration assumed office, the US and Slovenia would frequently jointly call for meetings on developments in Ukraine. After January 2025, Slovenia continued to co-pen on the file, consulting the US when it called for Council meetings on Ukraine political issues and inviting them to join these requests.

Invariably, however, the US did not participate in these requests. Instead, the norm was for Slovenia to be joined by the four other European members of the Council to collectively call for meetings on political issues in Ukraine, with other elected members, most notably the Republic of Korea (ROK), occasionally participating with them. The shift in the penholder dynamic on Ukraine was also reflected in the US serving as the sole drafter on the only outcome on Ukraine in 2025. Resolution 2774 of 24 February 2025 implored a swift end to the conflict between Ukraine and Russia and was adopted with 10 votes in favour and abstentions from the five European members of the Council. These members were disappointed that the draft neither reaffirmed the Council's commitment to Ukraine's sovereignty and territorial integrity nor referenced Russia's full-scale invasion of the country, among other concerns. In 2026, the five European members of the Council are considered the penholders on the humanitarian and political aspects of the Ukraine file.¹⁰ Russia has also called for meetings and produced drafts on Ukraine.

There have been several co-penholderships between P3-E10 members since 2022 on other geographical files. Depending on the file, P3 members have either consistently shared the pen with an elected member or done so for short periods. The US has held the pen with one of the Council's Group of Latin American and Caribbean (GRULAC) members on Haiti since 2022, with the US and Panama serving as the co-penholders on this file in 2025-2026. France was the co-pen on Operation IRINI in Libya with Malta (2023-2024) and has been with Greece in 2025-2026. Greece and the US share the pen on the Red Sea in 2026.¹¹ In recent years, the UK has shared the pen with the Central African elected member on the Central Africa file, including its partnership with Mozambique in leading the negotiations on a presidential statement in November 2024.¹²

There are also cases of P3-E10 collaboration from the recent past that have been discontinued. Mexico served as co-penholder with the UK in 2022 on Colombia, but since then, the UK has been the sole penholder on this file. France and Mexico, which chaired the 2374 Mali Sanctions Committee in 2021-2022, co-penned resolution 2649 in August 2022, renewing the Mali sanctions regime. The following year, France produced a draft with the United Arab Emirates (UAE) to renew this mandate, which was vetoed by Russia, thus terminating the Mali sanctions. France, the long-standing penholder on the Democratic Republic of the Congo (DRC), also shared the pen on this file for one year, in 2024, with Sierra Leone, but this did not continue into 2025.

E10 Collaborations on Geographic and Thematic Files

Three traditional E10 penholding files have been the Syria humanitarian file, the UN Office for West Africa and the Sahel (UNOWAS), and until recently, Afghanistan. From 2013-2023, depending on the year, two or three cross-regional E10 penholders stewarded the Syria humanitarian file. Elected members Australia and Luxembourg,

⁹ Ibid.

¹⁰ Interviews with current European members (April/May 2026). This is also the conclusion Sievers comes to in her update in February 2026: Loraine Sievers (2014). "Backgrounder on the 'penholder' practice for drafting outcome documents (with tables)", "Chapter 5: Conduct of Meetings and Participation", "2026 Security Council Penholders – Lead Countries" in Update Website of Loraine Sievers and Sam Daws, *The Procedure of the UN Security Council*, 4th Edition, Oxford University Press: Oxford, (updated on 14 February 2026), <https://www.scprocedure.org/_files/ugd/54a569_962e81016746413aa1f0bba24befe03c.pdf>.

¹¹ Loraine Sievers (2014). "Backgrounder on the 'penholder' practice for drafting outcome documents (with tables)", "Chapter 5: Conduct of Meetings and Participation", "2026 Security Council Penholders – Lead Countries" in Update Website of Loraine Sievers and Sam Daws, *The Procedure of the UN Security Council*, 4th Edition, Oxford University Press: Oxford (updated on 14 February 2026), <https://www.scprocedure.org/_files/ugd/54a569_962e81016746413aa1f0bba24befe03c.pdf>.

¹² Statement by the President of the Security Council (1 November 2024) (S/PRST/2024/7).

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later joined by Jordan, took the pen in 2013–2014 to address humanitarian issues in Syria, frustrated by the human suffering in the country and by gridlock among the permanent members which prevented the Council from playing a meaningful role in addressing the crisis. This pattern of E10 co-penholding continued through 2023, when Brazil and Switzerland were co-penholders and the same year that the Council’s authorisation of the cross-border aid mechanism ended. In the ensuing years, there has only been one penholder on Syria humanitarian affairs: Switzerland in 2024 and Denmark in 2025–2026.

West African members have long been penholders on issues in West Africa and the Sahel region. Chad, for example, penned presidential statements on the Sahel in 2014 and 2015. Since the creation of UNOWAS in 2016, the West African member of the Council has been the penholder on West African issues. Senegal was the penholder in 2016–2017, while Côte d’Ivoire took the pen in 2018. Since 2018, the UNOWAS file has had two elected members—one from West Africa and the other from Western Europe—serve as co-penholders.¹³

Between 2012 and 2018, a European elected member served as the penholder on Afghanistan. In the ensuing years, this file had either one or two elected members serving as penholders in any given year until 2025. China becoming the sole penholder in 2025 after a jostling for the pen among four members represented a significant change on the file. The US has been the penholder on Afghanistan sanctions issues since the creation of the 1988 sanctions committee in 2011.

A notable early example of elected members co-penning on a thematic file was the collaboration on resolution 2286 of 3 May 2016, which focused on the protection of health care in armed conflict. That initiative was spearheaded by five elected members—Egypt, New Zealand, Spain, Japan and Uruguay—who led the process of drafting and negotiating the resolution over a period of several months.¹⁴

In more recent years, elected members have also joined forces on penholding collaborations on other thematic and geographical issues. Resolution 2601 of 29 October 2021 on attacks on education was initiated by Niger and Norway, while resolution 2634 of 31 May 2022 on piracy and armed robbery in the Gulf of Guinea was spearheaded by Ghana and Norway. The cross-regional collaboration between Ireland and Niger on a draft climate and security resolution in 2021 did not lead to the resolution being adopted due to a Russian veto, but it both reflected and galvanised widespread support for the climate, peace and security agenda (CPS), garnering 113 co-sponsors from the wider membership. Mexico and Norway drew on their shared interest in conflict prevention to lead on the presidential statement on the Secretary-General’s diplomatic efforts on Ukraine and worked together on a potential outcome on the Black Sea grain deal negotiated by the UN. Ireland held the pen on Tigray, Ethiopia, in 2021 and worked closely with the A3 on outcomes. Additionally, the Council adopted a presidential statement on missing persons in armed conflict on 28 June 2024,¹⁵ an initiative led by the “A3 Plus one” grouping (which at the time

comprised of Algeria, Mozambique, Sierra Leone, and Guyana) to mark the fifth anniversary of resolution 2474 of 11 June 2019, which was penned by Kuwait and is the Council’s only standalone resolution on this issue. As well, Guyana and Sierra Leone were the co-penholders resolution 2807 on youth, peace and security adopted on 12 December 2025.

E10 Collective Penholding

On occasion, the E10 has collectively worked together to draft joint outcomes, especially when there is an impasse in the Council on intractable issues due to divisions among the permanent members. During the 2011–2024 civil war in Syria, elected members frequently expressed frustration with the gridlock in the Council. In April 2017, they collectively produced a draft resolution in response to the 4 April 2017 chemical weapons attack in the Khan Shaykhun area of Idlib, Syria, as an alternative to competing P3 and Russian draft resolutions that had been circulated to Council members. This was never put to a vote, however, and a subsequent P3 draft was vetoed by Russia.

In 2024, the E10 collaborated as a unit in an effort to draft outcomes on the war in Gaza. Resolution 2728 of 25 March 2024, which called for a ceasefire during the month of Ramadan was the first resolution to be adopted with the E10 as joint penholders. Although it did not have a noticeable impact on the ground, it was one of only two resolutions adopted on the Gaza war in 2024, and the first one calling for a ceasefire. The E10 then collectively penned three other draft resolutions on the situation Gaza in 2024 and 2025; each of these received 14 affirmative votes but were vetoed by the US.¹⁶

The A3’s Aspiring Role

The A3’s emergence as a cohesive negotiating bloc has significantly influenced Council dynamics, with the group’s support becoming a de facto requirement for the adoption of any Council product concerning African issues. In this regard, the P3 are not only seeking the A3’s support but also engaging with the group ahead of negotiations. Reflecting its growing influence, the A3 is increasingly interested in securing penholding or co-penholding responsibilities for African dossiers—and other issues of interest to Africa—on the Security Council’s agenda. To date, as discussed above, A3 members have primarily assumed penholding or co-penholding roles on files related to West Africa and the Sahel, as well as the Central Africa region. This push to expand A3 members’ penholding role has the potential to significantly increase the group’s influence, positioning it as a more assertive player in the Council’s decision-making process.

Working Behind the Scenes

In some cases, a country does not hold the pen but has a particular interest or knowledge of a file and provides quiet advice behind the scenes to the penholder. This has sometimes been referred to as “shadow” penholding, although there are differences of view on the accuracy of the reference because the “shadow” member is not

13 Penholders on West Africa and the Sahel file: Côte d’Ivoire and Sweden (2018), Côte d’Ivoire and Belgium (2019), Niger and Belgium (2020), Niger and Ireland (2021), Ghana and Ireland (2022), Ghana and Switzerland (2023), Sierra Leone and Switzerland (2024), Sierra Leone and Denmark (2025), and Liberia and Denmark (2026).

14 For more information, please see Security Council Report. “Briefing and Resolution on Healthcare in Armed Conflict” (What’s in Blue, 2 May 2016), <<https://www.securitycouncilreport.org/whatsinblue/2016/05/briefing-and-resolution-on-healthcare-in-armed-conflict.php>>.

15 Statement by the President of the Security Council (28 June 2024) (S/PRST/2024/4).

16 Draft UNSC Resolutions penned by the E10: (S/2024/835 (20 November 2024), (S/2025/353) (4 June 2025), and (S/2025/583) (18 September 2025).

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involved in drafting. Over the years, the UK and the US have frequently worked with several elected members who are able to complement their efforts as a penholder. This was, for instance, the case with Ethiopia in 2017–2018 in relation to the Horn of Africa files (for example, Somalia, Sudan and South Sudan) and with Kenya, which served on the Council in 2021–2022, on Somalia in particular. Both Ethiopia and Kenya were able to bring their regional knowledge to bear in these instances. An elected member can also work with a penholder in other ways. During its 2025–2026 term, Denmark has frequently joined the UK, the penholder on Sudan, in calling for meetings on pertinent developments in the country. Sometimes an elected member can nudge the penholder to pursue a Council product, as Sweden did on Yemen when it was a Council member in 2017–2018 and Norway on Myanmar in 2021–2022, files that the UK is the penholder on.

Besides individual members, the A3 as a group has at times preferred to act as “shadow” penholders in order to advance their objectives. This preference stems from two main considerations. First, the A3 recognise that sharing the pen can limit their ability to pursue their priorities assertively and may require them to dilute their positions for the sake of compromise. By acting as “shadow” penholders, however, they can influence the process without having to maintain a balance among competing interests. Second, penholdership or co-penholdership demands the type of resources that some smaller A3 missions may not possess. “Shadow” penholdership, therefore, allows them to shape decision-making processes without assuming the full responsibilities associated with formally sharing the pen.

Russia-the US Co-penholding

Russia and US have been longstanding co-penholders on the UN Disengagement Observer Force (UNDOF), which was established in May 1974 to monitor the ceasefire between Israel and Syria. It appears that the Secretariat used to draft the renewal resolution for UNDOF until around 2010. The start of the civil war in Syria brought greater attention to the UNDOF file and during the negotiations on the June 2011 UNDOF renewal, two draft resolutions were circulated—the first by the US and a later one by Russia. The US draft included extensive references to the political situation in Syria, while the Russian draft contained the technical language used in past resolutions renewing UNDOF. During the negotiations, an agreement was struck to merge the texts and reference the events that occurred in UNDOF’s area of operations but not demonstrations against the Syrian government. Wanting to avoid this scenario of competing drafts in the future, Russia and the US began jointly drafting UNDOF mandate renewals.¹⁷

The US–Russia co-penholdership on UNDOF has continued to this day. In line with the Council more broadly, they have, over the years, viewed UNDOF as an important stabilising presence in the region. Throughout Syria’s civil war (2011–2024), both Russia and the US managed to compartmentalise UNDOF as an issue on which they could reach agreement, distinct from their divergent views on the conflict in Syria.

On rare occasions, notwithstanding their opposing positions and the Council’s inability to contribute to a peaceful resolution of the Syrian civil war, Russia and the US could compromise on Syria when they were able to muster the requisite political will. They co-authored resolution 2118 of 27 September 2013, which required the verification and destruction of Syria’s chemical weapons stockpiles. The US was the sole penholder on resolution 2254 of 18 December 2015, which created a framework for a potential political solution to the conflict, but it consulted closely with Russia when preparing the draft.

The two countries are currently considered the co-penholders on Syrian issues outside the humanitarian track.¹⁸ They co-authored a presidential statement, adopted on 14 March 2025, that responded to sectarian violence between 6 and 10 March that left hundreds of civilians dead in Syria’s coastal governorates of Latakia and Tartous.¹⁹

Russia and Penholdership

In addition to co-penning with the US on UNDOF, Russia is also the penholder on the UN Regional Centre for Preventive Diplomacy for Central Asia (UNRCCA). Council members meet twice a year in consultations to discuss the work of the UNRCCA, although there has not been a Council outcome on this file since 2018.

In an increasingly geopolitically charged Security Council, Russia has frequently employed the tactic of proposing alternative or rival draft texts to challenge P3 initiatives on contentious issues. Although Russia occasionally convenes negotiations on its alternative draft texts, these drafts often do not undergo the usual negotiation process and are instead frequently placed directly in blue for a vote. While Russia had used this approach on the Syria file for some time, the practice appears to have intensified following its February 2022 invasion of Ukraine. More recently, Russia has also employed this tactic in relation to Gaza and the crisis in the Strait of Hormuz. In most cases, however, Russian alternative draft texts have failed to garner sufficient support for adoption, whereas P3-sponsored draft resolutions have often secured majority support but were ultimately vetoed by Russia.

China Becomes a Penholder

China’s active pursuit of the opportunity to serve as a penholder on Afghanistan in 2025 represented a significant development. A permanent member assuming the pen on Afghanistan broke with past practice, but it was also noteworthy that China, which does not appear to have held the pen on any other file in the past, was keen to assume this responsibility. As a neighbor of Afghanistan with strategic interests in the country, it is not surprising that China would have an interest in this file. China has also been a long-standing advocate for expanding penholding opportunities within the Council beyond the P3.

The road to penholdership in this case was not straightforward and was complicated by a tussle among Council members. Japan, which held the pen on Afghanistan in 2024, left the Council at the end of that year. During discussions on Japan’s possible replacement,

17 Security Council Report. “Resolution on UN Force in Golan Heights”. (What’s in Blue, 20 December 2011), <<https://www.securitycouncilreport.org/whatsinblue/2011/12/resolution-on-un-force-in-golan-heights.php>>.

18 Loraine Sievers (2014). “Backgrounder on the ‘penholder’ practice for drafting outcome documents (with tables).” “Chapter 5: Conduct of Meetings and Participation,” “2026 Security Council Penholders – Lead Countries” in Update Website of Loraine Sievers and Sam Daws, *The Procedure of the UN Security Council*, 4th Edition, Oxford University Press: Oxford, (updated on 14 February 2026), <https://www.scprocedure.org/_files/ugd/54a569_962e81016746413aa1f0bba24befe03c.pdf>.

19 Statement by the President of the Security Council (14 March 2025) (S/PRST/2025/4).

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it appears that China, Pakistan, and the ROK each expressed an interest in becoming a penholder on the file. China subsequently invited Pakistan and the ROK to work with it as co-penholders. While Pakistan agreed to this suggestion, the ROK apparently indicated that it needed more time to consider its position. It seems that this proposal was resisted by the US, which expressed concern about China holding the pen and begun to discuss a possible co-penholdership with the ROK.²⁰

This disagreement culminated in early February 2025 when China and Pakistan circulated a draft resolution on the renewal of UNAMA's mandate, prompting the ROK and the US to circulate their own draft resolution extending the mission's mandate on the following day. Ultimately, Council members agreed China would lead the negotiations in February, as Council president that month, including by merging the two drafts into one text. Members apparently agreed that the draft would be a "presidential text", meaning that it would be co-sponsored by all 15 Council members. When the negotiations carried over into March, members concurred that Denmark, the Council president for that month, would work with China to lead the negotiations through to the adoption of the mandate renewal.²¹ Although broader disagreement regarding who should have the pen on Afghanistan persisted for some time, China eventually assumed this role.²²

Arria-formula Meeting on Penholdership

On 11 August 2022, Russia convened an Arria-formula meeting on penholdership. It circulated a concept note in advance of the meeting, noting that penholdership is "an informal arrangement that is supposed to reflect shared responsibility and collective engagement", while pointing out that the P3 held the pen on most issues. It stated that the objective of the meeting was to give member states the opportunity "to provide their views and assessments and practical proposals aimed at ensuring better burden-sharing and more equal distribution of work of the Council...and enhancing its transparency [and] efficiency".

While there were no briefers at the meeting, 32 member states, including all 15 Council members, participated in the discussion.²³ Several ideas were presented: a more structured practice on selecting penholders and co-penholders, regular review of inclusivity and timeliness for drafting practices, and adopting a code of conduct for penholders. Some member states also suggested that countries were best placed to serve as penholders on situations from their respective regions.

During the Arria-formula meeting, Brazil reiterated a call that it made at the 22 July 2022 meeting of the IWG to include "more frequent and structured discussions in the IWG on the penholder practice and on the implementation of Note 507 regarding the conduct of negotiations of Council documents". This proposal has led to penholdership becoming a standing item on the agenda in IWG meetings since November 2022. In this context, penholders and co-penholders have had the opportunity to share their experiences in drafting and negotiating outcomes, including challenges and effective practices.

Presidential Notes

The first written reference to the term penholder in an official UN document appears to have been in a 2014 note by the President, which acknowledged that any Council member may be a penholder; the 2017 note 507 restated this agreement.²⁴

During their time as chairs of the IWG in 2018 and 2021, respectively, Kuwait and St. Vincent and the Grenadines attempted to adopt guidelines on penholdership but were unable to obtain consensus at the time. Finally, on 1 December 2023, the IWG was able to adopt a presidential note on penholdership. This note, which took several months to negotiate, was initiated by elected members UAE and Brazil. It was negotiated within the E10 and presented as an E10 draft. France brought their own draft to the table as well. China subsequently produced a consolidated draft based on the E10 and France draft notes that was ultimately agreed to by members. The Note captured the trend towards expanding penholders beyond the P3, including the pledge to make "enhanced use" of the expertise of the chairs of subsidiary bodies (who are elected members) and members with regional perspectives, and to take this expertise into account when considering members who could serve as penholder or co-penholders.

The substance of this note was subsequently incorporated into the updated presidential note 507, the compendium of the Council's working methods, which was adopted on 13 December 2024.²⁵ The updated Note 507 also includes a dedicated section on "Penholdership and outcome documents" that was not in the Council's previous working methods compendiums, according the issue some more prominence than in the past; the previous Note 507, adopted in 2017, addressed penholding in a section titled "Outcome Documents".²⁶

20 Security Council Report. "Afghanistan: Vote on Draft Resolution Renewing UNAMA's Mandate". (What's in Blue, 15 March 2025), <<https://www.securitycouncilreport.org/whatsinblue/2025/03/afghanistan-vote-on-draft-resolution-renewing-unamas-mandate-2.php>>.

21 Ibid.

22 Interview with UN diplomats (28 April 2026). It seems the US, which had been wary of China holding the pen on Afghanistan, decided to acquiesce to China serving as penholder on the file. At least in part, the US may have been influenced by China's decision not to block resolution 2793 of 30 September 2025, which authorised UN member states to transition the Multinational Security Support (MSS) mission in Haiti into a "Gang Suppression Force" (GSF) for an initial period of 12 months. China had voiced misgivings about the resolution, which received 12 votes in favour and three abstentions (China, Pakistan, and Russia). See also Richard Gowan (2026). "The UN Security Council: still room for compromise?", *International Affairs* 102:1, p.256.

23 It should be noted that Costa Rica made its statement on behalf of the Accountability, Coherence and Transparency (ACT) Group, while Venezuela's statement was delivered on behalf of the Group of Friends in Defense of the Charter of the United Nations.

24 Note by the President of the Security Council (14 April 2014) (S/2014/268).

25 Note by the President of the Security Council (13 December 2024) (S/2024/507).

26 Note by the President of the Security Council (30 August 2017) (S/2017/507).

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The penholder system appears to have altered the process of negotiating resolutions. In the early 1990s, the negotiation of resolutions was generally conducted by the president in informal consultations with participation by all members. By the 2010s, with the P3 assuming the pen on nearly all conflict-specific agenda items, the penholder tended to lead negotiations, consulting with other permanent members before circulating a draft to the elected members.²⁷

The mechanics of penholding is quite complex, involving multiple steps. The penholder or penholders must make a multitude of key decisions, including the amount of time to allocate for negotiations, the scope of their consultations with key stakeholders, and the balance between fostering consensus and adhering to core principles, among others. Over the years, how penholders execute these activities have been scrutinised by Council members and the wider membership. The 1 December 2023 presidential note²⁸ underscores the complexities of penholding. It calls for penholders and co-penholders to conduct negotiations in an “inclusive and respectful manner” by doing, among others, the following:

- ensure, as early as possible in the drafting exercise, an exchange of information among all Council members and engage in timely consultations with all Council members;
- share draft documents as early as possible to provide reasonably sufficient time for consideration by all Council members, bearing in mind that the Council needs to act swiftly if the situation so requires;
- informally consult the chairs of the subsidiary bodies concerned before circulating an early draft of a document involving the same country or region, in particular in the case of renewal of sanctions measures or the mandate of panels of experts;
- build consensus, whenever possible, through sufficient informal consultations or “informal informals” on draft documents among Council members, and make every effort to address divergences among Council members, in a flexible and timely manner; and
- informally consult with the wider UN membership, particularly the member states concerned, and, as appropriate, take into full

consideration their views and concerns, including during mandate renewals.

Time Allotment

A key question that arises in discussions on the penholder system is how much time is sufficient for on Council outcomes. During the 2024 annual open debate on working methods, China and Russia criticised the P3 for imposing artificial deadlines that limit opportunities for comprehensive, expert-level review of draft documents and failing to fully take into account the concerns of other Council members.²⁹

Over the past decade, the Security Council has been adopting an average of 50–60 resolutions each year, although since 2024, this number has come down to the low 40s. In addition, during the same period, the Security Council has adopted an average of 7–10 presidential statements and 50–60 press statements per year, both of which require agreement.³⁰ Press statements are typically negotiated through email exchanges and are generally less contentious. Presidential statements are also increasingly negotiated via email exchanges, although there remains a practice of conducting in-person negotiations, particularly when the negotiations are more difficult. The number of presidential statements has declined in recent years, possibly because they are consensual documents that are more difficult to agree on in an environment of heightened geopolitical tensions within the Council.

Council members negotiate various types of resolutions, with those concerning the renewal of mandates for UN peace operations, the extension of sanctions regimes, and the renewal of panels of experts’ mandates constituting the bulk of this work. The latest Note 507 states that “[f]or each draft resolution which is not a technical rollover or for each presidential statement, the members of the Security Council encourage the penholder or co-penholders to present and discuss the draft with all members of the Security Council in at least one round of informal consultations or informal-informals”.³¹

Possible Negotiation Steps for a Peace Operations Mandate Renewal or Extension of a Sanctions Regime

There is no formal template for Security Council negotiations, as the process is informal, flexible, and often shaped by the penholder. Although every negotiation is different, a negotiation led by a proactive penholder on a draft resolution concerning the renewal of a peace operation mandate or the extension of a sanctions regime could follow these steps:

- A visit to the field by New York-based experts and headquarters officials to engage with host authorities, mission leadership, and other relevant stakeholders; as an alternative, a virtual visit is a possibility.
- The penholder consults informally with the permanent members and, more recently, the A3 on African files, on the draft, possibly sharing a pre-zero draft and incorporating the inputs and comments received.
- Bilateral consultations with elected members are conducted—or with other elected members on African files, if the A3 have already been consulted. This can help to provide advance notice of the broad outlines of the draft text and to mobilise support for it.
- The penholder consults with the host government, Troop- and Police-Contributing Countries (T/PCCs), the UN Secretariat, and field missions.
- The penholder circulates the draft text to all 15 Council members by email

and conducts informal consultations. Depending on the complexity of the negotiations, there may be multiple rounds, usually held at the penholder’s mission, including an initial read-through followed by detailed, line-by-line discussions; negotiating virtually, a practice started during the COVID-19 pandemic, continues to be occasionally used.

- The draft subsequently undergoes a comments period and a silence procedure, during which revisions reflecting members’ proposals are incorporated to the extent possible. This phase is generally conducted via email exchanges.
- Council members continue to consult with their capitals and seek the necessary instructions throughout the negotiation period.
- Silence breaks are possible due to diverging views among Council members or if some feel their concerns have not been adequately addressed. In such cases, the penholder typically engages in bilateral consultations to resolve outstanding issues in an effort to secure compromise.
- Finally, the draft resolution is placed “in blue”, after which a formal vote is usually held within 24 hours. In recent years, however, the practice of making changes to the draft text after it was placed in blue has occasionally occurred.

27 Security Council Report. The Penholder System, Research Report no.3. (21 December 2018).

28 Note by the President of the Security Council (1 December 2023) (S/2023/945).

29 UNSC 9571st Meeting Record (11 March 2024) (S/PV.9571).

30 For more information, see the Annual Highlights of Security Council Practice 2016-2025 published by Security Council Affairs Division.

31 Note by the President of the Security Council (13 December 2024) (S/2024/507).

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Security Council negotiations do not have a fixed timeframe, and they tend to be influenced by the penholders. A typical negotiation process concerning the renewal of a peace operation mandate or the extension of a sanctions regime may require roughly two to three weeks, depending on the circumstances, from the circulation of the zero draft to Council members to the vote. With contentious negotiations, however, the process can be more complicated with multiple rounds of informal consultations and the draft text going through several iterations. In some cases, if the negotiations cannot be finalised before a mandate expires, the Council may be compelled to adopt a short-term technical rollover of the mandate to allow for more time for substantive negotiations. A recent example is the Council's decision in March 2026 to renew the mandate of the UN Assistance Mission in Afghanistan (UNAMA) for three months.³² In 2025, the Council also adopted a short-term technical extension of the Al-Shabaab sanctions regime and the mandate of the panel of experts following complex negotiations.³³

Penholders have considerable leverage in shaping how negotiations unfold. Initiating the process early can give Council members ample time to consult and engage actively in negotiations. In principle, penholders acknowledge the importance of allowing sufficient time and committing to doing so. However, in practice, they may sometimes view extended timelines as a tactical disadvantage, as they can create opportunities for Council members to introduce complex or contentious issues. Conversely, shorter negotiation periods place significant pressure on Council experts and can limit their ability to contribute meaningfully to the process, breeding resentment and contributing to outcomes that are not well considered.

In negotiations of peace operation mandates, sanctions regimes, or panels of experts' mandates, expiry deadlines create additional pressure on Council members. Penholders may seek to expedite negotiations to meet these deadlines and push for a vote. Sometimes, these timelines could be affected by the release of the Secretary-General's reports or Panel of Experts reports, in such situations where the penholder and Council members may need additional time to consider the reports and consult with their capitals.

Working with Key Stakeholders

The relationship of the penholder with key stakeholders—for example, the concerned country, T/PCCs, regional actors, and the UN system—is an important aspect of the role of the penholders and co-penholders. One of the criticisms levelled against penholders and co-penholders is the lack of adequate consultations with some of these key stakeholders. While penholders and co-penholders are increasingly trying to be more consultative in facilitating negotiations, the situation is often complicated and influenced by geopolitics and other factors.

Concerned Countries

In recent years, managing relations with the concerned governments—that is, “host governments” in the case of peace operations and “target countries” in the case of sanctions mandates—has become more complex,³⁴ especially in Africa, where many countries have become more critical of penholders. Prevailing divisions within the Council—with some concerned governments having close ties to China, Russia, and other like-minded members, including A3 members—have strengthened the hand of these governments. In some instances, fraught bilateral relations with the penholder have added a further layer of complication. A notable example is Mali, where the government formally rejected France's role as penholder in a letter addressed to the President of the Security Council on 1 March 2023.³⁵ The country also requested France to withdraw its forces from Mali in February 2022³⁶ and invited Russia to provide military and security support, which paved the way for the deployment of the Wagner Group, a Russian private security company later renamed the Africa Corps.

More recently, the UK appears to have faced the challenge of host country consent on the Somalia file. Somalia hosts a special political mission (SPM) and is also serving as an elected Council member in 2025–2026. In October 2024, the Council approved a two-phase transition for the UN Assistance Mission in Somalia (UNSOM), which was subsequently renamed the UN Transition Assistance Mission in Somalia (UNTMIS). This mission is expected to complete its transition by 31 October 2026 in line with the host government's request for the mission to hand over responsibilities to the Somali authorities and the UN Country Team (UNCT). The UK, the penholder on the file, apparently explored the possibility of a Council outcome to address the second phase of UNTMIS' transition and test options for a successor UN presence in recognition of Somalia's continuing needs.³⁷ However, this was not possible, in large part because of Somalia's discomfort in having such a product.

Having played a central role in South Sudan's independence and long serving as a major provider of humanitarian and development assistance, the US once had significant leverage as the penholder on the South Sudan file. But the country's prolonged political and security crises have generated growing frustration in Washington, particularly over the South Sudanese government's continued failure to implement the 2018 Revitalised Peace Agreement on the Resolution of the Conflict in South Sudan (R-ARCSS). At the same time, changes across US administrations since 2011 and shifting foreign policy priorities—which have seen the US retreating from Africa—have contributed to a decline in sustained engagement. The US has also reduced its aid to South Sudan as well as financial and operational support to the Reconstituted Joint Monitoring and Evaluation Commission (RJMEC), the body tasked with the responsibility of monitoring the implementation of the R-ARCSS and increasingly sought to exert pressure on the government. This

32 Security Council Report. “Afghanistan: Vote on Draft Resolution Renewing UNAMA's Mandate”. (What's in Blue, 13 March 2026), <<https://www.securitycouncilreport.org/whatsinblue/2026/03/afghanistan-vote-on-draft-resolution-renewing-unamas-mandate-3.php>>.

33 Security Council Report. “Vote on a Draft Resolution Renewing the Al-Shabaab Sanctions Regime”. (What's in Blue, 2 March 2025), <<https://www.securitycouncilreport.org/whatsinblue/2025/03/vote-on-a-draft-resolution-renewing-the-al-shabaab-sanctions-regime.php>>.

34 In several instances, concerned countries can be both host and target countries, as they host UN peace operations and are subjected to UN sanctions.

35 Security Council Report. “From the Margins to the Center: The Rise of the A3 in the UN Security Council”, Research Report no.4. (19 November 2025), <<https://www.securitycouncilreport.org/research-reports/from-the-margins-to-the-center-the-rise-of-the-a3-in-the-un-security-council.php>>.

36 France had deployed its forces in Mali from 2013 to 2022 upon Bamako's request to carry out enforcement action against terrorist groups.

37 Security Council Report. “In Insight: UN Peace Operations at a Crossroads”. (Monthly Forecast, 2 March 2026), <<https://www.securitycouncilreport.org/monthly-forecast/2026-03/in-hindsight-un-peace-operations-at-a-crossroads.php>>.

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approach has encouraged Juba to deepen its engagement with the P2 and other like-minded partners for diplomatic backing.

In recent years, these dynamics have been reflected in the UN Mission in South Sudan (UNMISS) mandate renewals, which have seen multiple abstentions since 2019. Similarly, the pattern of votes on the extension of the South Sudan sanctions regime continues to expose sharp divisions among Council members, with the P2 and the A3 regularly opting to abstain.

A key issue in consultations with concerned countries is the extent to which penholders should accommodate the views and concerns of countries that are the subject of the Council's decisions. While there is broad agreement on the importance of consulting with these countries as key stakeholders, accommodating all their demands could undermine the Council's objectives. At the same time, proceeding on Council outcomes without sufficiently addressing their concerns could affect the process and hinder implementation, as those countries may be less willing to cooperate. Penholders therefore face the challenge of balancing effective Council action with meaningful engagement with host governments and other concerned stakeholders.

Countries on the Council's agenda have become increasingly adept at advancing their objectives by working closely with the P2 and the A3. This trend is particularly evident in discussions related to sanctions imposed on some African countries. Typically, these countries first seek endorsement for their appeal on the lifting of sanctions measures imposed by the Council from their respective Regional Economic Community or Regional Mechanism (RECs/RMs) and the African Union (AU) Peace and Security Council (AUPSC), whose positions are then conveyed to the A3. They subsequently engage A3 members to consolidate support. In some cases, such target countries also submit formal letters outlining their positions, which often serve as the basis for the A3's stance during Council deliberations and negotiations. This coordinated approach has significantly enhanced their leverage within the Council.

The positions taken by some members on sanctions have also made sanctions-related negotiations particularly challenging. The P2 generally take the position that sanctions should not be viewed as an end in themselves, but rather as measures that should be regularly reviewed and ultimately lifted—a stance that increasingly aligns with the A3's position in recent years.

Geopolitics has also significantly impacted negotiations on sanctions. In 2024, Russia vetoed a US-proposed draft resolution to extend the mandate of the panel of experts assisting the 1718 Democratic People's Republic of Korea (DPRK) Sanctions Committee, arguing, among other things, that the sanctions regime no longer reflects realities on the ground. Other Council members, including the P3, strongly criticised Russia's veto, which they argued undermines the global non-proliferation regime and emboldens the DPRK in its attempts to evade sanctions.³⁸

The 1737 Sanctions Committee has also been directly impacted by geopolitical tensions within the Council. Following the 2015 agreement on the Joint Comprehensive Plan of Action (JCPOA) concerning Iran's nuclear programme, the sanctions measures

imposed under resolution 1737 were suspended. However, these measures were reinstated in September 2025 by the "E3" parties to the JCPOA—France, Germany, and the UK—a move that China and Russia opposed, advancing legal and procedural arguments to challenge the validity of the restored sanctions regime. In March 2026, China and Russia opposed a briefing by the 1737 Sanctions Committee, maintaining their position that the sanctions regime no longer existed. Nevertheless, the matter was put to a procedural vote and adopted with 11 votes in favour, two against (China and Russia), and two abstentions (Pakistan and Somalia).³⁹

Troop and Police Contributing Countries

The Security Council meets with T/PCCs and the Secretariat in the private meeting format in advance of peacekeeping mandate renewals to hear their views and perspectives so that mandates are not disconnected from operational realities on the ground. However, there seems to be a perception that these meetings tend to be formulaic and do not necessarily facilitate frank and interactive discussions. As a result, there has been growing recognition of the need for more regular and substantive engagement with T/PCCs to address the concerns of their contingents.

During its 2015–2016 term, New Zealand introduced the practice of informal consultations between Council members, troop and police contributing countries, the Secretariat, and regional countries, to foster more open exchanges in a less formal setting.⁴⁰ At the time, this approach was widely regarded as helpful in facilitating meaningful interactions. The expectation was that it would be fully mainstreamed and become part of standard Council practice. Penholders initially embraced this practice on some issues and began hosting such informal consultations at their missions. While it does not appear to have become institutionalised some missions still hold informal meetings with TCCs on a case-by-case basis, depending on the perceived necessity for them.

The UN System

The UN system—including relevant Secretariat departments, field missions, and agencies, funds, and programmes—plays an important role in shaping and influencing Security Council decisions. Through their technical expertise, operational experience, and situational awareness from the field, UN entities provide analysis and recommendations that assist penholders and inform the Council's deliberations.

Penholders regularly consult with the UN system, drawing on their assessments, briefings, and recommendations during the drafting of Council products. In addition, Secretariat officials engage both formally and informally with Council members, providing analysis, updates, and policy options for their consideration. These interactions help ensure that Council decisions are grounded in operational realities and reflect a comprehensive understanding of developments on the ground.

Nonetheless, there are several challenges related to the exchange of information and ideas between the UN system and Council members. One relates to the volume of requests from the Security

38 Security Council Report. "DPRK (North Korea): Vote on Panel of Experts Mandate Renewal". (What's in Blue, 27 March 2024), <<https://www.securitycouncilreport.org/whatsinblue/2024/03/dprk-north-korea-vote-on-panel-of-experts-mandate-renewal.php>>.

39 Security Council Report. "Iran: Briefing on the 1737 Sanctions Committee". (What's in Blue, 11 March 2026), <<https://www.securitycouncilreport.org/whatsinblue/2026/03/iran-briefing-on-the-1737-sanctions-committee.php>>.

40 Statement delivered by Gerard van Bohemen, then Permanent Representative of New Zealand to the United Nations (19 July 2016). Open Debate on Security Council Working Methods, United Nations: New York, NY, <<https://www.mfat.govt.nz/en/media-and-resources/open-debate-on-security-council-working-methods>>.

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Council to the Secretariat. In his 1 August 2025 briefing⁴¹ to member states on the UN80 Initiative, the Secretary-General expressed his frustration with this situation, noting that Security Council resolutions are now three times longer than they were 30 years ago, and highlighting how this is stretching the Secretariat's capacity. As a result, reports tend to be heavily shaped by the need to respond to specific reporting requirements, leaving limited space for deeper analysis, forward-looking assessments, or the presentation of policy options. This, in turn, can constrain elected members' ability to make substantive contributions during negotiations as they tend to rely more heavily on these reports, while penholders may not always adequately incorporate the Secretariat's analytical input into draft texts.

Council members also receive additional information and analysis from Special Representatives and heads of mission when they brief the Council both in the open chamber and in closed consultations. In addition, they use their presence in New York to hold bilateral meetings with Council members, offering more tailored briefings on sensitive issues that may not be appropriate to share with the entire Council.

However—in the context of increasingly strained relations between the UN and concerned countries, as well as divisions in the Council—these officials are at times cautious about what they communicate, both publicly and privately, as information can easily be leaked in ways that could complicate their work on the ground. As a result, some have become more reluctant to participate actively in closed consultations, while others tend to deflect difficult questions or provide more generic responses, thereby limiting the depth and candour of exchanges with Council members.

Constraints affecting the work of panels of experts assisting sanctions committees have also affected the quality and continuity of information available to penholders and other Council members. In recent years, there has been a growing trend of placing appointments or reappointments of panel members on hold, particularly when reports cast a negative light on the conduct of a permanent member—or, in some cases, an elected member. This can affect the continuity of the panels' work and limit the availability of independent analysis, which is an important component of sanctions-related negotiations.

The Security Council regularly requests assessments, reviews, and options to inform its decision-making. While inputs can serve as a solid basis for well-informed Council products, members have at times found them insufficiently responsive or not fully aligned with their expectations. In such situations, penholders may ultimately take note of the information without fully incorporating it and Council members may proceed to adopt decisions that diverge significantly from the recommendations provided. In other instances, despite the quality of the Secretariat's inputs, penholders may choose not to use them due to national interest considerations or broader political dynamics. As a result, technical analysis does not always directly feed into Council outcomes.

Regional Actors

Regional and sub-regional organisations are regularly invited to brief the Council on situations in their region, providing perspectives that often shape deliberations and negotiations. Their positions are frequently reinforced by elected members affiliated with these organisations, particularly the A3, which often advances positions aligned with the AU and its regional mechanisms. Other regional organisations, such as the European Union, the League of Arab States, the Organisation of American States, the Organisation of Islamic Cooperation, the Association of Southeast Asian Nations, among others, have briefed the Council on relevant issues. Although at times Council members view the interventions of regional and sub-regional organisations as adding limited value, penholders try to incorporate the positions of regional and sub-regional organisations when drafting Council products. Depending on Council dynamics, penholding may reflect or reinforce these positions to varying degrees, ranging from merely taking note of their decisions to welcoming, endorsing, or even authorising certain actions on the ground. Where interests diverge, penholders tend to underscore that Council products are not intended to simply endorse or replicate the decisions of these organisations. This has been the case, for example, in sanctions negotiations when regional and sub-regional organisations support the lifting of sanctions, thereby reinforcing the positions of countries targeted by those measures.

The Peacebuilding Commission (PBC)

Elected members and the broader UN membership continue to underscore the importance of the Security Council consulting with the PBC on country-specific and thematic issues to benefit from its advisory role.⁴² In this regard, in Note 507, the members of the Council acknowledge “the importance of strengthening the collaboration with the Peacebuilding Commission as an intergovernmental advisory body and express their intention to regularly request, deliberate and draw upon its specific, strategic and targeted advice in a timely manner”. In addition, Note 507 encourages holding informal interactive dialogues with the Chair of the Commission and the Chairs of the country-specific configurations. The inputs from the PBC can provide penholders with additional analysis and peacebuilding perspectives in drafting and negotiating Council products.

The PBC and its various configurations have been providing oral briefings to the Council and, since 2018, the submission of written advice on mandate renewals or anticipated Council resolutions as well as Council debates or briefings on country situations and broader regional and thematic issues has become a common practice. Despite these efforts, however, some Council members remain critical of the PBC's contributions, viewing them as providing only limited new analysis or insights. Part of the challenge is that the PBC operates by consensus, and any advice or recommendations must be accepted by all its members. Within the Council, some permanent members such as Russia and China tend to be more sceptical of the PBC's role and are not willing to allow it to encroach on the prerogatives of the Security Council.⁴³ Furthermore, it seems that the US,

41 UN Secretary-General's Remarks to the Informal Meeting of the General Assembly Plenary on the UN80 Initiative (1 August 2025) (Bilingual, as delivered), United Nations: New York, NY, <<https://www.un.org/sg/en/content/sg/statements/2025-08-01/secretary-generals-remarks-the-informal-meeting-of-the-general-assembly-plenary-the-un80-initiative-bilingual-delivered-scroll-down-for-all-english>>.

42 The Chair of the Commission and the Chairs of country-specific configurations of the Commission have briefed the Council, but this appears to be less common in recent years.

43 Dr Jiayi Zhou, Dr Jaïr van der Lijn, and Dr Jingdong Yuan (18 April 2024). “China, Russia and the Future of Peacebuilding”. Stockholm International Peace Research Institute, <<https://www.sipri.org/commentary/topical-background/2024/china-russia-and-future-peacebuilding>>.

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which in the past has been supportive of the PBC's role, appears to have now become more critical in line with the Trump

administration's new policies towards the UN.⁴⁴

The Practice of Co-penholdership

Any attempt to take the pen from a permanent member penholder is likely to generate unnecessary friction within the Council. As a result, co-penholdership arrangements have recently emerged as a more feasible option for elected members to play a greater role in shaping Council outcomes and promoting a more equitable distribution of work. Such arrangements between a permanent member and an elected member have the advantage of combining the institutional memory and diplomatic leverage of the permanent member with the regional expertise, political relationships and subject-matter knowledge of elected members. In some cases, elected members may also help in mobilising support both within and outside the Council.

The P3 has been open to sharing the pen selectively with elected members and has done so on a number of files, especially since 2022. France and the UK have shown particular interest in working with individual African members or sometimes the A3 as a group to advance Council outcomes. In particular, they have seen the value of some African members who can serve as a bridge in a divided Council, given their relationship with other permanent members. Mozambique, for example, served as co-penholder with the UK on the UN Office in Central Africa (UNOCA) in 2024 and reportedly played a key role in securing Russia's support for the adoption of a presidential statement on that file.⁴⁵ The Council had failed to do so since 2019, largely due to disagreements over references to CPS.

At the same time, co-penholdership arrangements present their own challenges and require additional coordination. Co-penholders should be able to align their positions on draft texts before circulating them to the wider Council and agree on how to address comments and concerns raised during negotiations. This requires not only a shared understanding of the objectives but also a willingness to show flexibility in coordinating their positions when they have differences of view.

Some co-penholdership arrangements have succeeded in ensuring effective coordination and division of labour, which ultimately helped in securing the necessary outcomes. However, these processes are not always smooth. Tensions and serious disagreements between co-penholders themselves can at times further complicate the negotiation processes, including as a result of differing approaches, priorities or the working styles among the experts involved. Co-penholdership arrangements can also give rise to asymmetric relationships between permanent and elected members, particularly where significant capacity gaps exist. In such cases, the permanent member may become the de facto penholder, shouldering most of the responsibilities, while the elected member assumes a largely symbolic role with limited ability to contribute meaningfully. This dynamic can work to the advantage of permanent members, who benefit from the symbolic value of co-penholdership—signalling a willingness to share responsibilities and enhancing their credibility—while in practice preserving control over outcomes in line with their interests.

How open a P3 member is to being a co-pen is related to a number of factors, including having similar positions on issues, bilateral relationships and sometimes regional affiliations. Some members are in favour of a more structured practice for penholders, including a code of conduct, in order to ensure fairness and inclusivity. Not all members are comfortable formalising the penholder arrangements, with the P3 expressing a desire to keep the system flexible and to be able to decide on a case-by-case basis which elected members they would like to work with.

On occasion, there have been co-penholderships between three or more elected members. This arrangement can produce positive results, but the larger the number of co-penholders, the greater the potential for coordination difficulties.

Council Dynamics and the Penholder System

For well over a decade, there has been a growing push to expand the penholdership system to enable elected members to play a more substantive role in the Council's decision-making and notable progress has been made in this regard. Despite these developments, however, the P3 continue to dominate the penholder system. Out of 45 active agenda items, the P3 hold the pen or co-pen on 34.⁴⁶

P2 criticism of the system has been longstanding but appears to

have grown in parallel with heightened geopolitical tensions among the major powers, which have constrained the Council's ability to address pressing peace and security challenges from Ukraine and the situation in Gaza to the ongoing developments in the Persian Gulf, as well as the crises in Sudan and the Sahel region, among others.

⁴⁴ Statement at the General Assembly Plenary on the Peacebuilding Commission (PBC) and Peacebuilding Fund (PBF), United States Mission to the United Nations, (accessed 11 May 2026).

⁴⁵ Statement by the President of the Security Council (1 November 2024) (S/PRST/2024/7).

⁴⁶ Data derived from an analysis of chart on penholdership in: Loraine Sievers (2014). "Backgrounder on the 'penholder' practice' for drafting outcome documents (with tables)," "Chapter 5: Conduct of Meetings and Participation," "2026 Security Council Penholders – Lead Countries" in Update Website of Loraine Sievers and Sam Daws, *The Procedure of the UN Security Council*, 4th Edition, Oxford University Press: Oxford, (updated on 14 February 2026), <https://www.scprocedure.org/_files/ugd/54a569_962e81016746413aa1f0bba24be fe03c.pdf>.

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P2 – P3 Dynamics

In the context of these complex dynamics, reaching agreement on Council products has become increasingly difficult. In public settings, in addition to criticising the P3 for monopolising the pen, China and Russia have questioned the objectivity, impartiality and inclusivity of the P3 in facilitating negotiations. Russia has also argued that some Council outcomes lack clear guidance to the Secretariat and create unrealistic goals, thereby eroding the Security Council's authority. More broadly, both China and Russia contend that these practices have contributed to an increasing use of abstentions and vetoes.⁴⁷ Such criticisms were voiced more frequently as dynamics between the permanent members became increasingly strained and may have been used to score political points against P3 penholders.

These tensions have been particularly visible during negotiations on politically sensitive files, including Libya, Mali, and Sudan, among others. During negotiations on the renewal of the UN Support Mission in Libya (UNSMIL) in 2021 and 2022, for example, Russia criticised the UK's handling of the file and pushed for shorter mandate renewals, contributing to repeated short-term extensions of the mission. Similarly, disagreements over the Mali sanctions regime in 2023 reflected broader tensions between France and Russia. France accused Russia of obstructing negotiations and presenting an alternative draft text that was not discussed by other Council members. France suggested that Russia's actions were tied to the investigation of human rights violations committed in Mali, including the Wagner Group.⁴⁸ Russia, which has maintained that France has a "colonial mentality" toward Mali,⁴⁹ expressed opposition to the use of the sanctions regime as an instrument for "maintaining external pressure" on the country.⁵⁰

While China and Russia have publicly advocated for greater involvement of elected members as penholders or co-penholders, it remains to be seen how open the P2 would be to sharing penholding responsibilities if they were penholders on a larger number of files. While China briefly partnered with Pakistan in attempting to take the pen in March 2025 on Afghanistan, ultimately, they became the sole penholder on Afghanistan in late 2025.

Over the years, the P3 has tended to maintain that the difficult negotiating dynamics around certain Council products do not stem from their role as penholders but are instead a result of broader geopolitical disagreements. They have also noted that their national interests are largely aligned with the broader consensus within the Council and that they prioritise consensus-building. They have been especially critical of Russia, accusing it of blocking constructive action in the Council, including what they consider the good faith efforts of penholders. Their explanations of vote following Russian vetoes on several files in recent years have demonstrated

their level of frustration. For example, the US argued that a draft resolution that Russia vetoed renewing the Mali sanctions regime in 2023 represented "a well-crafted compromise proposal that had the overwhelming support of Council members",⁵¹ while the UK called a Russian veto of a draft resolution on Sudan in November 2024 "mean, nasty and cynical"⁵² and France said it was cast "without any convincing justification".⁵³ The UK has also accused Russia of "tabling alternative drafts for a vote without taking into account the views of most Council members", which is "not consistent with the spirit of collaboration".⁵⁴

The P3 has highlighted their efforts to share the pen on different files, although they do not espouse formal and automatic allocations of co-penholderships. As their great power status has waned, France and the UK may view penholding as a useful avenue for maintaining influence on important global peace and security matters. The UK Parliament's Foreign Affairs Committee produced a report in 2025 on the UK's penholding in the Security Council that argued that: "Leading and managing the penholdership of conflict-affected files at the United Nations is a key aspect of how the UK contributes towards international peace and security efforts."⁵⁵ France and the UK believe that they are inclusive penholders that make a strong effort to consult with Council members, concerned countries, and other relevant stakeholders, and that they strive to make compromises and build consensus in the Council. The UK Foreign Affairs Committee's 2025 report asserted that the UK has "a strong and robust penholding process which adheres to the values of democracy and inclusivity".⁵⁶ Similarly, highlighting the responsibility of penholders in "building convergence and consensus", France has maintained that it deems "essential" its "close consultations with the United Nations, the parties, troop contributors, and regional neighbours" as a penholder on various peacekeeping mandates.⁵⁷

In past years, the US had expressed a desire to improve the penholdership system.⁵⁸ The US role as a penholder, however, appears to have become particularly complicated under the Trump administration, which has adopted a tough stance on the financing of the UN system, including on UN peace operations. It has tended to pursue its national positions more bluntly, to assume a "back to basics" strategy designed to cut costs and to focus the UN on what Washington believes is the body's core peace and security mandate, and to advance Council outcomes that have primarily aligned with US interests, rather than those shared by the broader Council. In this context, the US has shown willingness to flex its diplomatic weight to secure votes, while at the same time pursuing a "take it or leave it" approach to negotiations. This has at times made it difficult for elected members to oppose US proposals.

While this approach applies to US negotiation tactics in

47 In addition to the high number of vetoes in recent years, there has also been an increase in the percentage of non-unanimous resolutions. In 2025, for example, only 61.4 percent of the resolutions adopted by the Council received unanimous support, representing the lowest level of unanimity in the post-Cold War period. However, the divisions likely have more to do with irreconcilable clashes of policy positions, worldviews, and strategic interests than perceived shortcomings in negotiating processes.

48 For France's Statement, see UNSC 9408th Meeting Record (30 August 2023) (S/PV.9408), p.8.

49 Meryem Demirham (20 May 2020). "Russia accuses France of 'colonial mentality' in Mali", TRT World, <<https://www.trtworld.com/article/12788292>>.

50 For Russia's Statement, see UNSC 9410th Meeting Record (5 September 2023) (S/PV.9410), p.8.

51 For the US' Statement, see UNSC 9410th Meeting Record (5 September 2023) (S/PV.9410), p.5.

52 For the UK's Statement, see UNSC 9786th Meeting Record (18 November 2024) (S/PV.9786), p.3.

53 For France's Statement, see UNSC 9786th Meeting Record (18 November 2024) (S/PV.9786), p.9.

54 Arria-formula Meeting convened by Russia (11 August 2022), <<https://webtv.un.org/en/asset/k1r/k1rvk0abfj>>.

55 UK House of Commons: Foreign Affairs Committee (21 September 2025). The Write to Protect: Britain's Pen on the World Stage, Second Report Session 2024-2026: HC 930, p.1, <<https://committees.parliament.uk/publications/49593/documents/264116/default/>>.

56 Ibid., p. 24.

57 For France's Statement, see UNSC Meeting Record (14 November 2025) (S/PV.10043), p. 12.

58 See, for example, the US' Statement in UNSC Meeting Record (5 September 2023) (S/PV.9410), p. 5.

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general, as a penholder, it typically entails starting negotiations with strong demands, which often provoke strong reactions from other Council members, and then demonstrating limited willingness to compromise. This appears to have created challenges in recent negotiations on the mandate renewals of UN peace operations, with several members opposing and/or expressing reservations on the US position. Recent negotiations on the mandate renewal of the UN Interim Security Force for Abyei (UNISFA) and UNMISS reflect this US policy approach.⁵⁹

The Elected Ten (E10)

Elected members continue to seek a proactive role in shaping Council decisions and to raise questions about fairness, inclusiveness, and burden-sharing of the penholder system. They have consistently echoed these sentiments in their joint statements as the E10 at the annual working methods open debate. For instance, in their joint statement at the June 2022 annual open debate on working methods, noting that they represent two-thirds of the Council membership, they emphasised that the ideals of transparency, accountability, inclusivity, and effectiveness would be better served if the Council's workload were more equitably shared among all members.⁶⁰ This message has been emphasised by the wider UN membership, including at the most recent open debate on working methods in November 2025, which continues to call for enhanced participation of elected members in penholding processes.⁶¹ In addition, absent progress on structural reform of the Security Council, elected members have continued to pursue "certain informal practices to democratize the Security Council" [such as co-penholderships] that do not require amending the UN Charter.⁶² Moreover, the modest opening up of more co-penholding opportunities to the elected members can also be traced to pushback not just from elected members and the P2 but, as noted above, also from some host governments.

The E10 as a group has advocated for greater participation of

chairs of Security Council subsidiary bodies as co-penholders on their respective dossiers to promote greater cooperation and coordination among Council members in relevant matters. Their position was clearly stated in an E10 letter sent with the incoming five elected members (I5), to the President of the Security Council in November 2018. In the letter, they stressed the need to "make better use of the expertise that the Chairs of sanctions committees develop on the situations discussed in their respective committees", and "consider promoting their role as penholders and the automaticity of their role as co-penholders on the related dossiers, should they so choose".⁶³ This idea was also emphasised in the 1 December 2023 presidential note on penholdership. While most elected members agree in principle with the idea of sanctions committee chairs serving as co-penholders, some are more hesitant about formalising such an arrangement, as not all elected members would have the desire or resources to be a co-penholder in this context.

So far, there have been only three examples of chairs of sanctions committees acting as a co-penholder: Germany was a co-penholder on Libya sanctions with the UK in 2019 and 2020, Mexico with France on Mali sanctions in 2022, and Sierra Leone with France on the DRC sanctions in 2024.

Indeed, although there had been some positive momentum in opening up opportunities for elected member penholding for some years after 2019, there appears to have been a slight rolling back of this progress more recently. As discussed earlier, some co-penholding partnerships, such as on Colombia, have been discontinued. Others seem to be more in name than in substance. In addition, having an elected member continue to be a penholder on the Syria humanitarian file was recently questioned by a permanent member who argued that there was no need for this pen now that there was no cross-border mechanism. Yet, in spite of these hurdles, elected members continue to be interested in pursuing penholdership roles as one way of making their mark in the Council.

Challenges and Options

This section examines challenges related to the penholder system and how it affects Council decision-making. It offers options on reforming the penholder system in the years ahead, addressed to Security Council members in their collective and individual capacities, including in their roles as penholders.

Restore Trust for Better Outcomes

At the core of the challenges facing the conduct of negotiations is the erosion of trust among the P5, which has weakened consensus-building and undermined the Council's decision-making processes.

Restoring at least a basic level of trust among the P5--grounded in the norms and practices that previously enabled the Council to discharge its responsibilities effectively--would go a long way toward improving the situation. The importance of restoring such trust continues to be emphasised by the P5 in informal settings such as the annual Finnish Workshop for current and incoming Council members. Achieving this, however, is likely to remain difficult unless the P5 show greater willingness to avoid allowing geopolitical rivalries to permeate all aspects of the Council's work.

The recent resumption of P5 meetings, despite the profound

59 See Security Council Report. What's In Blue, "UN Interim Security Force for Abyei: Vote on Mandate Renewal Resolution" (What's in Blue, 13 November 2025), <<https://www.securitycouncilreport.org/whatsinblue/2025/11/un-interim-security-force-for-abyei-vote-on-mandate-renewal-resolution-4.php>>; Security Council Report. "UN Mission in South Sudan (UNMISS): Vote on Mandate Renewal Resolution". (What's in Blue, 30 April 2026), <<https://www.securitycouncilreport.org/whatsinblue/2026/04/un-mission-in-south-sudan-unmiss-vote-on-mandate-renewal-resolution-5.php>>.

60 See Ireland's Statement on behalf of the E10 in UNSC Meeting Record (June 28, 2022) (S/PV.9079), p.9.

61 See, for example, Statements by Germany, p.25, Austria, p.32, Brazil, p.38, and Kyrgyzstan, p.39 in UNSC Meeting Record (14 November 2025) (S/PV.10043).

62 62 Sithembile Mbete (June 2023). "Africa". UN Security Council Reform: What the World Thinks, Carnegie Endowment for International Peace, edited by Stewart Patrick, p.12, <<https://carnegieendowment.org/china/research/2023/06/un-security-council-reform-what-the-world-thinks>>.

63 Letter dated 13 November 2018 from the representatives of Belgium, the Plurinational State of Bolivia, Côte d'Ivoire, the Dominican Republic, Equatorial Guinea, Ethiopia, Germany, Indonesia, Kazakhstan, Kuwait, the Netherlands, Peru, Poland, South Africa and Sweden to the United Nations addressed to the President of the Security Council (S/2018/1024).

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disagreements among the permanent members, represents a positive and necessary step in that direction. Such engagements can help rebuild channels of communication, reduce misunderstandings, and create limited areas of cooperation even amid broader geopolitical tensions. This could have important implications for the conduct of negotiations within the Security Council. A more constructive political environment among the P5 could encourage greater flexibility, compromise, and inclusivity in the drafting and negotiation of Council outcomes by permanent and elected members.

In addition to bringing fresh energy and useful ideas to the Council's work, elected members have also on some occasions proven effective in bridging divisions within the Council on contentious issues. Therefore, their enhanced role as co-penholders should not be viewed merely as a matter of burden-sharing and equitable distribution of the Council's work, but as a potential means of fostering consensus, which is critical to strengthening the effectiveness of the Council's decision-making process.

Circumventing the Veto

The increasing use of the veto in recent years has been a source of major concern, paralysing the Council's decision-making capacity. Security Council Report's latest publication on the topic, entitled *Living with the Veto*, has provided a background to the various initiatives pursued over the years to restrain the use of the veto and promote accountability for its use.⁶⁴ With veto reform, which requires amending the UN Charter, unlikely in the near term, the report offers options for action that can be taken without such amendments.

Promoting timely, transparent, and inclusive consultations with all Council members and relevant stakeholders could help decrease the use of the veto. Wherever possible, penholders should prioritise building broad consensus through sustained engagement and compromise, rather than rushing draft resolutions to a vote in ways that risk deepening divisions or provoking a veto. Such an approach could help strengthen trust within the Council, enhance the legitimacy of its decisions, and improve the prospects for unified action on matters of international peace and security.

Equally important is the willingness of veto-wielding members to exercise restraint in the use of the veto, particularly in situations involving mass atrocities, humanitarian crises, or threats to international peace and security. The veto should not be employed in a manner that undermines the Council's credibility or prevents timely and effective responses to urgent crises. Greater political responsibility and a shared commitment to cooperation from all members are essential to enable the Council to fulfil its mandate effectively and maintain international confidence in its work.

Discuss a Code of Conduct for the Penholder System

Some member states have raised the need for the development of a code of conduct governing the penholder system. However, there has been little attempt to pursue the necessary practical steps to translate this proposal into a concrete framework for reform. Going forward, elected members could make more strategic use of existing Council mechanisms, particularly the IWG, to discuss this issue and lay the groundwork for the eventual development of a code of conduct informed by existing best practices as well as new procedural adjustments aimed at addressing current challenges. Such a

framework could build on the penholder section in Note 507 by outlining practical steps penholders could take to facilitate timely, transparent, and inclusive negotiations that foster consensus and enhance the effectiveness of the Council's decision-making processes.

Establish Clear Responsibilities and Expectations in Co-penholding Relationships

Every co-penholdership relationship is unique. Some function more effectively than others. Ideally, each co-penholder contributes to the file through their ideas, knowledge, resources, or political clout, while valuing the contributions of the other co-penholder(s). In some cases, however, tensions may arise when co-penholders hold differing views on certain aspects of a file or believe that their contributions to the process are not being adequately respected or considered. While difficulties are bound to arise in any joint working relationship, they can be mitigated through early and sustained coordination.

Before entering into a co-penholdership arrangement, members could consult extensively to clarify their respective roles, expectations, and objectives as well as to identify potential challenges. Where appropriate, co-penholders could also consider jointly producing an informal "terms of reference", mapping out their responsibilities, expectations, and goals for the arrangement.

Make IWG Briefings on Penholdership more Analytical

During the standing item on penholding in the IWG, penholders share their experiences with other members. This could be a genuine opportunity to share good practice and insights on how to improve the process. At times, penholders have reportedly provided a mechanical overview of the steps leading to the adoption of outcomes. As at 25 May 2026, the chairs of subsidiary bodies for 2026 had yet to be agreed. When the chairs are agreed and IWG meetings resume, penholders could be encouraged to give more analytical presentations regarding their experiences that serve as a springboard for dialogue on promoting more effective penholdership processes.

Take a Proactive Approach

As discussed in the report, there is greater recognition that broader participation in drafting and negotiating Council outcomes can enhance both the legitimacy and effectiveness of the Council's work. At the same time, experience over the past decade suggests that established penholders are unlikely to relinquish their privileged positions voluntarily, even though they have shown increasing willingness to share the pen selectively in line with their interests and priorities. Elected members, therefore, cannot assume that opportunities to serve as co-penholders alongside permanent members on existing files will be possible without sustained effort and advocacy. Instead, they need to be proactive in seeking such roles, particularly where they possess relevant expertise, regional knowledge, or a strong understanding of the dynamics surrounding a particular conflict or thematic issue. In this regard, elected members could draw on the successful experiences of past elected members highlighted in this report and build on them to strengthen their role within the Council. By leveraging their comparative advantages and demonstrating their capacity to contribute substantively to the Council's work, elected members can strengthen the case for a more inclusive and representative penholder system. Such an approach can enrich

64 Security Council Report. *Living with the Veto*, Research Report no.1. (24 March 2026), <<https://www.securitycouncilreport.org/research-reports/living-with-the-veto.php>>.

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negotiations by incorporating perspectives that may otherwise be overlooked, thereby contributing to more balanced and credible Council outcomes.

Build Institutional Memory

Elected members are unlikely to strengthen their influence within the penholder system without developing stronger institutional memory and greater continuity in their engagement with the Council's work. One of the main challenges they face is the duration of their tenure, as valuable experience and knowledge are often lost when members leave the Council. In this context, establishing effective mechanisms for the transfer of knowledge and experience between outgoing and incoming elected members is critical. The E10 should promote sustained coordination among elected members across successive Council terms to enhance the group's collective capacity. Previous examples of such sustained engagement by elected members on files such as Afghanistan, Syria (humanitarian), and the counter-terrorism files could provide a useful basis for such efforts.

Pursue Thematic Outcomes Strategically

Elected members seeking to make an impact during their relatively short two-year Council terms will often seek outcomes in areas where they believe they can achieve the most immediate results. These are frequently thematic products linked to priorities and often planned around their Council presidencies. In preparing for their Council terms, elected members could consider devising an overarching strategy for how to advance key thematic areas, including whether an outcome would add value in this regard, and whether pursuing such an outcome would be politically feasible. In some cases, the conclusion of such an analysis may be that there are other ways to achieve results in certain thematic areas, other than through a negotiated outcome. Nonetheless, strategic planning remains important in identifying and exploring all potential options.

While planning is important, Council members need to expect the unexpected and be able to pivot when necessary. Opportunities may arise unexpectedly to pursue outcomes on thematic issues (and country-specific situations) that had not been anticipated. Members should be willing to take the pen if they believe that their efforts can make a meaningful contribution to the maintenance of international peace and security.

Given that elected members' time on the Council is finite, it may be useful to view the adoption of thematic products not as a one-off event, but rather as part of a continuous process of advancing the issue in question. This often entails working with like-minded elected members, incoming members, and permanent members who can continue to champion the issue. Where appropriate, such products may also include follow-up reporting mechanisms to promote sustained Council focus on the relevant matter.

An example is resolution 2417 of 24 May 2018 on hunger and conflict, which requests the Secretary-General "to report swiftly to the Council when the risk of conflict-induced famine and widespread food insecurity in armed conflict contexts occurs, and expresses its intention to give its full attention to such information provided by the Secretary-General when those situations are brought to its

attention". This clause resulted in the issuance of 'white notes' by the UN Secretariat, delivered to the Council on an ad-hoc basis and highlighting the risks of acute hunger in situations of conflict. The Council also called on the Secretary-General to brief the Council annually on the implementation of resolution 2417 in his annual briefing on the protection of civilians.

Lessons from the General Assembly

Some Council members have suggested that the Security Council could draw useful lessons from the General Assembly in terms of inclusivity, transparency, and broader participation in the penholdership process. In the General Assembly, all member states can participate in the drafting and negotiation of resolutions. Typically, sponsors or "penholders" of a resolution take responsibility for facilitating consultations with the broader UN membership, with the aim of building consensus or, at a minimum, securing broad support—including a two-thirds majority on important issues. This consultative process ensures that a wider range of views is reflected in the final text, and that member states feel a greater sense of ownership over outcomes.

The General Assembly has developed the practice of appointing co-facilitators or co-chairs to lead major intergovernmental negotiation processes. These roles are often shared between member states from different regional groups, helping to balance perspectives, distribute responsibility more equitably, and enhance the legitimacy of outcomes. Co-facilitators are tasked with guiding negotiations in an inclusive manner, producing successive drafts, and ensuring that all delegations have opportunities to contribute substantively to the process.⁶⁵

These practices could be adapted as useful models, where appropriate, for the Security Council's working methods. While recognising the distinct mandate, composition, and urgency of the Council compared to the General Assembly, certain principles—such as inclusivity, shared responsibility, and structured consultation—could help improve the functioning of the penholder system without undermining its efficiency. Drawing inspiration from General Assembly practices may therefore offer a pathway toward a more balanced and representative approach to penholdership, strengthening both the legitimacy and effectiveness of the Security Council's work.

Promote Inclusive Consultations

Holding informal meetings with key stakeholders does not, and should not, depend exclusively on the penholders. If the penholders are not conducting inclusive consultations, elected members could play an active role in initiating and organising such consultations as part of their broader contribution to the Council's work. Informal discussions provide an important avenue for broadening participation, improving transparency, and ensuring that a wider range of perspectives are taken into account in the Council's deliberations and decision-making processes.

In many instances, elected members are well-positioned to facilitate dialogue among Council members, T/PCCs, regional organisations, and other relevant stakeholders. Existing practices and mechanisms can be revitalised and adapted to current circumstances

⁶⁵ This is akin to a proposal China made in the September 2023 working methods open debate, China suggested that the Council "could learn from the Assembly and consider having three coordinators for each agenda item from among both permanent and non-permanent members". See China's Statement in UNSC Meeting Record (5 September 2023) (S/PV.9410), p.10.

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rather than reinvented. One practical step would be to revive and institutionalise informal discussions with host countries, the UN Secretariat, T/PCCs and other regional actors, which have declined in frequency over time despite their importance for peace operations.

Elected members can also make greater use of the various Council meeting formats, including interactive dialogues and Arria-formula meetings to engage more systematically with regional and sub-regional organisations, civil society actors, humanitarian agencies, and other stakeholders directly affected by the Council's decisions. Such engagement can provide valuable contextual understanding, improve situational awareness, and help ensure that Council outcomes are better aligned with realities on the ground.

Council members that invite regional actors to participate in Security Council meetings should provide clear guidance regarding the areas of focus. Such coordination is essential to ensuring that briefings are substantive, complementary, and genuinely value-adding rather than repetitive. Without adequate preparation and direction, there can be considerable overlap between the interventions of regional organisations and the briefings already provided by the Secretariat or other UN officials, reducing the overall effectiveness and efficiency of Council meetings.

Regional actors are frequently invited because they possess unique political, operational, and contextual insights that the UN may not be able to provide fully. Their proximity to conflicts,

direct engagement with local stakeholders, and understanding of regional dynamics can make their contributions particularly valuable to the Council's deliberations. However, these comparative advantages are not always fully utilised when briefings become overly general or duplicate information already presented in official UN reports and Secretariat briefings.

To address this, penholders and convening members could engage more systematically with regional organisations and invited participants ahead of meetings. They should provide clear indications of the Council's expectations, identify areas where regional perspectives would be most useful, and encourage briefers to focus on issues where they can offer distinct insights or practical recommendations. This may include regional political dynamics, mediation initiatives, cross-border security threats, peace support operations, local perceptions of UN engagement, or the role of neighbouring states and regional institutions in supporting conflict resolution efforts.

Such guidance would not only improve the quality and coherence of Council discussions but also help maximise the added value of regional participation. It would allow meetings to become more focused and strategic, enabling Council members to benefit from a broader range of informed perspectives without unnecessary repetition. At the same time, better coordination could strengthen partnerships between the UN and regional organisations by fostering more structured and purposeful engagement.

Conclusion

This report has attempted to demonstrate how the penholder system lies at the heart of the Security Council's decision-making process. It has described the efforts over the past decade to reform the system, which have gained some traction, with elected members increasingly sharing penholder responsibilities with the P3. Despite their willingness to share the pen in some instances, however, the P3 continue to occupy a preeminent position within the system, fueling ongoing calls for further reform. As well, prevailing geopolitical tensions within the Security Council have increased calls for reform of the system, sparking growing P2 efforts to challenge the P3's dominance. The trust deficit among the P5 has undermined the Council's decision-making processes and weakened its capacity for collective action. The broad consensus that once underpinned the Council's approach to conflict management—including the deployment of peace operations and the use of sanctions and other punitive measures—has largely dissipated. Increasingly, issues both major and minor are viewed through geopolitical and strategic lenses rather than through the prism of collective international responsibility.

As a result, the Council has been unable to effectively respond to many conflicts and crises. Deadlock among the P5 has frequently prevented timely and decisive action, contributing to growing perceptions of paralysis within the Council. In this difficult context, elected members, wanting to play a meaningful role during their two-year terms and eager to contribute more substantively to the Council's work, have sought greater involvement in penholding processes. The E10 having the collective pen on a resolution on Gaza in 2024 and penning three other drafts on the situation is an example of

their willingness to take the pen when there is a gap.

At the same time, the Council's shortcomings have fuelled the search for alternative avenues to address global security challenges outside the UN framework. Consequently, mini-lateral forums, ad hoc coalitions, and strategic alliances have proliferated in recent years, as states increasingly turn to smaller and more flexible arrangements to advance their security and political interests. While these mechanisms may in the short term help advance such interests, they also risk undermining collective security by weakening multilateralism and eroding the authority of the Security Council in the long-term.

Against this backdrop, reforming the penholder system is not only a matter of ensuring fairness, inclusivity, efficiency, and effectiveness, but also of enhancing the Council's ability to make timely and effective decisions and restoring its credibility. This is not merely a procedural matter, but a fundamentally political one. In an increasingly fragmented international environment, the evolution of the penholder system may prove critical to maintaining the relevance, legitimacy, and effectiveness of the Security Council.

Annex I: Security Council Resolutions in 2025 (sole penholders)

PENHOLDER	COUNTRY-SITUATION OR THEMATIC ISSUE	RESOLUTION
France	Central African Republic sanctions	S/RES/2789 (29 July 2025)
France	Central African Republic	S/RES/2800 (13 November 2025)
France	Democratic Republic of the Congo	S/RES/2773 (21 February 2025)
France	Democratic Republic of the Congo sanctions	S/RES/2783 (30 June 2025)
France	Democratic Republic of the Congo	S/RES/2808 (19 December 2025)
France	Lebanon	S/RES/2790 (28 August 2025)
Greece	Bosnia and Herzegovina	S/RES/2795 (31 October 2025)
Not applicable	International Court of Justice election	S/RES/2784 (2 July 2025)
Not applicable	International Court of Justice election	S/RES/2770 (24 January 2025)
Pakistan	Pacific settlement of disputes	S/RES/2788 (22 July 2025)
Slovenia	Peacebuilding and sustaining peace	S/RES/2805 (26 November 2025)
UK	Al-Shabaab sanctions	S/RES/2775 (28 February 2025)
UK	Al-Shabaab sanctions	S/RES/2776 (3 March 2025)
UK	Al-Shabaab sanctions	S/RES/2806 (12 December 2025)
UK	Colombia	S/RES/2798 (31 October 2025)
UK	Cyprus	S/RES/2771 (31 January 2025)
UK	Iraq and Kuwait	S/RES/2792 (17 September 2025)
UK	Libya	S/RES/2796 (31 October 2025)
UK	Libya sanctions	S/RES/2769 (16 January 2025)
UK	Somalia	S/RES/2809 (23 December 2025)
UK	Yemen	S/RES/2786 (14 July 2025)
UK	Yemen sanctions	S/RES/2801 (14 November 2025)
US	South Sudan	S/RES/2778 (30 April 2025)
US	South Sudan	S/RES/2779 (8 May 2025)
US	South Sudan sanctions	S/RES/2781 (30 May 2025)
US	Sudan sanctions	S/RES/2772 (17 February 2025)
US	Sudan sanctions	S/RES/2791 (12 September 2025)
US	Sudan/South Sudan	S/RES/2802 (14 November 2025)
US	The situation in the Middle East, including the Palestinian question	S/RES/2803 (17 November 2025)
US	Threats to international peace and security caused by terrorist acts - Counter-Terrorism Executive Directorate (CTED)	S/RES/2810 (29 December 2025)
US	Threats to international peace and security caused by terrorist acts – Delisting Syrian President Ahmed al-Sharaa and interim Syrian Interior Minister Anas Khattab from the 1267/1989/2253 ISIL (Da'esh) and Al-Qaida sanctions list	S/RES/2799 (6 November 2025)
US	Ukraine	S/RES/2774 (24 February 2025)
US	Western Sahara	S/RES/2797 (31 October 2025)

Annex II: Security Council Resolutions in 2025 (co-penholders)

PENHOLDER	COUNTRY-SITUATION AND THEMATIC ISSUE	RESOLUTION
France, Greece	Libya (authorisation to inspect vessels on the high seas off the coast of Libya)	S/RES/2780 (29 May 2025)
France, Greece	Libya (authorisation to inspect vessels on the high seas off the coast of Libya)	S/RES/2804 (25 November 2025)
Greece, US	Red Sea crisis	S/RES/2768 (15 January 2025)
Greece, US	Red Sea crisis	S/RES/2787 (15 July 2025)
Guyana, Sierra Leone	Youth, Peace and Security	S/RES/2807 (12 December 2025)
Panama, US	Haiti	S/RES/2785 (14 July 2025)
Panama, US	Haiti	S/RES/2793 (30 September 2025)
Panama, US	Haiti sanctions	S/RES/2794 (17 October 2025)
China and Denmark (February and March 2025 presidents)*	Afghanistan	S/RES/2777 (17 March 2025)
Russia, US	Golan Heights	S/RES/2782 (30 June 2025)
Russia, US	Golan Heights	S/RES/2811 (29 December 2025)

*Before the penholder had been agreed on

Annex III: Security Council Presidential Statements in 2025 (penholders)

PENHOLDER	COUNTRY-SITUATION AND THEMATIC ISSUE	PRESIDENTIAL STATEMENT
Algeria	Counter-terrorism	S/PRST/2025/2 (24 January 2025)
Algeria	Peacebuilding and sustaining peace	S/PRST/2025/3 (27 January 2025)
Denmark	Syria	S/PRST/2025/6 (10 August 2025)
France	Lebanon	S/PRST/2025/1 (16 January 2025)
Pakistan	Cooperation between the United Nations and the Organisation of Islamic Cooperation	S/PRST/2025/5 (24 July 2025)
Russia	UN 80th Anniversary	S/PRST/2025/7 (24 October 2025)
Russia, United States	Syria	S/PRST/2025/4 (14 March 2025)
Slovenia	Bosnia and Herzegovina	S/PRST/2025/8 (29 December 2025)

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