2014 H-Diplo

H-Diplo FRUS Reviews h-diplo.org/FRUS/

No. 24

Published on 23 April 2014 Reissued, 9 June 2014

H-Diplo FRUS Review Editors: Thomas Maddux and

Diane Labrosse

Web and Production Editor: George Fujii

Commissioned for H-Diplo by Thomas Maddux

H-Diplo FRUS Review of Kristin L. Ahlberg, ed. Foreign Relations of the United States, Volume II, Human Rights and Humanitarian Affairs, 1977-1980. Washington, DC: United States Government Printing Office, 2013

Stable URL: http://h-diplo.org/FRUS/PDF/FRUS24.pdf

Review by Joe Renouard, The Citadel

The State Department's *Foreign Relations of the United States (FRUS)* series has long served as an invaluable resource for students and teachers of American foreign policy. These volumes are useful not only as primary-source snapshots for those who cannot visit the archives, but also for the editors' detailed annotations and explanations of key issues. This volume is no exception. Its editor, Dr. Kristin L. Ahlberg, has done a superlative job of gathering and annotating a set of documents that outlines President Jimmy Carter's human rights and humanitarian policy.

This collection covers three subject areas. Of its roughly 350 documents, just over 200 are dedicated to overall human rights policy, including the establishment of the State Department's human rights bureau, the creation of review groups, the drafting of a presidential directive, and approaches to multilateral organizations. The second and third sections—comprised of about seventy documents each—are dedicated to world hunger and food policy, international health, population growth, and women's issues. The documents in these latter sections address the Agency for International Development (AID), the Public Law 480 Food for Peace (P.L. 480) program, the establishment of the Presidential Commission on World Hunger (PCWH), proposals for a strategic grain reserve, and the administration's global health and population projects.

Given this organizational scheme, the volume highlights the work of lower-level policymakers and bureaucrats who are often overlooked in studies of this era. Indeed, with so much of the scholarship focused on National Security Adviser Zbigniew Brzezinski, Secretary of State Cyrus Vance, and President Carter himself, this collection gives researchers a more variegated impression of the policymaking enterprise. In addition to the names that are familiar to scholars of contemporary diplomacy and human rights—Assistant Secretary of State Patricia Derian, Deputy Secretary of State Warren Christopher, National Security Council (NSC) staffer Jessica Tuchman—some

lesser-knowns make frequent appearances here, including AID Administrator John J. Gilligan, Secretary of Agriculture Robert S. Bergland, Anthony Lake of the State Department Policy Planning Staff, Peter Tarnoff of the Department of State, and Peter G. Bourne, who served as a special assistant to President Carter on health issues and also chaired his World Hunger Working Group (WHWG).

Researchers will be intrigued by the volume's organization. Although there are some connections between human rights and humanitarianism, one could also argue that these policy areas are only loosely connected. Human rights scholars rarely address humanitarian issues, and vice-versa, though this *FRUS* collection suggests with some justification that the divide is somewhat artificial. By taking a more holistic approach, it offers something of an alternative to the common perception that the administration ignored Africa and most of Asia while giving a great deal of attention to Latin America and the Soviet Union. When Carter's foreign policy is considered more broadly, it is evident that the administration made significant efforts to ameliorate suffering in the global South as part of its 'global community' program, especially during Carter's first two years. This approach aimed to transcend ideology with preventive diplomacy, a belief in complex interdependence, and the joint pursuit of ambitious human rights and humanitarian goals.¹

The human rights section gives researchers a top-down impression of the administration's effort to define its human rights goals through broad policy statements and confidential memoranda. There is much less here about the minutiae of U.S. regional or bilateral policies, which means that some of America's most controversial relationships—Argentina and South Africa, for example—are only lightly addressed. This volume also omits subjects that are, or will be, covered elsewhere in the series, such as North-South relations, economic summits, trade policy, and the United Nations. Nor does this edition probe very deeply into the dissident problem or refugee/asylum issues. With respect to the latter, the lack of documentation perhaps reflects the bureaucratic separation between the newer human rights mandates and the much older (predominantly legal) problem of assessing refugee and asylum claims. We can presume that much more material on refugees and dissidents will be included in future *FRUS* editions.

Perhaps the most valuable aspect of this section—indeed, the entire volume—is its inclusion of so many candid internal discussions about the purposes of the human rights policy, its effects, and the possibility that it would hurt the president politically. These discussions include not just the shaping and implementation of the policy, but also the administration's speculation as to its probable results. They generally agreed that they could not establish a definitive set of guidelines, either in defining human rights or in outlining effective responses. "Judgments about human rights are necessarily difficult," concluded a State Department planning group during the 1977

¹ On this point, see Jerel A. Rosati, *The Carter Administration's Quest for Global Community: Beliefs and Their Impact on Behavior* (Columbia, SC: University of South Carolina Press, 1987), 35-41.

Carter transition. "The [State] Department cannot provide one set of definitive guidelines for all cases," though personnel could at the very least "ask the same questions and proceed as consistently as possible on the basis of comparable data and standards" (1).

The collection also reveals the administration's concerns about domestic and global perceptions. The problem of definitions was bound to hinder their efforts. Having chosen to make human rights the centerpiece of his foreign policy, Carter was now in the rather unenviable position of having to define its parameters. What were Carter's goals, and why was he pursuing them? What rights would be considered, and when? How would the administration implement the policy in different regions? Many documents address the administration's interest in giving a clear explanation of this policy. As Lake and Derian argued in an early memo, "The world now knows that Jimmy Carter thinks human rights are important. Many—not just representatives of foreign governments and journalists, but our own personnel—do *not* know what he means by 'internationally recognized human rights,' which human rights are to get priority US attention, and what criteria we plan to apply in individual cases" (29).

These documents suggest that the administration was not nearly as naïve as its critics have long argued. The naïveté charge was common during Carter's presidency, and it was reinforced by scholars in the first decade after he left office.² But all three sections of this FRUS volume illuminate the high level of analysis and thoughtfulness behind the administration's decisions. Although the advisers and bureaucrats were relatively optimistic about their global humanitarian abilities, they were not, on the whole, unaware of the world's complexities or the difficulties they would face. Nor were they unschooled in the sheer variety of interests competing for attention in Washington. "We cannot do everything and we will not try to," concluded Jessica Tuchman early in Carter's first year. The administration could demonstrate a preference for nations that respected human rights, she acknowledged, but "we obviously cannot speak out at every abuse" (18). Members of the administration also generally agreed that consistency was impossible. They engaged in lengthy debates over the extent to which human rights violations should impact Foreign Military Sales (FMS) decisions and U.S. votes in international financial institutions (IFIs) and multilateral development banks (MDBs). President Carter instructed his subordinates to "err on the side of human rights" in their IFI voting decisions, but he also admitted that "there can be no absolute standards" (23). The lack of consistency was understandable from a political standpoint, but it spurred charges of hypocrisy and double standards from activists and foreign governments alike. In retrospect, this conflict highlighted the divide between activists' idealism and the messy world of bureaucracy and interest-group lobbying.

² Early versions of this charge appeared in Donald S. Spencer, *The Carter Implosion: Jimmy Carter and the Amateur Style of Diplomacy* (New York: Praeger, 1988), ix; Joshua Muravchik, *The Uncertain Crusade: Jimmy Carter and the Dilemmas of Human Rights Policy* (Lanham: Hamilton Press, 1986); and Gaddis Smith, *Morality, Reason, and Power: American Diplomacy in the Carter Years* (New York: Hill and Wang, 1986), 247. For a more recent analysis, see Betty Glad, *An Outsider in the White House: Jimmy Carter, His Advisors, and the Making of American Foreign Policy* (Ithaca: Cornell University Press, 2009), 1, 279-280.

The administration's first year saw a broad effort to define the policy through speeches and a Presidential Review Memorandum (PRM). These speech drafts and internal discussions would make for tedious reading but for the fact that they shed light on what was, by and large, a very thoughtful debate about the goals and limits of American foreign policy. Global human rights was a relatively new area for the policymaking community, and these documents illuminate the many layers of bureaucracy involved in deciding just what the policy would include. There were no easy answers. As Tuchman wrote to Brzezinski in July 1977, if the administration assigned human rights priorities on a country-by-country basis, "the inevitable result is a situation in which human rights is the number one priority in our relations with certain countries (e.g., Argentina) while it is way down on the list (if there at all) for other countries (e.g., Iran). Can we live with such a policy? Won't other nations point it out and resent it?" (69). Derian was unimpressed with some legislators' idea of producing human rights reports on all countries. "My guess is that universal dismay would be the most positive reaction we could expect," she argued. "We have endeavored to avoid sanctimony and a holier than though stance; such reporting would require us to spend months assuring everyone that we do not feel that we are better than all other nations" (59).

As the administration shaped its public position, various agencies and bureaus wrote lengthy papers on what the human rights policy should entail. The wide variety of opinions gives us a feel for the unique difficulties each of them faced in combining human rights with their other mandates (54, 58, 60, 63-64). The lengthy August 1977 Presidential Review Memorandum PRM/NSC-28 laid out the policy in great detail (73). The administration then summarized its position in the February 1978 Presidential Directive PD/NSC-30, which explained that promoting the observance of human rights throughout the world was "a major objective" of Carter's foreign policy. The human rights policy would be applied globally, "but with due consideration to the cultural, political, and historical characteristics of each nation, and to other fundamental U.S. interests with respect to the nation in question." The administration would prioritize integrity of the person and civil and political liberties, while the promotion of "basic economic and social rights" would be "a continuing U.S. objective" (119). This nuanced description is noteworthy because it did go on to form the basic outline of the policy. Human rights mattered to the Carter administration, but each international relationship was considered on its own merits.

These documents include a great deal of self-reflection. In a lengthy memorandum at the Carter presidency's one-year mark, Anthony Lake described the policy's shortcomings and areas of potential failure. He concluded that the human rights policy "may be the best thing this administration has going for it" (105), but also admitted that every decision engendered some form of criticism. If the Carterites limited their efforts to quiet diplomacy, then activists and liberals charged them with superficiality and hypocrisy. If they used tough economic and security aid measures, they faced charges of moral superiority. And if they adjusted their tactics to fit each situation, they faced charges of inconsistency . Because the administration took the very logical path of treating each authoritarian regime as a unique problem, they foresaw accusations of

'double-standards' from the very start. Most of the foreign-service officers and bureaucrats wanted to differentiate between communist and non-communist states, but Derian and some of the other new arrivals were against such an ideologically-driven distinction. As one NSC official aptly noted, the administration appeared to be taking "firm action against non-communist countries while merely tut-tutting communist states." But the State Department concluded that Congress was not pressuring the administration to enforce a single standard (7, 22). Jessica Tuchman was particularly astute in her observations. In a November 1977 memo to Brzezinski, she lamented the difficulty of their endeavor, especially the problem of assessing other nations' human rights records: "[H]ow can you usefully compare El Salvador to Romania, or Guinea to Korea? Counting instances of torture or numbers of political prisoners and executions quickly becomes ludicrous. Each country is so different in its culture, its internal and external threats, its economic status, its political traditions, its relations to the U.S., and its reaction to outside pressure, that the task is impossible to accomplish to anyone's satisfaction" (95).

The administration also confronted charges of hypocrisy. How could the U.S. government pursue a vigorous global policy, some observers asked, given its own domestic problems and its refusal to ratify the major human rights instruments? Carter took this latter issue to heart and made a concerted effort to enhance America's multilateral profile. He supported establishment of a U.N. High Commissioner, and he hoped to win Senate ratification of the covenants on genocide, economic and cultural rights, civil and political rights, and racial discrimination. Carter also hoped that the U.S. would become more vigorous in multilateral forums, especially the United Nations. As Tuchman summarized this problem, "Our protracted failure to ratify [the conventions]. .. has in large part prevented us from using the United Nations as a forum to speak out on human rights because of our quite appropriate fear of being embarrassed by the charge of hypocrisy" (16). But although Carter initially gave the conventions a high priority, he had little luck in the Senate because he spent his political capital on SALT II, the Panama Canal treaties, and various domestic initiatives. Late in 1977, Tuchman argued that ratification of the genocide treaty would be a solid initiative: "This was the president's first human rights goal, and yet we haven't yet succeeded—because we haven't really tried. People are beginning to notice and to criticize—'talk is cheap'" (80). What she did not know was that Carter now believed these multilateral efforts to be politically unrewarding, and also largely out of his hands.

This volume does not dwell on the administration's interactions with Congress, though it does give us some insights into executive-legislative relations. Congressional human rights advocates saw Carter's election as a positive sign that the extraordinary interbranch conflicts of the Nixon/Ford years would subside. They were largely correct on this point. The key players in the administration clearly wanted to use human rights to make a sharp break with their White House predecessors. "I do not want human rights to become merely a slogan or a contentious issue between the executive and legislative branches," wrote Brzezinski during the transition (3). Tuchman suggested that human rights was an issue "on which the new administration has one of its best opportunities to radically improve executive-congressional relations" (4). Advisers also laid out many

recommendations of what they could do to show their seriousness, including some very astute assessments of challenges and potential pitfalls (9). Needless to say, sources of friction remained. Carter made some enemies on the political right when he cast his lot against the Byrd amendment, which had allowed the importation of Rhodesian chrome (7). He also worked to maintain some executive leeway within the confines of new human rights laws. An amendment sponsored by Congressmen Herman Badillo (D-NY) and Tom Harkin (D-IA) would have forced the administration to vote no on IFI loans to abusive governments, but Senator Hubert Humphrey's (D-MN) more moderate amendment sought to give the executive more room to maneuver. Due in part to Carter's support, the latter eventually won out (33, 36, 38).

Several documents hint at intra-administration conflicts. Tuchman wrote in April 1977 that "Both Derian and [United Nations Ambassador Andrew] Young are pretty unpredictable. Derian has been talking to all the fanatics in Congress and in the NGOs [non-government organizations], and has therefore absorbed a pretty lopsided view of things" (38). Advisers and bureaucrats also disagreed on goals. NSC staffer Michael Armacost wrote at the end of 1977 that the human rights bureaucracy seemed less interested in results than in disassociating the U.S. from unsavory practices. "I cannot help but wonder," wrote Armacost, "whether in this area we are operating on the basis of the Me-generation's Golden Rule: 'If it feels good, do it'—an approach which reduces foreign policy to a form of personal therapy" (100). There were also complaints that the endeavor was adding too many layers of red tape and creating much more work for bureaucrats. Tuchman was surprised to learn that the policy-level group spent so much time reviewing loans and grants to each of over thirty "grey area" countries. "The group often finds itself debating whether building a particular road, for example, serves the basic human needs of the population (is the ability to get goods to market a basic human need?)" (95).

The volume's humanitarian sections offer a different set of lessons. Of course, development assistance and food policies predated Carter's arrival by many years, but population growth, world hunger, and the environment emerged as new, powerful preoccupations in the 1970s. Early in the Carter presidency, the administration was quite optimistic about taking on these bigger problems, and its representatives rhetorically tied hunger and poverty to national security and global human rights. In a special message on the occasion of his inauguration, Carter touted "the basic right of every human being to be free of poverty and hunger and disease and political repression. We can and will cooperate with others in combating these enemies of mankind" (208). Later in his first year, Carter noted in a Cabinet meeting that he planned "personally to do more work on the issue [of world hunger] and noted the natural connection between dealing with world hunger and espousing human rights" (212, n3).

Hunger and population growth were twin concerns of the era in part because of the food crisis of the early seventies and the higher energy costs that were hindering economic growth in less-developed countries (LDCs). Famines in Biafra, the Sahel, Ethiopia, Bangladesh, and Cambodia further increased awareness of world hunger and

food shortages. The *FRUS* documents indicate that Carter took these problems seriously. He tasked his working group (WHWG) with preparing options for federal agencies to work together in the fight against world hunger, and he created the Presidential Commission on World Hunger (PCWH) (230, 244). Upon asking the renowned diplomat and presidential confidant Sol Linowitz to chair the PCWH, Carter explained that he had been trying to push the project through the bureaucratic red tape for more than a year, and that the effort had been a "bitch" to kickstart. "You would be shocked if I told you the number of hours I have personally devoted to this thing," said Carter (249). Carter seems to have been driven largely by humanitarian goals, though he also cited national interests. Not only would Americans benefit from a more peaceful, prosperous world, but food crises triggered ruinous cycles in food prices and contributed to inflation—yet another obsession of the era.

Among this section's most descriptive documents is the February 1978 report of the WHWG, which created the framework for Carter's overall policy and detailed the possibilities and pitfalls of fighting global hunger. Amid much frustration that hunger was not being alleviated, the group recommended a stronger presidential commitment, consolidation of aid programs, greater attention to poverty as the driver of hunger (as opposed to geography or climate), stabilization of population growth, and revision of food aid programs (245). But the many responsibilities of Carter's office made it somewhat inevitable that hunger would not be a top priority. Food policy was not only complex; it was also a bit thankless. More affluent nations generally agreed that they had a responsibility toward the LDCs, but food policy was unlikely to win votes, and it could even anger the agricultural sector if mishandled. Domestic politics constantly influenced this global issue, as when congressional conservatives sought to keep American funds away from the U.N.'s specialized agencies. A 1978 omnibus spending bill included Senator Jessie Helms's amendment cutting nearly thirty million dollars from U.S. contributions to these agencies. Carter signed the bill but released a statement of protest (253, n4). Carter's establishment of the emergency wheat reserve in January 1981 was similarly politicized (277, n14).

Yet irrespective of the internal debates over food production, food aid, and commodity exports, this section of the volume demonstrates that alleviating hunger was a much less controversial pursuit than human rights. True enough, world hunger was a political problem as well as a scientific and technical problem, but the administration's food and hunger advisers recommended policies that were qualitatively different from those of the human rights advisers. The former understood in a broad sense that enhancing development, increasing crop yields, improving transportation, and alleviating poverty were long-term problems that required long-term solutions. Their work was a marathon, not a sprint. The same could be said of some human rights pursuits, but these latter advocates could also expect quicker responses to certain problems. Reducing poverty could take generations, but political prisoners could be freed with the stroke of a pen, and free elections and a free press required few state resources.

The hunger and food bureaucrats often connected humanitarian and human rights goals. In the words of the PCWH's preliminary report in December 1979, "Whether one

speaks of human rights or basic human needs, the right to food is the most basic of all. Unless that right is first fulfilled, the protection of other human rights becomes a mockery for those who must spend all their energy merely to maintain life itself." The commission argued that American economic power and agricultural productivity created a special humanitarian obligation. By concentrating American efforts on the elimination of hunger, the authors argued that "the United States would provide the strongest possible demonstration of its renewed dedication to the cause of human rights" (263).

Reflecting the old adage that "food is power," food policy sometimes veered into the realm of power politics. This was clearest when Carter enacted an embargo on grain sales to the Soviet Union. Given this decision's potential for adverse effects on American farmers. Carter made it clear that the undelivered grain would be removed from the market and that the U.S. would increase the amount devoted to P.L. 480 food aid. Thus the anti-Soviet policy was spun into one of food aid and food security (265, 269). On this same subject, while a few documents in this volume's first section address human rights in the Soviet Union, researchers might be interested to see the half-dozen or so documents on U.S.-Soviet health cooperation in the volume's humanitarian sections. These indicate that at least some of Carter's advisers sought to engage the Soviets in a positive effort toward LDC development (286). This would prove difficult considering the level of East-West animosity and the array of North-South issues that the communist bloc had exploited. At a time when Moscow claimed to be a better steward of the LDCs' interests, the Carter administration's food/hunger policy was tied to the North-South dialogue and U.N. conflicts (215). But since global health was a less politicized topic, the U.S. and Soviets rarely attacked each other's initiatives (317).

Population growth was another obsession of the 1970s, and was closely linked to concerns over the environment, development, women's rights, and hunger. Ironically, the era's population anxieties (which occasionally bordered on alarmism) grew from otherwise positive developments—namely, the stunning scientific and technological achievements that had improved crop yields and had brought medicine and clean drinking water to impoverished regions, thus facilitating the global population explosion. The world added a billion people between 1960 and 1974, the fastest rate of growth in human history to that point, and this increase fueled fears of everything from mass starvation to resource wars. In the seventies people began to suggest that the population 'bomb' was potentially more destructive than the nuclear variety.³

President Carter tied population control to his other 'global community' goals. As he stated in May 1977, "Without controlling the growth of population, the prospects for enough food, shelter, and other basic needs for all the world's people are dim" (284). Anthony Lake reflected this thinking in a briefing memorandum: "Population growth entails an even more turbulent setting for the conduct of international affairs [and]

³ Paul Ehrlich's 1968 book, *The Population Bomb*, helped make this viewpoint a matter of national debate.

entails serious environmental costs for the entire world community" (287). But in contrast to the policies aimed at hunger and health, the population bureaucrats ran up against complex cultural and religious factors when trying to tackle population growth. There were also clear limits to what the United States could accomplish in other countries. The U.S. stood ready to assist in population programs, said Carter, but even he admitted that it was, "of course, up to each nation to determine its own policies" (284). Therefore the Policy Planning Staff recommended raising the issue with LDC leaders and presenting population control to them as a means of improving living standards (287).

The NSC's Ad Hoc Group on Population Policy understood these limits. Their lengthy 1978 report concluded that "the most successful population programs" depended on proper local implementation, with only some assistance from Washington. "It is not a matter of our lecturing them or they us," the group concluded, "but of learning from each other and discovering ways in which we can be of greatest mutual help" (308). One gets the sense here that the United States government and American NGOs could only play a supportive role (albeit an important one) in any population control policy. While the U.S. could offer incentives for another government to improve its human rights record or follow sound fiscal policies, incentives for population control could seem callous, even racist. And like development and food policy, population policy could be arduous and thankless for those who wanted to make a difference. In the words of one member of the NSC's ad hoc group, "As a complete tyro, I learned one first principle: you have to be a hopeless optimist to work on this problem" (339).

During Carter's first year there was much talk of how the administration had been identified with its global community rhetoric. "The commitment to address global human needs has become a fundamental theme of the Carter foreign policy," wrote Bourne in August 1977 (294). Yet there was a difference between a "theme" and actual policies. In truth, global human needs were really backburner issues when compared with so many other foreign policy priorities. With Carter, Vance, and Brzezinski taking on weightier security and economic matters such as SALT, the Middle East, China, and Central America, Deputy Secretary of State Warren Christopher was tasked with a long list of second-tier issues like foreign aid, energy, and agriculture. Even among these latter issues, population and health policies generally fell near the end of the list (298).

The administration had a hard time clarifying the connection between its humanitarian and human rights goals—a reflection, perhaps, of the longstanding activist and policymaking dilemma of whether to prioritize basic human needs over civil and political rights in the poorest nations. Harry Blaney of the Policy Planning Staff laid out the quandary succinctly late in Carter's first year. "We have to be very careful about how we characterize human rights and the provision of development assistance," he wrote. "There are many countries where political rights and social rights are comparatively upheld by the government but what with the extreme poverty there is little delivery of health and other services. . . . In some cases almost every country could be criticized including ourselves about provision of services to poorer people" (299). Carter's May 1978 presidential statement on international health was short on specifics,

but it was consistent with his other overtures to the global South, and it did set a tone for further engagement with the LDCs. Major objectives included efforts to eradicate the major infectious diseases and to provide clean drinking water, basic sanitation, and immunizations. The U.S. would work with private industry and NGOs, and would strengthen domestic and international institutions committed to development and health (313). This statement is interesting not only because of its policy implications, but also because Carter went on to pursue many of these causes in his post-presidential years through his work with the Carter Center.

Finally, this volume helps us understand why human rights had staying power beyond the presidency of Jimmy Carter. Of course, one reason for its longevity is that the human rights push predated Carter's arrival in Washington. But these documents show that his administration played an important part by strengthening the bureaucracy and by giving human rights a higher priority on the national agenda. Carter also defined human rights in relatively flexible terms. As Mary Stuckey has argued, the policy had "multiple meanings" that gave later administrations the freedom to assimilate their own version of human rights into their foreign policies. The administration of President Ronald Reagan took up this mantle in its fight against communism, and eventually applied pressure even to longtime American allies.

Joe Renouard (Ph.D., Emory University) is Assistant Professor of History at The Citadel in Charleston, South Carolina. He has published essays and book chapters in the areas of human rights, American foreign relations, the Cold War, transatlantic relations, and United States history. His most recently completed book manuscript explores human rights in American foreign policy from 1967 to 1991. At present, he is researching and writing a manuscript on the Genocide Convention.

This work is licensed under the Creative Commons Attribution-NonCommercial-NoDerivs 3.0 United States License. To view a copy of this license, visit http://creativecommons.org/licenses/by-nc-nd/3.0/us/ or send a letter to Creative Commons, 444 Castro Street, Suite 900, Mountain View, California, 94041, USA.

⁴ Mary E. Stuckey, *Jimmy Carter, Human Rights, and the National Agenda* (College Station: Texas A&M University Press, 2008), xxii-xxviii.