Civilizations began and survived along with rivers and later there was a transition where nation states fought for the flow of the river and ended up in wars. The twenty first century is also moving towards the spectre of conflict over water. There are states which have been fighting eternally for the rivers, there are few conflicts which came up animatedly with the creation of new states and the other few conflicts which probably would have found solutions amicably (between the disputants) but are not able due to third party interference. The India-Bangladesh water sharing dispute is a classic case of accepting, understanding, confronting, litigating and dragging the issue since the birth of Bangladesh. Several efforts have been made to find amicable solution. The push and pull factors such as national interest, foreign policy and geopolitics have been playing major role in perpetuating the conflict. One can neither give a definitive solution nor completely push it aside as a non-issue.

Rivers have become extremely important with the tag of scarce being added to it now. With the increasing demand for energy in day to day life, the natural flow of the river has been (ab)used by all the governments across the world. Water which was only required for drinking and agriculture has subsequently assumed pivotal position with advances made in science and technology and today it is the most important source of energy. The issue of rivers becomes extremely critical when they are trans-boundary in nature. This further leads to the issue of allocation. If a river flows through one state into another, the first state cannot possibly have the right to use all the resources at the mouth of the river. India is facing a serious water resource problem and as trends suggest, it is expected to become ‘water stressed’ by 2025 and ‘water scarce’ by 2050.1 This has
somewhat alerted India to have water conservation decisions that include the Ganges and the Teesta and several other tributaries. The water issue between India and Bangladesh has been going on in the name of India-Bangladesh water dispute for the last four decades. The famous saying in history "you can change your friends, but not your neighbours", is an apt example to explain India-Bangladesh relations, more specifically the water relations. It is a reality to live with and both the nations have to sort it out.

**The Rivers and Genesis of the Problem**

The most interesting case that needs examination is Ganges, being one of the largest river systems in the world. It rises south of the main Himalayan divide near Gangotri in Uttar Pradesh, India. On its way towards the sea, numerous tributaries join the Ganges river from India and Nepal. The river divides into two channels below Farakka. The right arm continues to flow south in West Bengal as the Bhagirathi-Hooghly on which Calcutta Port is situated. The left main arm enters Bangladesh 18 km below Farakka and joins the Brahmaputra river at Goalundo. In Bangladesh, the Gorai river is the main distributary which leaves the Ganges river about 65 kms above the confluence of the Ganges and Brahmaputra rivers.

Considering the Ganges basin in Bangladesh, regular water supply from upstream is needed, particularly during the dry season (November-May) for several things such as agriculture, domestic, industrial purposes, for maintaining river depths, and sustaining fisheries and forestry which is predominantly the livelihood of people. Until 1975, the river was unregulated and the supply of water in the dry seasons was adequate. In that year, a barrage on the Ganges river at Farakka was commissioned by India. The purpose of the construction was to divert water from the Ganges river to the Bhagirathi-Hooghly river to maintain the navigability of Calcutta Port. The Farakka Barrage Project is comprised of the Jangipur Barrage across the Bhagirathi-Hooghly and a feeder canal taking off from the Ganges upstream of the Farakka Barrage and discharging into the Bhagirathi-Hooghly downstream of the Jangipur Barrage. The latest issue being raised by civil society as well as environmentalists is that of the consequences related to environment in Bangladesh. The reduced flow in the Ganges system has potential socio-economic and environmental implications for Bangladesh.

The second important case in water dispute between India and Bangladesh is that of Teesta being the fourth major trans-boundary river
in Bangladesh. Upstream inflow in this river provides support to agricultural production in the Teesta river floodplain (TRF) in the northwest region of the country. Bangladesh constructed a barrage in 1990 to provide irrigation water for crop production in the Teesta Barrage Project (TBP) area and subsequently India also constructed a barrage on this river upstream. TBP commenced operation with partial conveyance infrastructure in 1993. The project was designed to be implemented in two phases. The phase I was finished in 1998. It is generally believed and observed that irrigation water supply significantly increases farm incomes. The Teesta water is crucial for Bangladesh, especially in the lean period from December to March when water flow often temporarily comes down to less than 1,000 cusecs from 5,000 cusecs every year.

This has augmented irrigation water demands. However, withdrawal of water in India upstream restricts irrigation water availability in the TBP area. The river Teesta is one of the main Himalayan rivers, which originates in the glaciers of Sikkim at an elevation of over 8,500 m above mean sea level and is the life line for Sikkim. The river then forms the boundary between Sikkim and West Bengal before it joins the Brahmaputra as a tributary in Bangladesh. Total length of the river is 315 km. The river traverses 97 kms in Indian plains before entering the extreme northwest region of Bangladesh. It flows around 124 kms in Bangladesh and joins Brahmaputra River. The Teesta river enters Bangladesh near Nilphamari region and flows for 45 km through the rice producing districts of Rangpur, Lalmonirhat and Gaibandha and thereafter joins the Brahmaputra river in Kurigram.

According to the Bangladesh Water Development Board, the country is dependent on the Teesta for its irrigation projects covering 750,000 hectares of land and has accordingly built a barrage (1st Phase) on the Teesta. Any water shortage in the Teesta very often disrupts irrigation in the vast tracts of land and undermines Bangladesh’s agriculture. As a lower riparian under pressure from the fluctuating flows on the Teesta, Bangladesh is keen to reach a deal. Water sharing of Teesta river is one of the thorny issues between New Delhi and Dhaka. In this respect, a water sharing agreement was supposed to be inked in 2011, but due to the West Bengal Chief Minister Mamata Banerjee’s objections, it could not be implemented. Ms. Benerjee’s apprehension with regard to Teesta is well-founded as the northern region of West Bengal also faces major issue of water scarcity and it is the only source of water for agricultural crops. With the reduced flow it would further inhibit the prevailing hydro deficit.
situation of northern region which could lead to domestic tensions and create major problem for governance itself. The creation of artificial canal at the Teesta (Gajoldoba) Barrage in Jalpaiguri to irrigate Northern Bengal was the only option left before the West Bengal government. Bangladesh calls this unilateral as its share of water has been reduced largely due to the Gajoldoba canal. Though one can locate larger politics by West Bengal government associated with the issue in keeping pressure on the Union government in India, one cannot completely ignore the problems faced by the north Bengal region. Some recent statements by West Bengal Chief Minister Mamata Banerjee on her visit to Dhaka are positive with regard to finding amicable solution to Teesta issue.4

It is also equally important to take note of the water crisis India has been going through in recent years. As a middle riparian state even India is struggling to meet the expectations of the agriculture sector. The water demand projection is quite alarming and India is making efforts to manage it and failure to do so would lead to domestic unrest. The World Bank in its 1999 report indicated that the overall water demand will increase from 552 BCM (Billion Cubic Metres) to 1,050 BCM by 2025, which will require the use of all available water resources in the country.5 According to The World Bank, India is the largest user of ground water in the world, after China. If something is not done soon, an estimated 114 million Indians will soon face desperate domestic, agricultural and industrial shortages.6 There are real pertinent issues which are directly linked to India’s economic progress. Lack of water resources has taken it towards facing food crisis and failing to act on water conservation and innovative methods would very soon make it a food importer. Government agencies say that by 2050 India must nearly double grain production, to over 450 million tons a year, to meet the demands of increasing population.7 India being a middle riparian state faces tremendous pressure from the upper riparian states such as China. India’s dependency on the rivers originating from the Tibetan plateau is a well-known fact and China is pursuing major inter-basin and inter-river water transfer projects in the region. As an alternative, the Indian policy makers came up with a plan to link major rivers of the country. The plan has not seen the light as there are several issues between several states within India. Bangladesh needs to understand these dynamics India has been facing for a long time.

Another important factor that goes unnoticed many a times is the poor water governance in Bangladesh during the floods. It has structured most of its time and energy in criticising India rather than looking for
solutions within. It has been identified that the main causes of flooding in Bangladesh are generally considered to be results of heavy monsoon downpour and synchronization of flood-peaks of major rivers. Bangladesh suffers from this extreme situation of facing floods in monsoon and then drought like situation affecting its fisheries industry and other major stakeholders in the summer. There have been some developments such as creation of Flood Forecasting and Warning Centre under the Bangladesh Water Development Board in the past but much attention is paid to disaster management rather than water conservation for use in the summer. Bangladesh also needs to concentrate on some other important factors contributing to the recent floods, such as river bed aggradations due to siltation and damming of rivers, soil erosion due to unwise tilling practices and changes in the base level of the rivers due to local sea level rise. There is a need for restoration of abundant channels and lakes, dredging rivers and streams, establishing buffer zones along rivers, conservation tillage and developing advanced early warning and flood-proofing systems to manage natural disasters like flood and drought. Though issues such as deforestation in Nepal and Tibet which also contribute to floods cannot be controlled by Bangladesh, preparing different watershed management methods and conservation methods can certainly make a difference in its drought situation.

**Institutional Mechanism**

The India-Bangladesh Joint Rivers Commission (JRC) has been functioning since 1972. JRC constituted a Joint Committee of Experts (JCE) headed by the two countries water resources secretaries on the mechanism of sharing the Teesta waters and decided to follow the ground rules and benchmarks that were used to arrive at the Ganges Treaty. The JCE decided that the 'principles' and 'details' would be the basis on which any water sharing formula would be worked out. The JRC cannot take any major decisions without consulting the higher political authorities in the respective countries. The JRC mandate stipulates for two meetings a year but many a times it has been found that it takes place may be once or twice in five years. Both countries need to use this as an opportunity to talk and dialogue regularly. This in a way would also help in improving the relations between two countries.
The Discourse on Water Dispute-Rhetoric to Reality

There are some interesting works with regard to Ganga which divide the relationship between India and Bangladesh into five phases. Namely, friendly regime and productive talks, a total rupture, rapprochement and the first agreement on water sharing, the sea-saw game: reverting to the old paradigm and the final breakthrough till the agreement was reached through. There is no definitive meaning of the word national interest and it is as vague as we are able to understand the actions of nations. Still it can be understood "as an analytic tool, it is employed to describe, explain, or evaluate the sources or the adequacy of a nation's foreign policy. As an instrument of political action it serves as a means of justifying, denouncing, or proposing policies. Both usages, in other words refer to what is best for a national society. They also share a tendency to confine the intended meaning to what is best for a nation in foreign affairs. Beyond these general considerations, however, the two uses of the concept have little in common". It is interesting to analyse this particular definition as it is tailor made for India in its relation to Bangladesh. It does qualify to all the three aspects mentioned in justifying its position, denouncing the fears often pronounced by Bangladesh and yet keeps proposing policies convenient to it as an upper riparian state. The question of best for 'national society' considering India's position emerges from its demand for energy domestically. With Prime Minister Modi's regime and his pro-industrial development model for India, it is going to be proactive in procuring the energy required to match the demand from the industry to meet its ends. Further "the national interest will continue to feature in the political discourse of states because it has important subjective utility. However, by examining the concept as it is understood across the spectrum of International Relations Theory, it is clear that while it may retain rhetorical and lexical functions in the modern age, the national interest lacks substantive objective content". There is lot more subjective utility in the whole discourse on water sharing based on national interest, national society, development and other related concepts.

The whole problem of river water sharing needs to go beyond the rhetoric of national interest alone as each country needs to cater to its national interest. The only substantial argument that can be thought henceforth is that national interest of a smaller nation (geographically, financially and militarily) is no inferior to that of a bigger state as national interest is an idea and an essential tool in the hermeneutics related to
politics used in building identity of a nation and confidence of the people of their respective countries. National interests continue to prevail through the form of governments jealously maintaining their sovereignty over their own stretches of the river, and they invoke the discourse of "national interest" to legitimise development of the basin's resources. It is usually assumed that each country has an "objective" geographically-based interest deriving from its location on the river, topography and benefits derived or sought from the river and its resources. Second, as opposed to this assumption of a singular, objectively definable national interest, there is an array of diverse political and social interests within each country. Each country, moreover, has different ways and mechanisms for understanding, negotiating, optimising and mediating these diverse interests. This drives us to the concept of understanding the existing mechanism for trans-boundary river water sharing. International river law is one of the handy tools in analyzing it. It has served purpose across the world in solving some of the major problems related to river water sharing.

The Congress of Vienna is one of the foundations on which many conventions have been built. In 1815 the Final Act of the Congress of Vienna laid down the framework of international river law for almost a century. The Barcelona Convention in 1921 declared that states are forbidden to create obstacles for navigation in any way. The Geneva Convention of 1923 allowed countries to develop hydraulic power as long as it remained "within the limits of international law," a fairly abstract idea. The Pan American Declaration of 1933 further developed the idea expressed in the Geneva Convention. This Declaration stated that states can exploit rivers as long as the use of the river will not affect the activities of another state through which the river flows. Also the declaration was made that navigation could not be impaired by agriculture. These laws have been developed in greater details by the United Nations, individual agreements between states, and other international governing bodies such as the European Union. A sustained attempt to develop in a systematic way "a code of conduct" concerning transboundary water resources was made by the International Law Association (ILA), resulting in the 1966 ILA Helsinki Rules on the Uses of the Waters of International Rivers. The ILA rules have had significant impact on the treaty practice of States that culminated in the adoption of the only universal legal instrument in this field – the 1997 UN Convention on the Law of the Non-Navigational Uses of International Watercourses (the UN IWC Convention).
The greatest problem in applying ILA rules to the case of India-Bangladesh is much more problematic. Both have agreed to talk bilaterally and have their own institution called JRC in place. Besides, neither India nor Bangladesh have signed or ratified the convention. When the problem of water sharing cropped up after 1971 it was much anticipated that Bangladesh would not be in a position to get a fair deal. Prior to the creation of Bangladesh, it was an issue between India and Pakistan. Notably Pakistan ignored this region and did not give the importance as that of the Indus Water Treaty of 1960 which India negotiated to buy peace with Pakistan. India has been quite often accused of being too generous to Pakistan but in turn it has ended up in creating anti-India sentiments among Kashmirirs as they are unable to locate the larger ideal Nehru envisaged while signing the treaty.

THE TIPAIMUKH: NEW ISSUE IN INDIA-BANGLADESH RELATIONS

The Tipaimukh Hydroelectric Project is one the major issues that caused flutters among the environmentalists, activists and indigenous people in India. It is being envisaged near the confluence of Barak and Tuivai rivers, in Manipur, India and within 100 km of Bangladesh border. Costing Rs 6,351 crore and the 164 meter high dam will have a firm generation capacity of 401.25MW of electricity by the Indian state-owned utility North East Electric Power Corporation Ltd. (NEEPCO).

The construction of Tipaimukh dam will have adverse impact on the downstream part of the Barak river basin, which is in northeastern part of Bangladesh, known as Surma-Kushyiara-Meghna river basin. Institute of Water Modelling (IWM), an autonomous research institute in Bangladesh has recently conducted a study on the impact of Tipaimukh dam on Bangladesh. The study predicts that, the dam, once operational, will change the hydrological pattern of the Barak River. According to the report, the overall nature of impact can be summarized in six broad categories, like hydrological impact, impact on flooding pattern and on river-floodplain-wetland ecosystem, impact on morphology, impact on water quality, dam-beak and general.14 Gowher Rizvi, Foreign Affairs Advisor to the Sheikh Hasina-led government, has accepted this position and equated it to a “run of the river project, where the water stored in the dam or the reservoir has to be discharged continuously to enable generation of electricity”. Meanwhile, the civil society in Bangladesh has questioned the nature of the dam in restricting water availability to the Kushiara and Surma rivers.
as well as the capacity of the dam to generate 1500 MW.\textsuperscript{15}

While India has been emphasising upon the hydro-electric and flood prevention benefits of the project, Bangladesh has been concerned about the impact of such activity on the river regime, capacity of the dam to control floods, impact on hydrology, particularly the water drainage on crop lands, etc. India has sought to allay these concerns by pointing out that the impact of the dam would be felt inside Indian territory as well, given that some land and National Highway No. 53 in Manipur will be partially submerged. India has also invited Bangladesh to become a partner in the project, which would also facilitate the sharing of power to be generated.\textsuperscript{16}

Environmentalists and agriculture experts have warned that the twin dams, at Tipaimukh and Phulertal, across the cross-border Barak river would dry up rivers and waterbodies downstream, rendering vast farmland arid, hitting agriculture and threatening food security in the north-eastern districts of Bangladesh. A joint communiqué issued during Ms. Hasina’s visit to New Delhi in January 2010 stated that Prime Minister Manmohan Singh gave the assurance that India would not take steps in respect of the Tipaimukh project that would adversely impact Bangladesh.\textsuperscript{17} However, the forest advisory committee (FAC), which met on 11 and 12 July 2013 denied forest clearance to the proposed 1,500 MW Tipaimukh hydel project in Manipur. The committee recommended that in case the implementing agency desired, they could explore the feasibility of constructing smaller dams involving diversion of smaller forest areas commensurate with their power generation capacity.

\textbf{Foreign Policy Imperatives and Political Gimmicks}

It is often said that every nation has the government it deserves, so it has the geopolitics it deserves. Leopold von Ranke once stated “politics is the attempt to safeguard and further national interests in the midst of a conflict of the Great Powers, both in the realm of ideas and realities”. Going by this statement, the water issue is a tussle between two important nations of the region to maintain their sovereignty over their geography through trans-boundary rivers. India for decades has been living in the illusion of creator of a nation called Bangladesh. However, there have been several unresolved issues which were taken up during the Janata government in March 1997. The data collected then indicated that flow during the lean season was as low as 55,000 cusecs at Farakka and they also opined that
the minimum requirement to keep the Calcutta port navigable in the lean season of April-May was 40,000 cusecs. The remaining 15,000 cusecs was more than what Bangladesh needed during the lean season. These negotiations led to short term solution of five years agreement but left the long term solution to Indo-Bangladesh Joint Rivers Commission. The Janata government gesture was much appreciated in Bangladesh as they found something more profitable to them happening against the produced data. The subsequent election led to Indira Gandhi coming back to power and there was a stalemate again. This led to much disappointment in Bangladesh. Rajiv Gandhi’s take over as Prime Minister of India and his desire to have regional cooperation and keeping India-Bangladesh river water sharing as a priority was a welcome move. His visit to Bangladesh led to another short term agreement for three years and also led to the setting up of a task force co-chaired by the concerned secretaries of water resources in the two countries to deliberate upon short and long term measures.

In between these events, it is important to take note of the political turbulence leading to coups and abuse of power. Khaleda Zia’s period from 20 March 1991 to 20 March 1996 didn’t produce any favourable results for Bangladesh. It was also a period of political consolidation. With the coming of Hasina to power with a political legacy and learning from the mistakes of her predecessor, she went ahead to seek India’s help in bringing a solution to the water sharing problem. As against these developments in Bangladesh, there were fractured mandates in India which led to the formation of a coalition government in the name of United Front led by H D Deve Gowda. The efforts of the secretaries and officials should be acknowledged in the long term solution inked between India and Bangladesh on 12 December 1996 called as Ganga Water Treaty. The success of the treaty is always debatable. India has its own arguments in trying to come up with new barrages and Bangladesh has its own compounding fears of receiving less water.

The latest issue between India and Bangladesh has been the case of Teesta water. Teesta issue generates immense nationalistic fervor in Bangladesh which is negotiating from the weaker position of a lower riparian state. Even the country’s two main political parties—the Bangladesh Nationalist Party (BNP) and the Awami League are accusing each other. For both parties, championing Bangladeshi national interests on the Teesta issue remains a key electoral strategy. Hasina who is often seen as someone who maintains smooth relations with India once made a statement reacting
to the suggestions made by Khaleda Zia of BNP prior to Hasina’s visit to India in 2010, “I thank her for wishing me success on my tour. But she did not go to Delhi to discuss these issues when she was in power. She was in power before me. But she did not bring the Teesta waters then, she seems to forget these issues when in power. It is only natural though, given that she was born in India. I brought the Ganges waters in my previous tenure; she could have done that with Teesta”.

During the visit of Manmohan Singh, it was announced that an agreement on sharing of Teesta waters would be signed, although the people of Bangladesh did not know the details. At the last minute, the agreement was not signed on the ground that Mamata Banerjee was opposed to it. “The people of Bangladesh don’t know what really happened. Our government says so. Hasina says so. I have not met Mamata, and I don’t know who blocked it”. Bangladesh High Commissioner Tariq Karim is extremely hopeful of the present NDA government finding a solution within a span of four months. He made an apparent reference to promises being made to the people of Bangladesh by the political class time and again on Teesta. He even pleaded in one of the interviews “when the PM went to Bangladesh, we sent invites to all of them, and all came except West Bengal CM (Mamata Bannerji). It’s that state that we have the strongest historical ties with, and what we have to understand is that rivers will flow a certain way....god and geography ensured that”. He also requested the political parties in India and Bangladesh to move beyond the politics one needs to play to stay in power. He reiterated, “we have to make a paradigm shift in our thinking about segmenting rivers. Any river basin is a force of nature with a personality of its own. What we are talking about is managing the common resource of water that we have, that we need to do for everything from agriculture to flood control. Every year thousands of acres are washed away when these rivers are in full spate. Our biggest challenge is to lift people out of poverty, but in Bangladesh every time we do that, the rivers push more people into poverty because of lost land. Being the lowest of the low riparians, we cannot manage this on our own, we have to do it together, we are all stakeholders”.

There are clear evidences to prove that more often the issue of rivers is played by political parties within their own territories to gain political mileage with least concern for the people who suffer on day to day basis. In case of India, the situation Manmohan Singh experienced as the Prime Minister at the hands of Mamata Bannerji was a mockery of federalism.
and it throws up many more challenges in the coming years. It is hard to make the politicians to think and accept that nature does not understand the politics but behaves according to the action reaction cycle. Despite the rhetoric running around between India and Bangladesh, there has been lot of support from India to Bangladesh. India has extended a $1 billion line of credit to Bangladesh which is the largest single line of credit given by India to any country, of which $200 million has been converted into grant-in-aid. The support is for a range of projects, including railway infrastructure, supply of Broad Gauge microprocessor-based locomotives and passenger coaches, procurement of buses, and dredging projects. Government of India also fulfilled its commitment of establishing IT labs in model schools of each of the 64 districts of Bangladesh, inaugurated by Prime Minister Ms. Sheikh. India is also committed to export 500 MW of electricity to Bangladesh, with the line having a 23 maximum capacity of 1,000 MW. The two countries also agreed to invest in power generation. As a result, grid connectivity was completed in 2013. India is now exporting 500 MW of electricity to the south-western region of Bangladesh. In March 2014, India has promised an additional 100 MW of power from the Palatana power plant in Tripura. India’s intention is much clear as it wants progress and economic development of Bangladesh. India expects a peaceful neighbourhood as the new government in power has made the policy of ‘neighbourhood first’. India has been liberal despite the security concerns and constant problem of illegal immigration posed by Bangladesh.

**Importance of Cohesive Political Regimes and Probable Solutions**

It is important to take note of the relations between India and Bangladesh getting strained due to unresolved issues such as water sharing. There needs to be a cost benefit analysis. There are few remarkable achievements so far in the bilateral relations between India and Bangladesh. Firstly, India faces a major challenge in handling insurgency in the Northeast as Bangladesh was used as a safe heaven by the insurgents for a long time. It is due to Sheikh Hasina’s support that some outfits are kept in control to a large extent. She also handed over some most wanted separatists who posed threat to India’s security in the region. Secondly, the growth of anti-Indian elements such as Jamaat has been checked under Hasina’s regime. With the ongoing trials of war criminals, the anti-Indian sentiments sown in the people using religion has been virtually controlled to a large extent.
extent. Sheikh Hasina has been promising to find a way out with regard to water problems. People are also quite realistic in Bangladesh as they are not expecting any miracle to happen with regard to the land boundary dispute, but water is a major issue concerning day to day life of the people. India needs to support some of her initiatives.

Water governance policies between India and Bangladesh are characterized by three important features: (a) statist in terms of decision-making (b) nationalistic in terms of discourse, and (c) reductionist in terms of scope. Governance in a sector like water must be perceived as a subset of a country’s general governance system of how various actors relate to each other. There is also a necessity to find alternatives to big dams and barrages by keeping the environmental concerns in mind. Single narrative of holding on to constructing dams and barrages as the only solution would lead to water conflicts which have the potential of causing damage to bilateral relations. Finding alternatives to a complex problem is the work of the policy makers and bureaucrats. Kalyan Rudra observes that “the Planning Commission of India and its counterpart in West Bengal – the Irrigation and Waterways Directorate – have never seriously considered the option of smaller, decentralised reservoirs. Such projects would be farmer-centred, less destructive from the environmental point of view and cost-effective”. The most important mechanism yet remains least explored is the conservation of water during the rainy season so as to be used during dry season. An integrated flood management program has to be designed and executed with people’s involvement in it in respective countries. It has to be acknowledged that a progressive step has been taken by both the countries to share flood projection data on constant basis and this can be one of the steps in a long way to start with.

References

3. n.2
8. n.5
13. Ibid.
16. Ibid.
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