

# The Principle of Discrimination in the Gulf War: a common humanity and the tensions of competing rights

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## Introduction: the intertwining of principles

Theories of just war have been elaborated to reduce the incidence of war and to render more human/humane the conduct of war. They tend to group four principles or considerations: the requirement of a just cause which reduces reasons for going to war and which in our times has tended to be interpreted mainly in terms of the right of defence against an unjust aggressor; the judgment of proportion which hinges on the sensible question of whether the gains of war will balance its losses; the principle of discrimination that accepts the common humanity of those in war and for that reason distinguishes between combatants and noncombatants<sup>1</sup>; and the practical elimination of other alternatives before having recourse to the scourge of war.

The principles of proportionality and discrimination move easily enough into one another since the harm done to noncombatants needs to figure in the calculations of the war's foreseeable losses. Discrimination adds however something to proportionality: it seeks to employ military acts of war against those only who are committed to combat and to offer noncombatants the safeguard of immunity from attack. For such reasons discrimination deals with *ius in bello* rather than *ius ad bellum*<sup>2</sup>. There is however a conceivable case where discrimination might condition the *ius ad bellum*, namely, in the use of nuclear weapons where in counter city policies it seems impossible to differentiate noncombatants from combatants. Moreover, as conventional weapons, developed within the computer and electronic revolution, continue to grow more powerful, issues akin to those already raised by nuclear weapons will be posed.

The principle of discrimination is based positively on the acknowledgement of a common humanity: what combatants share with one another in cherishing spouses, children and neighbours and in protecting the weak, the defenceless and those who threaten harm to

none. For that reason it is also called 'the principle of humanity'. Negatively, it builds on a logic that accepts that to seek to destroy an opposing people completely is to invite a similar attempt on the life of one's own people. In short, the principle of discrimination accepts that in war one wants to defeat an enemy but not to destroy a people<sup>3</sup>.

If justice is too readily awarded to one's own case, if wars have always come too soon, and if proportionate losses are seldom well gauged, discrimination was for a long time more easily respected as a principle than the other principles of just war theory. In centuries when most armies were professional and mercenary and the range of the technology of war was extremely limited noncombatants suffered evils such as sporadic looting and personal violence but they usually had their lives spared. Discrimination first came under great pressure in modern times in the wake of the Napoleonic wars and the industrial revolution. From that era on nations under arms rather than monarchs began to go to war; armies and navies began to rely on the industrial mobilisation of economies; and the new communications media could not only motivate effectively their own peoples for war but in enveloping enemy peoples in stereotypes could convince opposing peoples that their enemies were evil as people<sup>4</sup>.

## **The malign mutations of history**

The stakes of war were raised in a number of ways during the industrial era. The gains and losses of war now translated less into royal acquisitions of territory than into the living standards of peoples and were thereby greatly enhanced. Also, the shared culture of the royal dynasties had mitigated the sharpness of conflict. Once the industrial revolution had got under way in Europe—and later outside Europe—it changed relations between peoples. Moreover, in raising the stakes of war in the apparent zero sum conflict of the living standards of countries it envenomed popular hostility; and in enlarging the levels of political as well as military participation among populations it deepened national bitternesses, left leaders with less flexibility in working out terms of victory and capitulation, and helped to dissolve the traditional distinction between combatant and noncombatant. Not least, finally, in an age that had begun to take more seriously the ethics of international relations and the rights of man, the opposing national interests were buttressed by ideological righteousness and became thereby often less negotiable. The attitudes generated through these historical changes led the allied forces at the end of the first world war to maintain a food

blockade long after the end of the war and to cause the destruction of thousands of lives; and at the end of the second world war these attitudes induced the victors to remove or destroy a great part of the industry of Germany.

Out of these developments, and the resulting perceived relationship between on the one hand civilian back-up in munitions, communications and morale, and on the other hand military power, opposing sides in the aerial bombardments of the second world war refused systematically to acknowledge distinctions between civilian noncombatants and military forces. Understandably, the phrase 'total war' was coined. This outlook extended to the destruction of civilians those attitudes towards the expendability of soldiers in the great battles of attrition of the First World War. In a further extension to the new outlook civilians were deliberately and directly destroyed at Hiroshima and Nagasaki in an avowed effort to shorten the war and to lessen allied military casualties. Finally, it needs to be said that all these belligerent attitudes have coalesced since the last war in a targeting policy for nuclear weapons that has in a counter city policy set aside accepted versions of discrimination<sup>5</sup>. Karl Barth summed up those changes that we need now to confront:

Much is already gained if only we do at last soberly admit that, whatever may be the purpose or possible justice of a war, it now means that without disguise or shame, not only individuals or even armies, but whole nations as such are out to destroy one another by every possible means. It needed the atom and hydrogen bomb to complete the self-disclosure of war in this regard<sup>6</sup>.

## **The test of the Gulf War**

While various commentators considered that the traditional teaching on just war no longer held good for modern conflict these views tended to be stated rather than argued—what is significant is that only one principle, viz., that of a just cause, was argued in Western countries on the way to the Gulf war<sup>7</sup>. The other three principles—seeking alternative solutions to war, proportionality and discrimination—were given short shrift. It seems reasonable to argue that the war came too soon before sanctions had been given time to work and before all the pressure that might have been available had been put on the Iraqi government<sup>8</sup>. In this connection it has to be said that once the American government had sent large-scale forces to Saudi Arabia, war had become inevitable, mainly because these forces could not have been readily maintained in terms of

logistics and morale in the region while time was being given for sanctions to work. Proportionality may well have been considered by both sides but presumably each evaluated the balance of loss and gain in their own favour. There were however complex reactions on the Coalition side to discrimination which will need to be explored<sup>9</sup>.

Where the Gulf war deviated from many recent conflicts was that hostility among the coalition powers—the Western powers and their mainly Arab allies—was directed much more at the Iraqi government and its president<sup>10</sup> than at the Iraqi people. In fact, in working up Western moral indignation against the Iraqi leadership the latter's oppression of its own people provided added motive and justification. Under those circumstances it might have been thought that enormous consideration would have been given to avoiding civilian losses. While clearly an effort was made by the Coalition powers to avoid direct civilian loss of life, it was equally clear that such losses were not going to stand in the way of a successful conclusion to the war.

Why was the war pursued so ruthlessly? There appear to have been several reasons. First, attitudes carried over from the world wars and from the confrontation with the Soviets argued that the end of victory had to take precedence over squeamishness about the means. Second, the foregoing reason was deepened by opinions, held by many well-informed military and civilian experts, that the Iraqis were a formidable military force against which no chances could be taken. The military tendency to adopt worse case scenarios thrives in this kind of situation: it legitimated the use of all available weaponry and tactics, short of nuclear weapons (which still remained outside the strategic and possibly the moral ambit of warfare) and chemical and other weapons that were potentially deadly but not considered practically relevant. Third, without making the suggestion of racism, it does seem the case that the lack of full reporting on Iraq over a period of many years—a lack enforced in good measure by an autocratic government—reduced the sense of common humanity with Iraqis that might have softened military measures. Finally, the obnoxious character of the Iraqi regime was used as a reason for employing the most powerful kinds of force against it; and in the process the innocence of a civilian population that had little or no influence on its government's decisions seemed to be relatively overlooked.

## **Justice and discrimination**

Was the principle of discrimination violated during the war? It seems fair to say that it was not to the extent that by and large coalition forces sought to avoid direct attacks on civilian targets<sup>11</sup>. It came under some stress however in that the widespread bombing inevitably led to

considerable civilian losses. Yet even here it seems reasonable to say that the ferocity of the attacks reflected, as has already been suggested, at least in some measure a fear—an unreal fear as events were to make clear—of the strength of Iraqi forces in the event of a ground war<sup>12</sup>.

It is however much harder to justify the systematic destruction of the infra-structure of a developing country—roads, bridges, water tanks, water treatment plants, mains and towers, sewerage works, hospitals, power stations, industrial installations of every kind, oil industry installations, transport vehicles of all sorts—until it had reverted to near nineteenth century levels<sup>13</sup>. It seems hard not to believe that the destruction went beyond what was militarily necessary. It was foreseeable that such extensive destruction would not only cause direct loss of civilian lives but would bring in its wake a great loss of life, not least of children's lives, from malnutrition, disease, and untreated or poorly treated illnesses and injuries. One has to ask the question: were the Iraqis defeated so utterly that others might learn from the lesson? An Israeli general, opposed to the war, has written:

From an operational viewpoint the bombardment of the Iraqi hinterland made little sense. Saddam Hussein had already proved his incompetence in the Iranian war and confirmed it in 1991. The bulk of his forces were concentrated in the south of Iraq and in Kuwait, and they were vulnerable to an offensive coming from the sea or the desert, and he kept back only a small number of reserves to provide possible reinforcements or to offset encirclement. For that reason, there was no case for destroying the routes and the bridges between the rear and the army. The thousands of tons of materials and food directed towards the front could have been bombed at the crossroads close to their destined locations without destroying the routes and the bridges of the centre of the country. Further, there was no reason to deprive the civilian population of water and electricity. If the air forces which bombed the towns and the Iraqi countryside had used all their fire power against the army at the front, the latter would have been taken apart more quickly, the ground offensive could have been unleashed at least two weeks earlier, and the war would have been shorter and much less painful....The show of power was not just to impress the Iraqis only<sup>14</sup>.

A careful estimate suggests that some 5,000 to 15,000 Iraqi civilians may have died in the course of the war, and anything from 30,000 to 80,000 in the wake of the war<sup>15</sup>. Moreover, many more Iraqis are yet likely to die as the hot summer and its concomitant problems aggravate the existing grim situation. Compounding this form of aggression has been the continued imposition of general sanctions on the Iraqi regime

that impedes the use of foreign exchange for food and repair purposes and that worsens the health situation of the civilian population<sup>16</sup>. It suggests how little has been learned from the harm done to the German people in the aftermath of two wars as well as from the losses inflicted on the peoples of Vietnam after their years of struggle and devastation.

What is ironic and contradictory about the continued imposition of sanctions is that it is directed towards the removal of Saddam Hussein in a policy that fulfils the traditional maxim of being willing to wound but afraid to strike<sup>17</sup>. The half-hearted efforts to topple the Iraqi regime which encouraged Kurds and Shi'as to rebel and led to disastrous consequences for those peoples has imposed hardship on the Iraqi population in a poorly thought out policy that not only has stopped short of removing Saddam Hussein but that misunderstands and underestimates his support among the relatively privileged—and minority—Sunni population of Iraq who control the country's military and economic power. In a word, there is a case for a selective use of sanctions against the Iraqi government but there is not a cogent case for the wholesale prevention of trade (even in the name of exacting reparations), and imposing lower standards of living, lack of economic growth and development, malnutrition, diseases, illnesses and deaths on an entire population. In any case the tremendous destruction of their economy will harm Iraqi living standards and reduce life expectations for at least a generation among a poor people.

What has to be emphasised as crucial is that few protests have been raised in the West against the failures in discrimination and against the sufferings and deaths inflicted on a defeated and innocent population. It must worry us that we as peoples have been able to show or to arouse so little concern for the damage inflicted in war by our political and military representatives and for the continuation of part of the damage in the wake of the war. In this connection one has to regret particularly the lack of dissent among English churchmen—the contrast with Scottish churchmen is striking—in the face of governmental and opposition policies and public support for the war. One might perhaps make the comment that—apart from other considerations and perspectives—Scottish churchmen have seen themselves as part of a constructive debate, while English churchmen who are conditioned by older Establishment attitudes—and this includes senior members of the Roman hierarchy—excessively see their contributions as institutional and, in consequence, hold back from expressing views that run counter to governmental and public opinion as well as to that of most members of their own flocks<sup>18</sup>.

Beyond the issue of discrimination it seems important to remember

that in spite of the relevance and often the strength of the other conditions for a just war, those who opposed the Gulf war—or who at least hung back from supporting it—that had a just cause, viz., the liberation of Kuwait and the ejection of the Iraqis, found themselves faced with some embarrassment since the just war condition of defence against aggression is for most persons the most psychologically salient and the most morally legitimising condition of just war. The opponents of the war were effectively outmanoeuvred and overwhelmed by the conviction of moral righteousness—as well as by the governmental and other support—of those, including groups who had supported and armed Saddam Hussein for many years, who supported the war.

### **A conclusion in the guise of reflections**

Let me end this paper with three relatively simple reflections. First, those who are sensitive to the evils of war and who believe that for technological as well as moral reasons war has become more and more unsuitable, and almost always counterproductive, for resolving conflict in a world grown increasingly small and in a new global civilisation<sup>19</sup> need to use periods of peace, or relative peace, to work on political and other attitudes and values<sup>20</sup>. One has seen how impossible it is to work on such attitudes once war has appeared on the horizon and atavistic reactions have been played on<sup>21</sup>. Moreover, even those who subscribe to traditional concepts of the linkages of security and military capacity must give some thought to the scale of the human losses in the Gulf War, the political and civil disruption in its wake in at least two countries, and not only the lack of solutions but the complications brought to the problems of a troubled region. Finally, the confused and calamitous human circumstances that have marked the course and aftermath of the war, the lack of political follow through from the military victory, and the continuing lack of resolution of the general problems of the Middle East and the Gulf must oblige participants and observers to ask again whether means other than war should have been tried much further than they had been.

Second, further reflection, writing and discussion on the theory of just war could bring a useful contribution to moral thinking<sup>22</sup> and avoid the superficiality of reactions in respect of the Gulf war, not least among churchmen who might have seen themselves as guardians of conscience, reactions such as those that sought to distinguish between ‘just’ war which apparently this war was not and ‘justifiable’ war which it apparently was when commentators were doing little more than saying

that they did not like the war but were unwilling to take a public stand against it. Furthermore, the development of military technology and its relation in war to the civil economy makes discrimination much more difficult than in previous periods of history<sup>23</sup>. For that reason the principle of proportionality also has to be elaborated within a realisation that concepts of 'military necessity' will go on extending the scope of military devastation to every part of the civilian economy that has any considerable linkage with the military effort.

Third, it is necessary to stress those other conditions of just war as well as the condition of just cause. Not only do the other conditions raise crucial human considerations but they can also in good measure induce persons to bring a sophistication to analysis that may overcome the subjectivity and moralism of governments and peoples judging in their own case/cause. In a word, far from being out of date the theory of just war and its intersecting conditions may well be a cluster of ideas whose time has at last come.

- 1 Some theorists group under discrimination actions that involve inflicting excessive military losses. I should prefer to group such actions under proportionality. The torture and execution of prisoners fall however under the principle of discrimination.
- 2 For a clear and thoughtful statement of *ius in bello* one might turn to the pastoral letter of the U.S. Catholic bishops on war and peace in a nuclear age, *The Challenge of Peace: God's Promise and Our Response*, (CTS/SPCK), London, 1983, pp. 29-32.
- 3 In the Protocol Additional to the Geneva Conventions of 12 August, 1949, and relating to the Protection of Victims of International Armed Conflicts ((Protocol) (177) there are clear definitions:

'[Art.]51....

4. Indiscriminate attacks are prohibited. Indiscriminate attacks are:

- (a) those which are not directed at a specific military objective;
- (b) those which employ a method of means of combat which cannot be directed at a specific military objective; or
- (c) those which employ a method or means of combat the effects of which cannot be limited as required by this Protocol; and consequently, in each such case, are of a nature to strike military objectives and civilians or civilian objects without distinction.

5. Among others, the following types of attacks are to be considered as indiscriminate:

- (a) an attack by bombardment by any methods or means which treats as a single military objective a number of clearly separated and distinct military objectives located in a city, town, village or other area containing a similar concentration of civilians or civilian objects; and
- (b) an attack which may be expected to cause incidental loss of civilian life, injury to civilians, damage to civilian objects, or a combination thereof, which would be excessive in relation to the concrete and direct military advantage anticipated. . . .'

52....

2. . . . In so far as objects are concerned, military objectives are limited



to those objects which by their nature, location, purpose, or use make an effective contribution to military action and whose total or partial destruction, capture or neutralization in the circumstances ruling at the time, offers a definite military advantage.'

Other Geneva Protocols stress two things: one is that everything must be done to minimise civilian casualties (article 57, Para. 1); and the other is that such attacks should be avoided if the loss of civilian life is such that it is 'excessive in relation to the concrete and direct military advantage anticipated' (Article 57, Para 2).

- 4 The genesis of such attitudes between the British and the Germans is the *leitmotif* of the distinguished study by Paul Kennedy, *The Rise of Anglo-German Antagonism 1860-1914*, (Allen and Unwin), London, 1980.
- 5 Donald Nicholl in an article in *The Tablet* (1 June, 1991) makes a point similar to the argument in this paragraph: '... Ignaz Maybaum has perceptively commented: "The genocide of Auschwitz began in Verdun...the inhumanity of Auschwitz began with the inhumanity of the trench warfare of 1914-18." As well as the line leading from Verdun to Auschwitz there is a further branch line leading to the slaughter-house of Dresden in 1945, that of Hiroshima and of Vietnam/Cambodia and—the latest in line—Iraq/Kuwait/Kurdistan.'
- 6 *Church Dogmatics*, III/4, p. 149 (Eng. trans.: T. & T. Clark, 1961).
- 7 In another paper I have tried to take a broader look at the issue of justice in the Gulf War: "Les ambiguïtés de la justice", *L'Événement Européen*, March 1991, No. 13, pp. 137-148.
- 8 I would like to argue that a marvellous opportunity for making sanctions work—in particular, there was gross underestimation of the effect of revenue loss on the Iraqi government as it proved almost completely unable to sell its oil—that might have provided a most salutary contemporary precedent was lost, even if it is acknowledged that sanctions were likely to take a long time; and an opportunity was also missed for creating a new international atmosphere in which war options were taken up more slowly and reluctantly than in the past.
- 9 Let me state in an overall way my personal position on the Western intervention to start the Gulf war. In the last resort I could not bring myself to support the war or to judge it a just war in spite of my rejection of the Iraqi annexation of Kuwait and my desire to see it reversed. First, the war began too soon and its initiators lost the opportunity to make sanctions work and to enable Arab and other brokerage to prove effective. Second, I cannot condone in terms of a principle of discrimination the tremendous destruction of the Iraqi economy—though I acknowledge a genuine attempt to avoid civilian deaths—that will harm Iraqi living standards and reduce life expectations for at least a generation among a poor people. Third, though various longer term objectives have been formulated—and they have mostly been formulated in a vague and generalised way—I believe that this war has been started with insufficient understanding of its longer term effects as well as little grasp of the implications of contemporary global technology and political organisation. I believe also that this war has proved a setback to trends against war that were developing in the Western world—relations between the former enemies who now constitute the European Community are a significant example; and I only hope that we have not been provided with a new and malign prototype of behaviour for dealing with the Third World. In this connection too some harm has been done to the legitimacy of the United Nations which has allowed its authority to fall excessively into the hands of a partisan group of nations. I simply hope that in those Western countries that have led this war its short-sighted and cruel nature will with time be recognised and appropriate conclusions drawn for participating in the construction of a more intelligent and just world order than the present breakdown of international order would appear to herald. Finally, it may be objected to the personal position that I am

stating that at some stage the question had to be answered: what should be done if sanctions did not work? In reply I accept that at that stage there would have been a much better case for going to war. However by that time also many other issues might have come into better perspective. In any case the question/objection is speculative: sanctions were not given an opportunity to work—though the present situation shows how powerfully they work against Iraq.

On the Iraqi side the war was entirely unjust: its regime had no just reason for annexing Kuwait; it did not sensibly negotiate before the war began; it made calculations of momentous stupidity and folly in judging what would happen to its country and military; and it violated discrimination specifically in firing deliberately missiles against Israeli civilians as well as indiscriminately into Saudi Arabian cities, by holding foreign citizens prisoner in militarily exposed places, by pouring oil into the Persian Gulf, by stripping the country of its modern infrastructure and equipment by wantonly destroying the public buildings and offices of Kuwait, the electricity and desalination plants, radio and television studios, oil installations and wells, looting private homes, museums, stealing vehicles, treating civilians with brutality, and carrying out arbitrary and random killings.

- 10 Over-extended comparisons of Saddam Hussein with Hitler were constantly made by Western politicians and journalists.
- 11 William M. Arkin, Damian Durrant, and Marianne Chermi write perceptively: 'There is no denying that the public, and public opinion, became a third force [on the Western side] in the conflict. Through the shared consent of the conduct of the war, the public imposed certain expectations as to proper and acceptable behavior.' *Modern Warfare and the Environment: A Case Study of the Gulf War* (Greenpeace, London, 1991), p. 146
- 12 Arkin and his co-authors write: 'The force and decisiveness of the application of modern weapons, and the heretofore unexperienced power of an efficient electronic armed force working in synergy astonished Iraq, the public, and the allied military itself'. *Op. cit.*, p. 146
- 13 One of the problems arising for Iraq from the war's destructiveness was that a highly urbanised country had come to depend on contemporary technology in its infrastructure and was, in consequence, in a certain sense more immediately deprived than a country that had made fewer advances towards modern technological conditions.
- 14 Matitiahu Peled (general in the Israeli reserve), *Le Monde Diplomatique*, Juin, 1991, p.5.
- 15 Most likely 100,000–120,000 Iraqi soldiers were killed during the war, some half of them during the four days of the ground war at the end of the conflict. Some 350 allied soldiers were killed: see the careful discussion in Arkin's book.
- 16 Ed Vulliamy reports (*Weekend Guardian*, May 18–19, 1991, p. 5): 'It was not merely the transformers in the water plants that were bombed [in the allied offensive], but the giant Japanese-built turbines themselves, which cannot be repaired under the embargo.'
- 17 There has been the paradox that the Gulf war was waged to restore the sovereignty of a country (Kuwait) but in the aftermath of the war the plight of the Kurds—but not the Shi'as—was thought sufficient by Western countries to set aside the sovereignty of another country (Iraq).
- 18 Nicholl again—in the article already cited—has most perceptive things to say about the lack of educated dissent in Britain when compared to the United States. Archbishop Winning of Glasgow sensitively expressed a religious position in saying that he was not speaking for his people but he was speaking to them.
- 19 There was a superficial sense in which the American intervention in the Gulf resembled the gunboat diplomacy of the colonial period of the industrial revolution. The reality is however different and more serious. The intervention may have owed something to the mores of an earlier period but it has taken place in a world that has grown small, interdependent and dangerous with new technological production, trade

- and communication and that has begun to realise—without doing much that is constructive about it as yet—that world resources in their present forms of consumption are limited and that prevailing patterns of consumption remain possible only because some three quarters of the world consume much less than its developed one quarter. It is significant that the present war was dominantly about access to a crucial resource, energy. I have tried to tease out the wider implications of the war in a paper that was re-worked to present as evidence to the Foreign Relations Committee of the House of Commons: “Peace in the Gulf: The Shape of the End and the Making of the Future” in Foreign Affairs Committee, Third Report, *The Middle East after the Gulf War*, Vol. II, Appendix 4, pp. 256–263.
- 20 During the Gulf crisis Third World countries mostly looked on with resentment as a great and technologically developed country, the United States, pounded into the dust the infra-structure of a poor country with a cruel and foolish leader. That example may well not be forgotten when new and more militarily powerful and revisionist contenders come on the scene—India and China, not least—who will be better prepared to assert their claim to a share of global resources. They will have noted too the ready ruthlessness with which the leading Western country—and various allies and clients—went to war to protect their interests.
- 21 It is difficult not to sigh for a ‘might have been’ and lament the judgment that led President Bush in the face of a gross violation of international law and the perceived threat to Western access to oil at reasonable prices to have precipitate recourse to military measures: he chose to send shortly after the invasion of Kuwait huge rather than token forces into Saudi Arabia; and once he had done that, he had then in the face of problems of military logistics and morale little option except to use those forces in going to war. In consequence, an opportunity for making sanctions work that might have provided a most salutary contemporary precedent was lost, even if it is acknowledged that sanctions were likely to take a long time: and an opportunity was also missed for creating a new international atmosphere in which war options were taken up more slowly and more reluctantly than in the past. In short, President Bush not so much went to war too soon but with the connivance of his adversary, President Saddam Hussein, who refused to negotiate seriously in the days before the war began, he made war well-nigh unavoidable too soon. Yet if President Bush failed to exhaust other reasonable means, particularly sanctions, before going to war, once the war had become inevitable or had actually got under way, those who needed to take a stand had then to do so in the light of the other moral and political considerations of the just war theory.
- 22 Gerard J. Hughes reflects carefully and critically on the arguments on different sides in the run-up to the war in “Wise after the event”, *The Tablet* (25 May, 1991). During his discussion he suggests: ‘The role of the Churches, surely, is to raise rather than debase the standard of public discussion. There are several ways in which this might be done: by helping people not to confuse different kinds of issues; by trying to throw light on the problems of theology and moral theory which are involved; and by pressing politicians to provide honest information where such information is central to moral decisions. In all these areas we have much to learn.’
- 23 For some apt observations, see Arkin and others, *op.cit.*, pp. 145-149.