

CHAPTER II

THE AUSTRALIA SHIFTING POSITION TOWARDS EAST-TIMOR AND THE IMPASSE ON ITS RELATIONS WITH INDONESIA

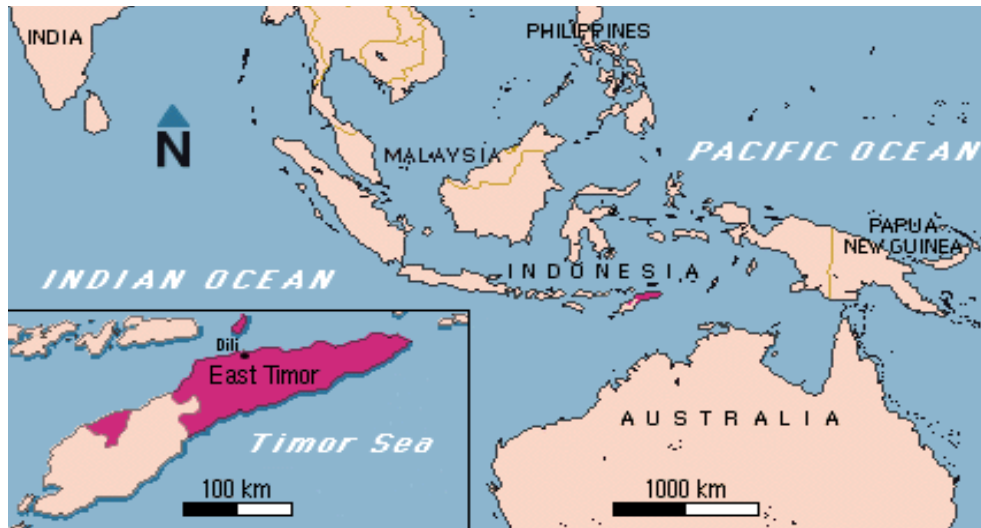
The involvement in East Timor case has been one of the contested decisions for Australia. The position of Australia which at first supported the Indonesia integration of East-Timor changed its tune around 1998. The shifting position happened due to the instability in East Timor that seems could not be handled by Indonesia. It made Australia under John Howard suggest the Indonesia disengagement toward East Timor. Those actions made some Indonesian, believed that the act of self-determination was the Australia's implicit interest. Thus, those misunderstandings led to many obstacles in maintaining state relations. It can be seen from the termination in military, society and government sector.

A. Australia Political Position on East-Timor's Independence

The relations of Australia and Indonesia began in the uncertain times, but it became more effective starting in the post-Indonesia independence. Furthermore, although both countries are geographically close, they still cannot overcome the differences in culture, people and habit. In which the lack of understanding often creates distrust in their bilateral relations. The turbulences in Australia-Indonesia bilateral relations made them known as a "Strange Neighbours". It refers to an

assessment that embodies the complexity and difficulty faced by two countries in maintaining and nurturing their bilateral relationship.³⁷

Figure 2.1: The map of Indonesia, Australia and East Timor



Source: <http://www.un.org/Depts/Cartographic/map/profile/timoreg.pdf>

Until the early 1970s, Australia-Indonesia relations were relatively untroubled. However, in 1975 there were five Australian journalists killed in Balibo which was famously known as Balibo Tragedy.³⁸ Balibo is one of the towns in East Timor which the border became one of the place to witness the chaos and human right violations during Indonesia invasion. Some of Australians believe that the killings of those Australian journalist were presumably involving Indonesian army which aimed to prevent the revelation of Indonesia invasion in East-Timor.³⁹ In

³⁷ P. Sulistiyanto, op.cit., p. 120.

³⁸ R. Tapsell & J. Eidenfalk, 'Australian Reporting from East Timor 1975-1999: Journalists as Agents of Change', *Australian Journal of Politics and History*, Vol. 59, No. 4, 2013, pp. 579-581.

³⁹ Ibid., p.580.

addition, the issues of human rights abuse done by Indonesia had been spreading, but there had not been concrete evidences making the journalists wanted to dismantle the truth.

The suspicions increased as Indonesia seemed trying to cover up the killings and the abuse in East Timor by implementing strict rules for journalists. As Tiffen writes: “Few countries in the contemporary era have been so hermetically sealed as East Timor was in the years following the invasion”.⁴⁰ Visits to the territory by international media or independent observers were prevented.⁴¹ If a foreign journalist wanted to travel to East Timor, they were required to obtain a *surat jalan* — a visa approved by the Ministry of Information and military authorities to enter the region.⁴²

Those regulations were written and implemented when Indonesia was under Suharto regime in which public information were limited, and criticising the government was forbidden. The actions of Australians journalists in Balibo would become massive problem for Indonesia, because the spreading news from East Timor would make issues more complicated and the probability of human rights abuse accusation to Indonesia was increasing. Apart from that, those journalists would be a witness of human rights abuse in East-Timor and presumably they would reveal the truth that made Indonesia position in danger.⁴³ It had also shaped

⁴⁰ R. Tiffen, *Diplomatic Deceits: Government, Media and East Timor*, Sydney, 2010, p.27.

⁴¹ Ibid.

⁴² Ibid.

⁴³ Tapsell & Eidenfalk, op.cit., p.600.

the international opinion to condemn Indonesia for every step taken for East-Timor. The dismantling of these issues might disrupt the active role of Indonesia in international arena and postpone Indonesia development. As transparency was very limited during Suharto regime, it made Australia start to involve in Timorese case after the Balibo Tragedy in 1975.

The contestation happened after the Australia's decision to involve in East Timor problem. There were two viable circumstances coming from Department of Defence and Department of Foreign Affairs and Trade (DFAT). Firstly, the defence department believed that the problem of East-Timor should be solved between Indonesia and Portuguese as East-Timor colonialist.⁴⁴ In addition, Australia should not involve implicitly or explicitly in those problems. It was also suggested that Australia could help Indonesia by giving defence aid.⁴⁵ Secondly, the DFAT argued that Australia should not involve in any circumstances although in terms of defence⁴⁶. In addition, DFAT also believed that Indonesia should solve the East-Timor problem by its own as DFAT seen Indonesia as a fully independent nation which capable enough in solving their domestic problems.⁴⁷

When the Australian government was ruled by Gough Whitlam, Australian foreign policy was in dilemma. On the one hand, it preferred to keep focusing on

⁴⁴ Ibid., p.108.

⁴⁵ Ibid., p.107.

⁴⁶ Ibid.

⁴⁷ S. Shuja, 'Australia's Role in East Timor', *Contemporary Review*, Vol. 277, No. 1616, 2000, pp. 139-143.

the integrations as Jakarta's condition became a priority.⁴⁸ On the other hand, they also wanted to suggest the act of self-determination without the use of military forces for East Timor.⁴⁹ However, he underlined the importance of securing relations with Indonesia. It is because of Indonesia is linchpin of Southeast Asia security system, for its ability as an oil-producing country and also a state that against communism.⁵⁰ Despite the fact that Australia has a lot of interest in Indonesia, some of Australian media and pressure groups kept criticising Indonesia towards the invasion in East-Timor. Even so, Whitlam chose to keep a good relations with Indonesia as Australia's priority by supporting East Timor as an integral part of Indonesia.

Furthermore, as Canberra really concerned on its relations with Jakarta. In 1979, under Malcom Fraser's regime, Australia became the only western state that acknowledged Indonesia's claims over East-Timor territory and granted de jure recognition.⁵¹ Those actions were taken for the sake of Australia's national security. It has been a common knowledge that Australia see Indonesia as a threat showing form the size, population and its military that can possibly invade Australia. It made Australia heavily stated that the integration of East Timor is very important for Indonesia. Bob Hawke and Paul Keating also had the same opinion towards his

⁴⁸ Shuja, op.cit., p.144.

⁴⁹ R.Leaver, 'Introduction: Australia, East Timor and Indonesia', *The Pacific Review*, Vol.14, No. 1, p. 2.

⁵⁰ Shuja, op.cit., p.138.

⁵¹ C. Brown, 'Indonesia, East Timor And Australia', *Taiwanese Journal of Australian Studies*, vol. 4, no. 37, 2004, p.6.

successor in maintaining and keeping up a good relation between Canberra-Jakarta, it still become the most prominent agenda.

Since 1975, the Australia position was clear to Indonesia and the support to East Timor to be independent has only been implicit suggestion. However, the tragedy of Santa Cruz Cemetery massacre in Dili made Australia actions support East Timor's independence more vocal. The Santa Cruz Cemetery massacre happened in Dili 12 November 1991.⁵² It started during the memorial of Timorese political activist Sebastiao (Gomes) Rangel was killed on October 1999 by Indonesian army.⁵³ This memorial was also used by the Timorese university students to demonstrate their will showing from many posters encouraging independence of East Timor and the status of the country should be decided by its people. Another thing was a number shouted pro-independence slogans like "Viva Timor Leste!".⁵⁴ At first this demonstration held in a peaceful and controlled circumstances. However out of nowhere the Indonesian army forces started to fire the crowd which was resulting mass chaos and victims. The cemetery was surrounded by walls making the people found it difficult to escape resulting many people killed. Some people believed that the shoots were planned and deliberate,

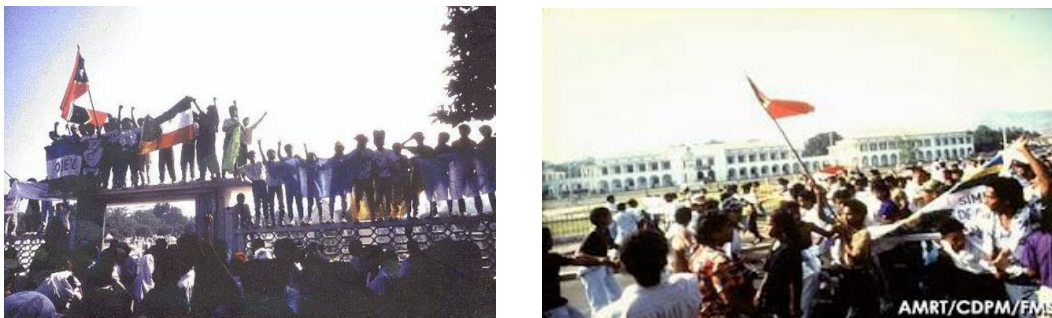
⁵² S. Blau & L.Fondenbrider, 'Dying for independence: proactive investigations into the 12 November 1991 Santa Cruz massacre, Timor Leste', *The International Journal of Human Rights*, Vol. 15, No.8, 2011, pp. 1251-1252.

⁵³ Ibid.

⁵⁴ Amnesty International, East Timor the Santa Cruz Massacre, Accessed on 8 March 2017, < <https://www.amnesty.org/download/Documents/196000/asa210231991en.pdf>.>

rather than a spontaneous reaction to provocation.⁵⁵This tragedy made Australia start to reconsider their position in Indonesia towards East Timor.

Figure 2.2 : The demonstration on Santa Cruz Cemetery tragedy



Source: Sydney Morning Herald, <<http://www.smh.com.au/world/striving-for-timor-20120518-1yvvy.html>>

B. Indonesia Domestic Conditions in 1998-1999

Starting in 1997, Asian financial crises became one of the devastating economic conditions in most of developing countries all over Asia. In this event, the countries such as Korea, Thailand, and Indonesia were placed at the very worse conditions.⁵⁶ However, among those countries, Indonesia became the one that was suffering throughout the crises. Showing from Indonesia's currency, the Rupiah, placed in the lowest position against the dollar around Rp.17.000,- creating very high inflation on 22nd January 1998.⁵⁷ Another thing is, the debt that Indonesia should pay was not followed by the ability of funds and state income making the conditions are in the edge of destruction. Furthermore, the lack of transparency

⁵⁵ Ibid.

⁵⁶ IMF, *The IMF Supported Programs*, Accessed on 1 September 2016, <<https://www.imf.org/external/np/exr/ib/2000/062300.htm#III>>

⁵⁷ J. Stevenson, *Preventing Conflict: The Role of the Bretton Woods Institutions*, The International Institutes for Strategic Studies, New York, 2000, pp. 18-19.

appeared in the body of government showing from the high level of corruption that brought Indonesia to the lowest position when Asian Financial crises hit Southeast Asia. The promise of new order in making Indonesia self-sufficient in economic aspect also collapsed during that time.

Another thing is, the mass insecurity also spread in most of Indonesia regions. For example, the killings of the Dayak-Madurese in West Kalimantan, revolutionary-army clashes in East Timor, and church burnings with an anti-Chinese and anti-Christian character in Tasikmalaya and Situbondo, possibly politically engineered in both cases have put Indonesia in the massive riots around the country.⁵⁸ It was getting worse as Indonesia political conditions are vulnerable due to the mass demonstrations held by students purposing to tackle down Suharto dictatorships regimes. As democracy becomes one of the fundamental basis for Indonesia, but during the New Order, democracy was not fully implemented. It can be seen from many regulations that bordered the media to spread the information, mass movement was limited and freedom of speech was abandoned. The lack of democracy practice became one of the obstacles for Australia to negotiate and make an open contact with Indonesia especially regarding to East Timor cases.

Furthermore, those turbulences occurred in Indonesia made Suharto step down forcedly as Indonesian president. On 21 May 1998, his thirty-two years in ruling Indonesia came to an end.⁵⁹ Through his public declaration, the continuation of Indonesia was handed to B.J. Habibie. The end of Suharto regime brought a new

⁵⁸ T. Friend, 'Indonesia in Flames', *Orbis*, Vol. 43, No. 3, 1998, pp. 393-394.

⁵⁹ *Ibid.*, p. 400.

phase for Indonesia transforming the New Order to Reformation era. However, the new president left with many turbulences around the country which one of them was the case of East-Timor.

During the transition, the Timorese case was seen differently by Suharto and B.J Habibie. Under Suharto era, keeping East Timor as an integral part of Indonesia was paramount important, Suharto was inspired by the Soekarno's effort in tacking back West Papua as a part of Indonesia.⁶⁰ As his era was considered as an Authoritarian government, in the case of East Timor to reduce the pro-independent movement and the dismantle of human rights abuses, using military forces became his alternatives. The military background that he had, made every decision was rigid creating several rejections for negotiations to discuss East Timor problem.⁶¹

After his replacement by Habibie, Indonesia has been accused for most of human right abuse in East Timor presumably done by the army. Habibie was also pressured by UN and Australia in seeking for the continuation of East Timor fate. Habibie, has been given an information that most of Timorese people were in favour to be an integral part of Indonesia. It made Habibie decide to give a special autonomy for East Timor which means the recognition of the unique religious and cultural differences in the province.⁶² However, this action seen from Australia's

⁶⁰ R. Abdulgani-Knapp, *Soeharto The Life and Legacy of Indonesia's Second President*, Marshall Cavendish International, Singapore, 2007, pp. 156-157.

⁶¹ Parliament of Australia, *The Future of East Timor: Major Current Issues*, Accessed on 7 March 2017

<http://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp9899/99rp21#indo>

⁶² Ibid.

side as the momentum to ask for self-determination that led to the liberation of East Timor. This announced policy change was complicated by the process of political change underway in Indonesia and the accompanying limitations in the political authority of President Habibie making the case of East Timor should be quickly resolved.

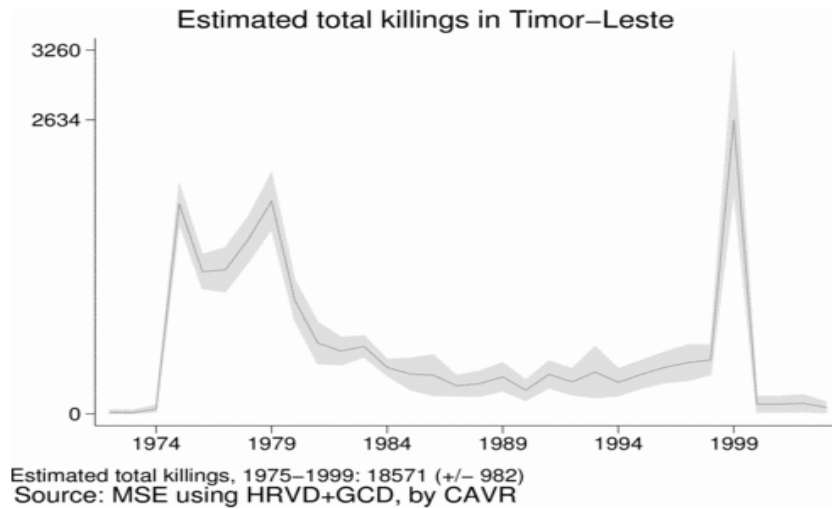
To some extent, the human rights abuse in East Timor became something that was neglected during that time. The inability of Indonesia to maintain its domestic conditions became the paramount issues for Australia. The vulnerability of Indonesia and the implementation of special autonomy policy became a chance for Australia to interfere deeper. Australia strongly viewed that their involvement aims to assist Indonesia in solving East Timor problem, and preventing the spread of instability that possibly sparks to Australia and the region.

C. The Shifting Position of Australia

After the years backing Indonesian occupation in East Timor, the Australia shifting position happened in late 1998. During the years between 1997 and 1998, Indonesian conditions were in the stage of vulnerability. Due to the economic crises as well as the domestic riots made the efforts to restore the economic conditions and reduce the tension in Java became the first priority. It made Australia's assumed that the problems of East-Timor were neglected and there might not have any further actions taken. As shown from the graph, the problems of human rights abuse

placed the highest rate around 1998-1999.⁶³ From that evidence, Australia taught that Indonesia was not yet ready to solve the problems and needed help from another party. During Indonesia invasion in East Timor, it is estimated between 160,000 and 200,000 East Timorese were killed.⁶⁴

Figure 2.3: Estimated killings in East Timor 1974-1999



There were three objectives of Australia decision to change the position in East Timor problem.⁶⁵ Firstly, the issues had been one of the problem in Australia-Indonesia bilateral relations that created a bad public opinion towards Indonesia in Australia.⁶⁶ Secondly, a new status of East Timor would remove a major obstacle in Indonesia which would maximize to play a positive role in the world

⁶³ R. Silva & P. Ball, *A Report by the Benetech Human Rights Data Analysis Group to the Commission on Reception, Truth and Reconciliation of Timor-Leste*, The Benetech Initiative, California, 2009, p. 27.

⁶⁴ *Ibid.*, pp. 27-30.

⁶⁵ J. Cotton, 'the Rethoric of Australia's regional policy', *Asia Pacific Security*, Vol. 46 , no. 6, 2004, pp.38-39.

⁶⁶ *Ibid.*

commensurate with its size and potential.⁶⁷ The last is the violence and suffering experienced of East Timor became the reasons of Australian decision as very strong reactions occurred among Australians.⁶⁸ It made suggesting a liberation for East Timor became one of the solutions for both Indonesia and East-Timor.

At the same years, John Howard also wrote a personal letter to Habibie urging a gradual disengagement towards East-Timor. The referendum suggested by Howards was based on the Matignon Accord-Style in which suggesting the act of self-determination after ten years.⁶⁹ Some of Indonesian believed that Australia persuade Indonesia to let East Timor independence through the UN and letting go East Timor became one of the Australia implicit national interests. However, it has to be noted that Australia changing its positions based on the conditions in 1998-1999 when human rights abuse in East Timor peaked and also inability of Indonesia to tackle and solve the problems. Furthermore, the “special autonomy” implemented in Indonesia became a chance for Australia to help East Timor in giving special status.⁷⁰ Those opportunities made John Howard urging to Indonesia to take decision towards Timorese problems and finally resolved the problems for the sake of Indonesia itself.

Another thing is, the sending of four thousand five hundred Australia Defence Force (ADF) that form the backbone of an International Force East Timor

⁶⁷ Ibid.

⁶⁸ Ibid.

⁶⁹ M. Kelton & R. Leaver, ‘Issues in Australian Foreign Policy’, *Australian Journals of Politics and History*, Vol. 45, No. 4, 1999, pp.528-529.

⁷⁰ Ibid., p. 529.

(INTERFET) became the end of Indonesia occupation in East-Timor.⁷¹ From Australia's perspective, the deployment of those forces already based on the chapter seven mandate from the UN Security Council.⁷² The involvement of ADF in East Timor was reasoning with two respects. First, ADF was used to assist the East Timorese realizing that their choice had made in an internationally supervised ballot.⁷³ And second, it was also to suppress the violence's, restore regional order and end uncertainty. As stated in the 2000 Defence white paper, the ADF might require them to contribute to regional peacekeeping and humanitarian relief operations and help evacuate Australians and others from regional trouble spots.⁷⁴ As the Australian defence department stated that "We should be prepared to be the largest force contributor to such operations. Our planning needs to acknowledge that we could be called upon to undertake several operations simultaneously, as we are at present in East Timor, Bougainville and the Solomon Islands".⁷⁵ The intention of Australia White paper is to ensure the continuations of security commitment:

"Within a short time East Timor will pass from UN authority to full independence. Australia will seek to develop an effective defence relationship with East Timor...East Timor faces formidable security challenges. Our aim will be to provide, with others, an appropriate level of help and support for East Timor as it builds the capabilities and national the rhetoric of Australia's regional policy institutions

⁷¹ Leaver, op.cit., pp. 9-11.

⁷² Ibid., p. 8.

⁷³ Cotton, loc.cit.

⁷⁴ Ibid., pp. 38-39.

⁷⁵ Department of Defence, Defence 2000 Our Future Defence Force, 2000, p. 39, in J. Cotton, pp. 39-41.

*that it will need to ensure its security and thereby contribute to the security of its neighbourhood”.*⁷⁶

The failure of Indonesia in maintaining East Timor position and pressure from international community made Habibie take a decision by declaring the East-Timor referendum in 1999. It was after the UN held voting to decide East Timor fate, which shows almost 80 percent of Timorese people were in favour of independent. It made the referendum became the starting point for the fully independent of East Timor latter in 2002. After that, Indonesia showing the official liberation for East Timor by gradually withdrawing Indonesian forces until 1st November 1999.⁷⁷ Later on, it was replaced with the United Nations Transitional Administration in East Timor (UNTAET) aimed to restore the conditions. Finally, the election for a new Timorese president held on 20 May 2002, which placed East Timor became a newly independent nation.

Thus, it can be said that around 1998-1999 Australia showing a full support for East-Timor to gain independence. In which before, supporting East Timor independence only an implicit suggestion. However, showing from the dispatch of Howard letter and the quick changing position of Australia made the intention to support East Timor independence became clearer. It made the aftermath of the Australia's actions resulting mistrust and misunderstanding from Indonesia that put its bilateral relationship in danger.

⁷⁶Ibid., pp. 40-41.

⁷⁷ CNN News, Timeline: East Timor's long path to nationhood, Accessed on 5 March 2017 <<http://edition.cnn.com/2002/WORLD/asiapcf/southeast/04/10/timor.timeline/>>

D. The Impact of Australia Support towards East Timor After Referendum

1. Military

As turbulence in Australia-Indonesia relations is rising, there are several impacts affecting its bilateral relationship. Indonesia seems to terminate the Agreement on Mutual Security (AMS) with Australia. The AMS has been signed on 18 December 1995 towards the importance of cooperation in terms of security.⁷⁸ This agreement was based on the threat and military attack that presumably can danger both countries. The AMS consisted of the agenda to prevent issues such as illegal migration, terrorism, the environment, and transnational crime.⁷⁹ As Australian foreign minister Gareth Evans “pointing out that [AMS] should be seen in the context of regional instability, it’s to deal with issues like terrorism and narcotics, piracy and other externally derived sources of instability of this kind which is very crucial for Australia”.⁸⁰

The turbulence in Australia-Indonesia relationship had disturbed this agreement in 1999. It shows from the military training between Australian Defence Forces (ADF) and Indonesian Special Forces (KOPASUS) presumably was stopped by Indonesia. At that time, as ministerial relations had also been reduced to the most basic common interest, it made Australia face several challenges to make or renew the agreement with Indonesia. The peak of Australia’s fear appeared in 2002 when

⁷⁸ A. Du Pont, ‘The Australia-Indonesia security agreement’, *Australian Quarterly*, vol. 68, No. 2, 1996, p. 49

⁷⁹ *Ibid.*, p.51.

⁸⁰ *Weekend Australian*, 16-17 December 1995, In Du Pont, *op.cit.*, p.51.

the first Bali Bombing occurred and killed 88 Australians. As Indonesia became the closest neighbour of Australia, the failure of Indonesia in tackling those problems frightened Australia's security stability. To that extent, joint military with Indonesia was paramount important, the turbulence in its relations due to East Timor problems would impact for the continuations of Australia's security. Thus, it made the Bali bombing become the turning point for the continuations of AMS in which not only Australia but also Indonesia sought the importance to have an ally in maintaining the conducive situations.

2. Public Opinion and The Rise of Separatism

Secondly, the steps taken by Australia have shaped Indonesian public opinion. The involvement in East Timor case made Australia have to face many criticisms from Indonesia. It can be shown that several Australians expatriate in Java become the target. The attack of Australian ambassador John McCarty in 2000 by rioting crowd became one of the evidences that there was lack of trust between the people of Indonesia to Australia.⁸¹ Feisal Tanjung, the Indonesia Coordinating Minister for Political and security affairs argue that "Australia is inconsistent between both the letter and the spirit of agreement".⁸² Furthermore, Imron Cotan, Indonesia's ambassador to Canberra, revealed in a March 2004 interview that 95 percent of 200 potential diplomats interviewed had expressed "anti-Australian

⁸¹ Chalk, *op.cit.*, p.237

⁸² The Australian, Indonesia scraps security treaty over East Timor, 16 September 1999, in P.Chalk, p. 237.

sentiments”.⁸³ Lastly, the opinion from General Wiranto and Major General Kiki Syahnakri that believed the role of Australia intelligent only brought major difficulties during the balloting process in East Timor.⁸⁴This phase Indonesia saw Australia as were tantamount to a betrayal of trust from what had been a very close and supportive friend.⁸⁵

Furthermore, several assumptions raised that Australia might encourage another region through the same method to be independent. Aceh and Irian Jaya can become the example of two vulnerable regions that might be easily persuaded. As there were several separatism actions such as Free Aceh Movement (GAM) and Free Papua Movement (OPM), the independence of east Timor presumably brought the spirit to the movement. The intervention from other parties in this case Australia brought a new opportunity to make those regions disintegrate.⁸⁶ This assumption was getting worse as the successive Ministers of Defence Juwono Sudarsono and Mohamad Mahfud had same points of view at that time.⁸⁷ However, from Australia’s perspective the help of East Timor was purely because of the human rights abuse and the instability of Indonesia which became Australia pivot attention. Thus, it made Australia’s effort to repair the ties in terms of defence would be very difficult.

⁸³ A.L. Smith, ‘ Australia-Indonesia Relations: Getting Beyond East-Timor’, *Asia-Pacific Center for Security Studies*, October 2004, pp. 4-5.

⁸⁴ *Ibid.*, p.4.

⁸⁵ Chalk, *loc.cit.*

⁸⁶ *Ibid.*, pp. 237-238.

⁸⁷ Interview at Australian Embassy , Washington D.C and Jakarta 2000, in Chalk, *op.cit.*,p.239.

3. Government-to-Government links

The involvement of Australia in INTERFET as the one that made those initiations through UN impacted on the relations in governmental level. After the referendum decision, Australia-Indonesia relations was still in the awkward relationship. Although in the year of 2000 Australia Foreign Minister Alexander Downer came to Indonesia, the conditions remained the same. The hope from Australia through the role of Abdurrahman Wahid as the Indonesian president disappeared since he only visited the country in the end of his regime without concluding any agreements with Australia.⁸⁸ During that time, the ministerial relations were also at worse showing from the agreement or treaty agreed by Indonesia. The links in governmental level that almost disappear made Australia should have looked for a new intention to repair the relations with Indonesia.

Australia needed to rebuild positive partnership with Indonesia, to avoid possible pitfalls that might worsen the relations. It is very important for Australia to maintain its relations with Indonesia due to several interests that were owned by Australia placed in Indonesia. For example, Indonesia became the most crucial neighbour especially in foreign policy and defence calculation. Secondly, a good relationship would allow Canberra to have constructive role in Indonesia in which the development of Indonesia could help Australia to maintain peace and stability. Finally, Indonesia is the natural bridge to Southeast Asia which becomes one of the most important national interest for Australia.

⁸⁸ Cotton, *op.cit.*, pp. 37-38.

Based on the goals in achieving stability and security, Australia decided to involve in the case of East-Timor for human rights abuse which possibly done by Indonesia. These factors became one of the important thing for Australia because of their efforts in achieving their interest might be postponed. It made Australia should take an action towards the case of East-Timor. At that time, the focus of Australia was to maintain a good relation with Indonesia whatever it takes. As argued by Shuja for Australia, the nature of Indonesia's ultimate leadership will be of vast importance, and a stable and friendly Indonesia is indispensable to Canberra's security and welfare.⁸⁹

⁸⁹ Shuja, *op.cit.*, pp. 139-140.