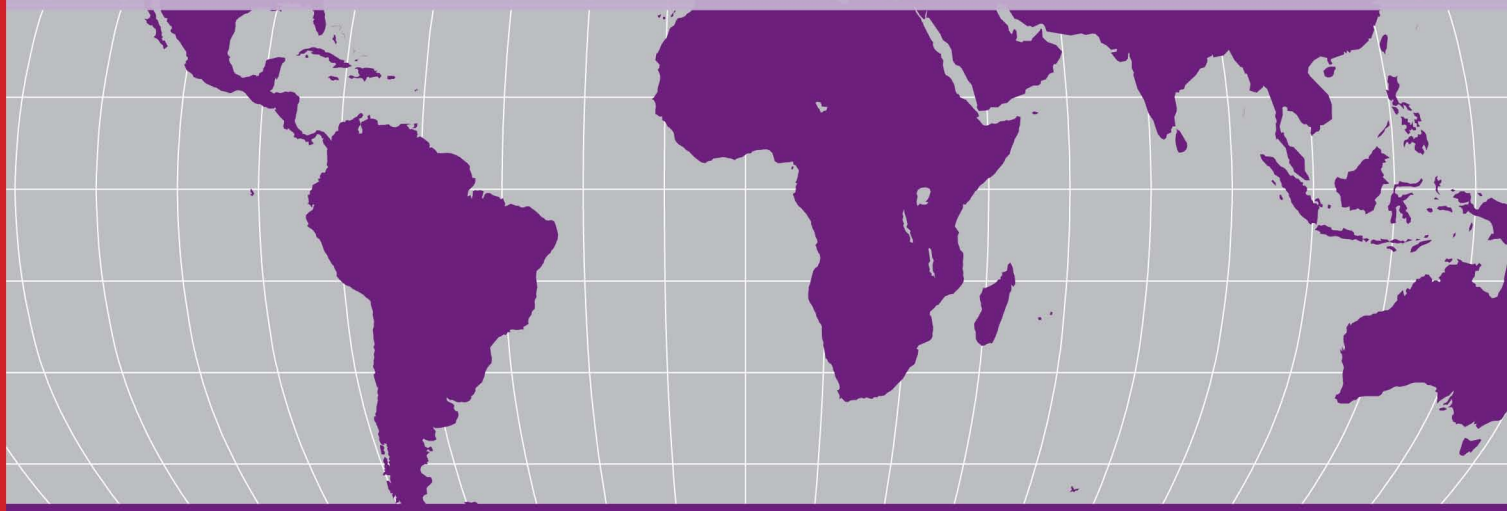
FICHL

Forum for International Criminal and Humanitarian Law

Publication Series

Law in Peace Negotiations

Morten Bergsmo and Pablo Kalmanovitz (editors)



E-Offprint:

Jon Elster, "Justice, Truth, Peace", in Morten Bergsmo and Pablo Kalmanovitz (editors), *Law in Peace Negotiations*, 2nd edition, Torkel Opsahl Academic EPublisher, Oslo, 2010 (ISBNs: 978-82-93081-08-1 (print) and 978-82-93081-09-8 (e-book)). This publication was first published on 26 March 2009. The Second Edition was published on 23 July 2010. TOAEP publications may be openly accessed and downloaded through the web site www.toaep.org which uses Persistent URLs (PURLs) for all publications it makes available. These PURLs will not be changed and can thus be cited. Printed copies may be ordered through online distributors such as www.amazon.co.uk.

This e-offprint is also available in the Legal Tools Database under PURL http://www.legal-tools.org/doc/24e5b1/.

2

Justice, Truth, Peace

Jon Elster[*]

2.1. Introduction

The mind seems to have a natural tendency to assume that all good things go together. We know from psychological studies that people dislike having to make trade-offs among different values.[1] The French Revolution was not based on the idea of an "optimal trade-off among equality, liberty and fraternity", but on the (mostly tacit) optimistic assumption that these values supported and reinforced each other, so that more of one led to more of the others, not less. Although each of the three values is endlessly ambiguous, on many common understandings they are more likely to work against one another or limit one another than to favour one another. This question is not, however, my topic here.

Instead I shall consider a similar question that arises in the context of transitional justice. Although the bulk of the literature on that issue concerns transitions to *democracy* after an authoritarian or totalitarian regime,[2] there is an emergent understanding that questions of justice also arise in the transition to *peace*.[3] As will be explained below, these include but are not limited to transitional justice as traditionally conceived, notably punishment of wrongdoers and reparations to victims.

---

[*] **Jon Elster** is member of the Collège de France and Robert K. Merton Professor of Social Sciences at Columbia University.

[1] Eldar Shafir, Itamar Simonson and Amos Tversky, "Reason-based choice", *Cognition* 49 (1993).

[2] Jon Elster, *Closing the Books*, Cambridge University Press, 2004.

[3] See notably Scott Gates, Helga Malmin Binningsbø and Tove Grete Lie, "Post-conflict justice and sustainable peace", World Bank Working Paper 4191 (2007).

The issue I shall consider, therefore, is the relation among the aims of achieving *justice*, *truth* and *peace*. The main purpose of the chapter is to point to ways in which attempts to realize one of these aims may interfere – positively or negatively – with the others. In this Introduction I shall first briefly characterize each of the three aims, and then spell out the grounds on which their realization can be desirable. In doing so, my purpose is only to lay the necessary groundwork for later sections, not to undertake the impossibly ambitious task of providing a general analysis of these aims and the reasons to value them.

The idea of peace will be understood in a large sense. It includes the absence of armed conflict between and within states, the absence of violent repression of the population by the government, and social or civic peace. The last idea is somewhat amorphous, but will be taken to include (i) a low level of ordinary (criminal) violence, (ii) some form of psychological healing, and (iii) a cooperative attitude of public officials to the post-transitional regime. To put it the other way around, factors undermining civic peace include high rates of crimes against persons, strong emotions of hatred and resentment, and sabotage of the new regime by agents and collaborators of the former regime.

The idea of justice can be defined either in intrinsic (deontological) or in instrumental (utilitarian) terms. I shall be carefully agnostic with regard to the choice between consequentialism and non-consequentialism, for the simple reason that I do not believe this is the choice we face. Full-blown non-consequentialism – let justice be done even though the heavens might fall – is absurd. Full-blown consequentialism – such as allowing the killing of innocent individuals "*pour encourager les autres*" – is no less absurd. Any reasonable policy must have both consequentialist and non-consequentialist components. Unfortunately, I have no theory that would define the limit and the proper scope of each; nor, I believe, has anyone else.

The idea of truth seems more straightforward. In the context of transitional justice, however, what we seek is not truth *per se*, but *knowledge* – justified true belief. Hence the idea of justification, or proof, is crucially important. The publication of the names of allegedly guilty individuals without documentary proof or an opportunity for the accused to refute the charges does not amount to knowledge. In addi-

tion, we may note that what matters is often *public knowledge*, rather than simply judicial knowledge that might be kept *in camera*.

The value of peace is mainly the intrinsic one of alleviating suffering and of allowing individuals to get on with their lives. Often we value peace in the ordinary sense – the sense in which it is the antonym of war – because it brings *peace of mind*. For this outcome to occur, the peace must obviously be perceived as *durable*. In my view, peace has no instrumental value, in the sense of causing other desirable outcomes. Peace may be a condition for other good things – such as economic growth, or even justice and truth – but it does not bring them about.

The value of truth is two-fold. On instrumental grounds, one will usually be better able to realize one's aims if one has true beliefs about the world. Following a transition, for instance, it may be useful to be able to identify collaborators and agents of the previous regime to make sure they do not sabotage efforts to rebuild society. On intrinsic grounds, one may prefer to know the truth rather that live in a fool's paradise. A person may want to get access to his security file to learn whether certain individuals informed on him, even when the latter are no longer alive. Others, when faced with the same question, may decide that, for them, ignorance is bliss.

The value of justice – the value of living in a just society – can also be intrinsic or instrumental. The knowledge that one is treated with equal concern and respect, on a par with other citizens, can be a source of intrinsic satisfaction. More importantly, being the target of discriminatory behaviour can be deeply disturbing, even when the discrimination has no material consequences. An example would be the disenfranchisement of low-income or low-education citizens. If the conception of justice in question has a consequentialist component, its realization may also make the citizens better off in material terms.

I shall now proceed as follows. In Section 2.2 I examine the relations between justice and truth, in Section 2.3 the relations between justice and peace, and in Section 2.4 the relations between peace and truth. Whenever appropriate, I shall refer to current developments in Colombia, notably to the Justice and Peace Law. As is well known, the

Colombian situation is unique and highly complex. It involves not only the government and several insurgency groups, but also paramilitary groups and drug-lords. The highly opaque relations among these actors are determined by the interplay of money and violence, two currencies that in Colombia have been deployed in truly enormous quantities. Although these features may be unique, other aspects of the current situation in Colombia have much in common with what we observe in transitions elsewhere.

2.2. Justice and Truth

Justice may serve the goal of truth, produced as a by-product of the ordinary workings of the justice system. Trials of wrongdoers will make the wrongdoings known to the public, especially if they are tried on camera rather than *in camera*. The Nuremberg trials served this function, as did the trials of the Argentine military in the 1980s. In the latter country, when "the trial to the members of the military Juntas was initiated […] the everyday media were flooded by the horrors of state terrorism".[4]

Truth may also serve as a substitute for justice. Truth commissions, in South Africa and elsewhere, are typically created in circumstances where the leaders of an autocratic regime retain enough power to block or severely limit the extent of penal proceedings. The creation of a truth commission can then serve as a compromise. The findings of these commissions vary in their extent. In many countries, the main task has been to document wrongdoings and to identify victims. Except for South Africa and El Salvador, the task of identifying wrongdoers has not been part of the mandate of the commissions. In South Africa the exposure of wrongdoers did not lead to their prosecution if the commission found that their crimes were politically motivated. The truth commission in El Salvador also named the wrongdoers, but parliament granted them a full amnesty five days after the report was published.

[4] Carlos H. Acuña, "Transitional justice in Argentina and Chile", Jon Elster (editor) in *Retribution and Reparation in the Transition to Democracy*, Cambridge University Press, 2006, p. 211

Yet even in the absence of mandate, truth-finding may reveal the identity of the perpetrators. In Argentina, on a parallel track to the trials of a small number of military personnel, the government created the National Commission of the Disappeared, which documented 9,000 persons who had "been disappeared". The commission itself did not name perpetrators, but someone inside it leaked 1,351 names to the press. Although Brazil never had an official truth commission, the Archdiocese of Sao Paulo secretly prepared a report on "Torture in Brazil" that received wide attention when it was published in July 1985. Five months later, the Archdiocese published a list of 444 torturers. In Chile, the truth commission documented 3,000 human rights violations and recommended extensive reparations. Although the report did not name perpetrators, the Communist party paper, *El Siglo*, published a list of the names of human rights violators.

In such cases, public knowledge of the identity of wrongdoers may, at least partially, serve the purposes of justice. According to Wechsler, the Brazilian torturers "had little more to suffer than the people's contempt".[5] This statement is somewhat misleading, however, since individuals publicly known to have committed wrongdoings may suffer social ostracism, which can be as painful as traditional forms of punishment. Thus A. O. Lovejoy quotes Voltaire as saying that, "[t]o be an object of contempt to those with whom one lives is a thing that none has ever been, or ever will be, able to endure. It is perhaps the greatest check which nature has placed upon men's injustice"; Adam Smith that, "[c]ompared with the contempt of mankind, all other evils are easily supported"; and John Adams that, "[t]he desire of esteem is as real a want of nature as hunger; and the neglect and contempt of the world as severe a pain as gout and stone".[6] In addition to being targets of contempt and ostracism, known wrongdoers may also suffer physically. In Argentina, one navy captain who was well known for his bru-

[5] Lawrence Wechsler, *A Miracle, a Universe, Settling Accounts with Torturers*, University of Chicago Press, 1978, p. 76.

[6] Arthur O. Lovejoy, *Reflections on Human Nature*, Johns Hopkins Press, 1961, pp. 181, 191, 199 respectively.

tal acts "suffered dozen of attacks […] by strangers on the street or people who say he tortured them and their relatives".[7]

Shaming and revenge, even when based on accurate information, do not amount to justice, however. In a civilized society, justice should be left to the courts, not to observers of wrongdoings or victims of wrongdoings. This statement is even more obviously true when names of wrongdoers are made public without proper verification of their guilt. In several post-Communist countries, lists of large numbers of alleged informers or collaborators have been posted on the Internet: 75,000 in the Czech Republic and 160,000 in Poland. The security archives on which the lists were based are notoriously incomplete and inaccurate (some files being mere fabrications), thus giving rise both to false positives and false negatives.

Although one can easily imagine the reactions of the individuals who were named, there has not, to my knowledge, been any systematic study of the subject. In a small-scale precedent from 1998, an unknown organization in Lublin (Poland) published the names of 119 persons who had allegedly cooperated with the militia before 1989. Two of the individuals who were named killed themselves.[8] It seems reasonable to assume that the longer lists had similar effects. Arguably, this "rough justice" is worse than abstaining altogether from seeking justice. Note that in these cases, unlike the Latin American ones, there is not even the excuse that ordinary legal prosecution was unavailable.

Truth may also be an instrument for providing justice to victims. This idea comes in a modest and in a more ambitious version. In the modest version, fact-finding by truth-commissions can lay the factual groundwork for reparations to victims. The South African and Chilean commissions, for instance, performed this task. The South African Commission also made the more ambitious claim that truth may contribute to "restorative justice". Knowledge of the facts is obviously a necessary condition for the victim-perpetrator interactions that are supposed to be at the core of restorative justice. Whether – in the ab-

[7] *New York Times*, 12 August 1997.

[8] Keszek Kuk, *La Pologne du post-communisme à l'anti-communisme*, l'Harmattan, Paris, 2001, p. 209.

sence of retributive justice – these interactions are likely to do much good is another matter. One might think that from the victim's point of view, knowing who the offender is *and* knowing that he will go free is likely to generate resentment and bitterness rather than catharsis and healing. Given offender immunity, ignorance about offender identity might be better. This is to some extent an empirical matter, on which it seems that the jury is still out.[9] Yet independently of the feelings that may be created, I believe – as stated earlier – that the rule of law favours a clear separation of victim and offender rather than their interaction.

There is also some evidence that in the aftermath of a civil war, physical separation rather than interaction favours peace. The amnesty that the Athenian democrats granted to the oligarchs in 403 B.C. went together with a demand that the oligarchs leave the city. The French wars of religion came to an end only when the Protestants were granted their own fortified cities, after the failure of earlier attempts to have Protestants and the Catholics coexist on a local basis.[10] Writing about Bosnia, Nalepa says that, "the strategy developed by the War Crimes Chamber staff is to begin prosecutions with those perpetrators who are most visible in public life. If administered consistently, this will gradually create an incentives mechanism for former perpetrators to shy away from public office […] This outcome also satisfies victims, who are not confronted by the glaring presence of their former perpetrators on a daily basis."[11] In the Colombian context, a relevant measure might be to ensure that demobilized paramilitaries and members of guerrilla forces do not resettle in areas where they inflicted harm on civilians. To cite another example, it may be impossible to settle the Israeli-Palestine conflict if Jerusalem is to be the Holy City of both religions.

---

9 See special issue of *Journal of Peace Psychology*, v. 13, no. 1 (2007).

10 Oliver Christin, *La paix de religion*, Liber, Paris, 1997.

11 Monika Nalepa, "Why do they return? Evaluating the impact of ICTY justice on reconciliation", University of Notre dame, unpublished manuscript.

2.3. Justice and Peace

In 1944, Henry Morgenthau, Secretary of the Treasury in the Roosevelt administration, devised a plan for how to deal with Germany after it was defeated.[12] He wanted to set the clock back to 1810, and turn the country into a "pastoral economy". The coal mines in the Ruhr should be flooded or dynamited and sealed for fifty years to make the Germans "impotent to wage future wars". The Germans should be prohibited from developing any kind of industry that could be converted into military production (ploughshares into swords). "If you have a bicycle, you can have an airplane. [...] If you have a baby carriage, you can have an airplane." Although Morgenthau initially persuaded both Roosevelt and Churchill to go along with his plan, they backed off when it became clear that it might have negative effects on the conduct of the war. As George Marshall, William Donovan and others pointed out, knowledge of the extreme severity of their punishment would stiffen the German will to resistance. For this reason (and for several others), the plan was not implemented in its draconian form.

Justice and peace have been at odds in other cases too. In Bosnia, France and Britain "saw the issue of war criminals as a potential impediment to making peace in ex-Yugoslavia, binding the hands of policymakers who might have to cut a deal with criminal leaders".[13] In another example, a "perverse scenario of inducing a dictator to fight for his survival may have happened recently when the prosecutor for Sierra Leone's International Criminal Tribunal indicted Charles Taylor in Nigeria. This action prevented diplomatic efforts from striking a deal with the former dictator, who arguably could have facilitated a smoother transition".[14]

We have to be careful, though, in characterizing these conflicts in terms of justice versus peace. Morgenthau's desire for a heavy punishment was based on a non-consequentialist desire for vengeance. In recent discussions, the demand for severe punishment of dictators and

[12] See Elster, *Closing the Books*, Chapter 7, for details and references.

[13] Gary Bass, *Stay the Hand of Vengeance*, Harvard University Press, 2000, p. 211.

[14] Kaminsky, M. and Nalepa, M., "Judging transitional justice", *Journal of Conflict Resolution* 50 (2006), p. 396.

autocrats has been based on the consequentialist argument that courts must set a clear precedent to dissuade would-be dictators in the future. As noted by Otto Kirchheimer, the precedent might "backfire, however, if it induced the leaders of a future war to fight to the bitter end rather than surrender and face the possible future of war criminals".[15] It is possible (although in my opinion psychologically implausible) that some aspiring dictators might refrain from grabbing power because of the consequences of losing it. It is certainly plausible, as we have seen, that the same fear may cause dictators to hang on to power longer than they would otherwise have done. I have yet to see a convincing argument why the first of these effects would dominate the second. Orentlicher merely asserts, with no argument (and one example), that "the prospect of facing prosecutions is rarely, if ever, the decisive factor in determining whether a transition will occur".[16] If that were so, why would the prospect of facing prosecution be a decisive dissuasive factor?

Even if an argument to that effect were forthcoming, the advocate of strong punishment would also have to show that the long-term net benefits dominate the short-term cost of prolonging or rekindling conflict. For the non-consequentialist, this cost is of course irrelevant. After the fall of the military dictatorship in Argentina, some human rights activists refused the pragmatic line of President Alfonsín, who feared that extensive punishment of the military might trigger a new coup. Consequentialists cannot, however, ignore short-term costs or risks. To accept the prolongation of a given conflict for the sake of the non-beginning of future conflicts they have to argue not only that the expected smaller number of future conflicts offsets their expected longer duration, but also that the net effect in the future exceeds the costs in the present. If one believes – as I do – that neither of these arguments can successfully be made, the idea of "sacrificing peace for justice" by punishing dictators severely has no consequentialist foundation. In fact, a consequentialist argument could be made for treating

[15] Otto Kirchheimer, *Political Justice*, Princeton University Press, 1960, p. 325, fn. 290.

[16] Diane Orentlicher, "Settling accounts: The duty to prosecute human rights violations of a prior regime", *Yale Law Journal* 100 (1991), p. 2549.

all dictators leniently, if I am right in my belief that this policy would reduce the duration of current and future conflicts while having little impact on the number of conflicts.

Yet this policy could run into either of two related problems: unpopularity and lack of credibility. The population at large may require that those responsible for wrongdoing and atrocities be severely punished. If they are not, the government might fall and the peace process might come apart. The wrongdoers, however, may not be willing to step down if they face the prospect of spending the rest of their life in prison. The question, then, is whether there exists a degree of punishment that is severe enough to satisfy the population and mild enough to satisfy the wrongdoers. In Colombia this window seems to exist, because of the threat of extradition to the United States that, as recent events show, is a highly credible one. At the same time, the Justice and Peace Law opened for the possibility that drug-lords could go free or receive reduced sentences, and at any rate escape extradition to the US, by virtue of the clause that granted amnesty for crimes with an "indirect" political purpose, the drug trafficking being a "means" to finance political ends.[17] This clause was later struck down by the Constitutional Court.

The Law in its original form was negotiated between the government and the paramilitaries. The fact that this crucial clause was struck down by the Court points to an intrinsic problem in the negotiated settlement of conflicts in a democracy. When the government negotiates with insurgents or paramilitaries, the latter know – or should know – that the government is constrained by parliament and the courts. It is in fact a defining characteristic of democracy based on the separation of powers that the government cannot force the legislative and judiciary branches to uphold its promises. This has been an acute issue in Latin American as well as in East European transitions.[18] In Colombia, the threat of extradition was credible because the govern-

[17] Pablo Kalmanovitz, this volume.

[18] Elster, *Closing the Books*, Ch. 7; Monika Nalepa, *Transitional Justice in Post-communist Europe: Skeletons in the Closet*, Cambridge University Press, 2010, chapter 5.

ment had both the power and the motivation to carry it out if necessary, but it lacked the power to enforce the promise of amnesty for political crimes.

So far I have discussed tensions between peace and *transitional* justice. There is a need, however, also to address the relation between peace and *distributive* justice, a question that is especially important in the aftermath of civil wars. The general issue is the following: if a conflict settlement fails to address the root causes of the conflict and limits itself to the problems created by the conflict itself, the peace may very well fail to be a durable one. (The distinction between problems causing the conflict and problems caused by the conflict is not always sharp, since the root causes may be exacerbated by the conflict. Yet in many cases it is clear enough.) Root causes include distributive injustice, such as unequal distribution of land, but other causes such as religion and discrimination of minorities are also found. Here I limit myself to conflicts arising on distributive grounds, with the implication that a durable peace requires distributive and not only transitional justice.

The following anecdote provides an illustration. In one of the several conferences in Bogotá that I have co-organized with Antanas Mockus and Vice President Santos over the last years, James Fearon (Stanford University) made the following perceptive remark. "If a conference on political conflicts in Colombia had taken place here forty years ago, the name most frequently cited would have been Marx. Today, it is Hobbes." In Colombia today, Hobbesian violence rather than Marxian exploitation is perceived as the main social ill. To create a durable peace, however, it is not enough to address the issue of violence by measures of transitional justice. One will also have to address the issues of exploitation, inequality and poverty by measures of distributive justice. Land reform is even more needed today than in the past, as vast land properties are concentrated in the hands of drug-lords and paramilitary leaders.

Ideally, new regimes should aim at both transitional and distributive justice. In South Africa the bulk of the black population received neither. Wrongdoers were not brought to justice, reparations to victims have been minimal, and there has been almost no land reform. The

country today has among the highest rates of murder, armed robbery and rape in the world. Although the causality is opaque, it is not unthinkable that this failure of civic peace can be traced back to the failures of justice. Although there is no collective violence that might be transformed into a civil war, the high level of individual violence shows that the conflict resolution is very far from perfect.

Given the need for both transitional and distributive justice, governments face an allocative question. They must decide whether to give priority to compensating victims of the conflict itself or to improving the situation of the landless poor in general. In abstract terms, should compensation be made on the basis of *entitlement* or of *need*?[19] Whereas the aim of a durable peace may favour the latter criterion, that of transitional justice may favour the former. Whereas redistribution often encounters great resistance among entrenched elites, transitional justice may command greater agreement. In the current demobilization process in Colombia, scarce resources are also devoted to subsidizing the ex-paramilitaries to prevent them from taking up their arms again. Although this may be a necessary measure to ensure a durable peace, victims of the conflict may see this subsidy to their perpetrators as deeply unjust.

2.4. Truth and Peace

Earlier I distinguished between several components of peace. With regard to the impact of truth on peace, I shall focus on peace as the absence of violent repression and as civic peace.

The most important effect of truth commissions is perhaps to make it impossible to deny that massive wrongdoings took place prior to the transition. In South Africa, many members of the white elite might have refused – in more or less good faith – to believe claims about apartheid wrongdoings had they not been so fully documented in the hearings of the Truth and Reconciliation Commission. The work of the commissions in Argentina and Chile also made it impossible to sustain the myth that the dictatorships were justified by the task of weeding out criminal subversive elements. If the truth had not been

[19] Elster *Closing the Books*, Chapter 6.

publicly recognized, the new regimes might have been jeopardized and the previous repressive regime been restored. The work of the truth commissions underwrote the enormously effective message "Never Again".

The most important impact of truth on civic peace concerns the effort to stabilize the new regime. If agents and collaborators of the old regime remain in high office after the transition, there is a risk that they may either work actively to undermine the new regime or be vulnerable to blackmail by members of the former security services who are aware of their involvement. For both these reasons, it is important to find out the truth about their past. In Poland, Romania, Estonia and Lithuania, security files have been used as an instrument of truth *revelation*, by creating an incentive for individuals to tell the truth about their involvement with the pre-transitional regime. In this procedure, known as "lustration",[20] individuals seeking elective or high appointive office are asked whether they ever collaborated with the security services under Communism. If they answer Yes, voters or administrators are free to elect or appoint them – or not. If they answer No and are later found out to have lied, they are blocked from office for a certain number of years. (This solves the problem of retroactivity, since they are not penalized for "what they did then" but for "what they say now about what they did then"). A similar procedure has been used in South Africa, where individuals testifying before the Truth and Reconciliation may be denied amnesty if they do not tell the full truth about their involvement with apartheid crimes.

The *gacaca* courts in Rwanda offer sentence reduction in exchange for full disclosure. This idea is also applied in the Colombian peace process. As noted by Pablo Kalmanovitz in his Introduction to this volume, the Justice and Peace Law has created the possibility of "gambling with the truth", by offering the incentive of reduced sentences in exchange for full confession and reparation to victims. If a serious wrongdoer gambles (does not apply for the benefits provided by the Law) and loses (is found out), he faces ordinary criminal law sentences, which are five or ten times higher than those imposed by the

[20] Kaminski and Nalepa, "Judging transitional justice".

Justice and Peace Law. If he wins (his crimes are not discovered), he serves a reduced sentence. The efficacy of this procedure obviously depends on the government's knowledge (or more accurately: on the belief of the wrongdoers about the government's knowledge) about serious crimes and on its capacity to enforce prosecutions.

FICHL Publication Series No. 5 (2010, Second Edition)

Law in Peace Negotiations

Morten Bergsmo and Pablo Kalmanovitz (editors)

This volume contains papers presented at the seminar "Peace and accountability in transitions from armed conflict" held in Bogotá on 15 and 16 June 2007. The seminar was co-organised by the Vice Presidency of Colombia, the National Commission for Reparation and Reconciliation of Colombia, Universidad del Rosario and PRIO (its Forum for International Criminal and Humanitarian Law).

The volume has contributions by experts such as Pablo Kalmanovitz, Jon Elster, Claus Kreß and Lena Grover, David Cohen, Monika Nalepa, Francisco Gutiérrez, Ana Arjona, Roger Petersen and Sarah Zukerman Daly, Marieke Wierda, Florence Hartmann, Carsten Stahn, Maria Paula Saffon and Rodrigo Uprimny, and Antanas Mockus.

ISBN 978-82-93081-08-1

FICHL: Forum for International Criminal and Humanitarian Law

Torkel Opsahl Academic EPublisher
Forum for International Criminal and Humanitarian Law
E-mail: info@fichl.org
www.fichl.org

PRIO