

AN ASSESSMENT OF THE PAYMENT OF BRIDE PRICE AS AN IMPORTANT ASPECT IN CUSTOMARY MARRIAGES IN TANZANIA

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ABSTRACT

This study makes an assessment on the effectiveness of payment of bride price as an important aspect in customary marriages in Tanzania. Tanzania is blessed with variety of tribes thus having different customs and traditions for each community or society and their differ in different aspects. The Tanzanian government to see this made sure and incorporate the usage of customary laws in adjudicating and determine the rights of the people of same community but the use of customary is when the customary law is not repugnant to justice and does not violate the rights of the people. Marriage is an important unit in each and every state including Tanzania and thus it has been given special treatment, as marriage is defined to mean the consented union between man and woman intended to last for their lives. But marriage has been faced with some requirements for its validity which will be assessed by this study. Thus this study examined the customary laws and laws governing marriage to determine the effectiveness and the challenges therein and provide the recommendations and conclusion.

INTRODUCTION

The Concept of Marriage

Is the legal status, condition, or relationship that results from a contract by which one man and one woman, who have the capacity to enter into such an agreement, mutually promise to live together in the relationship of Husband and Wife in law for life, or until the legal termination of the relationship. Marriage is a legally sanctioned contract between a man and a woman. Entering into a marriage contract changes the legal status of parties, giving husband and wife new rights and obligations.ⁱ Public policy is strongly in favour of marriage based on the belief that it preserves the family unit.ⁱⁱ Marriage is an important social institution, it has an effect on man's life and it is the heart of every family. It is influenced by social relations.

Under common law, marriage means a voluntary union for life of one man and one woman to the exclusion of all others. Read, *Hyde v. Hyde*.ⁱⁱⁱ This common law definition caters for a monogamous marriage. The position was influenced by the church, particularly the Roman Catholic; Canon law recognizes marriage as a permanent and insoluble sacrament. Its intention primarily being procreation and care of children according to Christian principles. So it goes with the saying...

“Once man and woman are married, they become one flesh by the Act of God”

Marriage definition in Tanzania, section 9^{iv} which defines marriage as a voluntary union of a man and a woman intended to last for their joint lives. The Act further provides for two kinds of marriage under section 10^v, thus, Monogamous marriage and Polygamous or potentially polygamous marriage

Procedural Aspect of Marriage

There are different types of marriage ceremonies under the LMA. Section 3^{vi} of the Act provides for appointment of the register general, the deputy and assistant register general of marriages and divorces by the president.

The Act further assures the presence of the deputy register general and as many assistant registrars general as the minister considers necessary per Section 3(2) of the Act^{vii}. In every district there is a district registrar or communities following customary law, in civil form or

according to the rites of the customary law. Celebration of these different forms of marriage takes different legal routes as presented below.

Celebration of Civil Marriages

These ceremonies are provided for under Section 29,^{viii} they are contracted in presence of the district registrar in his office or in any other place authorized by licence issued by him. In civil marriage ceremony the parties are allowed to add any additional rite. Also the parties to the marriage can request the registrar to make an entry in the register whether their marriage shall be monogamous or polygamous

Celebration of Religious Marriage

They are of two different legal routes surrounding celebration of marriage depending on the two different types of religious marriage which Christian marriages and Islamic marriages

i. Christian Marriages

Section 25(3) (b)^{ix}, provides that, a marriage in Christian form means a marriage recognised by Christian faith or by any denomination or sect of that faith. There are different Christian denominations notably Protestants, Roman Catholic and Pentecostals. For the Roman Catholics marriage is monogamous and it is among the seven sacraments, it is one witnessed by God and it is insoluble thus it cannot be divorced to death. The same position is shared by Anglicans. The Church never accepts divorce.

ii. Islamic Marriages

Section 25(3) (b) of the Law of Marriage Act^x marriage in Islamic form means a marriage contracted in the manner recognised by Islam or any school or sect of that faith. For Muslims marriage is a voluntary union between man and a woman or man and women. Islamic marriages are polygamous or potentially polygamous. There is a room for divorce under Islamic law where the marriage causes hardships to both parties. Although Muslims are allowed to marry one up to four women in order to do so the man must show that; he is capable of maintaining all the wives, and that he will treat all wives equally and fairly.

Celebration of Customary Marriages

These are mentioned under the Law of Marriage Act, but the same is not well articulated under the Act. These are marriages which are celebrated according to customary rites. Usually these marriages are contracted under the ward executive and divisional executive officer. These marriages must be the one which is recognised by customary law and it must take place among the people who observe that particular custom and tradition.

Requirement For Customary Marriage Ceremony

There are requirements that must be met before contracting a customary marriage and these requirements are; consent of the parents of the parties to a marriage; betrothal (engagement or agreement to be married) ;payment of bride price/dowry. Parties to a customary marriage cannot contract a valid marriage without meeting these mentioned requirements. However, the court may intervene where customary laws are against justice and morality, whenever the court has doubts on customary marriage, principles such as cohabitation and the reputation as husband and wife (presumption of marriage) are applied

Payment of Bride Price

Most societies, at some point in their history have been characterized by payment at the time of Marriage. Much payment typically goes hand in hand with marriage arranged by the parents or guardians of the respective spouses. In parts of Africa, a traditional marriage ceremony depends on the payment of bride price to be valid. Thus bride price must be paid first in order for the couple to get permission to marry in church or in other civil ceremonies or the marriage is not considered valid by the bride's family.^{xi} The amount can be varying from a token to a great sum, real estate and other values. It is custom connects families for lifetime.^{xii}

Thus, bride price can not always be paid all at once, depending on the wealth of the groom, he and his family can enter into a non written contract with the bride's family in which he promise to pay what he owes within a specified period of time. This is done to allow young men who do not have much to marry while they work towards paying off the bride price as well as raising a family or wait for their own sisters and aunts to get married so they in turn can use the amounts received to offset their debts to their in-laws.

Generally, the payment of bride price is taken as a form of recognition or an appreciation of the effort of the parents of bride for looking after the bride.^{xiii} The financial incentives to the parents also make it popular. But most important, it helps men to fulfil their need for the feelings of manhood and reinforcing their hegemonic masculinities, since payment of bride price in some ways gives men more power over women. On the other side majority of women believed that payment of bride price earns them respect among peers and parents and non payment of bride price would deprive them certain advantages.^{xiv}

Bride Price is taken as the payment made in kind, cash or material as demanded by custom of a group by a groom or his family to the family of bride in order to make the union legitimate.^{xv} One can say that, Bride Price is the first and compare payment either cash or in kind, a man pays the parent of a girl or lady he intends to marry in order to have rightful ownership of a woman. Traditionally, it makes marriage to be legal as bearing of children outside wedlock is a taboo in African societies. Thus bride price is considered as a significant custom or a belief that determines the legality of any marriage in societies where it is practiced.

THE LEGAL AND INSTITUTIONAL FRAMEWORK ON PAYMENT OF BRIDE PRICE IN TANZANIA

International Legal Framework of Marriage

One of the basic principles governing marriage under human rights law is that no one may be forced to enter into a marriage against his or her will. Moreover, according to the Universal Declaration of Human Rights^{xvi} and the International Covenant on Civil and Political Rights,^{xvii} men and women have equal rights upon entry into marriage, during marriage, and at its dissolution. International legal framework that supports these rights and then documents four main obligations of governments under international law: 1) guaranteeing that marriages are entered into with the free and full consent of both parties, 2) broadly construing the right to marry so that marital privileges and responsibilities apply to less formal and same-sex unions, 3) assuring that both partners in the marriage enjoy equal rights, and 4) removing legal barriers to divorce and to the protection of equitable property distribution once a divorce is obtained.

Right to consent to marry

The right to consent to marriage is explicitly recognized in principal human rights treaties. In all cases, consent must be full and informed, accompanied by an understanding of the consequences of entering into marriage. Where customary or religious law govern matters relating to marriage and the family, the consent of the bride and groom may not be required prior to marriage. Where one or both of the parties to marriage is a child, the conditions of consent are presumably not present.

Right to marry and find a family

The right to marry and found a family is a recognized human right. Because this right extends to all persons, the benefits of marriage should not be denied arbitrarily. Failure to recognize legitimate unions, including those between same-sex couples, denies individuals participation in an important social institution and jeopardizes the economic well-being of members of those unions.

Right to freedom from discrimination upon entry into Marriage

Women may be prevented from enjoying equality with their husbands within marriage. Discriminatory marriage laws can have far-reaching effects on women's lives. Some laws impede a woman's right to manage, own, and inherit property, while others require her to obtain her husband's permission to travel or work outside the home. A number of laws explicitly endorse the subservience of women to their husbands. There is, however, a growing trend to reform these laws.

It involves Civil rights, thus both spouses the right to legal representation of the married couple and the care of minor children. Both spouses were also given the right to administer the household's financial resources, jointly or separately, as well as the joint exercise of paternal authority, guardianship, and administration of assets. Also eliminated the obstacles to accessing credit, since now both spouses can legally represent the married couple and administer jointly held property and both spouses have the duty to attend to and care for minor children.

Capacity to marry

Capacity to marry is an important factor contributing towards the validity of marriage. There can not be any valid marriage unless each party to the marriage is capable to marry. The capacity of parties to the marriage differs from one legal system to another legal system. The nature of marriage differs from culture to culture and country to country.

Regional Legal Framework

This is an aspect of law which is governed by the African Charter on Human and People's Rights^{xviii} and the Treaty For East African Community^{xix} as the regional laws in a geographical context of East Africa. These legal instruments inter alia recognises individual's right to marriage subject to the nature of the African people, national policies and other practices among the nations especially African nations. Recognition of customary rites on marriage formation and validity therefore would be recommended to have a recognition of bride price in that context of it.

The requirement of the international community is that every state party to the convention must set down the system in their legal systems which could oversee the rights and welfare of the women and girl children in order to comply with the international standards. The ACHPR in ensuring that women and children are protected from any discrimination and violence that charter requires all states parties in Africa to respect, protect, declare and enforce rights and interests of women and children in their states.

The Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa has a long history in Africa as the Protocol emanates from the African Charter on Human and Peoples' Rights^{xx} which provide guarantee for the rights and interests of all people in the continent including women thus the Protocol intends to cover mainly on women's rights. Under the provision of Article 18 (3) of the ACHPR^{xxi} provides on the protection of women's' rights in Africa but the Charter fall short in the protection of women's rights as failed to cut across things which affects women in Africa to include female Genital Mutilations, gender based violence, inheritance issues and forced marriages which are touched by the Protocol.

The ACHRP is the main human right instrument in Africa thus it has some protocols and this is one of them which provides for the rights and protection of women. This protocol generally

provides for the elimination of harmful practices against women.^{xxii} This protocol obliged the state parties to prohibit and condemn all forms of harmful practices negatively affecting the human rights of women and which are contrary to recognized international standards thus the legislative and other measures to eliminate such practices shall be taken by parties.

Domestic Legal Framework

Tanzania's being a sovereign state it has the power and ability to manage its internal affairs without external interference. In exercising its sovereign power it has enacted a number of laws which are used to govern and regulate the practice of customary rights like payment of bride price during contraction of marriages.

The Constitution of United Republic of Tanzania ,1977

The Constitution of United Republic of Tanzania 1977 being a supreme law of the land it provides for governance and directions of all national activities. The position is the same when it comes to payment of bride price during contraction of Marriage. Though the constitution does not specifically provide regulation on bride price payment but indirectly it provides the general overview on the practice of bride payment or customary rights.

This can be traced under Part III^{xxiii}, on the Basic Rights and duties, that gives personal freedom to privacy, freedom of conscience and the like.

The Judicature and Application of Laws Act ,1920

As per Section 11^{xxiv}, provides for the application of customary laws. That Customary law shall be applicable to, and courts shall exercise jurisdiction in accordance therewith in, matters of a civil nature between members of a community in which rules of customary law relevant to the matter are established and accepted, or between a member of one community and a member of another community if the rules of customary law of both communities make similar provision for the matter relating to any matter of status of, or succession to, a person who is or was a member of a community in which rules of customary law relevant to the matter are established and accepted; or in any other case in which, by reason of the connection of any relevant issue with any customary right or obligation, it is appropriate that the defendant be treated as a member of the community in which such right or obligation obtains and it is fitting and just that the matter be dealt with in accordance with customary law instead of the law that would

otherwise be applicable, except in any case where it is apparent, from the nature of any relevant act or transaction, manner of life or business, that the matter is or was to be regulated otherwise than by customary law.

The Law of Marriage Act, 1971

Marriage under the Law of Marriage Act is defined as "a voluntary union of a man and woman intending to last for their lives".^{xxv} This means temporary marriages, which were sometimes recognized under some customary laws do not have any legal recognition under this Act (LMA). The Act also defines a monogamous marriage, "as a union between one man and one woman to the exclusion of all others".^{xxvi} Taken together the above definitions of marriage, they constitute the definition of a monogamous marriage as laid down in the case of *Hyde v Hyde* (supra) The Act then defines a polygamous marriage as a meaning, "a union in which a husband may, during the subsistence of the marriage be married to or marry another woman or women".^{xxvii}

There is a rebuttable presumption that a marriage contracted in Islamic form or according to customary rites is polygamous and one contracted in any other form is monogamous, such as those under Christian rites, however, of the two kinds of marriages, that is polygamous or monogamous, may be converted into the other kind.

However, where a man married under a polygamous marriage has given notice of an intended marriage his wife or if he has more than wife, any of his wives may give notice of objection to the registrar or registration office to whom the notice of intention was given on the ground that having regard to the husband means, the taking of another wife is likely to result in hardship to his existing wife or wives and infant children if any; or the intended wife is notoriously bad character or is suffering from an infections or otherwise communicable disease or is likely to introduce grave discord into the household.

Bride Price under the Law of Marriage Act

The law does not account the custom of paying bride price during marriage contraction as essential or legal to the validity of Marriage. Hence this practice is provided as one of the matters not affecting validity of Marriage. Section 41 provides;

Matter not affecting validity of marriage, A marriage which in all other respects complies with the express requirements of this Act shall be valid for all purposes, notwithstanding— (a) any non-compliance with any custom relating to dowry or the giving or exchanging of gifts before or after marriage.

It is not essential or important that bride price to be paid before marriage according to law. Thus it is with or without the payment of bride price the marriage will be valid.

The Local Customary Law Declaration Order of 1963

The Law of Marriage Act's enactment rendered most of the detailed regulations governing customary marriages obsolete, despite the fact that the Local Customary Law Declaration Order of 1963^{xxviii} still contains those regulations. Customary and Islamic marriages received official recognition and were also subject to state regulation when the LMA^{xxix} combined them into a single, uniform marriage code. Due to provisions in the second schedule of the LMA, customary law is no longer applicable to any matters pertaining to marriage, divorce, or dowry. It was decided in the *Mahenga Zengo v. Holo Kadaso*^{xxx} case that the court had an obligation to support the development and advancement of fair customary law and rules that are based on common sense. Presently, The Declaration of Local Customary Law, Government Notice, ^{xxxi} stipulates several guidelines for paying the "bride-price," but it also makes it apparent that, in the regions covered by the Declaration, the "bride-price" as such is no longer legally required for a marriage to be valid.

The Magistrates' Courts Act

The Magistrates' Courts Act,^{xxxii} is the law which was enacted to provide for the jurisdiction, powers and functions of magistrates' courts and for other related matters. The MCA under section 18 provide for the application of customary laws in the Primary Magistrate Courts in Tanzania to determine all issues including marriage, bride price claims which may be brought by the families.

Institutional Framework on Bride Price in Tanzania

Bride price as an aspect of marriage is recognized and practiced among different institutions including the following;

Customary Institutions

This area is regulated by various institution especially the customary institutions such as heads of families and clans. They are the roots to this kind of marriage initiative. This is because bride price is the creation of customary rules through relative customary institutions as they have been mentioned. It is through these institutions that a man will not marry a lady or woman unless otherwise he has offered bride price in various forms such as money or cattle plus other items depending on the community in which he lives.

Religious Institutions

Religious institutions have found themselves in the same level with other customary institutions by recognizing the payment of bride price before marriage would have been celebrated. It is an idea however which is not fixed by the religious rules and practice rather the acceptance of customary practice on marriage from which a person will be recognized as a potential groom in a particular church institution upon payment of bride price.

Courts of Law

The fact that courts of law have a recognizance of customary marriage in Tanzania makes it a plain truth that they are institutions which are in agreement with the presence of bride price within the marriage initiation and celebration. Had it been judicially accepted bride price wouldn't have predominance in the marriage celebrated within Tanzanian jurisdiction. It is from this observation that courts of law also are institution supporting bride price payment.

Bride Price in Customary Marriage

Parents or guardians are the ones who set the bride price in most of our communities. But most of times they prefer the cows, goat or money. After the bride price being paid, both parties may set the date for wedding. Although these formalities differ from one community to another, payment of bride wealth is one of such aspect which reflects itself in the community. The Law of Marriage Act, does not make it mandatory, however the community upholds it still.

Payment of bride price is left to be fixed by the parties themselves. Few examples drawn from Mara region will suffice to explain how this aspect upholds by the community. Among the Zanaki who are not much different with Kuria, in payment of bride price, they do prefer animals like cows and goat to be used as bride price. Also, among Jita, who prefer cows and sometimes canons since most of them are fishermen and few involve with animal keeping. Tribes found in Mara, they have almost the same system of payment of bride price, but there some few differences, example among the Kuria, a white woman is seen of a great value than a black one, and hence the family of white girl will receive high bride price compare to the family of a black girl.

Let it be noted that the claim for payment of bride wealth cannot be sustained after the breakdown of marriage. That there is no customary rule, which requires the payment of bride price where the marriage has broken-down. Bride wealth may only be recovered during the subsistence of the marriage and not later.^{xxxiii} Since bride wealth is paid subject to the existence of marriage, the same is refundable should there be a dissolution.

However, the refund of bride wealth is affected subject to the limitations attached thereto. That means there are factors, which limit the refund of the same. First, the claim for the refund of bride wealth cannot be sustained unless there has been petition for divorce.

Secondly, when discussing the factors, which limit the amount of bride wealth to be refunded, the relevant provisions are Rules 52 up to 61^{xxxiv}. These rules provide for guidelines to be followed by the courts when ordering the refund of bride wealth. Among the principles to be followed include the guilt of parties for the breakdown of the marriage, the length of the marriage and, whether there are any issues of the marriage or not.^{xxxv}

It should be born in mind that, in respect of duration in which the marriage had subsisted, the longer the parties lived together, the less the dowry is to be returned/refunded. The reason behind is that the husband is considered to have benefited a lot from the bride wealth he paid to the father in-law by living with the wife.

With regard to the blameworthiness of either of the parties who caused the breakdown of the marriage, the court has discretion to blame for the break up of marriage and determine which of the parties is fully to blame in deciding issue of refunding bride -price. For instance in the

case of *Marwa v Wambura*.^{xxxvi} It was held that it is provided for in S. 58 of the Law of persons G.N 279/1963 that if the wife repeatedly behaved in a manner which makes life unbearable for her, the court may decide that all or part of the bride wealth has to be repaid even though children have been born.

The court held further that it should not be made abundantly clear to unscrupulous father that the daughters are not for sale, nor they are the source of wealth, Bride wealth is intended to secure the marriage between the parties, and is not a price for marrying a girl.

As a point of remark the court have a role to play through their discretionary powers to decide the amount of bride wealth to be refunded. This goes as far as to regard the factors guiding them in deciding the same as just light throwers; and not absolutely decisive devices.

CONCLUSION

Therefore the paper concerned with both legal and institutional framework relating to bride price payment as much reflected in the auspices of customary marriage procedures and validity. This is very important for the purpose of highlighting the presence of bride price payment within the laws of Tanzania on the first part and those from outside the jurisdiction especially regional and international laws relating to marriage right, celebration and validity.

Recognition of customary marriage under the marriage laws of Tanzania is another important observation supporting a legal recognition of bride price payment within the Tanzanian legal regime. While application of customary laws through which marriage celebration is conducted is recognized under the laws of Tanzania,^{xxxvii} thus customary marriage is recognized under the Law of Marriage Act of Tanzania.^{xxxviii}

Customary laws may be applied in accordance with Section 11 of the Judicature and Application of Laws Act.^{xxxix} Courts will exercise their jurisdiction in accordance with the applicable customary law. Following the passage of the Law of Marriage Act, the majority of the detailed regulations governing customary marriages found in the Local Customary Law Declaration Order of 1963^{xl} are no longer in effect. Customary and Islamic marriages received official recognition and were also subject to state regulation when the LMA combined them

into a single, uniform marriage code. Due to provisions in the second schedule of the LMA, customary law is no longer applicable to any matters pertaining to marriage, divorce, or dowry. Section 18 of the Magistrates' Courts Act ^{xli} allows Tanzanian Primary Magistrate Courts to apply customary law in resolving any disputes, including marriage and potential bride price claims from families. ^{xlii}

RECOMMENDATIONS

The Law of Marriage Act should be amended and incorporate restriction of issues of bride prices in Tanzania. The amendment will bring new light to the issue of bride price and marriage in Tanzania and set an outright to society on the dangers of bride prices like domestic violence to the girls and women in Tanzania.

The laws should be amended to incorporate the rule of law also demands that a state respects and enforces international law. Under the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW), a treaty adopted by the United Nations Assembly, state parties are required “to embody the principle of equality of men and women in their national constitutions”. This has been fulfilled by presence of provisions on equality in the Constitution like Article 12 and Article 13. CEDAW also requires state parties to “modify the social and cultural patterns of conduct of men and women with a view to achieving the elimination of prejudices and customary and all other practices which are based on the idea of inferiority or the superiority of the sexes or on stereotyped roles for men and women.”

ENDNOTES

ⁱ Read, J., (2008) *A Milestone in the Integration of Personal Laws: The new Law of Marriage and Divorce in Tanzania*, Journal of African Law , Volume 16 , Issue 1, pp. 12

ⁱⁱ Dalton, G., (2015) *"Brief Communications: "Bridewealth" vs. "Brideprice"* American Anthropologist, p. 23

ⁱⁱⁱ (1886) LR 1 P& D 130

^{iv} The Law of Marriage Act

^v *Ibid.*

^{vi} *Ibid.*

^{vii} *Ibid*

^{viii} *Ibid*

^{ix} Law of Marriage Act op cit

^x *Ibid*

^{xi} Bennett, T. W, (2004) *Customary Law in South Africa*. Kluwer, p. 223

^{xii} Read, J., (2008) *A Milestone in the Integration of Personal Laws: The new Law of Marriage and Divorce in Tanzania*, Journal of African Law , Volume 16 , Issue 1, pp. 12

^{xiii} Parker, A.A C., (2002) *Using Human Rights to Change Tradition: Traditional Practices Harmful to Women's Reproductive Health in Sub-Saharan Africa* Vol.13, School of Human Rights Research Series, p.40

^{xiv} Ndangoh, M.L., (2022) *Bride price and marriage under cameroonian family law*, Synsto Journal of Law; 1(1): pp. 09-17

^{xv} Bennett, T. W, (2004) *Customary Law in South Africa*. Kluwer, p. 223

^{xvi} Universal Declaration of Human Rights 1948.

^{xvii} International Covenant on Civil and Political Rights 1967.

^{xviii} African Charter on Human and People's Rights, 1986.

^{xix} The Treaty for the Establishment of East African Community, 2000.

^{xx} <http://www.achpr.org/instruments/achpr/> visited on 11/07/2023

^{xxi} *Ibid*

^{xxii} Article 5 of the Protocol to African Charter on human and people's rights of women in Africa

^{xxiii} The Constitution of United Republic of Tanzania, 1977

^{xxiv} The Judicature and Application of Laws Act, 1920

^{xxv} Section 9(1) Law of Marriage Act

^{xxvi} Section 9(2) *Ibid*.

^{xxvii} Section 9(3) *Ibid*.

^{xxviii} GN. 279 of 1963

^{xxix} Cap 29 R.E 2019

^{xxx} [1982] TLR 94

^{xxxi} No. 279 of 1963

^{xxxii} Cap 11 R.E 2019

^{xxxiii} See case of Raphael Dibogo vs. F Wambura [1975] LRT No. 42

^{xxxiv} the Customary Law Declaration Order, GN No. 279/1963

^{xxxv} See also the case of Murange Mahande v Maricha Marosi [1971] TLR no. 295

^{xxxvi} Civil App. 115 of 1971.

^{xxxvii} See Section 9 and 11 of the JALA CAP 358 OF LAWS OF TANZANIA

^{xxxviii} *Ibid*

^{xxxix} The Judicature and Application of Laws Act [Chapter 358 R.E 2019]

^{xl} GN. 279 of 1963

^{xli} Cap 29 R.E 2019

^{xlii} Cap 11 R.E 2019