

Japanese Whaling and the International Community: Enforcing the International Court of Justice and Halting NEWREP-A

By Samuel K. Rebmann

*The bodies that regulate public international law, particularly those concerning areas of environmental law, are currently incapable of unilaterally enforcing international treaties and conventions. On December 1, 2015, Japan's Institute of Cetacean Research (ICR) commenced the organization's New Scientific Whale Research Program in the Antarctic Ocean (NEWREP-A). This paper argues that by launching NEWREP-A, Japan willfully acted in direct contravention to the International Court of Justice's ruling in *Australia v. Japan* (2014), which found that the ICR's previous research programs violated existing public international law and, thus, blocked all future scientific whaling permits from being issued to the Japanese institute. Through examining the international treaties and conventions governing whaling, environmental and maritime law, the historical context of Japanese whaling practices, and American legislative and political history, this paper defends the International Court of Justice's opinion and calls on the American government to support and enforce the ruling through extraterritorial application of United States law.*

In direct opposition to a 2014 ruling by the International Court of Justice (ICJ), the Japanese government declared in June 2015 their intent to revive the Institute of Cetacean Research's (ICR) scientific whaling program. The ICJ held in *Australia v. Japan* that the second phase of the Japanese Whale Research Program Under Special Permit in the Antarctic (JARPA II) violated international law; the court ordered the revocation of all existing permits and prevented the issuance of future permits, which included the proposed Research Plan for New Scientific Whale Research Program in the Antarctic Ocean (NEWREP-A).¹ Specifically, the court found that JARPA II failed to observe regulations set forth by the International Whaling Commission (IWC), such as the 1986 binding international moratorium

1. Christopher Butler-Stroud, "Japan's Antarctic Whaling Found to Be in Contravention of IWC and the moratorium," *US WDC*, last modified March 31, 2014, accessed March 8, 2016, <http://us.whales.org/blog/2014/03/japans-antarctic-whaling-found-to-be-in-contravention-of-iwc-and-moratorium>.

on commercial whaling, the binding moratorium on factory ship whaling, the international definition of scientific whaling and the boundaries of the Southern Ocean Sanctuary.²

The IWC was established in 1946 as “the global body charged with the conservation of whales and the management of whaling” by the International Convention for the Regulation of Whaling (ICRW).³ By officially objecting to amending the IWC in 1982, Japan, along with Iceland and Norway, were granted reservations giving the nation an exemption from complying with the binding ban on commercial whaling that would begin in 1986.⁴ Japan, however, ceded to diplomatic threats from the Reagan Administration and agreed to halt commercial whaling by 1987.⁵ Immediately upon ceasing commercial whaling operations, Japanese officials began issuing special permits to the Institute of Cetacean Research in 1988, claiming the programs were exclusively conducting scientific research, which is permitted by Article VIII of the IWC treaty.⁶ Japan is able to process and sell byproducts of the slaughtered endangered species and is exempted from the moratorium on factory ship whaling through a loophole in Article VIII (2), which requires “any whales taken under these special permits shall so far as practicable be processed.”⁷ Furthermore, twenty members of the IWC’s Scientific Committee penned an article for the American Institute of Biological Sciences testifying to the accuracy of a *New York Times* open letter in which “21 distinguished scientists (including three Nobel laureates) criticized Japan’s program of scientific research whaling, noting its poor design and unjustified reliance upon lethal sampling.”⁸

2. Ibid.

3. "International Whaling Commission Home Page," The International Whaling Commission, accessed March 8, 2016, <https://iwc.int/home>.

4. "US Sanctions Against Japan for Whaling," *The American Journal of International Law* 95, no. 1 (2001): 149–52. doi: 10.2307/2642050.

5. Ibid.

6. "Whaling in Japan," US WDC, accessed March 8, 2016, <http://us.whales.org/issues/whaling-in-japan>.

7. "International Convention for the Regulation of Whaling," Washington, December 2, 1946. 62 Stat. 1716; Treaties and Other International Acts Series 1849, March 8, 2016 <https://www.loc.gov/law/help/us-treaties/bevans/m-ustoo0004-0248.pdf>.

8. Philip J. Clapham., et. al. "Whaling as Science," *Bioscience* 53, no. 3 (2003): 210-212. <http://bioscience.oxfordjournals.org/content/53/3/210.full.pdf+html>

Considering the ICRW was written in 1946 when humanity's scientific understanding of whales was comparatively incomplete and the overall whale populations were dramatically higher,⁹ the ICJ judged the fundamental principles guiding JARPA II as unsound scientific practices in *Australia v. Japan*.¹⁰ The court held that the majority of the lethal "science" does not aid in research but rather results in the sale of whale meat to sustain the country's market for byproducts of whaling.¹¹ Japan augments their supply of whale meat and other byproducts by importing whale goods from Iceland and Norway, the only two other countries still engaging in commercial whaling. Unlike Japan, however, Norway and Iceland have been exempted from the moratorium through continued formal objections.¹² A *BBC World* investigative report from February 2016 quoted a high-ranking Japanese government official arguing, "There is no commercial demand for (whale) meat,"¹³ and Iceland's cessation of all commercial whaling in late February 2016, due to difficulties finding Japanese buyers, seemingly confirms the statement.¹⁴ As Japan's yearly consumption of whale meat has fallen from 2,000 to 50 grams per person from 1967 to 2005, thousands of tons of whale meat has been frozen and left unused.¹⁵ Japan, therefore, is not driven to whale by an insatiable demand for whale meat, and the ICR's research has been proven unscientific by the international justice system; yet, Japan's whaling fleet set sail for the Antarctic on December 1, 2015 to commence whaling, officially launching NEWREP-A.

Logically, two questions follow: Why does Japan continue to whale, and what enforcement mechanisms are available to the international community, specifically the United States, to ensure Japan abides by international law? After providing

-
9. Jennifer L. Jacquet, "What Can We Learn from the Cockroaches of the Sea?" *Science Blogs*, last modified December 6, 2008, accessed March 8, 2016 <http://scienceblogs.com/shiftingbaseline/2008/12/06/can-we-learn-from-cockroaches/>.
 10. "US Sanctions Against Japan for Whaling".
 11. Jane J. Lee, "Japan Halts Whaling Program in Response to International Court Ruling," *National Geographic*, last modified April 2, 2014, accessed February 19, 2016, <http://news.nationalgeographic.com/news/2014/03/140331-whaling-japan-international-court-ocean-animal-conservation/>.
 12. Richard Black, "Japan Sells Icelandic Whale Meat," *BBC News*, last modified December 5, 2008, accessed March 8, 2016, <http://news.bbc.co.uk/2/hi/science/nature/7767716.stm>.
Iceland left the commission in 1992 and rejoined in 2002 under a reservation that permitted an objection to the moratorium.
 13. Rupert Wingfield-Hayes, "Japan and the Whale," *BBC World Asia*, last modified February 8, 2016, accessed March 8, 2016, <http://www.bbc.com/news/world-asia-35397749>.
 14. "Success--No Fin Whaling in Iceland This Summer!" *US WDC*, last modified February 26, 2016, accessed [date?], <http://us.whales.org/news/2016/02/success-no-fin-whaling-in-iceland-this-summer>.
 15. "US Sanctions Against Japan for Whaling".

further history on international whaling laws in Part I, an answer to the first question will be offered in Part II, which will examine NEWREP-A and demonstrate Japan's reason for willfully disregarding the decision in *Australia v. Japan*. Finally, Part III will defend the United States' legal authority and obligation to counter Japan's illegal whaling operations through economic sanctions and extraterritorial application of US law.

I. Twentieth Century History of International Whaling Jurisprudence: The International Convention for the Regulation of Whaling and the International Whaling Commission

Since "the history of whaling has seen overfishing of one area after another and of one species of whale after another to such a degree that it is essential to protect all species of whales from further overfishing," fifteen whaling countries convened to negotiate the legally binding International Convention for the Regulation of Whaling (ICRW) and charter the International Whaling Commission (IWC), which is the international governing body charged with implementing the ICRW.¹⁶ Evidence of whaling dates to over four thousand years ago when aboriginal Norwegians hunted whales as a food source; however, some theorists suggest Japan may have begun whaling even earlier, for both food and cultural identity.¹⁷ By the early twentieth century, whaling was a multi-million dollar industry that expedited the depletion of whale populations by hunting an equivalent number of whales as the previous four centuries combined.¹⁸ The establishment of the IWC did not curtail the escalation of whaling, however, as during the first fifteen years following the originally signing the IWC focused on regulating and promoting sustainable commercial whaling operations.¹⁹ The business-centric focus directly led to whaling reaching its peak in 1962, when over 66,000 whales were killed worldwide²⁰ (Japan

16. "International Convention for the Regulation of Whaling"

17. Megan E. Marrero and Stuart Thornton, "Big Fish: A Brief History of Whaling," *National Geographic Education*, last modified November 1, 2011, accessed March 9, 2016, <http://nationalgeographic.org/news/big-fish-history-whaling/>.

18. *Ibid.*

19. Angela Lang, "Overview of International Whaling Commission," *Michigan State University Animal Legal and Historical Center*, last modified 2002, accessed March 9, 2016, <https://www.animallaw.info/article/overview-international-whaling-commission>.

20. "Successes and Failures of the International Whaling Commission (IWC)," *WWF Global*, accessed March 9, 2016, http://wwf.panda.org/what_we_do/endangered_species/cetaceans/cetaceans/iwc/iwc_successes_failures/.

peaked in 1964, hunting over 24,000 whales alone),²¹ which forced the commission to adopt an ethically-based approach to their conservation efforts.²² In order to effectively implement the new philosophy, anti-whaling and non-whaling signatories ratified the ICRW during the 1970s to overrule the original signatories that were still pro-whaling and controlled the convention's majority.²³ Control over the IWC, which requires a three-fourths majority to amend the schedule of the convention, eventually allowed the anti-whaling signatories to enact a moratorium on factory ship whaling in 1979 and adopt in 1982 the moratorium on commercial whaling that was proposed by the UN Conference on the Human Environment, but exceptions were given for aboriginal subsistence and scientific research.²⁴ The ban did not come into force until 1986. Additionally, in 1994 the IWC designated 50 million square kilometers off the coast of Antarctica as the Southern Ocean Sanctuary.²⁵

Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

Overall, the 1960s and 70s gave way to a worldwide conservation movement, which led to the CITES international treaty. After being proposed during the 1960s, on March 3, 1973, eighty countries negotiated and agreed to the CITES treaty, which aimed "to ensure that international trade in specimens of wild animals and plants does not threaten their survival."²⁶ The treaty came into force during 1975, and today 181 countries, including Japan, are party to CITES, which protects over 35,000 species of flora and fauna.²⁷ Trade of all beaked whales and almost all great whales, which are the species overseen by the IWC, is regulated by Appendix I of CITES.²⁸ The great whales protected by CITES include the minke, fin, humpback, Bryde's, sei, and sperm whales,²⁹ which are the high target species for Japanese, Icelandic and Norwegian whalers who have killed a combined 2,000 per year since

21. "Whaling," *US WDC*, accessed March 9, 2016, <http://us.whales.org/wdc-in-action/stop-whaling>.

22. Lang, "Overview of International Whaling Commission"

23. *Ibid.*

24. "Successes and Failures of the IWC," *WWF Global*

25. *Ibid.*

26. "What Is CITES?" *CITES.org*, accessed March 9, 2016, <https://www.cites.org/eng/disc/what.php>.

27. *Ibid.*

28. "Marine Species in CITES," *NOAA Fisheries*, accessed March 9, 2016, http://www.nmfs.noaa.gov/ia/agreements/global_agreements/cites_page/cites_species.html.

29. *Ibid.*

the 1986 moratorium.³⁰ The three countries have registered reservations granting exemptions from the treaty's ban on the trade of the whale meat and byproducts.³¹

United Nations Convention on the Law of the Seas (UNCLOS)

The UNCLOS treaty, which entered into force in 1994 after being ratified by sixty nations, is considered to be the most influential international agreement for outlining maritime boundaries, jurisdictional principles, and dispute settlement mechanisms.³² The multilateral agreement has large implications for international whaling law, as well. Article 65 of UNCLOS on Marine Mammals fortified the IWC's authority to regulate and protect great whale species by stating:

Nothing in this Part restricts the right of a coastal State or the competence of an international organization, as appropriate, to prohibit, limit or regulate the exploitation of marine mammals more strictly than provided for in this Part. States shall cooperate with a view to the conservation of marine mammals and in the case of cetaceans shall in particular work through the appropriate international organizations for their conservation, management and study.³³

Furthermore, the regulations set forth in the Convention of Migratory Species of Wild Animals (CMS), which classifies the six high target whaling species in Appendix I of the CMS as migratory species threatened with extinction,³⁴ are reinforced by Article 64 of UNCLOS on Highly Migratory Species, stating:

The coastal State and other States whose nationals fish in the region for the highly migratory species listed in Annex I shall cooperate directly or through appropriate international organizations with a view to ensuring conservation and promoting the objective of optimum utilization of such species throughout the region, both within and beyond the exclusive economic zone ...³⁵

30. Lang "Overview of IWC"

31. Lee "Japan Halts Whaling Program"

32. Gerhard von Glahn and James Larry Taulbee, "The Law of the Sea," in *Law among Nations: An Introduction to Public International Law*, 10th ed. (New York: Routledge, 2013), [page number].

33. UN General Assembly, Convention on the Law of the Sea, December 10, 1982, accessed March 10, 2016, p. 48, http://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf.

34. "Species," CMS, accessed March 9, 2016, http://www.cms.int/en/species?field_species_class_tid=443.

35. UN General Assembly, Convention on the Law of the Sea

The exclusive economic zone (EEZ), or the area of rights and jurisdiction “beyond and adjacent to a country’s territorial sea,” was re-delimitedated by Part V, Article 57 of UNCLOS from about four miles to two hundred miles.³⁶ Combined with a country’s objection to or reservations in a treaty, UNCLOS negatively impacted international entities’ ability to regulate whaling by extending the area in which a country can exercise their sovereign rights. Contrastingly, the extension of the EEZ gave anti-whaling countries a bargaining chip to diplomatically threaten whaling nations, which will be examined further in Part III.

II. NEWREP-A: Japan’s Audacious Decision

In order to justify the scientific relevancy of the country’s whaling “research,” Japan claims “JARPA II exists to ‘demonstrate’—all data to the contrary notwithstanding—that whales eat too much fish (resulting in the decline of the world’s fish populations) and therefore should be culled by more whaling,”³⁷ which the ICJ ruled in *Australia v. Japan* could broadly be considered scientific; however, the court found “that little attention was given to the possibility of using non-lethal research methods more extensively to achieve the JARPA II objectives and that funding considerations, rather than strictly scientific criteria, played a role in the programme’s design,” calling into question the overall scientific design of the program.³⁸ It should be noted, despite the opinion of the ICJ, that the great whales, sans the sperm whale, are baleen whales that filter feed.³⁹ As such, the baleen whales’ largest prey are small schooling fish and, more often, they feed on krill, copepods, and squid.⁴⁰ As remedy for violating international law, the court ordered the revocation of all existing permits and the prevention of issuance of all future permits.

According to Japanese officials, NEWREP-A adequately addresses the concerns brought forth by the ICJ and, therefore, is in accordance with IWC regulations. Japan intends to hunt 333 minke whales per year for the next twelve years, which, according to Whale and Dolphin Conservation, is actually an increase

36. von Glahn and Taulbee “The Law of the Sea”

37. Clapham et. al. *Whaling as Science*

38. “Whaling in the Antarctic (*Australia v. Japan: New Zealand intervening*),” ICJ Summary, March 31, 2014, accessed March 9, 2016, <http://www.icj-cij.org/docket/files/148/18160.pdf>.

39. “Lives of Whales,” *International Whaling Commission*, last modified 2016, accessed July 5, 2016, <https://iwc.int/lives>.

40. *Ibid.*

in the average number of whales killed.⁴¹ Furthermore, NEWREP-A will expand Japan's hunting grounds in the Southern Ocean Sanctuary, which was cited as a violation of international law by the ICJ in *Australia v. Japan*.

By negligently disregarding the opinion of the ICJ, Japan risks being taken to The Hague for a second time, which is a measure that will be considered during September of 2016 when the IWC reviews NEWREP-A again. During the first review, forty-four of the scientists present, a clear majority, signed a statement strongly opposing the new whaling program.⁴² According to a high-ranking Japanese official interviewed by *BBC*, Japan must knowingly and willfully disregard the ruling, because "there are some important political reasons why it's difficult to stop now."⁴³

International law disputes inherently originate from political motivations. By ignoring the ICJ's ruling, Japan makes a clear statement to the international community, which is highlighted by the reversal of the country's stance on the jurisdiction of the ICJ. Japan's Ministry of Foreign Affairs issued a statement directly after the judgment emphasizing the country's dedication to the IWC, commitment to continuing to whale under the commission's regulations, and the importance of abiding by international law.⁴⁴ Japan's permanent representative to the United Nations, Motohide Yoshikawa, reiterated the Ministry of Foreign Affairs' statements in an address to the UN General Assembly, while also illuminating a potential reason for why NEWREP-A is being pursued, by stating:

The situation concerning the acceptance of the jurisdiction of the Court is, however, very poor. Only 70 out of the entire membership of the United Nations have accepted the compulsory jurisdiction of the ICJ. Looking at the Asia-Pacific Group, which Japan belongs to, only 7 out of 54 countries

-
41. "'Business as Usual' as Japan Publishes New 'Research Whaling' Plan," US WDC, last modified November 18, 2014, accessed March 9, 2016, <http://us.whales.org/news/2014/11/business-usual-japan-publishes-new-research-whaling-plan>.
 42. Dennis Normille, "Scientists Renew Objections to Japan's Whaling Program," *Science Magazine*, last modified June 19, 2015, accessed March 9, 2016, <http://www.sciencemag.org/news/2015/06/scientists-renew-objections-japan-s-whaling-program>.
 43. Black "Japan Sells Icelandic Whale Meat"
 44. "Statement by Chief Cabinet Secretary, the Government of Japan, on International Court of Justice 'Whaling in the Antarctic (*Australia v. Japan*: New Zealand intervening)," *Ministry of Foreign Affairs of Japan*, last modified March 31, 2014, accessed March 9, 2016, http://www.mofa.go.jp/press/danwa/press2e_000002.html

have accepted it. I hope to see more countries, in particular, members of the Asia-Pacific Group do so.⁴⁵

Almost exactly a year after the address, Yoshikawa stated, in regards to why Japan believes it is allowed to disregard the ruling, that the court's jurisdiction "does not apply to ... any dispute arising out of, concerning, or relating to research on, or conservation, management or exploitation of, living resources of the sea."⁴⁶ The court, however, does have jurisdiction under authority given by Articles 117, 136, and 137 of UNCLOS, which established the conservation of the global commons.⁴⁷

III. The Police of the World Fail to Enforce the Law: America's Duty to Act

Despite possessing jurisdiction, neither the IWC nor the ICJ carry the full force of law, meaning neither organization enjoys a realistic mechanism to enforce regulations and rulings. As such, rulings are generally complied with willingly as a form of comity. When a country, like Japan, elects to disregard the opinion of the ICJ or other international organizations that do not carry the full force of law, the enforcement of a ruling or regulation is entrusted to nations capable of exerting influence through diplomatic pressure or the levying of economic sanctions.

In 1954, the United States passed the Fisherman's Protective Act that included what is known as the Pelly Amendment, which gave the President authority to order the Secretary of the Treasury to prohibit importation of fish products from a nation that weakened the capability of an international conservation program to regulate their respective fisheries. Specifically, the Executive power to issue such an order, which was broadened in 1978 by P.L. 95-376 (92 Stat. 714), is legally authorized "whenever the Secretary of the Interior or the Secretary of Commerce certifies that nationals of a foreign country are engaging in trade or taking that diminishes the effectiveness of an international program in force with respect to

45. "Statement by H.E. Mr. Motohide Yoshikawa," *Permanent Mission of Japan to the United Nations*, last modified October 30, 2014, accessed March 9, 2016, <http://www.un.emb-japan.go.jp/statements/yoshikawa103014.html>.

46. Andrew Darby, "Japan Rejects International Court Jurisdiction over Whaling," *The Sydney Morning Herald*, last modified October 19, 2015, March 9, 2016 <http://www.smh.com.au/federal-politics/political-news/japan-rejects-international-court-jurisdiction-over-whaling-20151018-gkc7rm.html>.

47. von Glahn and Taulbee, "The Law of the Seas"

the United States for the conservation of endangered or threatened species."⁴⁸ The Pelly Amendment was enhanced in 1976 by the Packwood-Magnuson Amendment, which enacted automatic sanctions for countries that violate IWC regulations.⁴⁹ While several countries have been certified under the Amendment, the United States has routinely used the legislation's power to diplomatically pressure Japan to concede, such as when the Reagan Administration threatened certifying Japan in 1984 in order to pressure the country to agree to the 1986 IWC moratorium.⁵⁰ Once Japan began engaging in scientific whaling in 1988, the Reagan Administration further utilized the Packwood-Magnuson Amendment by stripping Japan of all fishing rights within US waters.⁵¹ In 2000, President Bill Clinton further expanded the stripping of Japan's fishing rights by cancelling the scheduled meeting to negotiate the reinstatement of fishing rights in response to Japan's expansion of their whaling program.⁵² Considering the UNCLOS expansion of the EEZ from about 4 to 200 miles, which came into force in 1994, the stripping of fishing rights in 1988, that has continued indefinitely greatly enhanced the impact of applying the Pelly and Packwood-Magnuson Amendments. The United States Supreme Court clarified the amendments in *Japan Whaling Association v. American Cetacean Society* 478 US 221 (1986), holding that the certification and imposition of sanctions are voluntary options for the Secretary of the Treasury and the President.⁵³

The political heart of the conflict between anti-whaling countries and Japan was exemplified in a demarche sent from the United States, the United Kingdom, Australia, New Zealand and all member states of the EU—totaling thirty nations—to Japan in response to the Japanese whaling fleet's departure for Antarctica. The governments delayed the statement's release for six days, delivering the message on December 7, 2015, which is highly unlikely to have

-
48. Department of the Interior. "Pelly Amendment." US Fish and Wildlife Services: International Affairs. Accessed August 19, 2016. <https://www.fws.gov/international/laws-treaties-agreements/us-conservation-laws/pellyamendment.html>.
 49. Angela Lang, "Detailed Discussion: The Global Protection of Whales," Michigan State University Animal Legal and Historical Center, last modified 2002, accessed March 9, 2016, <https://www.animallaw.info/article/detailed-discussion-global-protection-whales>.
 50. "US Sanctions Against Japan for Whaling"
 51. Ibid.
 52. Ibid.
 53. "Statement by H.E. Mr. Motohide Yoshikawa"

been a coincidence.⁵⁴ December 7, 2015 was the seventy-fourth anniversary of the attacks on Pearl Harbor that resulted in the United States entering World War II, which ended when the United States dropped two atomic bombs on Japan. The majority of countries joining in the demarche were members of the Allied Alliance in World War II. In the statement, the countries reminded Japan that the “Southern Ocean can be a treacherous, remote, and unforgiving environment, (and) its isolation and extreme conditions mean that search and rescue capability is extremely limited.”⁵⁵ The metaphorical implications of the phrasing cannot be understated, as Japan was forced to begin whaling in the Antarctic in the aftermath of World War II in order to adequately feed their citizens.⁵⁶

On March 23, 2016, the Japanese whaling fleet returned from the Antarctic, after harvesting over 300 minke whales (as promised). Ninety percent of the 230 females killed in the name of science were pregnant.⁵⁷ The United States and the other signatories must “respond to unlawful activity in accordance with relevant international and domestic laws,” as promised in the demarche. The United States has clear precedent from the Reagan and Clinton Administration’s use of the Pelly and Packwood-Magnuson Amendments, and, if America is still truly the “police of the world,” the United States must lead by example through the enactment of diplomatic and economic sanctions on Japan.

54. "Joint Statement on Whaling and Safety at Sea," *US Department of State*, last modified January 11, 2016, March 9, 2016 <http://www.state.gov/r/pa/prs/ps/2016/01/251100.htm>.

55. "Joint Statement on Whaling and Safety at Sea."

56. Black "Japan Sells Icelandic Whale Meat"

57. Jareen Imam, "Japan Kills 333 Minke Whales," CNN, last modified March 25, 2016 accessed March 26, 2016, <http://www.cnn.com/2016/03/24/world/japan-minke-whale-333-irpt/>

Author's Biography

After graduating from Mary Institute and Saint Louis Country Day School in Ladue, Missouri, Samuel Rebmann enrolled in the University of Arizona and is graduating in May 2017 with a Bachelor of Arts degree in philosophy (ethics). Samuel has focused his philosophical studies on contemporary ethics concerning psychopathology — specifically the sociocultural and medical treatment of mental health patients — and has thematic minors in law and Latin American anthropology. After completing his undergraduate education, Samuel intends to pursue a law degree. “Japanese Whaling and the International Community” is Samuel’s first publication as a primary author, and he served as an associate editor for Volume 6, Number 1 of The George Washington University Undergraduate Law Review.