EMERGING US-JAPAN RELATIONS AND IMPACT ON EAST ASIAN SECURITY

Arsh Shahid Khan and Aiysha Safdar*

Abstract

States with shared interests and values may form a collective identity to enact their vision and achieve security objectives against those they view as threats. Similarly, US-Japan relations have progressed for a long, not just due to the dangers posed by China and North Korea but because of their shared values of democracy, human rights, peace, and global prosperity. They share the vision of a Free and Open Indo-Pacific by forming bilateral and multilateral alliances. The US and Japan are also engaged in strategic partnerships for traditional and non-traditional security in the region, including maritime, cyber, space, and energy. This paper, therefore, focuses on East Asia due to its vulnerable security architecture and explores how the US and Japan’s security cooperation strengthens regional security by sharing values and security concerns. It highlights that the potential of both states to form a collective identity may improve the security situation in East Asia.

Keywords: East Asia, Security, Collective Identity, Indo-Pacific, United States, Japan.

Introduction

The upsurge of maritime and territorial issues and the development of nuclear weapons in East Asia posed grave threats to regional security. It is accredited to the long-standing history of wars and resentment between various northeast Asian states, such as Japan and South Korea. In this regard, scholars and researchers have emphasised the importance of strengthening states relations through collective identities, like the US and Japan’s joint interests in the region, including controlling or countering threats from China and North Korea. Forming a collective identity and common strategic practice is possible if states’ convergence of interests and values exists in an interdependent bilateral or multilateral relationship. Thus, the US and Japan share a Free and Open Indo-Pacific vision and democratic values, such as freedom of politics, free economy, and protection and preservation of human rights. Both states practice unity against potential threats and develop multiple diplomatic, economic, and security projects within the region to forge a collective identity and stronger relations with other East Asian states. This paper, therefore, deals with the concept of collective identity and security while discussing US-Japan ties in East Asia. A simple qualitative research method is used to analyse the situation.

*Arsh Shahid Khan is a MPhil graduate in International Relations from Kinnaird College for Women University, Lahore. Dr. Aiysha Safdar is a Lecturer and Head of the Department of International Relations at Kinnaird College for Women University, Lahore.
Collective Identity and Security

The role of constructivism in a state’s security challenges traditional concepts provided by realist scholars. It focuses on conceptual and non-traditional factors, such as the impact of norms on the international system and its security. Another factor shaping national interests and threat perception is ideological similarities and differences. Alexander Wendt, one of the pioneers of constructivist theory, holds identity in high regard concerning inter-subjectivity in international relations. Identities are formed due to external and internal factors influencing the understandings of the Self as opposed to the Other. Wendt also named four types of identity: person or corporate identity, type identity, role identity, and collective identity.

Collective identity is considered a core variable in a state’s security and foreign policy. It can be formed if states’ interests and values are apparent in bilateral or multilateral relationships. It refers to positively identifying the welfare of another actor, whereby they are an extension of Self rather than as an opposing Other. Realists discuss that material forces, such as power and human nature, could form the basis of cooperation and collective action, whereas liberalists credit institutions and knowledge. Nonetheless, constructivism and its core concepts believe that collective identity is a prerequisite for all joint efforts among states. To form a collective identity among states, inter-subjective structures are essential, such as shared knowledge, understanding threat complexes, interdependence through trade, talks and capital flow, societal convergence of values, the existence of a common Other (an aggressor or a non-traditional threat), and symbolic interactions between what constitutes as Self and what they perceive as the Other.

Collective Identity of the US and Japan

The US-Japan relations have seen some exciting developments in the 20th and 21st centuries. Despite being against each other during WW II, the US and Japan now have one of the most robust economic and military relationships, particularly in Asia. After the war, the US had militarily occupied Japan. The former began to transform the latter’s politics and society to ensure it does not pose a threat in the future. Japan soon became a democracy after years of being under military rule, and the security treaty of 1952 created a foundational basis of their security relations once it became apparent that Japan was more of an industrial and military asset against communist influence in Asia. An alliance usually ends once a potential threat has been countered; however, the US-Japan relations continued to flourish and grow even after the Cold War. It happened due to sharing liberal, economic, and political identities and democratic values. Differences in their national security cultures even serve their security interdependence, and both states share complementary power sources. Since 2019, despite US President Donald Trump’s criticism, Japan has asserted itself to take more leadership actions towards preserving the integrity of the alliance and stability of the international order.
Meanwhile, China remains a central focus of the US-Japan alliance, with similar views on containing its growing military and economic power. The US-Japan agreed approach is also inflicting maximum pressure on North Korea. China and North Korea are two states that constitute an Other to the Self (that the US and Japan see themselves). They are being considered a threat to US-Japan security and mutual interests. The collective interests of both Japan and the US include controlling and countering threats from China and North Korea to East Asia and global security. Besides, maritime security is another priority area for the US-Japan alliance with President Trump adopting Abe’s vision of a Free and Open Indo-Pacific region. Both countries emphasise developing a network of partnerships and collaborations to uphold order in the region. The need for strategic cooperation on non-traditional matters, such as energy, digital economy, science, space, and technology within East Asia, has also been underlined. Cyber security is also taken into consideration under international law.

Free and Open Indo-Pacific

The Indo-Pacific region is a collective geopolitical entity aiming to help the US and its regional allies expand and strengthen their networks, countering a perceived threat from China. Since the rise of China as one of the most significant global economic and military powers, the security of the Indo-Pacific region primarily revolves around China’s socio-economic developments, foreign policy behaviour, and strategic actions. Even though China practices a free market economy, it implements protectionist measures to guard its economy, maritime routes, and sovereignty. However, the US and allies in the region consider China undermining their liberal values, open cooperation, free markets, and freedom of navigation. They conclude that geopolitical anxieties of the US, Japan, Australia, and India surrounding Chinese dominance have created this space.

The concept of Free and Open Indo-Pacific (FOIP) was introduced in 2016 by Japanese Prime Minister Shinzo Abe to bring openness and freedom in the working relationship of Japan, Australia, India, and the US. In 2017, US President Donald Trump brought about a new and expanded version of the Free and Open Indo-Pacific strategy, which entailed more military involvement and strategic investments. This version of FOIP primarily counters China’s One Belt One Road (OBOR) initiative (also known as Belt-Road Initiative – BRI). Even being an important regional security ally of the US, Japan has not completely disregarded China’s BRI; Japan and China held summits to discuss how BRI could contribute to the region’s prosperity. The vision of FOIP in both cases has a certain duality to it; both converge on common points. Despite seeming like a counter to China’s efforts, they leave a space for the possibility of China cooperating and aligning with them. China and its foreign policy behaviour are crucial in determining the FOIP framework’s conceptualization.
East Asian Security

Today, the overall security architecture of East Asia faces several issues on both traditional and non-traditional fronts that could render it unstable and vulnerable to internal and external threats. These include but are not limited to armament on conventional and nuclear fronts, historically stemmed animosity (Japan-China, Japan-South Korea), territorial disputes, resource conflicts, and rivalries on power. The northeast Asian region lacks stable security architecture in contrast to Southeast Asia, where multilateralism flourishes as part of ASEAN. However, the consequences of an organized gap in Northeast Asia’s security framework can spill over into Southeast Asia, particularly regarding economic security.

Although South Korea and Japan share resentment towards China and North Korea, their relations experience a considerable strain due to collective memories and previous war experiences. The territorial dispute over Liancourt Rocks (Dokdo and Takeshima Islands) and Comfort Women are prominent issues. Collective memory comes into play with China’s strained relations with Japan due to Japan’s refusal to acknowledge its war past and war crimes, such as the Nanjing Massacre in 1937 and quarrel over the sovereignty of Senkaku islands. Together, these political and territorial security concerns play a significant role in establishing a sense of shared identity and collective security. On the other hand, the ASEAN Way and the development of multilateral relations could be seen as an identity-building exercise. They pave the way to create a collective regional identity, whereby the ASEAN Way is considered the Asia-Pacific Way. Norms shared in the ASEAN Way build a solid collective identity. It lays out the region’s collective strengths and weaknesses to build mutual trust and deepen relations with regular interaction.

Impact of US-Japan Relations on East Asian Security

The US and Japan, like their relationship, may be able to strengthen the security architecture of East Asia through the formation and strengthening of a collective identity among states both in Northeast and Southeast Asia. It is possible by creating common Others (China and North Korea) for all regional states and establishing multiple bilateral and multilateral relations based on shared interests, the convergence of values, and interactions. These interests and systemic processes do not have to pertain to traditional security measures; they can establish trade and capital flow and cultural and political values. This way, even if there are no potential physical threats, the security architecture would be more robust against any other traditional and non-traditional threats that could arise.

There are two principles to build trust between states in Northeast Asia, i.e., to balance interests with identity, something that is integral to East Asian cooperation, and to create the perception of an Asia of citizens over Asia of states. These can be applied to the economy, socio-cultural collaboration, and security. An example can be fostering travel between states and making investments to target the younger generation on a
socio-cultural basis to help end negative perceptions and enable the emergence of collective identity between them. \(^{24}\) With Southeast Asian states showing a comparatively stronger regional solidarity, the US and Japan have increased their efforts to maintain stability and security, primarily through consultation and coordination with their partners within the region.

**Pivot to Asia Policy**

US President Barack Obama’s Pivot to Asia policy redirected US diplomatic, military, economic, and cultural instruments towards Asia by strengthening alliances, increasing depth to partnerships, helping build a solid regional financial architecture, and empowering institutions within the region. \(^{25}\) On the one hand, it attempted to curb China’s rising dominance in the region and adopted a less accommodating stance towards China. \(^{26}\) On the other hand, it was the first step towards building collective identity and a shared security network in the East Asian region. In 2011, keeping the US commitment to advancing broader regional strategy in view, President Obama introduced a new approach known as ‘Rebalance’ to preserve and enhance a stable and diversified security order in Asia-Pacific. In 2015, China began constructing an artificial island in the South China Sea called the Spratly Islands, an area claimed by the Philippines and Vietnam. In response, President Obama stressed forming the Trans-Pacific Partnership (TPP), aiming to open further collaboration between the US, Japan, Philippines, and Vietnam. \(^{27}\) Overall, the Pivot to Asia was a multi-dimensional strategy that significantly impacted the US relationship with Japan and other regional partners. \(^{28}\)

**Defence Cooperation**

In 2015, the revised guidelines for US-Japan defence cooperation recognized the threat brought by global terrorism, the proliferation of nuclear weapons (North Korea), a shift in global power balance (with China’s rise), and the existence of grey zone situations. \(^{29}\) In this regard, a coordination mechanism was introduced to expand cooperation on cyberspace, maritime, and outer space security. Both states pledged to work closely on regional and global levels. \(^{30}\) The key aspects include Situations in Areas surrounding Japan (SIASJ), particularly regarding the Korean Peninsula issue and collective self-defence.

Washington and Tokyo also set regular meetings on different levels with regular interaction between US President and Japanese Prime Minister. The forum where primary decision-making occurs is the Security Consultative Committee (SCC), also known as 2+2, comprising Secretaries of Defence of both states. \(^{31}\) From 2005 to 2007, SCC meetings contributed significantly to help strengthen the alliance. The 2017-SCC meeting emphasised that US-Japan security cooperation should be increased with regional partners, such as South Korea, Australia, and Southeast Asian states, and advance bilateral and multilateral training and exercises. The most recent 2019-SCC meeting put cyber, electromagnetic, and space on the priority list for security, particularly within East Asian and Indo-Pacific regions. \(^{32}\)
Quadratic Security Dialogue

Japanese Prime Minister Shinzo Abe introduced a Quadratic Group (the US, India, Japan, and Australia) deciphered into a comprehensive security pact as a part of an Asian arc of democracy, freedom, and prosperity based on shared values. It is an Asian version of NATO and a joint effort to contain China’s rise within the region. The presumption behind creating this group was ideological as well as geographical. According to Prime Minister Abe, QUAD’s vision spanned around states within the Chinese periphery, such as the Korean Peninsula and Southeast Asia. Former Indian Prime Minister, Manmohan Singh, marked it as cooperating with “like-minded countries in the Asia Pacific region with mutual interests.” QUAD’s first meeting was held in May 2007, followed by military and naval exercises called ‘Malabar’ in September same year, with all four countries’ navies and Singapore.

During the 2017-ASEAN Summit, the Quadratic Security Dialogue had a resurgence based on the growing convergence of four original members, particularly on the security in the Indo-Pacific region and creating joint countermeasures for terrorist activities. Issues discussed during the ASEAN Summit in Manila included the denuclearization issue of North Korea, propagating the vision of a Free and Open Indo-Pacific, and having a rule-based system within the region.

Collective Identity among Regional Partners

The thickening of security cooperation between regional allies, particularly Australia, Japan, South Korea, India, Vietnam, Philippines, and Indonesia, is due to several possible explanations. It includes a shared threat perception against China and North Korea, decreased dependency on the US (out of fear of its abandonment and total control of its partners), and enhanced shared regional identity, norms, and interests. However, the US-Japan security activities with Australia, India, and South Korea are shown in Table-1.

**Table-1: US-Japan’s Security Activities in the Region**

<table>
<thead>
<tr>
<th>Economic and security relations</th>
<th>India</th>
<th>South Korea</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACA (Japan)</td>
<td>Aligned interests (democracy, anti-terrorism, China as a threat)</td>
<td>Common threat perceptions on China and North Korea</td>
</tr>
<tr>
<td>Trilateral Security Dialogue (TSD)</td>
<td>RIMPAC exercises</td>
<td>US-Japan-South Korea trilateral relations</td>
</tr>
<tr>
<td>Maritime security + RIMPAC exercises:</td>
<td>Joint Declaration of Security Cooperation (2008-Japan)</td>
<td>US Bombers, Japanese ASDF, South Korean Airforce fighters</td>
</tr>
<tr>
<td>Navigational freedom</td>
<td>GSOMIA (Japan)</td>
<td>Non-combatant evacuation</td>
</tr>
<tr>
<td>Inclusivity</td>
<td>“2+2” dialogues (Japan)</td>
<td>Strike exercises (US-SK) and Ballistic Defense exercises (US-Japan)</td>
</tr>
<tr>
<td>Maritime capacity building in Southeast Asia</td>
<td>US-Japan-India trilateral strategic coordination</td>
<td>Joint Training and Multilateral Exercises: RIMPAC, Cobra Gold</td>
</tr>
<tr>
<td>Counterterrorism</td>
<td>Promoting FOIP vision: Maritime capacity building with coastal countries</td>
<td>Defense Ministers dialogues</td>
</tr>
<tr>
<td>Disaster relief</td>
<td>Maritime security cooperation</td>
<td>Exchange of Chief of Staffs (2005)</td>
</tr>
<tr>
<td>Non-proliferation of WMDs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tactical, logistical, and intelligence based interoperability</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Air-to-air &amp; Air-to-ground combat</td>
<td>Cope North Guam (2007)</td>
<td></td>
</tr>
<tr>
<td>Source: Author’s Compilation</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Margalla Papers-2021 (Issue-II)
Military capability is the key driver in strengthening the region’s defense community. Even militarily weak states, such as Indonesia, the Philippines, and Vietnam, cooperate with those having robust military capabilities in numerous ways. Sharing intelligence among states within the region and counterterrorism measures can pave the way for further cooperation. In Northeast Asia, despite their tense relations, Japan and South Korea’s main incentive for developing defence and intelligence sharing ties is because of North Korea. Counter piracy and tackling illegal fishing, human smuggling, and drug trafficking problems have prompted deeper defence cooperative efforts among partners in Southeast Asia. The US-Japan security activities with the ASEAN partners are shown in Table 2.

Table-2: US-Japan Security Activities with ASEAN

<table>
<thead>
<tr>
<th>Vietnam</th>
<th>Philippines</th>
<th>Indonesia</th>
</tr>
</thead>
<tbody>
<tr>
<td>Economic relations with both US and Japan</td>
<td>War on Terror coalition (post 9/11) - Developing military capabilities of AFP (US)</td>
<td>Reinforcement of democratic values</td>
</tr>
<tr>
<td>Maritime cooperation + military exercises (US)</td>
<td>Bilateral Strategic Talks (2011- US)</td>
<td>Prevention of weapons smuggling</td>
</tr>
<tr>
<td>RIMPAC exercises</td>
<td>Provision of Defense Sales: Training coast guard and Navy. Military, political, strategic consultations EDCA to contain China and to allow the US a strategic footprint in Southeast Asia</td>
<td>Non-proliferation and counter-piracy</td>
</tr>
<tr>
<td>Strategic partnership with Japan (security, diplomacy, and political dialogues)</td>
<td>Extensive Strategic Partner for Peace (2014 - Japan) JSDF bases in Cam Ranh Bay (2016)</td>
<td>Three coastal guard craft</td>
</tr>
<tr>
<td></td>
<td></td>
<td>“2+2” dialogues (2015 – Japan)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Negotiations to transfer defence equipment and technology + joint multilateral exercises (2015)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>998 security and defence activities (2011-2016 - US)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Synergizing of IPO with Japan’s FOIP (2018).</td>
</tr>
</tbody>
</table>

(Source: Author's Compilation)
In 2015, the alliance cooperation mechanism expanded cooperation areas, including maritime, cyber, and outer space within its security realms. It reflects how collective identity and security in the 21st century need to cover expanding technological advancements.

### Maritime and Cyber Security

Maritime law enforcement and cybersecurity are vital areas for expanded cooperation among regional states. Japan’s efforts to transfer maritime law enforcement platforms, logistics, maintenance support, and training have been critical in developing security cooperation. Multinational naval and military exercises, such as the Rim of the Pacific Exercise (RIMPAC), Cobra Gold (Indo-Pacific Military Exercise), and the Cooperation Afloat Readiness and Training (CARAT) with ASEAN, have proven helpful in strengthening security cooperation and partnerships in the region. The US-Japan alliance and their partners could counter grey zone coercion tactics via promotion of information sharing, maritime domain awareness, persistent Intelligence, Surveillance, and Reconnaissance (P-ISR), and continued joint patrols and exercises, particularly in the East and the South China Sea.

Given the growing cybersecurity threats from North Korea, China, and even Russia, the US and Japan consider forming collective cybersecurity cooperation in a multilateral setting, involving Australia, South Korea, India, and other states in the Asia Pacific region. The US and Japan also work closely with the Philippines and Singapore to emphasise sharing best practices. Integrating national efforts with joint coordination ensures progress that can pave the way for broader allied cooperation; however, the variety of cultures, values, policies, and priorities presents a unique challenge.

### Space Security

Multilateral cooperation with Japan, ASEAN, and Australia on space security is a promising area of cooperation; therefore, the US had co-hosted two security workshops at ASEAN Regional Forum in 2014. The US-Japan Defence Guidelines (2015) also indicate space assets for early warning, navigation, communication, and positioning as essential areas of coordination. These assets, mainly ISR capabilities, can improve space systems’ reliance and reliability for the US and Japan. Information sharing to detect and attribute threats in outer space can help improve situational awareness for the US and Japan. Both states have also established the Space Cooperation Working Group and the Comprehensive Space Dialogue. The Asia Pacific Regional Space Agency Forum (APRSAF) is also an important platform to increase regional cooperation. Its current advantages are open, flexible, cooperative, and committed to tackling regional issues, aligning with the ASEAN Way. Another joint initiative is SERVIR, established in 2004, a global network of regional partners dedicated to environmental management using satellite data and geospatial technology. Space security has taken an important
position in the US-Japan alliance. The Quadrilateral Security Dialogue has also extended to the space security field, furthering the community building in the region.46

Aside from multilateral and bilateral regional partnerships, the US and Japan work to advance the concept of Free and Open Indo-Pacific, mainly centred around regional energy security and digital economy. The Japan-US Strategic Energy Partnership (JUSEP), announced in November 2017, also promotes widened access to reliable and affordable energy in Indo-Pacific and Sub-Saharan Africa. The bilateral dialogues under this partnership are crucial to the vision of FOIP promoting peace, prosperity, and stability. 47 The Japan-US Strategic Digital Economy Partnership (JUSDEP) was initiated under the framework of the US-Japan Internet Economy Policy Cooperation Dialogue.48 It aims to promote digital cooperation between the two states for regional security. Through this partnership, the US and Japan aim to provide and develop digital economic projects in other regional countries, such as Australia, New Zealand, and South Korea. The Japan-US Mekong Power Partnership (JUMPP), initiated in September 2019, allows the two countries to partner with the Lower Mekong states, such as Cambodia, Laos, Thailand, Vietnam, and Myanmar. It provides opportunities for more sustainable energy, regional power integration and trade, and quality infrastructure development under the G20 Summit’s rules for Investment in Quality Infrastructure. 49

Challenges and Opportunities for the Region

One of the biggest challenges (and a major concern for US administration) is the uncertainty surrounding the US vision and commitment to the region. The ‘America First’ policy signified a dramatic shift in priorities for the US, where they testified to put their national interests before regional partners, including Japan. It has made the other states apprehensive about the US’ possible abandonment due to shifting priorities.50 The US administration would have convinced East Asian states that they are fully committed to working together to preserve regional security with mutual benefits in mind, not just catering to what the US expects and threatening to abandon them. The US should be mindful of its allies’ interests and own individual cultures, norms, and identities.

Another challenge for the region would be the possibility of losing East Asian regionalism as the US, with the help of Japan, further establishes itself within the region. The US uses two methods, an indirect method involving Japan and supporting nations that share common democratic values, such as Australia, India, and even New Zealand (the formation of the East Asia Summit in 2005). The second method utilizes the Asia-Pacific Economic Cooperation (APEC) and Trans-Pacific Partnership (TPP), overshadowing regionalism among East Asian states.51

The idea of Free and Open Indo-Pacific as both the leading actors, Japan and the US, cannot guarantee the security of East Asian states as better as China holds the potential to provide. It is a fact that China has already established itself as a regional and global power, and the idea of disregarding China’s influence is off the table, especially
when East Asian states are politically, economically, or militarily dependent on China. East Asian states cannot completely break their economic ties with China; therefore, the US can balance China’s growing influence. Moreover, the US does not share geographical proximity with the East Asian region. Thus, the entire responsibility lies with Japan to counter or initiate a military confrontation with China. The US-Japan relationship seems interesting since Japan faces constitutional limitations to using force and does not hold enough military capabilities to confront China’s expanding military power. Such practical realities essentially undermine the credibility of the region’s collective identity and collective security.

While the progression of US-Japan relations comes with challenges, they also hold a lot of opportunities for regional states. Building upon multilateral ties through a sense of collective identity, the US-Japan alliance can enable a substantial security architecture, especially for East Asian states. Partnerships, such as JUSEP, JUSDEP, and JUMPP, work towards improving energy security, cyber security, and the digital economy, particularly for the ASEAN states. They ensure the region’s security on traditional means and non-traditional ones. Both conditions improve regional security on maritime, cyber, and outer space frontiers. Japan has proven to be a key ally in improving US relations with East Asian states; however, it has recognized the need for a certain degree of cooperation with China. While China’s military capabilities are one of the prime threats to the region, there is still a possibility of cooptation between the US, Japan, and China. Japan’s FOIP vision is the one that prompts more inclusivity and supports BRI for regional stability and prosperity. It holds the possibility of cooperation with China without giving in to its increasing pressure or demands. It may also keep some opportunity to increase collaboration between the US and China, where the former can view the latter as less of a threat.

Conclusion

The US-Japan relations are an example of how collective identity has made these two states from adversaries to one of the most important alliances in the region. The progression of this relationship in the post-Cold War era, with changed Japanese identity and increased dependency on the US, has paved the way for collective security efforts, traditionally and non-traditionally. With the perceived threats from China and North Korea as ‘Other,’ the US-Japan alliance has become of utmost importance for the region. They help strengthen regional states by building strategic partnerships and providing assistance, including military, maritime, cyber, space, energy, and digital economy. Building a solid and stable East Asian security architecture secures the region significantly. The FOIP vision is another point of convergence that promotes openness, inclusivity, peace, and prosperity. All those states that share these values can strengthen collective identity and maintain collective security. The US and Japan have proven that partnerships and alliances can progress and strengthen regardless of a potential threat. Their emerging relations can improve and increase regional security cooperation and form a collective identity strengthening East Asian security architecture through shared values and interests.
References

4. Ibid.
22. Ibid.
30. Ibid.
32. Ibid.
35. Ibid.
38. Ibid.
42 Ibid.
48 Ibid.
50 Ibid, 10.
52 Ibid, 11.
53 Ibid, 4.
54 Ibid, 8.