National Security Law

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This Article surveys 2016 international legal developments relevant to National Security Law.1

I. Surveillance & Privacy

A. United States

Following the February 2015 San Bernardino shootings, the Federal Bureau of Investigation (FBI) and Apple began a lengthy court battle that propelled the conversation between modern technology and national security surveillance. The FBI sought to gain entry into the phone without triggering the mechanism that would wipe the phone after ten unsuccessful attempts to enter the correct password.2 Although the FBI was eventually able to gain access to the phone using a third-party contractor, Apple’s challenge initiated intense public debate and was seen as a flashpoint between privacy and national security.

The fight between the Federal government and tech companies within the United States escalated following the United States Supreme Court’s approval of changes to a key provision in the Federal Rule of Criminal Procedure 41—Searches and Seizures.3 The adjustments to the rule give law enforcement officials the ability to go before a magistrate judge and obtain a


1. For developments during 2015, see James D. Carlson et al., National Security Law, 50 ABA/SIL YIR (N.S.) 499 (2016).
warrant allowing remote access while searching electronic storage devices and electronically stored information located within or outside the jurisdiction of the court. The rule applies if the district where the information is located has been concealed through the use of technology or if the computer in question is involved in fraud and located within five or more districts. Critics of the amended rule argue it will significantly expand the government’s ability to conduct remote access searches to further their investigation by removing jurisdictional requirements. With no Congressional intervention, the amended Rule 41 took effect December 1, 2016.

B. CANADA

A recent Canadian federal court decision could have an impact on the interpretation of surveillance statutes around the world, particularly in the Five Eyes intelligence-sharing network, comprised of Canada, the United Kingdom, Australia, New Zealand, and the United States. In October 2016, a Canadian federal judge ruled the Canadian Security Intelligence Service illegally retained data collected during investigations. The decision interpreted Sections 12(1), 2 and 21 of the Canadian Security Intelligence Service Act regarding the collection and retention of information collected through the operation of certain warrants used to retain associated data obtained from service providers. In doing so, the ruling narrowly construed the statute and determined the mandate is limited and does not permit the retention of such data. The decision further specifies that information collected by investigators, accidently or as a “spin-off,” cannot be retained if it is not found to be related to a threat to the security of Canada.

5. Id.
decision follows a trend in which the oversight and parameters of security agencies are being scrutinized following an outcry of civil liberties concerns.

II. Cybersecurity Developments

Several important cybersecurity developments occurred during 2016. As discussed below, these developments included: (a) major cyber-hacking of various organizations and individuals in or associated with the Democratic Party that is widely viewed as having been perpetrated by Russian entities; (b) a massive distributed denial of service (DDoS) attack targeting the Domain Name System (DNS) service of the Dyn company that disrupted internet access to major websites for millions of Americans on a short-term basis; (c) the issuance of various kinds of cybersecurity guidelines by several U.S. Government (USG) agencies; and (d) the release of an important report with numerous cybersecurity recommendations by the Commission on Enhancing National Cybersecurity.

In June 2016, it was alleged that Russian hackers had penetrated the computer network of the Democratic National Committee (DNC) for nearly a year before being thwarted, and that, during that time, the hackers had been able to read all of the DNC’s e-mail and chat traffic.12 Subsequently, many of the DNC’s emails were leaked shortly before the Democratic National Convention was held in Philadelphia in July 2017, which resulted in the resignations of several high-ranking DNC members. Based on extensive analysis of the hacking of the DNC’s computer network, numerous experts concluded that the hacking had been perpetrated by two Russian entities commonly referred to as “Fancy Bear” and “Cozy Bear,” which are widely believed to be operatives of the Russian Government.13

Major breaches of the email accounts of other entities and people affiliated with the Democratic Party also occurred in 2016. In July 2016, the Democratic Congressional Campaign Committee’s (DCCC) computer network was reported to have been hacked. The FBI subsequently launched an investigation relating to the incident and concluded that the Russian Government likely perpetrated the attack.14 In October 2016, it was discovered that the e-mail account of John Podesta, campaign manager for

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Hilary Clinton’s presidential campaign, had been hacked. Based on its investigation into the matter, the FBI again expressed its view that the Russian Government likely perpetrated the hacking of Podesta’s e-mail account.\textsuperscript{15}

Other entities also engaged in cyber-attacks on United States companies in 2016. On October 21, 2016, a massive DDoS attack targeted the DNS service of Dyn, which caused an extended Internet outage that resulted in millions of Internet users being unable to access at least 80 websites, including those of Twitter, PayPal, Amazon, and Netflix.\textsuperscript{16} Sources at Dyn stated tens of millions of IP addresses were used to overwhelm the company’s servers, a large portion of which came from internet-connected devices that had been co-opted by a type of malware, called Mirai.\textsuperscript{17}

Even before the attack against Dyn, the USG had become concerned about possible large scale cyber-attacks that could be launched by massively infecting Internet of Things (IoT) devices (e.g., routers, and webcams). Given this concern, and in light of the attack against Dyn, on October 26, 2016, the FBI issued a Private Industry Notification that provided a list of precautionary measures that stakeholders should take to mitigate a range of potential DDoS threats.\textsuperscript{18} Subsequently, on November 15, 2016, the U.S. Department of Homeland Security (DHS) issued non-binding guidance on principles that should be followed when developing IoT security measures,\textsuperscript{19} and on that same date, the National Institute of Standards and Technology (NIST) published guidelines on systems engineering processes that should be utilized when designing security to be integrated into IoT devices.\textsuperscript{20}

The United States Government issued additional general cybersecurity guidance in 2016. On July 26, 2016, the Obama Administration issued a Presidential Policy Directive on United States Cyber Incident Coordination (“PPD-41”), which sets forth the principles that federal agencies should use

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\item See id.
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in responding to any cyber incident that is brought to their attention.\textsuperscript{21} Under PPD-41, federal agencies are required to undertake the following three concurrent lines of effort: (1) threat response coordinated by the FBI; (2) asset response coordinated by the U.S. Department of Homeland Security (DHS); and (3) intelligence support and related activities coordinated by the Office of the Director of National Intelligence (ODNI).\textsuperscript{22}

In 2016, President Obama also established the Commission on Enhancing National Cybersecurity pursuant to Executive Order 13718 of February 9, 2016.\textsuperscript{23} In accordance with its mandate, on December 1, 2016, the Commission submitted a report to President Obama in which it made numerous short-term and long-term cybersecurity recommendations, many of which emphasized the need for joint public-private action.\textsuperscript{24}

III. Tensions Between the United States and Russia

Tension between the United States and Russia increased significantly during much of 2016. Areas of ongoing concern include: (1) Russian involvement in Syria, (2) interference with the U.S. election, and (3) security measures in Europe.

Tensions over the five-year Syrian civil war reached an all-time high this year. At one point, diplomatic negotiations stopped due to Russian and Syrian airstrikes on Aleppo,\textsuperscript{25} and a United States' acknowledgement that it bombed Syrian soldiers.\textsuperscript{26} President Putin cited tensions in Syria and United States aggression for Russia’s withdrawal from a long-standing bilateral agreement on the disposition of plutonium used in nuclear weapons.\textsuperscript{27}

Purported Russian efforts to interfere with the United States’ 2016 presidential election – described as both espionage and information

\textsuperscript{22} Id.
operations—raised significant legal and political concerns. Intelligence and Homeland Security officials accused Russia, in cooperation with the websites WikiLeaks, DCLeaks, and Guccifer 2.0, of stealing and disclosing emails from the Democratic National Committee and other institutions and individuals, and stated that these actions were “intended to interfere with the United States election process.” Similarily, Admiral Michael S. Rogers, Director of the National Security Agency, stated: “This was a conscious effort by a nation-state to attempt to achieve a specific effect.”

In an effort to deter Russian aggression in Eastern Europe, the United States announced several thousand troops would be deployed to Poland, Lithuania, Latvia, and Estonia in coordination with other NATO forces. This action was likely in response to Russian military incursions in the territory of Estonia, Lithuania, and Poland, and multiple “close calls,” including the use of Russian jets in April to buzz the U.S. missile destroyer U.S.S. DONALD COOK on the Baltic Sea.

Additionally, the United States imposed new sanctions against Russian targets in reaction to the invasion of Ukraine in 2014. John Smith, Acting Director of the Treasury’s Office of Foreign Assets Control stated: “Treasury stands with our partners in condemning Russia’s violation of international law, and we will continue to sanction those who threaten Ukraine’s peace, security and sovereignty.”


Russia views these moves, along with NATO control of missile defense systems in Turkey and missile interceptors in Romania, as provocative and a threat to Russia’s nuclear deterrent. In response, Russia continued massing troops on the border with Ukraine, started militarizing the Crimean peninsula, announced an increase in troop exercises, and issued threats to neighboring states.

In a move that will further polarize the United Nations Security Council, Russia is strengthening ties with China. The two signed the Declaration of the Russian Federation and the People’s Republic of China on the Promotion of International Law. The Joint Declaration describes in broad terms shared approaches to (1) principles of international law, (2) state sovereignty, (3) use of force, (4) non-intervention, (5) dispute resolution, (6) economic sanctions, (7) terrorism, (8) immunity for state officials, (9) United Nations Convention on the Law of the Sea, and (10) jointly promoting international law.

Russia also unsigned the Rome Statute of the International Criminal Court, similar to actions taken by the United States in 2002. Russia’s unsigned is a symbolic act of protest regarding the Court’s investigations in Georgia, Crimea, and, possibly, Syria.

IV. Hostilities in Syria

As co-chairs of the International Syria Support Group, the United States and Russia adopted the Terms for a Cessation of Hostilities in Syria (CoH) on February 22, 2016. This measure was in support of U.N. Security

35. Id.
39. Id.
41. Id. See also Ingrid Wuerth, China, Russia, and International Law, LAWFARE BLOG (Jul. 11, 2016), https://www.lawfareblog.com/china-russia-and-international-law.
Council Resolution 2254\textsuperscript{44} and was designed to achieve a peaceful settlement to the Syrian conflict and to establish conditions for a Syrian-led political transition process.\textsuperscript{45}

The CoH requires, inter alia, organizations engaged in military or paramilitary hostilities in Syria—other than ISIS, Jabhat al-Nusra, or any UN-designated terrorist organizations—to indicate to the United States or Russia their commitments to and acceptance of the CoH, implementation of UN Security Council Resolution 2254, including the readiness to participate in the UN-facilitated political negotiation process, the cessation of attacks against the Armed Forces of the Syrian Arab Republic and any associated forces, and allowing humanitarian agencies safe access where necessary to reach people in need of assistance.\textsuperscript{46} The UN Security Council endorsed the CoH and demanded that all parties to whom the CoH applied fulfill their commitments under it.\textsuperscript{47} By May 2016, the CoH resulted in progress in the areas of North Latakia and East Ghouta,\textsuperscript{48} but it largely unraveled throughout the remainder of 2016.\textsuperscript{49} The United States-led coalition, Russia, and Syria are permitted under the CoH to continue military actions against ISIS, Jabhat al Nusra, and other UN-designated terrorist organizations.

Since entering the conflict in September 2015, Russia has conducted military operations against ISIS and anti-Assad opposition groups, in cooperation with President Bashar al-Assad’s Syrian government.\textsuperscript{50} The


\textsuperscript{45} Joint Statement, supra note 43.

\textsuperscript{46} Id.


United States has waged parallel but separate military operations against ISIS, while backing certain groups opposed to the Assad government.51
In March 2016, Russian airstrikes aided Syrian forces in overtaking ISIS-controlled Palmyra.52 In August 2016, Russia began staging missions from Hamad in northwest Iran targeting ISIS and other groups fighting in the city of Aleppo.53 The airstrikes in Aleppo resulted in heavy civilian casualties, leading to strained United States-Russia relations, and the United States suspending bilateral CoH discussions. However, in September 2016, another cease fire was agreed,54 which unraveled within days after the United States mistakenly bombed a Syrian army base.55 Moreover, the United States condemned Russia for violating its obligations under international humanitarian law and UN Security Council Resolution 2254.56 Although Russia halted its airstrikes on October 20, 2016,57 Russia and Syria commenced a new offensive in eastern Aleppo on November 15, 2016.58

The Organization for the Prohibition of Chemical Weapons59 (OPCW) released an Executive Council Decision on November 11, 2016, adopting the conclusions of the OPCW-United Nations Joint Investigative Mechanism that Syria used chemical weapons on three occasions: in Talmenes on April 21, 2014; in Qmenas on March 16, 2015; and in Sarmin

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on March 16, 2015. In addition, the Decision concluded that ISIS used mustard gas in Marea on August 21, 2015. The OPCW raised concerns on September 7, 2016, about alleged use of chemical weapons in the northern area of Aleppo earlier that month. The Syrian National Coalition, the main anti-Assad opposition group, and Russia accused each other of using chlorine explosives in these attacks.

V. Nuclear Arms Control

On October 27, 2016, the First Committee of the United Nations General Assembly voted 123 to 38 with 16 abstentions “to convene in 2017 a United Nations conference to negotiate a legally binding instrument to prohibit nuclear weapons, leading towards their total elimination.” The conference, which is scheduled for March, June, and July 2017 in New York, will be open to all member states.

Russia, the United States, and most members of NATO voted against the resolution. The United States criticized the resolution as an unwise departure from a gradual process of negotiating “pragmatic steps to reduce the role and number of nuclear weapons.”

The First Committee also voted 174 to 4 with 4 abstentions for “decreasing the operational readiness of nuclear weapons systems” to reduce the risk of accidental nuclear war through mistaken, unintentional, or
The United States State Department has asserted that Russia has been violating the Intermediate Nuclear Forces (INF) Treaty since 2014. This treaty prohibits the development, testing, or possession of ground-launched cruise missiles (GLCMs) with a range capability of 500 km to 5,500 km, or launchers for such missiles. The United States asserts Russia is progressing toward deployment of a prohibited GLCM. Washington called for a meeting of the Special Verification Commission under Article VIII of the INF Treaty to examine the issue. The State Department subsequently confirmed that such a meeting took place on November 15-16, 2016.

For its part, Russia has countercharged that certain elements of the U.S. missile defense and armed drone programs violate the INF. The United States has denied those assertions.

Citing United States’ “hostile actions,” including economic sanctions, the Russian government announced its withdrawal from the Plutonium Management and Disposition Agreement (PMDA) in October 2016. The Agreement’s purpose is to render surplus plutonium unusable for nuclear weapons.

Russia also announced its withdrawal from an agreement between the Russian State Nuclear Energy Corporation (Rosatom) and the U.S. Department of Energy (DOE) for research on measures to convert research reactors from weapons-usable high-enriched uranium (HEU) to low-enriched uranium (LEU). Moscow stated that Russia would continue its conversion program “independently” without U.S. aid. DOE announced...

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that the Russian withdrawal would have “no practical effect” on U.S. international efforts to convert reactors from HEU to LEU.\(^{73}\)

On October 5, the International Court of Justice (ICJ) held that it lacked jurisdiction to hear a claim by the Republic of the Marshall Islands (RMI) against India, Pakistan, and the United Kingdom.\(^{74}\) The claim asserted that those nations were violating customary international law (and, in the case of the UK, treaty obligations under Article VI of the Non-Proliferation Treaty (NPT)) by failing to negotiate in good faith for nuclear disarmament. The ICJ held that there was not sufficient evidence of a justiciable dispute by a vote of 9-7 as to India and Pakistan, and 8-8 with the President’s casting vote as to the UK. The ICJ recited its unanimous 1996 finding that there is a legal obligation to pursue and to conclude negotiations leading to nuclear disarmament.\(^{75}\)

All nine nations openly possessing nuclear weapons\(^{76}\) continued to modernize and upgrade their nuclear arsenals in 2016, in some cases adding new capabilities.\(^{77}\) The quantitative nuclear arms race between India and Pakistan continued, with Pakistan continuing to deploy short-range nuclear missiles, despite United States’ expressions of concern that this could lower the threshold for actual use of nuclear weapons.\(^{78}\) North Korea conducted its fifth nuclear weapon test.

VI. International Reaction to Democratic People’s Republic of North Korea (DPRK) Weapon Development

Tensions continued to mount through 2016 between the international community and the DPRK, stemming from the DPRK’s evolving weapons program and human rights abuses.

The DPRK conducted nuclear detonations in February and September 2016, eleven medium- or intermediate-range ballistic missile test launches, four submarine ballistic missile test launches, a short-range ballistic missile

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74. India, Pakistan, and the United Kingdom were the only nuclear weapon states that had accepted the compulsory jurisdiction of the ICJ. RMI had asked the other nuclear weapon states to appear voluntarily in the ICJ case, but none did so.

75. Full text of all opinions available through www.icj-cij.org/homepage/.

76. United States, Russia, China, United Kingdom, France, India, Pakistan, Israel, and North Korea.


test launch, two new rocket engine tests, and a space launch.\textsuperscript{79} Additionally, in June 2016 the IAEA reported North Korea appeared to have reopened the Yongbyon nuclear facilities to produce plutonium from spent fuel, which the DPRK confirmed to Japan’s Kyodo news agency.\textsuperscript{80} This aggressive weapons development program triggered sanctions, condemnation, and widespread concern regarding stability on the Korean peninsula.\textsuperscript{81} In response, the UN Security Council passed Resolution 2270,\textsuperscript{82} which “condemned in the strongest terms the DPRK’s previous nuclear test conducted in January.”\textsuperscript{83} The resolution, \textit{inter alia}:

- Requires states to expel DPRK diplomats or nationals working on behalf of a designated person to violate sanctions;\textsuperscript{84}
- Calls on states to conduct inspections of cargo that has originated in or is destined for the DPRK;\textsuperscript{85}
- Prohibits DPRK’s sale of coal, iron, iron ore,\textsuperscript{86} gold, titanium ore, rare earth minerals;\textsuperscript{87}

The resolution seeks to ensure that Pyongyang’s latest provocations are met by efforts to shrink the number of overseas locations from which North Koreans can facilitate illicit activity, and increase the cost of doing business in those countries. . .North Korea’s official foreign presences have traditionally been essential nodes in the country’s illicit trade networks . . . UNSCR 2270 takes aim at those ‘safe spaces.’\textsuperscript{88} In late November, in response to the DPRK’s September nuclear detonation, the United Nations Security Council passed Resolution 2321:\textsuperscript{89} 

\textsuperscript{81} China, Russia, France, and the EU among others, issued condemnations at various times this year. See, e.g., \textit{International Leaders Condemn North Korea's latest nuclear Test}, Euronews (Sep. 9, 2016), http://www.euronews.com/2016/09/09/international-leaders-condemn-north-korea-s-latest-nuclear-test.
\textsuperscript{82} S.C. Res. 2270 (Mar. 2, 2016).
\textsuperscript{83} Intl’l Atomic Energy Agency [IAEA], \textit{Statement by IAEA Director General Yukiya Amano on DPRK} (Sept. 9, 2016), https://www.iaea.org/newscenter/statements/statement-by-iaea-director-general-yukiya-aman0-0.
\textsuperscript{84} S.C. Res. 2270, supra note 82, ¶13.
\textsuperscript{85} S.C. Res. 2270, supra note 82, ¶18.
\textsuperscript{86} S.C. Res. 2270, supra note 82, ¶29.
\textsuperscript{87} S.C. Res. 2270, supra note 82, ¶30.
\textsuperscript{88} Andrea Berger, \textit{The New UNSC Sanctions Resolution on North Korea: A Deep Dive Assessment}, 38 North Blog (Mar. 2, 2016), http://38north.org/2016/03/aberger030216/; Annex I to S.C. Res. 2270, supra note 82, adds 16 persons, including trade representatives in Iran, Syria, and Viet Nam, while Annex II adds 12 entities.
To slash North Korea’s biggest export, coal, by about 60 percent . . . . The resolution also bans copper, nickel, silver and zinc exports . . . . China, believed to be the only country that buys North Korean coal, would slash its imports by some $700 million compared with 2015 sales under the new sanctions . . . . Banning North Korean exports of copper, nickel, silver and zinc would slash about $100 million in revenue . . . .

The United States took its own actions in response to the DPRK’s weapons development. It passed the North Korean Sanctions and Policy Enforcement Act of 2016, with President Obama signing Executive Order 13722 to effectuate this law.

The new sanctions extend a ban on exporting goods to North Korea to cover all items set out in Section 6(j) of the Export Administration Act [of] 1979 (50 U.S.C. § 4605) and broaden the scope of asset blocking rules to include entities controlled by or acting on behalf of a blocked person. Previously, the rules only applied to entities owned 50% or more by a blocked person.

The United States took actions to further block DPRK’s access to financial institutions, issuing a notice of finding that the Democratic People’s Republic of Korea is a Jurisdiction of Primary Money Laundering Concern pursuant to section 311 of the USA PATRIOT Act, and an implementing rule that “would require U.S. financial institutions to implement additional due diligence measures in order to prevent North Korean banking institutions from gaining improper indirect access to U.S. correspondent accounts . . . [and] prohibit the use of third-country banks’ U.S. correspondent accounts to process transactions for North Korean financial institutions.” Lastly, in July the United States and Republic of

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Korea (i.e., South Korea) agreed on the United States deploying a Terminal High Altitude Area Defense battery over Chinese objections.98,99

VII. Developments in the South China Sea

Control of the South China Sea continued to capture headlines through 2016 due to on-going disputes involving overlapping and competing island and maritime claims among several states in the region, including China, Taiwan, Vietnam, the Philippines, Malaysia, Brunei, and Japan.100 Tensions in the West are generally viewed as being driven by China’s stance in its assertion of sovereign rights to the waterways and tiny island chains of the Spratly and Paracel Islands, as well as Scarborough Shoal.101 Vietnam, Malaysia, the Philippines, and Taiwan have all expanded islands in the Spratlys, but at nowhere near the same scale as China.102

The South China Sea occupies a strategic position on the world stage. Over half the world’s annual merchant fleet tonnage passes through its various choke points, and approximately US$5.3 trillion, or 30 percent of the annual world trade, passes through the South China Sea.103 Due in part to the

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99. The United States also offered its own shows of force, launching two Minuteman III ICBMs within a week in February. David Alexander, U.S. Test-fires ICBMs to Stress its Power to Russia, North Korea, REUTERS (Feb. 26, 2016), http://www.reuters.com/article/us-usa-defense-nuclear-idUSKCN0VZ02R. Additionally, two overflights of South Korea by U.S. and South Korean Air Force were conducted after the January and September North Korean nuclear detonations, with the flyovers after the September DPRK nuclear detonation conducted by B-1B bombers.


103. CSIS Memo 14, supra note 102. There are also varying estimates for oil and gas reserves, but this prospect may be a mere proxy for sovereign rights over the sea. Ralph Jennings, Oil Becoming Code for Sovereignty in Contested South China Sea, Voice of America (Nov. 23, 2016),
strategic importance of these waters, the United States, while claiming neutrality, has maintained a territorial presence through significant naval and air patrols, termed “freedom of navigation operations,” as has China, resulting in a build-up of tensions between the two powers.\footnote{Julian G. Ku, M. Taylor Favel, & Malcolm Cook, Freedom of Navigation Operations in the South China Sea Aren’t Enough, FOREIGN POLICY (May 16, 2016), http://foreignpolicy.com/2016/05/16/freedom-of-navigation-operations-in-the-south-china-sea-arent-enough-unclos-fonop-philippines-tribunal/.}


In July 2016, the Permanent Court of Arbitration in The Hague granted a decisive victory to the Philippines when it ruled against China’s maritime claims in Philippines v. China.\footnote{The South China Sea Arbitration (The Republic of Philippines v. The People’s Republic of China), Award, § V(F)(d)(278), 17 (Perm. Ct. Arb. 2016), http://www.pcacases.com/pcadocs/PH-CN%20-%2020160712%20-%20%20Award.pdf.} The panel ruled overwhelmingly in favor of
the Philippines, which had argued that its maritime territory had been illegally seized by China. The court, inter alia, ruled that China did not have a legal basis to claim historic rights to resources that China claimed were within its sovereign rights. The tribunal further held that some of the waters at issue are within the exclusive economic zone of the Philippines and are not overlapped by any possible entitlement of China. The tribunal stated that China had violated the Philippines’ sovereign rights in those waters through the construction of artificial islands and its interference with Philippine fishing and petroleum exploration. Although the verdict is binding and final, the court lacks enforcement mechanisms. China, which refused to participate in the proceedings and does not acknowledge the tribunal, dismissed the ruling as “null and void.”

Subsequently, as China’s aggressive activities continued, China’s President Xi Jinping and Philippine President Rodrigo Duterte agreed to undertake bilateral negotiations in an attempt to reach an accommodation. An informal deal was apparently reached in November, with reports that China had begun to allow Philippine fishermen to operate in Scarborough Shoal, waters contested by China and the Philippines. It has been suggested that the arrangement gives both parties what they seek, while sidestepping the more contentious sovereignty issue over Scarborough Shoal.


113. Id.

114. Id.

115. See, e.g., Gillian Wong & Gerry Shih, China Rejects Ruling on South China Seas as ‘null and void,’ ASSOCIATED PRESS July 12, 2016), http://bigstory.ap.org/article/d6d1fe0f98341aba8440b321c35ef6/china-rejects-ruling-south-china-sea-null-and-void.


117. Id.

118. Id.