# From The Lack of Women Representation to the Case of Comfort Women: An Analysis of Gender Issues in Diplomacy and Diplomatic Relations

Syifa Kamila Azzahra, Emmy Latifah Department of International Relations, Faculty of Social and Political Sciences Universitas Sebelas Maret, Surakarta, Indonesia

#### kamila@student.uns.ac.id, emmy.latifah@yahoo.com

## Article Information

# Submitted:

June 18<sup>th</sup>, 2021 Accepted: August 15<sup>th</sup>, 2021

#### keywords:

gender; diplomacy; gender and diplomacy practice; feminism; comfort women As time goes by, public awareness of gender issues is reaching an uphill trend, due to the increasing number of activism movements concerning it. The scope of diplomacy is not an aspect that is free from the problem of gender inequality. Starting with analyzing the under-representation of women in diplomatic posts issue, to the case of comfort women that characterizes diplomatic relations between South Korea and Japan, this article aims to provide an illustration that shows the fact of even though there has been better inclusiveness, there is still nevertheless a need for reforms in the world diplomacy system to be more open to the principals of gender equality.

Abstract

### I. Introduction

When talking about diplomatic positions or even the practice of diplomacy itself, it is generally seen and often associated with positions that are reserved for men. After all, diplomatic posts in a country exist as a bridge between the two sending and receiving states. therefore, this position talks a lot about high political issues that historically have not been held in the hands of women. Women's role in diplomacy used to only be as the wives of diplomats. However, as times goes by and with the increasing number of movements of gender equality in society, there has been newfound openness in higher institutions regarding the

participation of women as actors in the practice of diplomacy [1].

Starting from the early 20th century, more precisely in the 1920s, began the idea of giving foreign service responsibilities to female diplomatic actors. Proved in the United States, with the assignment of Lucille Atcherson from Ohio who served in Berne and Panama in 1922, Pattie Field from Colorado who was assigned to Amsterdam in 1925, Frances E. Willis from Illinois who had served in Valparaiso, Santiago, Stockholm, and. Brussels since first commissioned in 1927, Margaret Warner of Massachusetts was assigned to Geneva in 1929, Nelle B. Stogedall who served in Beirut

from 1921, Constance R. Harvey of New York was assigned to Basel and Ottawa in 1930, and Margaret M. Hanna from Michigan who was commissioned in Geneva in 1937 [2].

Until the 1990s, it was undeniable that the development of society and its perception of gender equality and the emergence of movements including the emergence of intergovernmental organizations (IGOs), nongovernmental organizations (NGOs), and transnational coalitions served as the driving force that continued to demand the realization of said agenda. Those forces put a strong emphasis on framing the issue of inequality women's in representation in diplomacy to a wider realm with a higher level of seriousness, such as when the United Nations' Security Council (UNCR) adopted а resolution regarding women's participation in diplomacy called resolution 1325 on Women, Peace, and Security (WPS) in 2000 [3]. Not only that, broadly speaking, this WPS resolution has generated awareness of the movement regarding this issue, as evidenced by the adoption of WPS resolutions in foreign regulations of several states such as Australia, Sweden, Canada, and Norway to continue to support the of equalizing agenda gender representation and women's participation in diplomacy and peace efforts [4][5].

However, even after the practice of placing women in diplomatic posts began to be implemented, even from the very beginning some opinions emerged that were still adamant with the that there notion were manv reasons why women should not be involved in the world of diplomatic services. Looking back at the early era of women in diplomacy, much criticism was expressed by the public regards the in to appointment of Ruth Bryan Owen M, who was the first American woman to serve as a career diplomat and was assigned to Denmark in 1934 [6], as head of States diplomatic the United mission to Norway. The majority of the public questioned the competence of a woman as a head of a diplomatic mission [7].

Many other reasons were expressed bv critics of the placement of women in diplomatic posts. The first reason being how the inequality in the treatment of women, in general, will make it difficult for them to carry out their missions, the second was related to the inability of women who incidentally were beginners in the scope of diplomatic missions to be placed in posts that are not comfortable, for example, related to extreme climates and other things, which makes them then placed in more attractive posts, which will then reap protests from the male peers, and finally arguments about how women will eventually be tempted by the prospect of marriage which will be a hindrance to them in carrying out their duties, and will eventually choose to leave their assignments [8].

These criticisms seemed to be typical of their time and may feel less relevant to be applied in the 21st century. However, even a century later, the presence of men still dominates over women in regards to diplomatic positions. In one study it was found that the percentage of men as diplomatic representatives is eighty-five percent [9], and the scale of male negotiators and chief mediators is also much higher than women in peace negotiations [10]. Differences in the masculinity and femininity of a diplomat can also have a great influence on his ability to advance in his career [11]. Although there have been many developments that have taken place, the fact remains that female and male diplomats are treated differently even today.

In addition, gender relations and diplomacy are not only about inequality in gender representation, but, also related to gender issues which are the subject of diplomacy between two countries that have diplomatic relations, which then become part of their mission. One example of problems related to gender issues that are the subject of diplomatic missions is the issue of comfort women, a conflict between Japan and South Korea wherein the period before and after the Second World War, women throughout Asia, including South Korea were forced by Japanese troops be made sexual slaves [12].

This paper aims to find out the extent to which developments have occurred regarding the inequality of participation of one identity gender compared to another, whether there is а relationship between the gender identity of a diplomat in carrying out their duties, gender-related issues that are the subject of focus for several diplomatic missions between countries as well as related case studies and whether the greater representation of women in a diplomatic mission will influence both the existence and resolution of these cases.

#### II. Conceptual Framework

## Feminism

In analyzing and explaining various gender issues. most researchers took the feminist approach. Feminism is a theory with the basic view and principle that all women have an equal position with men [13]. There are many branch theories of feminism itself, such as liberal, cultural, materialist or socialist feminism, radical, psychoanalytic, and postmodernist, all of these branches can present their discourses [14]. By applying the theory of feminism and looking at its practice, it can be understood how the practice of diplomacy has shifted over time along with how people's views have changed regarding issues related to gender [15].

Feminism studies also study the concept of masculinity and femininity which then leads to how variables these two produce inequality in treatment in society [16]. By using this concept, we can explore why diplomacy itself then appears to be reserved to the principles of masculinity, and whether there is а space in diplomacy to accommodate the feminine side or whether the two concepts can co-exist. This concept can also be applied to the issue of the comfort women case where there juxtaposition is а of femininity and masculinity between the women who are the subject of war crimes, comfort women, and the Japanese military forces who are the perpetrators of the crime.

In addition, feminist thinkers have also conducted many searches related to the patriarchal system. The patriarchal system itself has a definition as a social system where the role of men is far more dominant than the role of women, both politically and morally, this causes men to have special rights regarding social control and even patriarchal property [17]. The system can be divided into two types, the first is the private patriarchal system, namely that which occurs in the privacy of the household, example for where women are controlled before they can reach the public sphere directly by individual patriarchs who share the household with them so that women cannot have access to the public sphere at all, the second is public patriarchal the system, where women have access to both spheres in society, namely private and public, but in the public sphere, women have limited capabilities due to the control of patriarchal agents in the [18]. community system The concept of patriarchy can be used in the analysis of why there is an imbalance in the representation of women in the world of diplomacy systemically.

Broadly speaking, both genderization and patriarchal systems can be used as auxiliary tools in analyzing the two topics to be discussed in this paper, namely the inequality in the representation of women in diplomatic missions and the existence of the comfort women case which is the cause of the presence of tensions between South Korea and Japan.

# III. Analysis

## **Women in Diplomatic Positions**

Historically, many professions have traditionally been professions that are synonymous with men and masculinity, including those related to politics, because politics is a subject that has the main focus on regulating and gaining power [19], something that is very closely associated with masculinity. Viewed historically, in the 19th-century diplomacy remained a profession that was dominated by male actors [20]. However, without the invisible roles of women who were in positions as wives, support staff, ambassadors, and others, the diplomatic process will not be able to take place [21][22]. The realm of diplomacy in the hands of women was initially only reduced to the wives of diplomats, who had a role at least in providing advice, gathering information. and spreading rumors and false information which can serve a great use [23].

This was expressed in Linse's writing as a practical and profitable thing to be done by sending states because most diplomats already have a spouse or wife, then the country can get representation in the form of tasks which are then carried out by diplomatic wives without the need to give salaries for the individual wives [24],essentially, these governments can get two representatives by paying only one person. The existence of these restrictions may be one of the reasons why women seem to have invisible barriers in the scope of diplomacy that are difficult to cross. As long as they are still seen as wives by politicians, the media, or other diplomatic actors, it doesn't matter what contribution they have done, the sexist wall will still exist and even stand firmly separating their roles in real diplomacy which will still be firmly held by male actors and the concept of masculinity will continue to be tied around it [25]. Therefore, it can be concluded that the political nature of marriage will play a large role in opening or closing the gates of women in the world of diplomacy.

However, in the 1970s and 1980s, just as the second wave of feminism was taking place, women diplomats who married from Canada. Britain. Sweden. and America founded new organizations and revived old ones, they also expressed some new demands. namely the recognition of the contributions they made to the policies their husbands' of assignments. Some even wanted more than just recognition, they official jobs, pensions, wanted benefits, and more radical ones even demanded salaries [26]. The organizing efforts of these diplomats' wives show how much the governments rely on the control of their marriages to carry out the practice of international relations [27]. According to Beryl Smedley, a wife of a retired senior British diplomat, being the wife of a diplomat is a profession in itself, although it is unrecognized and unpaid [28]. This means that simply by having marital status with a diplomat, a person is automatically required to have certain skills, they then have responsibility for certain things as well, just like a normal job, only without the wages and recognition usually obtained by someone with the official profession.

Lately, although the numbers still can't match the number of their male counterparts, the emergence of female career diplomats seems to be more of a commonplace. However. the emergence of women in diplomatic careers is a fairly new phenomenon. As discussed prior, the United States only allowed the entry of women in the sphere of diplomatic careers in the 1920s, followed by Turkey in 1932 but then Turkey banned it again in 1934 until 1957, the same thing happened in Brazil

where in 1918 Brazil allowed a woman to have a career in diplomacy but then Brazil banned it again in 1938 to 1954, countries such as Canada, Sweden, and Japan only allowed this in 1947, 1948, and 1949 respectively [29][30][31].

Of course, the openness of countries to allowing women to have careers in diplomacy is indeed a significant achievement and is the first step, but the fact is, it is not enough to break down the wall because even after that there was a ban on married women from becoming diplomats by several countries such as Brazil which was not lifted until 1966/1988, the United States in 1971, and Sweden in the 1970s [32][33]. If a woman serving in a diplomatic position wishes to marry before that, they were forced to leave the post.

Currently, where the attitude of the world community and the scope of diplomacy is more friendly towards the presence of female diplomats, in the real world, they still experiencing several are challenges in the current era. In a study conducted by Caroline Linse in which she researched this issue by conducting direct research by interviewing eleven women, who were from Estonia, Germany, Lithuania, South Africa, and the United States. Ten out of eleven were being assigned outside their home countries in the diplomatic professions, and one out of eleven has been assigned but chose to leave to remain in their home country [34].

In this study, two types of aspects were examined, the first was the challenges in the scope of work and the second was the family aspect. In terms of work, it was found that they were expected to work harder than their male colleagues, both at the secretarial and senior levels, some even said that there were difficulties for advancement in their careers which would not have happened had it not been for their status as women [35]. While in the family aspect, several women who were also mothers said problems related the that to education of their children were a problem that was present, more specifically related to language conflicts that would occur, the second problem was related if their husbands later became 'dependent' parties in the relationship, where the wife has a career outside the household and the husband do not [36]. It is arguably untraditional in a heterosexual marriage which may be a source of tension in the family and household.

It can be concluded that the journey of women to obtain a position in the world of diplomacy is a long journey and even now when it is more open than in previous eras and conditions of society, it is still in a state of underrepresentation when compared to the gender identity of men who still have the power of domination to date. It is also evident that they, women with diplomatic careers. still have special difficulties due to their gender identity.

# The Comfort Women Case and South Korea-Japan Diplomatic Relations

Before and during the Second World War, during the Japanese imperialist era, approximately two hundred thousand women, most of them being Korean women, were forced by the Japanese army to be forced into sex work for the Japanese troops [37]. Protests have been held in front of the Japanese embassy building in Seoul, South Korea once a week since 1992 [38], with a total of 1,488 protest movements occurring over the past twenty-nine years [39]. However, the Japanese side continued to show a defensive attitude [40], this was one of the issues that made diplomatic relations between Japan and South Korea tense.

According to Japan's point of view. this problem has been resolved in the bilateral agreement between Japan and South Korea that occurred in 1965 in regards to diplomatic relations between the two countries. In that agreement, all activities that occurred during the post-war period. However, in that agreement, Japan only offered moral support [41]. Japan refuses to accept legal liability in any form, takes a non-involvement defense in cases of systemic sexual slavery, and rejects government interference these activities [42], despite in placement of evidence of the comfort women at stations under the Japanese Imperial Army [43]. The response to this was sour and Japanese of accused the incompetence in facing the fact that they had committed war crimes [44].

In 2015, to be exact on December 28, it was surprisingly announced that the governments of and South Korea had Japan entered into negotiations regarding the comfort women issue and a solution had been reached 'finally and irreversibly' [45]. In these negotiations, Japanese the government apologized and as part its apology, promised of compensation of as much as one billion yen for the establishment of a reconciliation organization and

others [46], however, many are of the view that Japan's actions were merely apologizing, while still not mentioning the problem specifically acknowledging and not the systemic interference of the Japanese government, and giving no money to the surviving victims or their families, and that this act enough [47]. was not This organization made by Japan was later dissolved by President Moon in 2019 [48]. Victims who were directly involved were also not involved in the negotiations before this agreement [49], the lack of women's involvement in cases involving themselves is one of the problems related to gender issues that are rife in the sphere of diplomacy and peace negotiations in general [50].

Efforts to seek a resolution other have involved countries outside of Japan and South Korea, namely the involvement of the United States in efforts to resolve the problem. The involvement of the United States is enough to provide an interesting development of the case. At first, the United States showed great support for South Korea, from the mayor, city council, and members of the US Congress their support expressing [51]. Hillary Clinton, who used to serve as Secretary of State in the US said in 2012 that 'comfort women' is a misleading term and that these women should use the actual term, namely sex slaves [52]. However, the United States' support for this case still had political indications, both US political parties were indicated to want to secure votes from prospective voters from Asian-American voters, because more than before Asia-Americans served as a 'swing vote' for America [53], this was simply because immigration rates continue to grow

and because Asian-Americans represent a large demographic [54].

However, after the agreement on comfort women in 2015, many developments in cases and new political turmoil have occurred. Victims of sexual slavery by Japan in the form of South Korean women tried again to bring the case before the Seoul district central court, but Januarv 2021. the Prime in Minister of Japan refused to appear in court, citing sovereign immunity, doctrine of international law а whereby a country is immune to the jurisdiction of another country [55]. In April 2021, a new judge was assigned to this case, and in contrast to the attitude of the previous judge who rejected the Japanese side's reason for not being involved in the case, the new judge considered the case cannot be continued because there is the principle of sovereign immunity which was mentioned by the Prime Minister of Japan [56].

Meanwhile, the connection of this case to Japan and South Korea's diplomatic relations lies in the United States' new role in this case. The US is now under the new Biden-Harris government. This new government has one of the main missions. In foreign policy issues, it is to overcome North Korea's nuclear weapons arsenal and also deal with the antagonistic to and relations between the US China. This causes the United States to seek an alliance from Japan and South Korea, thus the US has to form good diplomatic relations between the two countries [57]. But at this time, there has been no further official comment made bv the United States government regarding this specific case.

The stopping of the case when the victims themselves immediately demanded justice was a major attack on the struggle for justice and accountability in the comfort women case. Considering that previous agreements were made without the participation of even victims' representatives, and the compensation provided did not show the any sense of accountability shown by the Japanese government towards these former comfort women, since the funds given were not delivered directly to the victims. Up until now, there are still weekly protests held by South Koreans in front of the Japanese Embassy to South Korea which shows that at least from a citizen's point of view, there is still a rejection of the Japanese government's attitude. To a certain extent, this will affect diplomatic between the relations two This case should be countries. resolved through diplomacy such as renegotiation, this time involving the victims to reach a more acceptable resolution, but it seems to be difficult to be conducted at this stage, except perhaps with the help of a third party such as the United States to resolve the conflict.

# IV. Conclusion

Currently, the broad scope of diplomacy is not yet a sphere that truly applies gender inclusivity. Starting from the fact that female workers in the field of diplomacy are still very under-represented and female workers who managed to experience different enter also treatment compared to their male colleagues, to the handling of cases involving violence against women have not been that handled perfectly. It seems that there needs to be a system reform that occurs within the scope of the world of

diplomacy which now seems to be still patriarchal, to achieve a situation where openness to gender equality can be more applied, both in the system and in terms of resolving diplomatic conflicts themselves. In this way, these two issues can be broadly resolved.

# References

[1] Garner, Karen. Shaping a Woman's Global Agenda. Manchester, Manchester University Press, 2013.

[2] Wright, Herbert. "Can a Woman Be a Diplomat?" The North American Review, vol. 248, no. 1, 1939, pp. 101.

[3] Aggestam, Karin, and Ann Towns. "The gender turn in diplomacy: a new research agenda." INTERNATIONAL FEMINIST JOURNAL OF POLITICS, vol. 21, no. 1, 2019, p. 10.

[4] Aggestam, Karin, and Annika Bergman-Rosamond. "Swedish Feminist Foreign Policy in the Making: Ethics, Politics, and Gender." Ethics & International Affairs Journal, vol. 30, 2016, pp. 323-334.

[5] True, Jacques. "Gender and Foreign Policy." Navigating the New International Disorder: Australia in World Affairs 2011-2015, edited by Mark Beeson and Shahar Hameiri, Oxford University Press, 2017, pp. 224-241.

[6] Jeffreys, R. Changing Differences: Women and the Shaping of American Foreign Policy, 1917-1994. Rutgers, Rutgers University Press, 1995.

- [7] Wright, op cit. pp. 102.
- [8] Wright, op cit. pp. 100-101.

[9] Towns, Ann, and Brigitta Niklasson. "Gender, International Status, and Ambassador Appointments." Foreign Policy Analysis, vol. 13, pp. 521-540.

[10] Aggestam, Karin, and Isak Svensson. "Where are the Women in Peace Mediation?" Gendering Diplomacy and International Negotiations, edited by Karin Aggestam and Ann Towns, Palgrave MacMillan, 2018, pp. 149-168.

[11] Neumann, I. B. "The Body of The Diplomat." European Journal of International Relations, vol. 14, no. 4, pp. 671-695.

[12] Dolgopol, Ustinia, and Snehal Paranjape. "Comfort women, an unfinished ordeal: report of a mission." International Commission of Jurists, 1994.

[13] Burkett, Elinor. "Feminism." Britannica,

https://www.britannica.com/topic /feminism. Accessed 24 April 2021.

[14] Ryan, J. Michael. The Concise Encyclopedia of Sociology. Wiley, 2010, pp. 223.

[15] Standfield, Catriona. "Gendering the practice turn in diplomacy." European Journal of International Relations, vol. 26, 2020, p. 141.

[16] Baucom, Donald H., and Brenda S. Sanders. "Masculinity and Femininity as Factors in Feminism." Journal of Personality Assessment, vol. 42, no. 4, 1978, pp. 378-384.

[17] Walby, Sylvia. Theorizing patriarchy. Oxford, Basil Blackwell, 1990.

[18] ibid.

[19] Almond, Gabriel A. Pengantar Ilmu Politik, by Seta Basri, Indie Book Corner, p. 3.

[20] Tinling, T. A Guide to Landmarks of Women's History in the United States. Greenwood Press, 1936.

[21] Cassidy, editor. Gender and Diplomacy. New York, Routledge, 2017.

[22] Sluga, and James, editors. Women, Diplomacy and International Politics Since 1500. London, Routledge, 2016.

[23] Aggestam & Towns, 2019, Op cit. pp. 16.

[24] Linse, Caroline. "CHALLENGES FACING WOMEN IN OVERSEAS DIPLOMATIC POSITIONS." Intercultural Communication and Diplomacy, 2004, p. 253.

[25] Enloe, Cynthia. Bananas, Beaches and Bases : Making Feminist Sense of Internatio. Berkeley, University of California Press, 2014.

[26] ibid.

[27] ibid.

[28] Corbett, Ann. "Beryl Smedley obituary." The Guardian, The Guardian, 4 August 2011, www.guardian.co.uk/theguardian/ 2011/aug/04/beryl-

smedleyobituary. Accessed 25 April 2021

[29] Aggestam, Karin, and Ann Towns. "Conclusion." Gendering Diplomacy and International Negotiation, edited by Karin Aggestam and Ann Towns, Palgrave Macmillan, 2018, pp. 277-293.

[30] Foreign & Commonwealth Office. "Working for FCO." GOV.UK,

https://www.gov.uk/government/o rganisations/foreigncommonwealthoffice/about/recruitment. Accessed 25 April 2021.

[31] McCarthy, Helen, and James Southern. "Women, Gender and Diplomacy: A Historical Survey." Gender and Diplomacy, edited by Jennifer Cassidy, Routledge, 2017, pp. 15-31.

[32] Aggestam & Towns, 2018, Op cit.

[33] Foreign & Commonwealth Office, op cit.

[34] Linse, op cit. pp. 254.

[35] ibid. pp 257.

[36] ibid. pp. 260-261.

[37] Knop, Karen, and Annalise Riles. "SPACE, TIME, AND HISTORICAL INJUSTICE: A FEMINIST CONFLICT-OF-LAWS APPROACH TO THE "COMFORT WOMEN" AGREEMENT." Cornell Law Review, vol. 102, no. 4, 2007, p. 855.

[38] Lee, Seulki, et al. "The Legacy of Wartime Atrocities Still Looms Over Asian Alliances." Foreign Policy, 21 April 2021, https://foreignpolicy.com/2021/04 /21/koreas-comfort-women-lostdid-u-s-diplomacy-win/. Accessed 26 April 2021.

[39] ibid.

[40] ibid.

[41] Kumagai, Naoko. "The Background to the Japan-Republic of Korea Agreement: Compromises Concerning the Understanding of the Comfort Women Issue." Asia-Pacific Review, vol. 23, no. 1, 2016, p. 66. [42] Diaz, Joanna. "Negotiating the "Comfort Women" Issue in the 21st Century." Institute for Security and Development Policy, 19 December 2018, https://isdp.eu/negotiatingthe-comfort-women-issue-in-the-21st-century/. Accessed 26 April 2021.

[43] Kono, Yohei. "Naze 'Kanbo cho kan danwa' wo happyo shita ka, (Why did the Chief Cabinet Secretary Issued the Statement?)." Nihon no Zento to Rekishi Kyo iku wo Kangaeru Wakate Giin no Kai (Junior Diet members' Association for Reflection on Japan's Future and History Education), Tendensha, 1997, pp. 429-437.

[44] Diaz, Joanna, loc cit.

[45] Ministry of Foreign Affairs Japan. "Announcement by Foreign Ministers of Japan and the Republic of Korea at the Joint Press Occasion." Ministry of Foreign Affairs Japan, 2015,https://www.mofa.go.jp/a\_o/na/kr /page4e 000364.html.

"'Saishuuteki [46] de Fukagyakuteki Kaiketsu' ni Kakunin Motoianfu Shien de Kankoku Shin zaidan ni 10 oku en, ('Finally and Irreversibly Resolve' confirmed. Japan's 1 billion yen contribution to a new Korean foundation for former comfort women)." Sankei Shimbun, 2015, https://www.sankei.com/politics/n ews/151228/plt1512280066n1.html.

[47] Committee on the Elimination of Discrimination against Women. "Letter to United Nations Secretary General Ban Ki Moon." Submission by The Korean Council for the Women drafted for Military Sexual Slavery by Japan, Appendix 3,, 2016. [48] "South Korea formally closes Japan-funded 'comfort women' foundation." Japan Times, 5 July 2019,

https://www.japantimes.co.jp/new s/2019/07/05/national/politicsdiplomacy/south-korea-formallycloses-japan-funded-comfortwomen-foundation/.

[49] Diaz, Joanna, loc cit.

[50] Krause, Jana, et al. "Women's Participation in Peace Negotiations and the Durability of Peace." International Interactions, vol. 44, no. 6, 2018, pp. 985-1016.

[51] Ward, Thomas, and William Lay. "The Comfort Women Controversy: Not Over Yet." East Asia, vol. 33, 2016, pp. 255-269

[52] "Clinton says 'comfort women' should be referred to as 'enforced sex slaves.'" Japan Today, 2012, https://japantoday.com/category/ politics/clinton-says-comfortwomen-should-be-referred-to-asenforced-sex-slaves.

[53] Ward & Lay, loc cit.

[54] ibid.

[55] Lee, loc cit.

[56] ibid.

[57] ibid.