

SOUTH AFRICAN LAW COMMISSION

WORKING PAPER 8

PROJECT 33

REVIEW OF THE LAW OF PRIZE

December 1984

The South African Law Commission was established by the South African Law Commission Act, 1973 (Act 19 of 1973).

The members of the Commission are -

The Honourable Mr Justice G Viljoen (Chairman)
The Honourable Mr Justice H J O van Heerden (Vice-Chairman)
Prof J T Delpport
Mr J E Knoll
Mr P A J Kotzé
Mr P J J Olivier SC
Mr G G Smit.

The Secretary is Mr D A Kruger. The Commission's offices are on the 8th Floor, NG Kerk Sinodale Sentrum, 228 Visagie Street, Pretoria. Correspondence should be addressed to:

The Secretary
South African Law Commission
Private Bag X668
0001 PRETORIA

Telephone: (012) 26-1121*

PREFACE

This working paper has been prepared by the research staff of the Commission to serve as a basis for the Commission's deliberations. The points of view, conclusions and recommendations contained herein should not at this stage be regarded as those of the Commission. The working paper is being published in full to provide persons and bodies wishing to comment or to make suggestions for the development, improvement, modernisation or reform of this particular branch of the law with sufficient background information to enable them to place substantiated submissions before the Commission.

Any person or body wishing to make oral representations to the Commission, should submit a brief résumé of his or its proposed representations, together with a request to be heard by the Commission, to the Commission in writing.

It would be appreciated if written comments, representations or requests, could reach the Commission not later than 15 June 1985. Please refer to the previous page for the address to which correspondence should be directed.

The researcher responsible for the project, who may be contacted for further information, is Mr G G Smit.

HIERDIE STUK IS OOK IN AFRIKAANS BESKIKBAAR

CONTENTS

PAGE

REVIEW OF THE LAW OF PRIZE

1. Origin of the inquiry	1
2. The concept of prize law	1
3. Prize Courts	3
4. Scope of the Inquiry	3
5. The South African Prize Courts	4
6. The need for reform	7
7. Proposed reform	10

BILL	11
------	----

REVIEW OF THE LAW OF PRIZE

1. Origin of the Inquiry

Our courts derive their prize jurisdiction from British enactments dating back to the previous century. Until recently a similar position obtained with regard to the admiralty jurisdiction of our courts. The constitutional developments that led to the establishment of the Republic of South Africa in 1961 made it necessary for the Republic to enact its own legislation on these matters. This was done by the enactment of the Prize Jurisdiction Act, 1968 (Act 3 of 1968), and the Admiralty Jurisdiction Regulation Act, 1972 (Act 5 of 1972). These enactments, however, merely conferred prize jurisdiction and admiralty jurisdiction on our courts in terms of South African legislation without updating or modernising the somewhat outdated rules of law and procedure with regard to these matters. The Commission was, therefore, requested in 1977 by the Department of Justice to undertake the review of the admiralty law and the prize law.

With the approval of the Minister of Justice, the review of these two branches of the law was placed on the Commission's programme as two separate inquiries. Mr D J Shaw QC was appointed by the State President to the Commission as an additional member for purposes of both these inquiries. It was found convenient to commence with the review of the admiralty law. This inquiry, recently completed, resulted in the enactment of the Admiralty Jurisdiction Regulation Act, 1983 (Act 105 of 1983). It now remains for the Commission to review the prize law.

2. The concept of prize law

Prize law is part of the international law of warfare. It relates to the capture of vessels and cargo by belligerents. The object of warfare is the overpowering of the enemy. In sea warfare the effort is concentrated against the maritime power of the enemy and it is endeavoured to cut off or paralyse all maritime trade by or with the enemy. It is evident that the pursuit of these objects poses a serious threat to peaceful navigation and trade by neutrals. International law has over the centuries developed rules aimed at pro-

protecting the rights of neutrals. These rules are embodied in usages and treaties. Thus we find in the *Consolato del Mare* (a compilation of maritime usages of the fourteenth century) the rule that a belligerent may seize and appropriate private enemy vessels and goods but that neutral goods found in private enemy vessels must be restored to the owners. A further rule provides that enemy goods found in neutral vessels may be seized and appropriated by a belligerent but that a neutral vessel must be restored to its owner. These rules were not, however, consistently adhered to by all maritime states. When peace was concluded at the end of the Crimean War in 1856, the maritime states issued the Declaration of Paris, which laid down certain rules with regard to the capture of private goods. These rules provide that goods carried under a neutral flag, excluding contraband of war, may not be captured and that neutral goods carried under an enemy flag, excluding contraband of war, may not be captured. It was further laid down that privateering was abolished and that a blockade was to be regarded as binding only if it was effectively maintained. Most of the maritime states became parties to the Declaration of Paris and those that did not accede to the Declaration did, in general, subsequently observe the rules thereof. The interpretation of some of these rules by belligerents during the two world wars, however, led to a large extent defeated the objects of the rules. Further rules relating to sea warfare were embodied in the Hague Conventions of 1907. They relate to, inter alia, the status of enemy merchant vessels at the outbreak of war, the conversion of merchant ships into warships, the laying of submarine contact mines, bombardment by naval forces, and certain restrictions on the right of capture in maritime war.

In broad outline, the rules of international law allow a belligerent to seize enemy merchant vessels on the high seas or within the belligerent's territorial waters or the enemy's. Belligerents are, however, required by international law to submit such captures to prize tribunals for judicial decision on the lawfulness or otherwise of the capture. The capture or destruction of enemy ships of war does not have to be adjudicated upon by prize tribunals. Certain classes of ships, such as hospital ships and small fishing boats, may not be captured. Like neutral vessels, however, they are subject to inspection for contraband of war.

3. Prize Courts

The origin of prize courts can be traced back to the end of the Middle Ages. During the Middle Ages a state of lawlessness prevailed on the high seas. Piracy was prevalent and threatened to disrupt peaceful navigation and trade. Merchantmen associated themselves for mutual protection. They sailed in fleets and armed themselves for defence against, and attack upon, pirates. They elected a chief, called the admiral. Captures made by them were divided among them according to the decision of the admiral. In the course of time maritime states started to exercise control over captures made by their subjects. Captors were required to bring their captures into port and to report the circumstances of the capture to an independent body presided over by a judge. This body had to decide whether the capture was authorised and was therefore good and lawful prize. Vessels and goods condemned as prize vested in the state but the captors were awarded a portion of the prize.

In modern times prize may only be taken in time of war. Belligerents have a duty to establish prize tribunals to decide whether a capture constitutes lawful prize. Prize courts are established under the municipal law of the belligerents. They function in time of war only. Although a prize court has to apply the law of the belligerent by which it was instituted, that law is supposed to be in accordance with the international law. The procedure followed by prize courts is, however, entirely prescribed by the municipal law of the states that institute such courts.

4. Scope of the Inquiry

The inquiry appears on the Commission's programme under the title:

Review of the Law of Prize

This may give the impression that the intention is to review the rules of the substantive law of prize. These are essentially, however, rules of international law. They can be reformed only by concerted efforts at an international level. And, indeed, attempts to codify the prize law have been made in the past. It has also been endeavoured to establish an international prize court with appeal jurisdiction from the decisions of municipal prize courts. To date, all such efforts have been unsuccessful.

It must be clear that the Commission can make recommendations for the reform of the prize law only to the extent that the Government of the Republic can effectively enact prize law. The Government's powers in this connection, it is submitted, are restricted to giving effect to international conventions and to enacting municipal law with regard to the application of prize law. This would embrace the jurisdictional and procedural aspects of prize law and incidental matters.

5. The South African Prize Courts

Prize jurisdiction was conferred on certain South African courts by the Colonial Courts of Admiralty Act, 1890 (53 and 54 Victoria Chapter 39). Section 2(1) of this Act provided as follows:

Every Court of Law in a British possession which is for the time being declared in pursuance of this Act to be a Court of Admiralty, or which, if no such declaration is in force in the possession, has therein original unlimited civil jurisdiction, shall be a court of Admiralty, with the jurisdiction in this Act mentioned, and may for the purpose of that jurisdiction exercise all the powers which it possesses for the purpose of its other civil jurisdiction, and such Court in reference to the jurisdiction conferred by this Act is in this Act referred to as a Colonial Court of Admiralty.

So far as can be ascertained, no court in South Africa was declared to be a court of admiralty in terms of the Act. The South African courts derive their admiralty jurisdiction from the fact that they were situated in British possessions and had original unlimited civil jurisdiction in such possessions. They were, in the words of the Act, Colonial Courts of Admiralty. At the commencement of the Act (1 July 1891) the Cape of Good Hope and Natal were British possessions. The South African Republic and the Republic of the Orange Free State became British possessions after they had been conquered in the Anglo-Boer war in 1902.

The Colonial Courts of Admiralty Act, 1890, remained in force in South Africa after the establishment of the Union of South Africa in 1910 - vide section 135 of the South Africa Act, 1909. It also remained in force when the Union became the Republic of South Africa in 1961 - vide section 107 of the Republic of South Africa Constitution Act, 1961 (Act 32 of 1961). The admiralty jurisdiction conferred upon Colonial Courts of Admiralty consisted of two forms of

jurisdiction, namely instance jurisdiction and prize jurisdiction. In connection with prize jurisdiction section 2(3)(b) of the Colonial Courts of Admiralty Act, so far as it was relevant, provided as follows:

A Colonial Court of Admiralty shall have under the Naval Prize Act, 1864, ... the jurisdiction thereby conferred on a Vice-Admiralty Court and not the jurisdiction thereby conferred exclusively on the High Court of Admiralty or the High Court of Justice; but unless for the time being duly authorised, shall not by virtue of this Act exercise any jurisdiction under the Naval Prize Act, 1864, or otherwise in relation to prize.

This provision must be read together with section 2 of the Prize Courts Act, 1894 (57 and 58 Victoria Chapter 39), which provides as follows:

2(1) Any commission, warrant or instruction from her Majesty the Queen or the Admiralty for the purpose of a prize court at any place in a British possession may, notwithstanding the existence of peace, be issued at any time with a direction that the court shall act upon such proclamation as hereinafter mentioned being made in the possession.

2(2) Where any such commission, warrant or instructions have been issued, then, subject to the instructions from Her Majesty, the Vice-Admiral of such possession may, when satisfied by information from the Secretary of State or otherwise, that war has broken out between Her Majesty and any foreign State, proclaim that war has broken out, and thereupon the said commission, warrant and instructions shall take effect as if the same had been issued after the breaking out of such war and such foreign State were named therein.

2(3) The said Commission and warrant may authorise either a Vice-Admiralty Court or a Colonial Court of Admiralty, within the meaning of the Colonial Courts of Admiralty Act, 1890, to act as a prize court, and may establish a Vice-Admiralty Court for that purpose.

2(4) Any such Commission or warrant may be revoked or altered from time to time.

2(5) A Court duly authorized to act as a prize court during war shall after the conclusion of the war continue so to act in relation to, and finally dispose of, all matters and things which arose during the war, including all penalties and forfeitures incurred during the war.

From the above it is clear that a South African court can act as a prize court only after having been commissioned thereto and after the issue of a proclamation that was has broken out. The Commission will have to be issued by the State President - vide section 3 of Act 32 of 1961. Apart from authorising the courts to exercise prize jurisdiction the commission also fulfils the function of defining the powers of the courts in prize matters. It may be noted, by way of example, that the courts of the Cape of Good Hope and Natal were authorised in 1899:

to take cognizance of and judicially proceed upon all and all manner of captures, recaptures, seizures, prizes and reprisals of all ships, vessels and goods, which shall, on the outbreak of any such war, have been already seized and taken, and which are, or shall be, brought within the limits of such court, and all other matters of prize falling within the jurisdiction of the said Court, and to hear and determine the same, and according to the course of Admiralty and the Law of Nations, and the Statutes, Rules and Regulations in that behalf for the time being in force; to adjudge and condemn all such ships, vessels and goods, as shall belong to the Foreign State named in such Proclamation, or to the subjects of such State, or to any others inhabiting within any of the Countries, Territories or Dominions of the same or which are otherwise condemnable as prize and which shall be brought before the said Supreme Court ... for adjudication and condemnation.

During the Second World War the courts were merely authorised to act as prize courts without their jurisdiction having been defined - vide Proclamation 239 of 1939. They had, therefore, the jurisdiction set out in the Naval Prize Act, 1864. Section 3 of this Act merely empowers an admiralty court "to take cognizance of and judicially proceed in matters of prize".

The Act does not define "prize" or "matters of prize". The context of these expression will have to be interpreted in accordance with the rules of international law in every issue.

The Naval Prize Act, 1864, contained several provisions of a procedural nature. Section 13 empowered the Judicial Committee of the Privy Council to frame general orders for regulating the procedure and practice of prize courts. This provision was repealed by section 3 of the Prize Courts Act, 1894, subsection (1) of which provides:

Her majesty the Queen in Council may make rules of court for regulating, subject to the provisions of the Naval Prize Act, 1864, and this Act, the procedure and practice of prize courts within the meaning of that Act, and the duties and conduct of the officers thereof, and of the practitioners therein, and for regulating the fees to be taken by the officers of the courts, and the costs, charges and expenses to be allowed to the practitioners therein.

The Prize Courts (Procedure) Act, 1914, provided that with effect from the date when rules were made under an Order in Council in terms of section 3 of the Prize Courts Act, 1894, such of the provisions of the Naval Prize Act, 1864, as related to procedure were repealed. Such rules were made by Order in Council in 1914. They also applied to prize courts in South Africa. These rules were, however, repealed and superseded by a new set of rules issued by Order in Council in 1939. By the year 1939 the British Parliament no longer had the power to legislate for South Africa, with the result that the repeal of the 1914 rules and the promulgation of the 1939 rules did not apply to prize courts in South Africa. The 1939 rules were made applicable to South African prize courts by the Governor General under the powers vested in him by the War Measures Act, 1940 (Act 13 of 1940) - vide proclamation 224 of 19 November 1941. This was only a temporary measure for the duration of the Second World War. At present, therefore, the procedure of our prize courts is still regulated by the outdated British rules issued in 1914.

As has been noted before, it was found necessary for the Republic to enact its own legislation on prize matters. This was done by the enactment of the Prize Jurisdiction Act, 1968 (Act 3 of 1968). Under this Act, prize jurisdiction is conferred on the provincial and local divisions of the Supreme Court of South Africa and the British enactments relating to prize matters are repealed so far as they apply in South Africa. The Act has not been put into operation, however, mainly because our prize procedure needs to be updated.

6. The need for reform

Before examining the provisions of the Prize Jurisdiction Act, 1969, and any shortcomings the Act might have, it is perhaps appropriate to ask whether in modern times there is any need for prize legislation at all. It appears that wars are being waged without prize courts' being called upon to adjudicate on

prize matters. Iran and Iraq, both of them maritime states, have for the past couple of years been involved in an active war. There has been a blockade of ports, and vessels belonging to neutrals have been attacked or destroyed. Nevertheless one has not heard of prize proceedings having been instituted. There has been sea warfare between the United Kingdom and Argentine over the Falkland Islands. Again one has not heard of any prize matters arising therefrom. It is uncertain whether any disputes concerning injury to, or the destruction of, private property have been settled extra-judicially.

The waging of war and the capture of vessels or aircraft jure belli are acts of state that would not be justiciable by the ordinary courts of a state. The very purpose of prize courts is to determine judicially whether any particular capture was justified and so avoid lengthy disputes through diplomatic channels or the imposition of sanctions internationally or by the aggrieved state. Although the Republic is not at present involved in a war with any other sovereign State and no such war is foreseen, it is suggested that the State's machinery for the settling of disputes arising from warfare should at all times be effective and in accordance with internationally accepted practice.

Shortly after the enactment of the Prize Jurisdiction Act, 1968, it was thought that all that was needed was for a new set of prize court rules to be drawn up before the Act could be put into operation. On closer examination it appears, however, that the Act is itself in need of adjustment.

In the first place, the British enactments that are to be repealed upon the commencement of the Act provide for matters not embodied in the Act. Some of these matters could not properly be regulated by rules of court but ought to be embodied in the Act itself. By way of example the provisions relating to appeals and the transfer of proceedings from one court to another may be mentioned. Prize salvage, prize ransom, requisitioning and the right of pre-emption ought also to be considered for inclusion in the Act.

Furthermore, it is suggested that the jurisdiction of the prize courts ought to be defined more precisely. Act 3 of 1968 merely confers prize jurisdiction on provincial and local divisions of the Supreme Court without making it clear

what that jurisdiction comprises. "Prize" is defined as a ship or aircraft captured jure belli and also anything so captured while in or upon a ship or aircraft. It is doubtful whether the Act covers the detention of a ship for purposes of inspection without the ship's actually having been captured. The definition seems to be too restricted in regard to "cargo" in that it does not cover cargo that has been landed for closer inspection aimed at ascertaining whether such cargo includes contraband of war. It should also be made clear that prize jurisdiction does not extend to the capture of military vessels and aircraft belonging to the enemy.

The traditional position has been, not only that a proclamation had to be issued to the effect that a state of war existed between the State and a specified enemy, but also that the prize courts had to be specially commissioned before their prize jurisdiction took effect. In the absence of such a proclamation it might be difficult for a prize court to determine whether any capture was in fact made jure belli. In some instances, moreover, the special commission served the additional purpose of circumscribing the jurisdiction of prize courts. It is suggested that the practice of suspending the jurisdiction of prize courts until they are specially authorised to exercise that jurisdiction ought to be retained.

Section 2 of the Act provides that any division of the Supreme Court of South Africa has jurisdiction in prize matters instituted in such division, whether or not the capture occurred within or outside the Republic or within or outside such division's area of jurisdiction. It ought to be made clear in which prize court prize proceedings should be instituted. In the case of a captured vessel brought into port the court having jurisdiction in the area where the port is situated should have exclusive jurisdiction. In the case where the vessel is destroyed or cannot be brought into port the court where the capture is reported should have jurisdiction. Where proceedings are not instituted by the captor, it ought to be provided that any person having an interest in the vessel or aircraft or its cargo may institute proceedings in any convenient court. Moreover, it should be considered whether a time limit should not be imposed on the institution of such proceedings. Finally, provision should be made for the transfer of proceedings from one court to another.

The Act is not explicit about the law to be applied by prize courts. From the definition of prize it may perhaps be inferred that the law to be applied is

international law. International law as regards prize is, however, a rather vague concept. Rules recognised by some maritime states need not necessarily be adhered to generally. Even where rules are embodied in treaties one finds that the treaty provisions are variously interpreted. Indeed, apart from a few rules that are fairly generally accepted, one may doubt whether an international law of prize even exists. It must be borne in mind that prize courts are municipal courts and that they are bound to give effect to the laws of the State by which they have been instituted. Although States are expected to keep their prize law in accordance with general principles that have been evolved over a long period, the substance of these principles remains vague and, to the extent that it is clear, is subject to many departures.

Because of our colonial heritage our prize courts have in the past applied British prize law. Great Britain, for centuries a leading maritime state, has undoubtedly exercised a profound influence on the development of the laws of warfare at sea. British prize law could perhaps be said to be in conformity with international prize law, to the extent that there is such a thing as international prize law. At any rate, the application of British prize law has long been accepted by other maritime states.

It is suggested that our prize courts should in the first place apply any South African legislation that may be applicable and any treaty that is binding upon the Republic. For the rest they should apply the law applied by our prize courts immediately before the commencement of the Act, adjusted where necessary in accordance with principles accepted by leading maritime states.

7. Proposed reform

A draft bill embodying the suggestions made above is attached for comment.

BILL

To regulate the prize jurisdiction of courts and to provide for matters incidental thereto.

Introduced by the Minister of Justice

BE IT ENACTED by the State President and the Parliament of the Republic of South Africa, as follows:-

Definitions.

1. In this Act, unless the context otherwise indicates -

"court" means any court of a provincial or local division of the Supreme Court of South Africa;

"prize" means any property condemned by a court as prize;

"prize proceedings" means proceedings -

- (a) for the condemnation as prize of any ship or aircraft, or anything carried in or on a ship or aircraft, which is detained, captured or destroyed by the armed forces of the Republic or of any co-belligerent of the Republic during a war by or against the Republic or any co-belligerent of the Republic;

- (b) for the release of anything so detained or captured or for the recovery of damages suffered as a result of anything's being so detained, captured or destroyed;
- (c) relating to the requisitioning by the State, for purposes of war, of any ship or aircraft or anything in or on any ship or aircraft and the recovery of compensation in respect of any such requisitioning;
- (d) declared in terms of section 3 to be prize proceedings.

Jurisdiction
of courts.

2. (1) A court shall have jurisdiction in prize proceedings instituted in or transferred to such court, whether or not the detention, capture or destruction of the property concerned occurred or the cause of action arose within or outside the Republic or within or outside the area of jurisdiction of such court.

(2) No court shall have jurisdiction in respect of the detention, capture or destruction of any ship of war or any military aircraft or anything in or on such ship or aircraft: Provided that every court shall have jurisdiction to decide the question whether any ship is a ship of war or any aircraft is a military aircraft.

(3) No court shall exercise any jurisdiction under this Act unless a proclamation has been issued by the State President to the effect that a state of war exists between the Republic and any specified enemy and unless the courts are authorised by such proclamation to exercise such jurisdiction.

(4) No court shall exercise any jurisdiction under this Act in respect of any alleged act or omission by any co-belligerent of the Republic unless the government of such co-belligerent has consented to the exercise of such jurisdiction.

State President may declare proceedings to be prize proceedings.

3. The State President may by proclamation in the Gazette declare any proceedings or any category of proceedings relating to a war in which the Republic is involved to be prize proceedings.

The institution and transfer of proceedings.

4. (1) Prize proceedings shall be instituted in the court having jurisdiction in the area within which the property forming the subject matter of such proceedings is detained or within which such property is brought for condemnation as prize.

(2) In the event of such property having been destroyed, proceedings for the condemnation thereof as prize may be instituted in any convenient court.

(3) Where no proceedings for the condemnation of property as prize have been instituted within a reasonable time after the capture thereof, any person having an interest in such property may institute proceedings for the recovery thereof, or for damages, in any convenient court.

(4) A court, if of the opinion that any prize proceedings with which it is seized can be tried more appropriately by any other court, may order such proceedings to be transferred to such other court, whereupon such proceedings shall be tried by such other court as if they were instituted in that court.

Adjudication of
prize proceedings.

5. Prize proceedings shall be adjudicated upon *mutatis mutandis* as if they were civil proceedings and a court adjudicating upon such proceedings shall, in addition to the powers it possesses by virtue of its ordinary civil jurisdiction, have also the power to make any such appropriate order as it may deem fit.

Law to be applied
and rules of evi=
dence.

6. (1) Subject to any treaty which is binding upon the Republic and to any law of the Republic which is applicable, a court exercising jurisdiction under this Act shall -

(a) with regard to any matter in respect of which the High Court of Justice of the United Kingdom in the exercise of its prize jurisdiction

would at the commencement of this Act have had jurisdiction, apply the law that would have been applied by the said High Court of Justice in respect of such matter at such commencement;

(b) with regard to any other matter, apply the Roman-Dutch law applicable in the Republic.

(2) In the exercise of its jurisdiction under this Act a court may, subject to such directions and conditions as it may think fit, receive as evidence statements or evidential matter which would otherwise be inadmissible as being in the nature of hearsay evidence.

(3) The weight to be attached to the evidence referred to in subsection (2) shall be in the discretion of such court.

Appeals.

7. A judgment or order made by a court in the exercise of its jurisdiction under this Act shall be subject to appeal as if such judgment or order were that of a provincial or local division of the Supreme Court of South Africa in civil proceedings.

Prize to belong to State.

8. Prize shall belong to the State.

Rules of Court.

9. A power to make rules under the Supreme Court Act, 1959 (Act No. 59 of 1959), shall be deemed to include also the power to make such rules as the Chief Justice of South Africa may deem necessary or expedient for the adjudication of prize proceedings or for the regulation of any matter incidental thereto.

Repeal of laws.

10. The laws mentioned in the Schedule are hereby repealed to the extent therein indicated so far as they apply in respect of the Republic.

Short title and commencement.

11. This Act shall be called the Prize Jurisdiction Act, 1986, and shall come into operation on a date to be fixed by the State President by proclamation in the Gazette.
.....

SCHEDULE

LAWS REPEALED

No. and Year of Law	Title	Extent of Repeal
27 & 28 Victoria, Ch.25	"The Naval Prize Act, 1864"	So far as it relates to prize matters
53 & 54 Victoria, Ch.27	"The Colonial Courts of Admiralty Act, 1890"	So far as it relates to prize matters
57 & 58 Victoria, Ch.39	"The Prize Courts Act, 1894"	So far as it relates to prize matters
4 & 5 George 5, Ch.13	"The Prize Courts (Proce= dure) Act, 1914"	So far as it relates to prize matters
5 & 6 George 5, Ch.57	"The Prize Courts Act, 1915"	So far as it relates to prize matters
6 & 7 George 5, Ch.2	"The Naval Prize (Proce= dure) Act, 1916".....	So far as it relates to prize matters
Act No. 3 of 1968	Prize Jurisdiction Act	The whole