

difficulty, however, still exists on the subject, owing to the different modes by which States establish the line of their sea coasts. It is admitted by all that the actual line of the shore, with its indentations, bays, and promontories, cannot be followed without producing the greatest confusion and doubt as to the limits of the maritime territory of each State, and consequently straight lines running from headland to headland of bays, not exceeding six miles in width, are taken as the actual line of coast from which the three marine miles of marine territory of the State to which the headlands belong are to be measured.

(5) If a bay exceed six miles at its entrance, with islets belonging to the State that owns the shore of the bay, either outside or inside, at a distance of six marine miles or less from the headlands and from each other, the bay is the property of the State to which the headlands and the islets belong, and the boundary landwards of its maritime territory, is the line drawn from headland to headland, resting on the different islets, which give the greatest distance seawards, within six miles of each other, or of one of the headlands, the said line lying perfectly straight between each pair of its resting places, and being also straight between each headland and its nearest resting place. (6) Thus an island or islet lying off the coast of a State at a distance of six miles or less, is considered as part of the land territory of that State, and if another island lies at a distance of six miles or less from the first, seaward, or in the entrance of a large bay, such second island also forms part of the land territory of that State, and such is the rule, no matter what may be the number of links in the chain of islands, so long as each island lies within six miles of the coast, or of the neighboring islands in the chain.

The exclusive right of fishing within maritime territory belongs to the State. No person has any right, according to the principles of International Law, to fish within the maritime territory of any country or State, but that of which he is a subject. (7) Such right to

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(5) 1 *Hautefeuille* supra. 1 *Ortolan* 158. 1 *Azuni* Part 1, c. 2, § 17. *Laurence's Wheaton* supra. *Vattel* § 291. 1 *Phillimore* § 199. *Abdy's Kent*, p. 116.

(6) *The Anna*. 5 *Rob.* 385. 1 *Ortolan* *Dip. de la Mer*. p. 145.

(7) 1 *Ortolan* b. 2, c. 8, p. 161. 1 *Cussy* b. 1, t. 2, § 52, p. 129. 1 *Rayneval Institutions* 1, 2, c. x. § 12. 1 *Cauchy*. p. 39. 1 *Phillimore* § 188. *Lawrence's Wheaton* pt. 2, c. 4 § 8. *Petrushevce*, art. 6.