

growth of the spirit of humanity during the last sixty years. The Emblem was a schooner that was dismasted and thrown on her beam ends in a storm. She drifted for five days, was passed by twenty-three vessels, no one of which went to her relief. Finally one vessel did succor her. Alas! all her crew died of exposure. The captain's wife alone survived.

The British Parliament made some provision by statute for the amendment of the law of salvage in this particular. The first enactment proved inadequate. The British Merchant Shipping Act of 1894, s. 544, sub-s. 1, authorized the court to award salvage compensation for saving life from a foreign vessel, if "the services are rendered wholly or in part within British waters," and for saving life from a British vessel wherever the services were rendered. If it had not been for this Act, the Carpathia would have no right to compensation for saving the lives of the shipwrecked survivors of the Titanic.

That great admiralty lawyer, Sir Francis Jeune, held, in *The Pacific*, [1898] P. 170, 67 L.J. Prob. N.S. 65, 79 L.T.N.S. 125, 46 Week. Rep. 686, 8 Asp. Mar. L. Cas. 422, that a British vessel was entitled to compensation for saving the passengers and crew of a Norwegian ship that had been wrecked on the high seas, on the ground that they were brought into England by the salvor. The British Parliament did not think itself justified in extending to foreign vessels the liberal rule it applied to British ships, unless the service was partly rendered on British waters.

It is reserved for international agreement to extend this beneficial principle to the commerce of all nations.—EVERETT P. WHEELER, in *Case and Comment*.