



**Padjadjaran Journal of International Law  
International Law Department Universitas Padjadjaran**

ISSN: 2549-2152, EISSN: 2549-1296

Volume 6, Number 2, June 2022

DOI: 10.23920/pjil.v6i2.993

**Aegean Sea Issue: Urgency on Maritime Jurisdiction and Status of the Aegean Sea according to International Law**

Tobias Binsar Ezra<sup>1</sup>

**Abstract**

*The Aegean sea issue is a long case that first occurred in 1950; the main issue of this case revolves around the geographical condition that has led Turkey and Greece on fighting over supremacy to take control of the Aegean sea area. The issue of both Turkey and Greece has earlier been submitted to the ICJ however, its lack of jurisdiction causes the issue itself to remain unsolved. In 2020 Greece stated that it looked forward to extending its territorial waters. The statement itself might become a big issue for Turkey and has further proved the urgency of an actual maritime jurisdiction between Greece and Turkey. The goal of this research is to clarify and find a resolution that can be used under the situation of the Aegean Sea issue in both international legal theory and practice. Apart from clarifying possible and available Legal instruments and theories, this research will elaborate even further on the status of the Aegean Sea according to International Law. This research will reveal how UNCLOS, as an International law instrument, can be used in a special case like the Aegean sea to draw an end line to the long-lasting issue of maritime jurisdiction over its territorial sea.*

**Keywords:** *Aegean sea, Greece, International Law, Maritime Jurisdiction, Turkey*

**Isu Laut Aegea: Urgensi kepentingan Yurisdiksi Maritim dan status laut Aegea berdasarkan Hukum Internasional**

**Abstrak**

Permasalahan laut Aegea adalah kasus panjang yang pertama kali terjadi pada tahun 1950, masalah utama dari kasus ini berhubungan dengan kondisi geografis yang telah menempatkan Turki dan Yunani dalam kondisi untuk bersaing atas kekuasaan dan kontrol di wilayah laut Aegea. Isu dari Turki dan Yunani sebelumnya telah diangkat ke mahkamah internasional, namun dikarenakan oleh permasalahan yurisdiksi, kasus tersebut tetap tidak terselesaikan. Pada tahun 2020 Yunani memberikan pernyataan mengenai ekspansi laut teritorial yang mereka miliki, hal tersebut akan menjadi masalah besar untuk Turki dan mendorong kepentingan yurisdiksi maritim yang jelas terhadap laut teritorial Yunani dan Turki. Tujuan dari penelitian ini adalah untuk memberikan klarifikasi serta jawaban yang dapat digunakan untuk menyelesaikan isu laut Aegea. Adapun selain memberikan klarifikasi terhadap instrumen hukum dan teori yang tersedia, penelitian ini juga akan menjelaskan status laut Aegea oleh Hukum Internasional. Penelitian ini akan menjelaskan bagaimana UNCLOS, sebagai instrumen hukum internasional dapat digunakan pada situasi kasus yang spesial seperti laut Aegea, guna menciptakan garis akhir dari permasalahan yurisdiksi maritim diatas laut teritorial tersebut

**Kata kunci:** *Laut Aegea, Hukum Internasional, Turki, Yunani, Yurisdiksi Maritim*

---

<sup>1</sup> Research Assistant, Indonesian Center of the Law of the Sea, tobiasbinsar1501@gmail.com

## A. INTRODUCTION

The case of the Aegean sea on the issue of maritime boundaries is a long case that still needs to be resolved. In this case, it can be seen that both Greece and Turkey are geographically close and are two Aegean Sea neighbors. Based on its history, the two countries have been in a supremacy conflict related to the Mediterranean sea for a very long time going from the mid of 1950s even to the current year of 2022,<sup>2</sup> with the current point of confrontation regarding the issue of the expansion on the Aegean Sea. Referring to history, Greece submitted the issue of the Aegean issue to the ICJ in 1976. However, Turkey's refusal towards the matter created a standpoint where ICJ had no jurisdiction over the case and was considered incompetent to solve the case, which resulted in the problem not being resolved and remains without any proper solution or resolutions to solve the conflict and put an end to it. This article will further cover the issue on the Aegean maritime boundaries that are well related to the specific issue of Jurisdiction, including territorial waters, contiguous zone, and continental shelf, along with the delimitation process that should be taken into account.

When it comes to discussing the issue of Aegean maritime boundaries, it can be concluded that the issue itself is rooted in the issue of different standpoints and conflict of interest between the two countries. In comparison, Greece has signed and ratified the UNCLOS, and on the other hand, Turkey has not signed UNCLOS nor ratified the Convention on the continental shelf. The differences in standpoints between Greece and Turkey created different legal obligations that opened a path for Turkey to continue on

the issue without any legal obligation to do their measurement as regulated in UNCLOS or Convention on the continental shelf. Another factor that also matters on the issue of the Aegean sea dispute is the claims that both countries have made over the year, creating situations that are even worse and harder to solve. One of the latest claims that have been made, Greece argues that the island of the Aegean Sea could provide their own EEZ line allowing Greece to explore further while Turkey disagrees that Islands can have their own EEZ and should only be counted from the mainland. Another factor that should be considered is the disagreements on the concerns of continental shelf delimitation and the territorial sea breadth in the Aegean Sea between Greece and Turkey. One of the main reasons the continental shelf became a dispute is the oil exploration rights related to the stemmed oil exploration that can be accessed in the Aegean Sea.

The main aim of this research is to clarify the status of the Aegean sea under the International law, and to create a clear explanation of the detail of the Aegean disputes regarding the main issues that create a prolonged situation in this dispute, other factors such as Greece's small island position along with the status of Turkey that is not a part of UNCLOS are also a huge part that will be highlighted in this research to create a more comprehensive and clear understanding of the big picture in the Aegean dispute. Other factors like the Aegean sea being considered as a common sea between both countries should also be a playing factor since both countries should respect each other rights that are protected under International law<sup>3</sup>. The conditions that were previously

---

<sup>2</sup> Ankara, "Turkey urges Greece not to extend territorial waters to 12 miles in Aegean", January 08 2022, <https://www.hurriyetdailynews.com/turkey-urges-greece-not-to-extend-territorial-waters-to-12-miles-in-aegean-170644>. Accessed 6/20/2022

---

<sup>3</sup> Republic of Turkiye, "Turkey's Perception of the Aegean Sea", [https://www.mfa.gov.tr/turkey\\_s-perception-of-the-aegean-sea.en.mfa](https://www.mfa.gov.tr/turkey_s-perception-of-the-aegean-sea.en.mfa). Accessed 8/10/2022

## Aegean Sea Issue Urgency on Maritime Jurisdiction and Territorial water extension between Turkey and Greece

explained could trigger the point that is well related towards the right of freedom of navigation at the high seas and air space that can be broken if Greece were to extend their territorial water line, thus explaining the urgency for a clear maritime jurisdiction to further secure a good and neutral position for Turkey.

### B. ANALYSIS AND DISCUSSION

The Aegean Sea is located between Europe and Asia on the eastern side of the Mediterranean Sea. The location that was set to be is bound on three sides by continental land masses and are on the fourth by several islands which create a unique form of chain on the southern side, in comparison to the eastern side, continental land masses were formed near Turkey. Regarding its dimension, the Aegean Sea is 620 km from the region of Kavalla to Crete and 460 km from Kythira to Rhodes.<sup>4</sup> As it was mentioned several times, the main factor that are produced in this issue is well related to the unique situation of Greece that has several islands in regards to its position to the Aegean sea, in continuation to this the Greek islands geographically fall into three large groups: The Cyclades around the center of the Aegean Sea, the Sporades around the islands northeast of Euboea, and the largest of the Greek islands, Crete. To further clarify the analysis of the Aegean dispute, several points need to be analyzed separately to fully understand the main issue and the regulation that are available to help solve the issue. The analysis shall be divided into four parts focusing on the issue of Jurisdictions on the water territorials, The status of Aegeansea under the International law, Possible consideration with Contiguous zone, continental shelf, and the delimitation of

the Aegean sea, along with the final analysis of the Greece claim over its territorial sea extension.

#### 1. Jurisdiction on territorial water

Regarding the first issue, Jurisdiction on the water territorials is one of the main problems that can be brought up when discussing the Aegean issue. By its history and track record, it can be concluded that both Turkey and Greece has not yet been tied by any agreement regarding the Jurisdiction of the maritime boundaries that they have. Based on the current status quo, the boundaries that has been set is are 6<sup>5</sup> nautical miles range for both Turkey and Greece in the Aegean. The main issue regarding the two countries is that Turkey and Greece geographical position is adjacent and requires a boundary with delimitation.

While it is true that delimitation system is effective when discussing about methods on how to cover maritime jurisdictions, there has not been any maritime delimitation between Turkey and Greece with the respect of the territorial sea in the big coast are between the two countries. By using delimitation of the continental shelf as a standard to create a clear maritime jurisdiction, however due to the fact that both Greece and Turkey have only used delimitation measurement for only 6 nautical miles of territorial sea, pressed the fact that Greece and Turkey presently only have an exercise of a 6 nautical miles breadth of territorial waters in the Aegean. This allows half of the sea and airspace to be above it can be used as

<sup>4</sup> Captain George V. Galdorisi, USN, "Military Activities in the exclusive economic zone: Preventin Uncertainty and Defusing conflict", <https://core.ac.uk/download/pdf/232621081.pdf>. Accessed 4/20/2022

<sup>5</sup> Captain George V. Galdorisi, USN, "Military Activities in the exclusive economic zone: Preventin Uncertainty and Defusing conflict", <https://core.ac.uk/download/pdf/232621081.pdf>. Accessed 4/20/2022

high seas by both Greece and Turkey along with other countries.

With the facts that were discussed on the previous part, high considerations should be made towards the statement of extension on territorial waters to the 12 nautical miles. The extension itself shall create alteration of the balance interest towards the Aegean sea for Turkey and Greece<sup>6</sup>. The main issue here is the numbers of islands that is quite the abundant creating a situation where Greece have over 40% Territorial waters in the Aegean Sea.<sup>7</sup> If the consideration for all of the island were given with a 12 nautical miles wide territorial waters, the rate of percentage would rise from 40% to 70%, creating a situation where Turkey has far less territorial waters. Going back to the matter of expansion on territorial waters from 6 to 12 miles in the Aegean Sea. Geographic position of Greece that owns a lot of islands will create a situation where Turkey will not be able to sail towards International waters without the consent of the Greek governments. With the expansion of Greece territorial waters from 6 to 12 miles, Turkey's 2820 Km long coastline to the International sea would be encircled by Greek territorial waters and will blocked Turkey from having any access from its west shores to the International waters of the Aegean.

Another factor that should be applied regarding the issue of the extension on the Jurisdiction of the

territorial waters is the fact that Greece as a member of the UNCLOS should exercise article 3 of the convention along with the Article 300<sup>8</sup> that stated "*States Parties shall fulfill in good faith the obligations assumed under this Convention and shall exercise the rights, jurisdiction and freedoms recognized in this Convention in a manner which would not constitute an abuse of right*". The application of article 300 should be used in addition when using article 3 as the base for the extension of Greece's Jurisdiction on the Territorial water.

In regard to the claims by Greece that has been previously discussed, Turkey has responded that such claims for an extension would be a *casus belli* (an act or situation provoking or justifying war). The cause for that is due to the fact that by doing such extension, a grief situation would soon occur for Turkey, due to the fact that it would convert most of the Aegean Sea into Greek territorial waters and restrict freedom of movement of the ships and planes of Turkey and other nations.<sup>9</sup> In addition to this issue, a major factor should be a big consideration, especially in regards to the fact that the Aegean Sea constitutes a unique geography that creates special circumstance that forces Greece and Turkey to find a unique solution to the question of territorial waters. If Greece doubled its claimed territorial sea from 6 to 12 nautical miles, it would increase the proportion of the Aegean Sea under its control from about 35% to about 64%. Turkey will have sovereignty over only

<sup>6</sup> Constantinos Yiallourides, "Maritime Disputes and International Law", [Maritime Disputes and International Law: Disputed Waters and Seabed ... - Constantinos Yiallourides - Google Books](#). Accessed 5/20/2022

<sup>7</sup> Jon M. Van Dyke, "An analysis of the Aegean disputes under International law", <https://www.tandfonline.com/doi/abs/10.1080/00908320590909088>. Accessed 8/11/2022

<sup>8</sup> UN General Assembly, Convention on the Law of the Sea, 10 December 1982, available at: <https://www.refworld.org/docid/3dd8fd1b4.html>. Accessed 19 June 2022

<sup>9</sup> Jon M. Van Dyke, "An analysis of the Aegean disputes under International law", <https://www.tandfonline.com/doi/abs/10.1080/00908320590909088>. Accessed 8/11/2022

## Aegean Sea Issue Urgency on Maritime Jurisdiction and Territorial water extension between Turkey and Greece

8.3% of the waters of the Aegean, and the percentage of "sea" will decrease from about 56% to about 26%. Article 3 of the 1982 Law of the Sea Convention provides that all states have "right" to establish territorial sea "limited not exceeding 12 nautical miles" from their ribs. However, Turkey has not signed or ratified the Convention and has done whatever they can do to assert themselves as a "persistent opponent", against implementing this standard. Therefore, it may claim that a "regional national practice" in The Aegean to limit all territorial claims in this case to six nautical miles.

In addition, another point should also play a consideration, due to the fact that territorial seas from the Greek Aegean islands is facing westward. This gave Turkey the ability to invoke Articles 122 and 123 of the Law of the Sea Convention which though written in generic and ambiguous language - realize that "semi-enclosed sea", such as the Aegean Sea, requiring special and mandatory management measures for the riparian States these seas to cooperate in coordinating their policies. Turkey can also invoke Article 300 of the Convention, which provides that States must exercise their rights under the Covenant "in a manner that does not constitute an abuse of rights". If Greece establish a 12-nautical-mile territorial sea, especially around its eastern Aegean islands, such an action seems like an abuse because of the expansion of the territory the sea will fill most of the Aegean Sea and completely fill the southern region that causing Turkey to be in a pinched position and leaving them with almost no territorial sea.<sup>10</sup> As a reference

towards the issue of territorial sea surrounding islands, examples can be found when states have agreed to establish surrounding territorial waters islands smaller than 12 nautical miles, when they are in cramped places or on the "wrong" side of the midline. Hiran W. Jayewardene, in his 1990 book, cites the case of Isla Patos island of Venezuela, Dayyinah island of Abu Dhabi and Australia's Torres Strait Islands, all of which only three nautical miles are territorial seas. Ambassador Jayewardene cited these cases support the view that similar solutions could be considered for "the Greek islands adjacent to the Turkish coast". Another compelling example is found in the 1984 agreement between Argentina and Chile, where the two countries limited their territorial claims to each other to within 3 nautical miles, but claimed 12-nautical-mile territorial waters from all other countries<sup>11</sup>.

The demand that has been made by Greece to extend its Territorial water is very well related to the conclusion and settlement of the Aegean issue. This is due to the fact that the issue of territorial water is very much interrelated with other Aegean disputes such as the delimitation of the continental shelf and Contiguous zone along with economic zone and others. With the practice of Article 300 combined with Article 3 it can be concluded that any unilateral action that is aimed at enlarging maritime Jurisdiction areas in the Aegean should not be allowed. In addition, it is worth mentioning that both Greece and Turkey haven't taken any unilateral action by refraining from

<sup>10</sup> International Court of Justice, "Fisheries (United Kingdom v Norway)", <https://www.icj-cij.org/en/case/5>. Accessed 8/11/2022

<sup>11</sup> Jon M. Van Dyke, "The republic of Korea's Maritime Boundaries", <https://view.officeapps.live.com/op/view.aspx?src=https://www.hawaii.edu/~felp/fpublications/faculty/TheRepublicofKorea.doc&wdOrigin=BRQWSELINK>. Accessed 8/11/2022

the Madrid declaration of 1997. The Declaration contains a commitment to refrain from unilateral acts which is directly related to the preservation of the 6 miles territorial waters to keep the stability and jurisdiction of both countries over the water territorials.

## 2. Status of the Aegean sea under the International Law

In regards towards its status under the International Law, Turkey and Greece are two states that has legitimate rights and sovereignty over the Aegean sea. All the complementary factors such as security, economy and other traditional rights are all recognized under the International Law, however the issue that escalated created situation that does not seem to end or involves any resolution. For an instance, Greece has made claims of the extent their territorial waters several times. In 1936 Greece started their first claim, extending their territorial waters from 3 lines to 6 miles<sup>12</sup>, causing Turkey to make their first suit in 1964 that became the prologue of the long conflict over the Aegean Sea. The second claim was made in 2021 that indicate the willingness and plan of the Greek government on extending Greece territorial water even further from 6 nautical miles into 12 nautical miles.

In regard to its position under the International Law, several Legal frameworks have been created and could be used as an example to solve the Aegean Sea issue. One of the legal framework that can be used is the Treaty of Lausanne. The treaty was Signed on 24 July 1923, with the purpose of handling issues related to the limits of Turkey's sovereignty with

the condition that excludes Imbros, Tenedos and the Rabbit islands.

Turkey officially ceded the Dodecanese islands to Italy. In addition towards that treaty, one of the important aspect can actually be seen through Article 15 of the Treaty offers that: *“Turkey renounces in favor of Italy all rights and identify over the subsequent islands: Stampalia, Rhodes, Calki, Scarpanto, Casos, Piscopis, Misiros, Calimnos, Leros, Patmos, Lipsos, Simi, and Cos, which might be now occupied with the aid of using Italy, and the islets structured thereon, and additionally over the island of Castellorizzo.”* Under Article sixteen of the identical Peace Treaty, Turkey *“renounces all rights and identify in any respect over or respecting the territories located out of doors the frontiers laid down within the gift Treaty and the islands aside from the ones over which her sovereignty is diagnosed with the aid of using the stated Treaty, the destiny of those territories and islands being settled or to be settled with the aid of using the events concerned.”*<sup>13</sup> Due to a dispute concerning the islets among the island of Castellorizzo and the Turkish coast, Italy and Turkey concluded on four January 1932 the Convention among Italy and Turkey for the Delimitation of the Territorial waters Between the Coasts of Anatolia and the Island of Castellorizzo. On the identical day, through a change of letters initiated with the aid of using Turkey among the Turkish Foreign Minister and the Italian Ambassador to Turkey, it turned into agreement that the two sides might enlarge the already hooked up delimitation.

<sup>12</sup> Republic of Turkiye, “Background Note on Aegean Dispute”, <https://www.mfa.gov.tr/background-note-on-aegean-dispute.en.mfa>. Accessed 8/10/2022

<sup>13</sup> Stergios Arapglou, “Dispute in the Aegean Sea the Imia/kardak crisis”, (Thesis, Air University, 2002), <https://apps.dtic.mil/sti/pdfs/ADA420639.pdf>. Accessed 8/11/2022

## Aegean Sea Issue Urgency on Maritime Jurisdiction and Territorial water extension between Turkey and Greece

In addition to the issue of the Aegean Sea, the Imia/Kardak issue is another case that is well related towards the Aegean dispute and has a big impact on changing the current status quo. The Imia/Kardak as a case also concerns both Greece and Turkey with the separation between Imia in Greece and Kardak in Turkey with both countries claiming sovereignty over the islets, despite previously considered to be owned by Greece, in comparison to the Aegean Sea issue, the owner of the islets could extend the territorial waters around them to 6 or 12 nautical miles, one of the ways to do this is by conducting a travel restriction through the straits which are located with the purpose of bringing the existing international waters under national control. It should also be noted that the ownership of Imia/Kardak and its constraints on the continental shelf and territorial sea can have a significant impact on each state's sense honor.<sup>14</sup>

In the circumstances that have occurred during the conflict of Aegean Sea, both Greece and Turkey have accused each other for committing violation towards the Article 60 of Vienna convention on the law of treaties related to the material breach. It was stated under the Article 60 (3) (b) of the Vienna Convention that "*the violation of a provision essential to the accomplishments of the object or purpose of the treaty.*" The definition of that regulation triggers a question over the context of whether the militarization of some of the eastern Aegean islands and the overflight of Turkish planes actually defeat the "purpose of the treaty." Where such measures are considered relatively

minor changes to the treaty, the reminder of the treaty remains binding and mandatory. On the other hand, if demilitarization clauses are essential conditions for package deals found in the 1923 Convention, their breach could change the underlying contractual relationship, and Article 60(1) of the Vienna Convention on Treaties in the language of the non-violating side.

In addition to the previous arguments, in a condition where Greece and Turkey involve themselves in a violation of strict language towards the Lausanne Treaty, both parties would be creating a violation of their own, which resulted in circumstances where the violation that was made is considered and viewed as canceling each other, leaving the remaining of the Treaty as binding upon the parties.

Another regulation of the International Law that is well needed to be considered is the regulation of Article 53 and 64 of the Vienna Convention on the Law of Treaties that stated treaties are void if they were to conflict with the norm of general international law or what is known as *jus cogens*. Apart from the fact that self-defenses are mostly considered as high transcendent norms of international law, demilitarization clauses in the 1923 Lausanne Peace Treaty within the current situation can be pointed as depriving Greece of the inherent right to defend its sovereign territory. They might be considered to be void,<sup>15</sup> in violation of a *jus cogens* norm of international law. On the other hand, demilitarized zones remain

<sup>14</sup> Michael Robert Hickok, "The Imia/Kardak Affair, 1995–1996: A Case of Inadvertent Conflict", *European Security*, Vol. 7, No. 4 (1998)

<sup>15</sup> Tozun Bahcheli, "Greek-Turkish Relations Since 1955", 1990, <https://www.routledge.com/Greek-Turkish-Relations-Since-1955/Bahcheli/p/book/9780367010867>. Accessed 8/11/2022

common, and some, such as the one governing the Baltic's Aaland Islands, have lasted for many generations. As long as the demilitarized zones continue to play a useful role in reducing military tensions, it would still be considered as an effective measure.

### 3. Possible consideration

#### A. Contiguous Zone and Continental Shelf

When discussing about maritime jurisdiction of the Contiguous Zone and Continental shelf, it can be seen that the issue of maritime jurisdiction over territorial sea associated with other Aegean disputes such as continental shelf delimitation, exclusive economic zone, airspace issue, etc. The expansion of territorial sea in the Aegean Sea would have direct impact on the settlement of these issues<sup>16</sup> due to the fact that the consequences of any expansion of the territorial sea of Greece are, in essence, not limited to internationally recognized rights and freedoms of navigation as presented by Greece, but goes beyond that. This is because that any extension of the territorial sea beyond 6 miles into the Aegean Sea of Greece is not accepted by Turkey. Contrary to what Greece alleges, such unilateral expansion of the territorial sea would also be contrary to the provisions of the 1982 United Nations Convention on the Law of the Sea for the following reasons. It should also be noted that there is no maritime border between the two countries.

In addition, it was explained in article 77 of UNCLOS<sup>17</sup> that coastal states have sovereign rights to explore and use the continental shelf. This primarily refers to the ability of coastal states to actually drill for oil and gas. It is therefore a hereditary right for Greece to pursue exploration and development of the eastern Aegean continental shelf. Moreover, UNCLOS reflects customary international law and should be legally binding even for Turkey, which has not signed it. In addition, the median line between the Greek islands and mainland Turkey must be defined, based on the equidistant principle recognized by the ICJ in the 1969 North Sea Continental Shelf Incident.

In accordance with the current situation, it can be seen that there is no legal obligation for States to claim rights to their continental shelf. It can also be seen that the national law of Greece and Turkey can only demonstrate their potential continental shelf and EEZ claims in the Aegean Sea, emphasizing that their rights to areas of the continental shelf will not be exceeding 200 nautical miles, for the purpose of exploration and exploitation of the natural resources of the seabed and their basements. On a more legal basis argument, it could also be added that under the Decree-Law 162/1969, Greece claims "the exclusive right to explore and exploit all minerals of metallic origin, including hydrocarbons on the continental shelf, by agreement and determination in international conventions accepted by law". In addition Article 2, paragraph 1,

<sup>16</sup> Edanur Yildiz, "The conflict between Greece and Turkey in the Mediterranean sea (International maritime law study)", Volume 36 No 2, September P-ISSN: 1412-2723, <http://jurnal.unissula.ac.id/index.php/jurnalhukum/article/view/11393/4445>. Accessed 6/20/2022

<sup>17</sup> UN General Assembly, Convention on the Law of the Sea, 10 December 1982, available at: <https://www.refworld.org/docid/3dd8fd1b4.html>. Accessed 8/13/2022

## Aegean Sea Issue Urgency on Maritime Jurisdiction and Territorial water extension between Turkey and Greece

Petroleum Law 4001/2011<sup>18</sup> also stated that Greece has exclusive sovereign rights for the purpose of finding, exploring and exploiting all hydrocarbons located on the seabed and subsoil of the continental shelf<sup>19</sup> and exclusive economic zone, when claimed, within 200 nautical miles of the baselines from which the breadth of the territorial sea is measured. In comparison it was regulated under 6326/1954 that Turkey claims its exclusive right to "territory outside Turkish territorial waters" for the purpose of oil and gas activities in accordance with international agreements and practices. This provision has been amended by Article 29 of Law 5574/ which explicitly mentions Turkey's exclusive sovereign rights over the "continental shelf and specific economic zones with defined boundaries". 2007,

In addition to the issue of extension that were claimed by Greece, the first consideration that should be made is that the territorial sea in the Aegean is expanded from the current 6 nautical miles to 12 nautical miles, which will occupy more than three-quarters of the Aegean Sea and is barely delineated according to the principles that demarcate the continental shelf. As explained above, territorial sea claims should be reduced to three nautical miles in parts of the congested East Aegean Sea to ensure freedom of navigation and overflight,

which is important for Turkey and third countries. A strong argument can also be made that Turkey has argued upon continental shelf as natural extension of such continental landmasses, and the Greek islands do not have their own continental shelves, the main emphasis is on the continental landmasses when establishing the boundaries of the continental shelf.<sup>20</sup> Turkey has argued that the unique geography of the Aegean Sea and its status as a semi-enclosed sea are undeniable examples of the Aegean Sea as a "special situation" that requires a fair solution to allow Turkish ships to reach the high seas from Aegean ports without passing through Greek waters.

On another case that can be taken as a reference, the Qatar-Bahrain case proven that The International Court of Justice has completely ignored the existence of Kiat Jalada, a small, uninhabited and desolate island of Bahrain, halfway between mainland Bahrain and the Qatar Peninsula. The court also decided to ignore factual data involving "sizeable maritime feature" which was discovered to be in Bahrain's territorial waters.<sup>21</sup> It was later decided as the Qatar ebb tide. Despite the claim that Bahrain made upon calling it as an island, the court said that the situation of "at high tide only a small part is above water" made it impossible to be classified as an island. The court also noted that it could serve as an ebb tide (the movement of the tide out to sea),

<sup>18</sup> 8LSE, "Law 4001/2011 on the Operation of electricity and gas energy markets, for exploration, production and transmission networks of Hydrocarbons and other provisions", [Law 4001/2011 on the Operation of Electricity and Gas Energy Markets, for Exploration, Production and Transmission Networks of Hydrocarbons and other provisions - Greece - Climate Change Laws of the World \(climate-laws.org\)](#). Accessed 5/20/2022

<sup>19</sup> Aegean Sea Continental Shelf (Greece v Turkey) (Interim Measures) [1976] ICJ Rep 3, 23–25; Yücel Acer, *The Aegean Maritime Disputes and International Law* (Routledge 2003) 153

<sup>20</sup> Jon M. Van Dyke, "The regime of islands in international law: Hiran J. Jayewardene Martinus Nijhoff, Dordrecht", [https://econpapers.repec.org/article/eeem/arpol/v\\_3a16\\_3ay\\_3a1992\\_3ai\\_3a5\\_3ap\\_3a406-407.htm](https://econpapers.repec.org/article/eeem/arpol/v_3a16_3ay_3a1992_3ai_3a5_3ap_3a406-407.htm). Accessed 8/13/2022

<sup>21</sup> International Court of Justice, "Maritime Delimitation and Territorial Questions between Qatar and Bahrain (Qatar v. Bahrain)", <https://www.icj-cij.org/en/case/87>. Accessed 8/13/2022

which indirectly translates as a baseline to measure territorial waters, exclusive economic zones, and the continental shelf.

### **B. Delimitation system on the Aegean Sea**

Based on the history itself there has been several action that has been done in regards of the continental shelf issue between Turkey and Greece in the past. In this regards Greece has requested upon the United Nation Security Council and the ICJ which resulted in the form of Resolution 395 which was later adopted in the 1976. In continuity, United Nation security council urges Turkey and Greece to do everything possible to degrade the tension in the Aegean and urges both countries to resume direct talks and negotiations to resolve their differences, The UN Security council also urged<sup>22</sup> both countries to ensure that these negotiations lead to solutions that satisfy both parties. In a ruling issued on 11 September 1976, the International Court of Justice designated the continental shelf of the Aegean Sea outside the territorial seas of the two coastal States as a "disputed area" in which Turkey and Greece claim exploration and exploitation rights. However, despite proceeding on the search of help from the International community, the proceedings that was done by Greece against Turkey in a dispute over the Aegean Sea on the continental shelf can be concluded to be quite useless, due to the fact that on the Judgment that were later released on the 1978, the court with the vote of 12 to 2 has decided that it

has no jurisdiction on the application that was filed by Greece.

Both Greece and Turkey have clearly articulated its respective maritime claims in the Aegean Sea through its national legislation. Their claims are consistent with the provisions of UNCLOS including claims to territorial seas and continental shelf. Given the Aegean's narrow geographical profile, these claims met and overlap, and that both parties agreed that their maritime disputes should be settled on the basis of international law. While Greece is a signatory to both Convention on the Continental Shelf 1958 and UNCLOS, Turkey is not a signatory to either of these conventions, this means customary international law, as reflected in international precedents, applies in maritime delimitation of the Aegean, especially towards the jurisdiction on the continental shelf.

In the method of delimitation for the Aegean sea, it can be seen that both Greece and Turkey have different advanced/approach when it comes to the delimitation system that are used. For the position of Greece itself, Greek islands, including the islands in the mid are of the Aegean and enjoy beyond their territorial waters, unless another limitation is justified by a special situation. Greece has a special situation where the Aegean islands of Greece justify solutions other than the median, with the exception of some low tide elevations and negligible uninhabitable rocks that can be ignored in the delimitation process. With its own relation it can also be seen that the Greek Aegean islands do not qualify to be a special circumstance to justify any other solution outside the median line. In its own addition, Greece has also emphasized that the delimitation of the continental shelf is

<sup>22</sup> Michalis Nicolaou, "Cyprus: Greece v. Turkey, Maritime Conflict Over The Aegean Sea: An International Law Perspective", [Greece v. Turkey, Maritime Conflict Over The Aegean Sea: An International Law Perspective - Marine/ Shipping - Cyprus \(mondag.com\)](#). Accessed 5/20/2022

## Aegean Sea Issue Urgency on Maritime Jurisdiction and Territorial water extension between Turkey and Greece

based on both the theory and practice of international law on the principle of equality.

At the meeting of the delegations and experts between Greece and Turkey on June 19 and 20, the Greek delegation pointed out that the rule of international law concerning the delimitation of continental shelf are limited between opposing states median. Therefore, since the Hellenic Island can create their own full set of seas, a median line should be drawn between the Islands of Greek island and Turkish territory. Similar position is stated in Greek Petroleum Law 2289/1995 that<sup>23</sup> stated "in the absence of a delimitation agreement with neighboring States the outer limit of the continental shelf and of the exclusive economic zone (once declared) is the median line".

On the other hand, Turkey has also come with its own measuring methods in delimitation of the continental shelf, however its needs to be agreed by both parties in order to fulfill the principle of fairness which will result a more justifying result.

According to Turkey, the median/equal line has one residual feature in the event of no agreement unless special circumstances justify other boundaries to reach a "fair and equal agreement"<sup>24</sup> based on fair principles". Turkey has repeatedly express the view that "the outer limits of the continental shelf of Turkey should be built on the principles of fairness, taking into account all

relevant or special circumstances in accordance with international law". Therefore, Turkey relies on the "fairness" of any resolution that no particular method of identification, including the equidistant method, has priority status because the equals cannot be determined solely on specific instances of the delimited area.

Furthermore, there are currently around 2400 islands in the Aegean sea with the majority of the islands are in dispute. The Aegean Sea is home to many small islands and rocks whose ownership is not defined by international treaties.

Another problem with islands and rocks arises from different interpretations of treaties, given the vague language embedded in the relevant treaties. In regards to those islands, most of them have neither human habitation nor economic life. Greece sought to change its status by opening some of these geographical features to artificial settlements. Turkey sees this Greek policy as another attempt to create a *fait accompli* to blockade the Aegean Sea as a Greek sea<sup>25</sup>. In the next two sections, it will further discuss upon the delimitation system that can be used for the islands of the Eastern Aegean Sea, kardak rocks, and The Greek demilitarized obligation on the eastern Aegean islands.

### C. Delimitation system of the Eastern Aegean Sea islands

Upon its starting status, it was well known that Greece initially claimed that the islands in the Straits and Saruhan Islands belonged to Greece,

<sup>23</sup> Constantinos Yiallourides, "The Aegean Sea Maritime Delimitation Dispute", June 1 2019, [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3517237](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3517237). Accessed 5/20/2022

<sup>24</sup> International Court of Justice, " Reports of Judgments advisory opinions and orders", <https://www.icj-cij.org/public/files/case-related/62/062-19781219-JUD-01-00-FN.pdf>. Accessed 8/13/2022

<sup>25</sup> Ufuk Alkan, "Legal and Political Aspects of the Aegean Dispute and Its Implications for Turkey's Relations with Greece and the European Union", Atatürk Üniversitesi İktisadi ve İdari Bilimler 29, sy.4 (2015), 710.

with the exception of Gökçada, Bozžada, Tavshan, and the islands as referred in Article 15 of the Lausanne Peace Treaty. It further stated that under Article 12(3), the islands that is less than 3 miles from the Asian coast remains under Turkish sovereignty. On the other side Greece has sovereignty over the<sup>26</sup> islands more than three miles from its coast, with the exception of the Three Islands which belonged to Turkey and those within three miles of it. However, Turkey rejected the Greek interpretation of Article 12 of the treaty, as the islands are not mentioned in the treaty remains as an issue and is pending for a mutual negotiations.

#### D. Delimitation system of the Kardak rocks

As another reference that can be used on the Aegean issue, The Imia-Kardak Rocks dispute can also be used due to geographical situation of the Kardak Islands that are relatively small islands that at first seemed very important. This dispute must be negotiated in good faith between Turkey and Greece. In addition, the Kardak Islands are located about four miles off the Turkish coast close to other Greek territories, putting them on a beneficial position.

The issue of Kardak/Imia sovereignty began on December 25, 1995 when the Turkish cargo ship *Figen Akat* ran aground Kardak/Imia, which is about 5.5 miles from the Greek island of Kalymnos and 3.8

miles off the Anatolian coast. Based on the perspective of the available law, Turkey claimed that the area of Kardak rocks does not belong to Greece and stated two reasons. First, on the fact that the document regarding delimitation of Kardak rocks was made by Turkey and Italy. However, Turkish General National Assembly does not ratify those documents.

With the consideration that treaties without national parliamentary ratifications are not considered as binding instruments, thus making it non-binding. Second, the document in question has not been registered by the League of Nations, so the unregistered document is considered invalid. However, Turkey's claims are questionable. In accordance with Articles 11 and 12 of the VCLT<sup>27</sup>, even if the relevant document between Turkey and Italy on Kardak Rocks has not been ratified by the Turkish parliament, a mere signature of the representative may be sufficient.

#### E. Greek obligation towards demilitarized area on the eastern Aegean islands

The Treaty of Lausanne of 1923<sup>28</sup> has mandated that the demilitarization of several islands in the eastern Aegean falls to Greece. Under the 1947 Treaty of Paris, Italy gave the Dodecanese Islands to Greece. Greece began militarizing the islands and accelerated its plans after the Cypriot crisis of 1947. The militarization of the islands of Lemnos and Samothrace and its

<sup>26</sup> Yusuf Avar, "Aegean Disputes Between Turkey and Greece: Turkish and Greek Claims and Motivations in The Framework Of Legal and Political Perspectives", 2019, <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&cad=rja&uact=8&ved=2ahUKFwii39nglL75AhUZS2wGHalLCSgQFnoECBEQAO&url=https%3A%2F%2Fdergipark.org.tr%2Ftr%2Fdownload%2Farticle-file%2F706054&usq=AOvVaw3vJ91CWmomzqgS-gFuY7Ll>. Accessed 8/11/2022

<sup>27</sup> United Nations, Vienna Convention on the Law of Treaties, 23 May 1969, United Nations, Treaty Series, vol. 1155, p. 331, available at: <https://www.refworld.org/docid/3ae6b3a10.htm>. Accessed 8/13/2022

<sup>28</sup> Britannica, "Treaty of Lausanne", <https://www.britannica.com/event/Treaty-of-Lausanne-1923>. Accessed 8/13/2022

## Aegean Sea Issue Urgency on Maritime Jurisdiction and Territorial water extension between Turkey and Greece

expansion into the Dardanelles pose a great threat to Turkey, which accuses Greece and says that what Greece has done should be considered a serious violation of the Lausanne and Paris Treaties

Regarding Greece's arguments regarding the delimitation process, a similar approach towards enclosing the islands in its territorial sea can be observed in several delimitations, particularly concerning islets. For example, in Dubai/Sharjah border arbitration, Sharjah stated that the island of Abu Musa should benefit from at least half the effect, describing it as significant and economically important. Dubai argues that the island is remote, small, and very close to the equidistant distance between Dubai and Sharjah. They argued that using the island would lead to a clear distortion of the boundary and would be contrary to the principle of non-aggression.

The Court recognized that Abu Musa was entitled to maritime zones within its power but held that by granting Abu Musa an area of continental shelf beyond its territorial sea would have the effect of distorting the areas. therefore it was decided that the delimitation of the maritime boundary would be done by using an equidistant line starting from the end of the land boundary between the two States and enclosing Abu Musa's Sharjah Island within 12 nautical miles<sup>29</sup>of territorial sea which does not give the weight of the assignment. of the continental shelf. ICJ took a similar approach in Romania vs Ukraine for the

small uninhabited Serpents Island, leaving it inland within its 12-nautical-mile territorial sea. Since islands have the right to create maritime zones according to their own capabilities, their coasts can, in principle, be taken as the basis for the delimitation of the territorial sea, exclusive economic zone and continental shelf with other countries.

In other situations that involves small islands that are far from the coast of the state to which they belong, it is possible that they may be significantly reduced for delimitation purposes, if their use is found to have an unfairly distorting effect on the final demarcation line, parts of small marine features, including islands in their own right and "rocks referred to in Article 121 (3)",<sup>30</sup> is evidenced in many bilateral agreements signed by States through diplomatic channels and in some cases the delimitation of the sea has been proposed previously which was also settled by the ICJ, ITLOS and other international arbitral tribunals. For example, in the case of the North Sea Continental Shelf, the first on the subject, ICJ argues that delimitation process should ignore the presence of islets, rocks and coastal projections that are disproportionate.

In discussion regarding the islands that are owned by Greece, They argued that under the regulation in the International law, all Greek islands are qualified to be specified as an island as it was stated under the Article 121 of UNCLOS and should be able to generate the same maritime zones along with the other islands territorial. Further, it should also be applicable to be used for the delimitation process between the Greek islands and the

<sup>29</sup> Serkan Demirtas, " Turkey urges Greece not to extend territorial waters to extend territorial waters to 12 miles in Aegean", January 8 2022, <https://www.hurriyetdailynews.com/turkey-urges-greece-not-to-extend-territorial-waters-to-12-miles-in-aegean-170644>. Accessed 5/20/2022

<sup>30</sup> Maritime Delimitation in the Black Sea (Romania v Ukraine) (Judgment) [2009] ICJ Rep 61 para 188

Turkish mainland coasts. However, in return for the argument that given by the Greece,<sup>31</sup>Turkey considers the Aegean sea as a special case and argues that in order to achieve a justified equitable delimitation solution, all possibilities and all relevant circumstances should be taken as an account to find an appropriate approach. In its regard towards the legal position, it can be concluded that Turkey's position on the issue is very complicated due to the geographical position of their location that are just 6 nautical miles off from the Greek islands of Rhodes and Kastellorizo. However, in response, Greece considered this to be a violation of the Greeks islands continental shelf areas. Regarding the contradicting arguments between the two countries, it can be concluded that one of the best ways to find an equal solution when it comes to creating a delimitation line is by an agreement between the two countries to find an equitable solution regarding the exploration, development, and the jurisdiction of the territorial sea in the Aegean along with its delimitation.

### **C. CONCLUSION**

The dispute between Greece and Turkey regarding the Aegean Issue is a very long case that has not been resolved ever since the 1950s, on one of its biggest issue, Turkey is not a part of UNCLOS and has denied on bringing the case into ICJ. On the other hand, Greece arguments of extension in the territorial water from 6 nautical miles into 12 nautical miles could become a big issue for Turkey due to the expansion that will result on Turkey not being able to reach the high seas from Aegean ports without passing through

Greek waters. Regarding the available international Legal framework itself, the regulation under Article 121 UNCLOS classifies that the islands that the Greece own have its own maritime zones and should be applicable for the delimitation process between the Greek islands and the Turkish mainland coasts. In addition to the situation that is currently happening, both Greece and Turkey have not yet found an applicable solution that is able to solve the problem of the maritime Jurisdiction regarding the Aegean issue. Those conditions that are mentioned before also concluded that potential resources of the Aegean cannot be meaningfully assessed, largely because ongoing maritime disputes and general political instability in the region discourage investment in exploration and exploit.

In addition to the current standing of both countries regarding the delimitation system, the equidistance method of delimitation cannot be drawn without taking into account of the possible circumstances that might take effect. This is well related to the various available methodologies that are available and are in accordance with the International law. In regards to the current situation, the action that was undertaken by Greece on their claims of territorial water extension is a clear indication of ignorance towards the article 300 of UNCLOS. In conclusion, it can be seen that in order to solve the maritime jurisdiction on the Aegean sea, a clear line especially on the delimitation of the two countries is needed, along with Greece to not extend the territorial water that currently stands. The International Court of Justice or other international legal bodies is also the best available path in addressing the Aegean Sea dispute. Another possibility is for Greece and Turkey to take part in confidence-boosting activities like joint military drills or cultural exchanges to foster goodwill and lower tensions. Additionally, reaching an agreement and working together with both sides will be

<sup>31</sup> Republic of Turkiye Ministry of Foreign affairs, "The breadth of Territorial waters", [The Breadth of Territorial Waters / Republic of Turkiye Ministry of Foreign Affairs \(mfa.gov.tr\)](https://www.mfa.gov.tr/The-Breadth-of-Territorial-Waters/Republic-of-Turkiye-Ministry-of-Foreign-Affairs). Accessed 5/20/2022

## Aegean Sea Issue Urgency on Maritime Jurisdiction and Territorial water extension between Turkey and Greece

necessary to resolve the Aegean Sea issue. Despite of the challenging, perseverance in seeking for a resolution, other methods like cooperative discussion between the two countries would also be another good way of resolving the case.

### REFERENCES

#### Print Book

Ufuk Alkan, "Legal and Political Aspects of the Aegean Dispute and Its Implications for Turkey's Relations with Greece and the European Union", Atatürk Üniversitesi İktisadi ve İdari Bilimler 29, (2015).

#### E-Book fromt the Internet

Tozun Bahcheli, "Greek-Turkish Relations Since 1955", 1990, <https://www.routledge.com/Greek-Turkish-Relations-Since-1955/Bahcheli/p/book/9780367010867>. Accessed 8/11/2022

#### Website

Republic of Türkiye Ministry of Foreign affairs, "The breadth of Territorial waters", 20 July 2021, [The Breadth of Territorial Waters / Republic of Türkiye Ministry of Foreign Affairs \(mfa.gov.tr\)](https://www.mfa.gov.tr/Turkiye-Ministry-of-Foreign-Affairs). Accessed 5/20/2022

Republic of Türkiye, " Turkey's Perception of the Aegean Sea", 17 May 2020, [https://www.mfa.gov.tr/turkey\\_s-p-erception-of-the-aegean-sea.en.mfa](https://www.mfa.gov.tr/turkey_s-p-erception-of-the-aegean-sea.en.mfa). Accessed 8/10/2022

#### Online Journal article

Captain George V. Galdorisi, USN, "Military Activities in the exclusive economic zone: Preventin Uncertainty and Defusing conflict", <https://core.ac.uk/download/pdf/232621081>. pdf. Accessed 4/20/2022

Constantinos Yiallourides, "Maritime Disputes and International Law", [Maritime Disputes and International Law: Disputed Waters and Seabed ... - Constantinos Yiallourides - Google Books](https://books.google.com/books?id=3517237). Accessed 5/20/2022

Constantinos Yiallourides, "The Aegean Sea Maritime Delimitation Dispute", June 1 2019, [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3517237](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3517237). Accessed 5/20/2022

Edanur Yildiz, "The conflict between Greece and Turkey in the Mediterranean sea (International maritime law study)", Volume 36 No 2, September P-ISSN: 1412-2723, <http://jurnal.unissula.ac.id/index.php/jurnalhukum/article/view/11393/4445>. Accessed 6/20/2022

Jon M. Van Dyke, "An analysis of the Aegean disputes under International law", <https://www.tandfonline.com/doi/abs/10.1080/00908320590909088>. Accessed 8/11/2022

Jon M. Van Dyke, "The regime of islands in international law: Hiran J. Jayewardene Martinus Nijhoff, Dordrecht", [https://econpapers.repec.org/article/eeemarpol/v\\_3a16\\_3ay\\_3a1992\\_3ai\\_3a5\\_3ap\\_3a406-407.htm](https://econpapers.repec.org/article/eeemarpol/v_3a16_3ay_3a1992_3ai_3a5_3ap_3a406-407.htm). Accessed 8/13/2022

Jon M. Van Dyke, "The republic of Korea's Maritime Boundaries", <https://view.officeapps.live.com/o/p/view.aspx?src=http%3A%2F%2Fwww.hawaii.edu%2Felp%2Fpublications%2Ffaculty%2FTheRepublicofKorea.doc&wdOrigin=BROWSELINK>. Accessed 8/11/2022

Michalis Nicolaou, "Cyprus: Greece v. Turkey, Maritime Conflict Over The Aegean Sea: An International Law Perspective", [Greece v. Turkey, Maritime Conflict Over The Aegean Sea: An International Law](https://www.greecev.turkey.com/2017/05/01/maritime-conflict-over-the-aegean-sea-an-international-law-perspective/)

- [Perspective - Marine/ Shipping - Cyprus \(mondaq.com\)](#). Accessed 5/20/2022
- Republic of Turkiye, "Background Note on Aegean Dispute", <https://www.mfa.gov.tr/background-note-on-aegean-dispute.en.mfa>. Accessed 8/10/2022
- Stergios Arapglou, "Dispute in the Aegean Sea the Imia/kardak crisis", (Thesis, Air University, 2002), <https://apps.dtic.mil/sti/pdfs/ADA420639.pdf>. Accessed 8/11/2022
- Yusuf Avar, "Aegean Disputes Between Turkey and Greece: Turkish and Greek Claims and Motivations in The Framework Of Legal and Political Perspectives", 2019, [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cad=rja&uact=8&ved=2ahUKEwji39ngLL75AhUZS2wGHallCSgQFn\\_oECBEQAQ&url=https%3A%2F%2Fdergipark.org.tr%2Ftr%2Fdownload%2Farticle-file%2F706054&usg=AOvVaw3vJ91CWmomzggS-gFuY7Ll](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cad=rja&uact=8&ved=2ahUKEwji39ngLL75AhUZS2wGHallCSgQFn_oECBEQAQ&url=https%3A%2F%2Fdergipark.org.tr%2Ftr%2Fdownload%2Farticle-file%2F706054&usg=AOvVaw3vJ91CWmomzggS-gFuY7Ll). Accessed 8/11/2022

### Print Journal Article

- Michael Robert Hickok, "The Imia/Kardak Affair, 1995–1996: A Case of Inadvertent Conflict", *European Security*, Vol. 7, No. 4 (1998)

### Online Newspaper

- Ankara, "Turkey urges Greece not to extend territorial waters to 12 miles in Aegean", January 08 2022,
- UN General Assembly, Convention on the Law of the Sea, 10 December 1982, available at: <https://www.refworld.org/docid/3dd8fd1b4.html>. Accessed 19 June 2022
- United Nations, Vienna Convention on the Law of Treaties, 23 May 1969, United Nations, Treaty Series, vol. 1155, p. 331, available at: <https://www.refworld.org/docid/3>

<https://www.hurriyetdailynews.com/turkey-urges-greece-not-to-extend-territorial-waters-to-12-miles-in-aegean-170644>. Accessed 6/20/2022

- Serkan Demirtas, "Turkey urges Greece not to extend territorial waters to 12 miles in Aegean", January 8 2022, <https://www.hurriyetdailynews.com/turkey-urges-greece-not-to-extend-territorial-waters-to-12-miles-in-aegean-170644>. Accessed 5/20/2022

### Treaties

- Britannica, "Treaty of Lausanne", <https://www.britannica.com/event/Treaty-of-Lausanne-1923>. Accessed 8/13/2022
- 8LSE, "Law 4001/2011 on the Operation of electricity and gas energy markets, for exploration, production and transmission networks of Hydrocarbons and other provisions", [Law 4001/2011 on the Operation of Electricity and Gas Energy Markets, for Exploration, Production and Transmission Networks of Hydrocarbons and other provisions - Greece - Climate Change Laws of the World \(climate-laws.org\)](#). Accessed 5/20/2022

### UN Documents

[ae6b3a10.htm](#). Accessed 8/13/2022

### Judgements, Orders, and Advisory Opinions

- International Court of Justice, "Reports of Judgments advisory opinions and orders", <https://www.icj-cij.org/public/files>

Aegean Sea Issue Urgency on Maritime Jurisdiction and  
Territorial water extension between Turkey and Greece

[/case-related/62/062-19781219-JU  
D-01-00-EN.pdf](#). Accessed  
8/13/2022

International Court of Justice, “Maritime  
Delimitation and Territorial  
Questions between Qatar and  
Bahrain (Qatar v. Bahrain)”,  
<https://www.icj-cij.org/en/case/87>.  
Accessed 8/13/2022

Aegean Sea Continental Shelf (Greece v  
Turkey) (Interim Measures) [1976]  
ICJ Rep 3, 23–25; Yücel Acer, *The  
Aegean Maritime Disputes and  
International Law* (Routledge 2003)  
153

Maritime Delimitation in the Black Sea  
(Romania v Ukraine) (Judgment)  
[2009] ICJ Rep 61 para 188