

THE ONGOING MARITIME DISPUTES IN THE EASTERN MEDITERRANEAN SEA AND THE ROLE OF MEIS ISLAND*

Doğu Akdeniz’de Süregelen Deniz Alanı Uyuşmazlıkları ve Meis Adası’nın Rolü

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L&JIR

Year: 16, Issue: 29
January 2025

pp.19-38

Article Information

Submitted :10.06.2024

Last Version :01.07.2024

Received

Accepted :16.10.2024

Article Type

Research Article

Abstract

In this study, the disputes related to the maritime areas developing around the Eastern Mediterranean are evaluated from the perspectives of Greece, Turkey, the Greek Cypriot Administration of Southern Cyprus (GCASC), and the Turkish Republic of Northern Cyprus (TRNC). The conflicts over the rules to be applied for the delimitation of maritime zones arise from competing interests among states to use marine resources more. International law stipulates that disputes concerning maritime zones, especially in areas with geographical restrictions, should be resolved through negotiations and agreements within the framework of “equitable principles”. Undoubtedly, the conflicting claims of states over the maritime zones and the different interpretations of delimitation rules have added a new dimension to the disputes that have been ongoing for years between Turkey, Greece, the GCASC, and the TRNC. Due to mutual demonstrations of power by the states, the region is currently under high tension. The article examines the international judicial decisions related to islands’ maritime zone rights to highlight the need for a comprehensive and fair resolution to prevent potential military conflicts in the region.

Keywords: Eastern Mediterranean, Delimitation, Maritime Zones, Equitable Principles, Meis Island.

Özet

Bu çalışmada Doğu Akdeniz çevresinde gelişen deniz alanları ile ilgili anlaşmazlıklar Yunanistan, Türkiye, Güney Kıbrıs Rum Yönetimi (GKRY) ve Kuzey Kıbrıs

* There is no requirement of Ethics Committee Approval for this study.

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Türk Cumhuriyeti (KKTC) perspektiflerinden değerlendirilmiştir. Deniz yetki alanlarının sınırlandırılmasında uygulanacak kurallara ilişkin anlaşmazlıklar, devletlerin deniz kaynaklarını daha fazla kullanma isteğinden kaynaklanmaktadır. Uluslararası hukuk, deniz alanlarına, özellikle de coğrafi kısıtlamalara sahip deniz alanlarına ilişkin uyuşmazlıkların, “hakkaniyet ilkeleri” çerçevesinde müzakere ve anlaşmalar yoluyla çözülmesini öngörmektedir. Şüphesiz ki, deniz yetki alanları konusunda devletlerin çatışan iddiaları ve sınırlandırma kurallarının yine devletler tarafından farklı yorumlanması, Türkiye, Yunanistan, GKRY ve KKTC arasında yıllardır devam eden anlaşmazlıklara yeni bir boyut kazandırmıştır. Devletlerin karşılıklı güç gösterileri nedeniyle bölgede güncel olarak yüksek gerilim yaşanmaktadır. Makale, adaların deniz alanı haklarına ilişkin uluslararası yargı kararlarını inceleyerek bölgedeki olası askeri çatışmaların önlenmesi için kapsamlı ve adil bir çözüme duyulan ihtiyacın altını çizmektedir.

Anahtar Kelimeler: Doğu Akdeniz, Sınırlandırma, Deniz Alanları, Hakkaniyet İlkeleri, Meis Adası

INTRODUCTION

Throughout history, states have shown excessive interest in and made numerous claims to maritime zones. Compared to other regions, the Eastern Mediterranean has always been a region of critical geopolitical, geostrategic, and socioeconomic importance. Various empires, such as the Venetian, Lusignan, Roman, Ottoman, and British, have ruled the region in different periods. Particularly after World War I, sharing the areas bordering the Mediterranean and establishing new states became a cornerstone and the developments in international law and the claims of regional states in maritime areas in the 20th century triggered new disputes.

Today, the scope of international law of the sea is determined by the rules of the 1982 United Nations Convention on the Law of the Sea (UNCLOS) and customary rules. In this context, the exclusive economic zone (EEZ) and the continental shelf exist, where, coastal states have sovereign rights regarding economic activities beyond the 12 nautical miles (nm) territorial waters and the 24 nm contiguous zone.

When the Mediterranean region is examined; the number of states, geographical limitations, and historical and political tensions between neighboring states pose difficulties regarding the delimitation of maritime areas. Specifically, the dispute between Greece and Turkey regarding the Aegean Sea Continental Shelf and the events that occurred in Cyprus between the Turkish Cypriot and Greek Cypriot Communities since 1960s, are the main reasons for the unsolved situation until today. The existence of natural resources in the area claimed as the continental shelf by the GCASC has brought another dimension to these disputes. The dispute over the Eastern Mediterranean, developed with mutual showdowns between the states, continues within the framework of the claims

made through Meis Island between the GCASC- Greece and Turkey –TRNC. In this article, the *status quo* in the Eastern Mediterranean is examined with claims concerning the Island of Meis and the applicable principles of international law.

I. DEVELOPMENT OF MARITIME ZONE DISPUTES IN THE EASTERN MEDITERRANEAN

The Eastern Mediterranean has been crucial to geopolitics throughout history due to its advantageous geographical position. As well as being a geostrategic location, the region emerged as a new geoeconomic zone demonstrating its impact on state-to state political relations and the struggle for dominance following the discovery of hydrocarbon resources.¹ The desire of the states to explore and exploit new energy sources and to introduce additional concepts to territorial waters and offshore applications to benefit more from marine resources is the main reason for the formation of the current disputes in the Eastern Mediterranean.² Following the exploration of energy sources, the conflict among the states regarding maritime sovereignty became more apparent, and subsequently, international groupings formed in the region as a result of various agreements.³

Currently, apart from the maritime zones that devise part of the state's territory, there are also "international maritime zones" in which coastal states have certain "sovereign rights" that enable the states to further use marine resources. The contiguous zone, the fishery zone, the continental shelf, and the EEZ are the areas that fall under this category.⁴ UNCLOS 1982 provides details of the rights and authority conferred on coastal states over each maritime zone. Amid these areas, the continental shelf "comprises the seabed and subsoil of the submarine areas that extend throughout the natural prolongation of its land territory to the outer edge of the continental margin or to a distance of 200 nm where the outer edge of the continental margin does not extend up to that distance."⁵ Article 76 of the UNCLOS 1982 clarifies that states may use two different methods in establishing the continental shelf. Nevertheless, it is worth noting that the relevant article does not address the delimitation of "overlapping entitlements" among neighboring states but rather addresses "the entitlement to and the

¹ Levent Kırval and Arda Özkan , "The Delimitation Dispute of the Maritime Jurisdiction Areas in the Eastern Mediterranean: Turkish Perspective Based on the Equitable Principles" (2021) 52 Turkish Yearbook of International Relations 85, 87.

² Hüseyin Tamer Hava, "Doğu Akdeniz'deki Doğal Gaz Rezervlerinin Ekonomik ve Güvenlik Boyutuyla Türkiye Açısından Değerlendirmesi" (2020) 16 Güvenlik Stratejileri Dergisi 675, 677.

³ Kırval and Özkan (n 1) 87.

⁴ Hüseyin Pazarıcı, *Uluslararası Hukuk* (20th edn, Turhan Kitabevi 2021) 294.

⁵ 1982 United Nations Convention on Law of the Sea (UNCLOS), Article 76.

establishment of the outer limits of the continental shelf.”⁶ In this context, it is required to draw attention to the difference between “maritime boundary” and “maritime limit”. By following the principles of international law, a state may establish its maritime limits (delineation) and reveal the maritime areas over which it may exercise relevant jurisdiction. On the other hand, “a maritime boundary” represents the apportionment of the maritime area with respect to another state (delimitation).⁷

Every coastal state has a warrant for “a 200 nm continental shelf” under Article 76 of the UNCLOS 1982, as far as geography permits, without requiring any proclamation, effective occupation, or evidence of the geomorphology of the seabed.⁸ Coastal states own exclusive sovereign rights to “explore and exploit the seabed and subsoil non-living resources, as well as living organisms that belong to sedentary species” in the relevant submarine area.⁹ Nevertheless, a coastal state may claim for “a continental shelf beyond 200 nm” if it meets the complex geoscientific requirements outlined in the Convention on the condition that “the outer limit shall not exceed 350 nm from the baselines which the breadth of the territorial sea is measured.” In this regard, the coastal state is required to provide information to “the Commission on the Limits of the Continental Shelf” regarding the delineation beyond 200 nm.¹⁰ In light of this, it is appropriate to note that the legal notion of the continental shelf is based around the idea that “the land dominates the sea.”¹¹

The idea of the EEZ was brought about by the fact that certain states’ needs are unable to be satisfied by the continental shelf.¹² Unlike the Continental Shelf, the establishment of the EEZ is based on the declaration of the coastal state and grants the coastal state “the freedom to explore and exploit living and non-living natural resources, to conduct marine scientific research, to build facilities on the sea, to lay submarine cables and oil pipelines for an extension of 200 nm”.¹³ The EEZ is distinguished by a hybrid character that results from finding a balance between freedom of navigation and the coastal state’s jurisdiction

⁶ Bjarni Már Magnusson, *The Continental Shelf Beyond 200 Nautical Miles* (Brill 2015) 18.

⁷ Ki Beom Lee, “The Demise of Equitable Principles and the Rise of Relevant Circumstances in Maritime Boundary Delimitation” (PhD Thesis, University of Edinburgh 2012) 2.

⁸ Vladimir Jares, “The Continental Shelf Beyond 200 Nautical Miles” (2009) 42 *Vanderbilt Journal of Transnational Law* 1265,1272.

⁹ UNCLOS, Article 77

¹⁰ Magnusson (n 6)2.

¹¹ *ibid* 14.

¹² Selami Kuran, *Uluslararası Deniz Hukuku* (Beta 2016) 267.

¹³ *ibid* 266.

and rights.¹⁴ In comparison to the internal and territorial waters over which the nations exercise full sovereignty, these maritime jurisdiction areas are envisaged to be quite wide. Even though all countries are equal under international law, it is also possible that a marine zone including two or more states does not have the geographical breadth necessary to grant each state the 200 nm extension permitted by the Conventions and customary international law.¹⁵

A. The Mediterranean: “A Semi-Enclosed Sea”

The Eastern Mediterranean is encompassed by the coasts of Turkey, Greece, Syria, Lebanon, Israel, Palestine, Egypt, the TRNC, and the Republic of Cyprus¹⁶, which neither Turkey nor the TRNC recognises as a state but rather as the GCASC.¹⁷ Since the region is not geographically expedient to provide a 200 nm distance continental shelf to each riparian country by considering the latter method mentioned in Article 76 of UNCLOS 1982 to establish a continental shelf, it can be argued that the unresolved Cyprus dispute constitutes only one aspect of the maritime disputes among the aforementioned countries and Greece.¹⁸

In regions with geographical restrictions to determine the continental shelf, the first solution envisaged by UNCLOS 1982 is the conclusion of delimitation agreements among states based on international law rules to attain an “equitable solution” by considering geographical restrictions.¹⁹ The significance of the implementation of “equitable principles” in the delimitation of maritime zones is also emphasized by the International Court of Justice (ICJ) in the North Sea Continental Shelf Case, which can be defined as a landmark case for the resolution of disputes among states regarding maritime boundaries.²⁰ In this regard, factors such as the geographical characteristics of the region, security, borders of neighboring countries, and energy resources should be examined.

¹⁴ Umberto Leanza and Maria Christina Caracciolo, “The Exclusive Economic Zone” in David Attard (ed), *The IMLI Manual on International Maritime Law Volume I: The Law of the Sea* (Oxford University Press 2014) 184.

¹⁵ Victor Prescott and Clive Schofield, *The Maritime Political Boundaries of the World* (Martinus Nijhoff Publishers 2005) 47.

¹⁶ Kuran (n 12) 267.

¹⁷ Mustafa Erçakıca, “Doğu Akdeniz’de Yaşanan Güncel Gelişmelerin Kıbrıs Sorunu ve Uluslararası Deniz Hukuku Çerçevesinde Değerlendirilmesi” (2021) 16 Erciyes Üniversitesi Hukuk Fakültesi Dergisi 301,304.

¹⁸ Berk Hasan Özdem, “Examination of the Overlapping Claims of Turkey and the Greek Cypriot Administration of Southern Cyprus on the Maritime Areas to the West of the Island of Cyprus” (2019) 77 İstanbul Hukuk Mecmuası 953,954.

¹⁹ UNCLOS, Article 74, 83.

²⁰ North Sea Continental Shelf Cases (Federal Republic of Germany v. Denmark; Federal Republic of Germany v. Netherlands), I.C.J. Reports 1969, p.3, International Court of Justice (ICJ), 20 February 1969.

In view of the current situation, the region has gained value in terms of global actors due to the energy resources found. Aside from the coastal states Russia, the USA, NATO, the UK and the European Union (hereafter the “EU”) have entered into the competition to get the largest share of the resources in the region.²¹

B. The Dispute Between the GCASC and Turkey, and the Rights of the Turkish Cypriot Community

From the perspective of Turkey, the geographical restriction emerged as a “dispute” when the GCASC established its EEZ within the Eastern Mediterranean, disregarding the presence of both Turkey and the TRNC in the region. Indeed, to establish the boundaries of the EEZ, the GCASC concluded agreements with coastal states, including Egypt, Lebanon, and Israel. Through these developments, it could be observed that Turkey and the TRNC were isolated by the coalition of the GCASC, Greece, Israel, and Egypt.²² The GCASC’s operations continued despite the note verbale submitted by Turkey declaring its rights and demonstrating its view that the agreements concluded ignoring Turkey’s presence in the region were null and void. Turkey refused the sovereignty of the GCASC over the continental shelf in the Eastern Mediterranean in a letter delivered to the UN as Turkey does not agree with the application of the “median line” technique for the relevant delimitation.²³

Turkey claims that the rights of Turkey and, the rights of the Turkish Cypriot Community residing on the northern side of Cyprus have both been violated by the GCASC through this conduct. As a result, the Continental Shelf Delimitation Agreement was concluded among Turkey and the TRNC in 2011. The boundaries were delimited between the two countries according to international law principles.²⁴

Undoubtedly, the divided situation in Cyprus further complicates any issue regarding the island.²⁵ In this context, the Republic of Cyprus’s attempts to carry out exploring and drilling operations within the EEZ it established, sparked debate about the Turkish Cypriot community’s actual level of participation in state institutions, given that they could not have done so since the start of the 1963–1964 crisis.²⁶ It should be noted that The Treaty concerning the establishment

²¹ Betül Algür, “Kıbrıs ve Doğu Akdeniz’deki Son Uluslararası Gelişmeler Işığında Değişen Türkiye, ABD ve NATO Politikalar” (2020) 2 Anadolu Strateji Dergisi 55, 56.

²² Kırval and Özkan (n 19) 88.

²³ Papadakis Demetris, “Fresh Challenge by Turkey to the Sovereignty of the Republic of Cyprus and Greece” (2016) <https://www.europarl.europa.eu/doceo/document/E-8-2016-007740_EN.html> accessed November 2, 2023.

²⁴ Kuran (n 12) 268.

²⁵ Erçakıca (n 17) 303.

²⁶ Ioannis N Grigoriadis, “Eastern Mediterranean in Uncharted Waters” (Michaël Tanchum ed, Konrad Adenauer Stiftung 2021) 40.

of the Republic of Cyprus (UK, Greece, Turkey, Cyprus) concluded in 1960 and the additional protocols indicate that Turkish Cypriots will also take an effective role in the governance of the Republic of Cyprus.²⁷

The TRNC's claims about maritime jurisdiction have often been challenged by factors such as the lack of international recognition as a consequence of UN Security Council Resolutions 541 and 550, indicating that the establishment of the TRNC would not be legally recognised by other States. Furthermore, the Republic of Cyprus is a Member State of the European Union and solely represented by the GCASC, which is also a fact that reduces the influence of the TRNC in the region.²⁸ Following agreements with Egypt, Lebanon, and Israel, the GCASC, acting as the Republic of Cyprus, declared that it was prepared to profit from the 2011 exploration of the Aphrodite natural gas deposit.

However, the Cyprus issue remained a significant barrier to the "monetization" of natural gas since Turkish Cypriots were not effectively involved in the Republic of Cyprus' "decision-making process", which calls the legitimacy of these activities into question. Due to this circumstance, on behalf of the TRNC, Turkey also organized explorations in the marine area in question.²⁹

Turkey defends its rights and those of the Turkish Cypriot Community as a guarantor power under the Treaty of Guarantee 1960.³⁰ In 2019, Turkish exploration and drilling ships were sent to the area, which is also claimed by the GCASC as its EEZ, and in response the EU imposed sanctions against Turkey as it deemed these activities to violate the sovereignty of the island. The EU Council renewed its restrictive measures which include "an asset freeze for listed persons and entities and EU citizens and companies are forbidden from making funds or economic resources available to those listed. In addition, a travel ban to/through the EU applies to listed persons." until November 30, 2024. Presently, two officials from the Turkish Petroleum Corporation (TPAO) are listed for these restrictive measures.³¹ Even though the rights of the coastal state on the continental shelf are not based on any "express proclamation", Turkey established the outer limits of its continental shelf in the Eastern Mediterranean region with a letter dated March 18, 2019, delivered to the UN General Assembly. Turkey

²⁷ Treaty No. 5476. United Kingdom of Great Britain and Northern Ireland, Greece and Turkey, and Cyprus, Additional Protocol I, Additional Protocol II.

²⁸ Algür (n 21) 56.

²⁹ Grigoriadis (n 26) 43.

³⁰ Treaty No. 5476. United Kingdom of Great Britain and Northern Ireland, Greece and Turkey and Cyprus.

³¹ European Council, "Unauthorised Drilling Activities in the Eastern Mediterranean: Council Prolongs Restrictive Measures" <<https://www.consilium.europa.eu/en/press/press-releases/2023/11/09/unauthorised-drilling-activities-in-the-eastern-mediterranean-council-prolongs-restrictive-measures>> accessed November 3, 2023

highlighted “The Continental Shelf Delimitation Agreement” concluded with the TRNC by relying on the fact that there is no single authority in Cyprus to represent both Turkish Cypriot and Greek Cypriot communities within the same letter.³² Turkey still has not declared an EEZ. While a continental shelf is a right for all countries, the EEZ is subject to declaration.

C. The Maritime Disputes Between Greece - Turkey and Meis Island-Related Claim

Among the GCASC’s policy in the area, Greece also maintains a policy in which it asserts rights in the Eastern Mediterranean through the islands it dominates, which it cannot actually make through its mainland. By relying on this argument, Greece claims that the Aegean Sea islands could provide their own EEZ, enabling them to explore 200 nm of the Mediterranean Sea.

Criticising the Eastern Mediterranean axis alone will not be sufficient to explain the Greece and Turkey’s maritime disputes. To explain the basis of these claims, it is essential to mention the disputes among Greece and Turkey throughout the Aegean Sea, which include “the continental shelf, extension of the territorial sea of islands, air space, disputed islands, islets, and rocks concerning their status and the demilitarized obligation.”³³

Greece asserts that each island has the continental shelf, by setting forth the 1958 UN Convention on the Continental Shelf and the UNCLOS 1982. However, Turkey is not a party to the conventions and therefore these instruments are not legally binding on Turkey.³⁴ Furthermore, considering Article 46 of the UNCLOS 1982, Greece cannot declare itself as an “archipelagic state”. In Article 46, an “archipelagic state” is defined as a state that is formed of one or more archipelagos. A state which has at least a part of its territory on the mainland of a continent is not an archipelagic state.³⁵ Although its territory encompasses a group of islands, Greece is not considered to be an archipelagic state.

The Island of Meis, which was ceded to Greece as an extension of the Dodecanese islands with the Treaty of Paris in 1947, is a small island with a population of 500, located approximately 330 nm from Piraeus and only 1.25 nm from the Turkish coast.³⁶ The island’s role in the Eastern Mediterranean

³² Letter dated 18 March 2019 from the Permanent Representative of Turkey to the United Nations addressed to the United Nations Secretary-General

³³ Yusuf Avar and Yu Chou Lin, “Aegean Disputes Between Turkey and Greece: Turkish and Greek Claims and Motivations in the Framework of Legal and Political Perspectives” (2019) 1 International Journal of Politics and Security 57, 59.

³⁴ *ibid* 60.

³⁵ UNCLOS, Article 46.

³⁶ Christian Schaller, “Hardly Predictable and Yet an Equitable Solution: Delimitation by Judicial Process as an Option for Greece and Turkey in the Eastern Mediterranean” (2022)

maritime zone issue emerged from the claims of Greece, which are viewed as entirely contrary to international law. Greece asserts that the islands under its sovereignty have an unconditional and exceptional continental shelf. By giving full authority to the islands in the Eastern Mediterranean regarding limitations of the boundaries, Greece demands that the continental shelf and the EEZ limitations to be determined according to the principle of “equidistance” between the mainland and the islands. Greece’s theses on maritime jurisdiction areas are shaped around “the principle of territorial integrity” and are based on the view that, as a continental country, Greece should be evaluated as a whole with the islands that it dominates. In this respect, Greece claims that the boundaries should be drawn with the median line principle by relying on Crete, Rhodes, and Meis.

Greece interprets Article 1 of the UN Convention on the Continental Shelf 1958 as requiring a delimitation without distinction between continents and islands. Under Article 6, the limitation of the continental shelf must be determined by an interstate agreement. If no agreement is reached on the limitation of the continental shelf, “the principle of equidistance” should be applied starting from the nearest point of the baselines where the width of the state’s territorial waters begins to be measured. Since Turkey is not a party to this treaty, it is not obliged to make an “equidistance” limitation arising from this Convention.³⁷ At this point, it must be clarified that the concept of the maritime zones now exists both in treaty and customary law. However, not every provision in a treaty may develop into customary law. The detailed rules regulating the governing of the maritime zones are not a component of customary law.³⁸

As a second basis for its continental shelf claim through Meis Island, Greece refers to Article 121 of the UNCLOS 1982.³⁹ While Article 121 of UNCLOS determines “the regime of the islands”, it refers to the fact that islands suitable for human habitation can have territorial waters, contiguous zones, EEZs, and continental shelves, just like the mainland, and that the limitations will be made in accordance with the provisions of the convention applicable to other land territories.⁴⁰ The Greek government does not address two issues in the making of these claims. First, the fact that Turkey is not a party to UNCLOS 1982. A treaty does not grant “rights and obligations” to a non-party state without that state’s assent, by Article 34 of the Vienna Convention on the Law of Treaties, many of

35 Leiden Journal of International Law 549,550.

³⁷ Eren Alper Yılmaz, “Doğu Akdeniz’deki Gelişmeler Doğrultusunda Türk Dış Politikası’nın Dünü ve Bugünü” (2020) 12 Karadeniz Uluslararası Bilimsel Dergi 27,37.

³⁸ Martin Dixon, *Textbook on International Law* (Oxford University Press 2013) 30.

³⁹ Maria Gavouneli, “Whose Sea? A Greek International Law Perspective on the Greek-Turkish Disputes” <<https://www.institutmontaigne.org/en/expressions/whose-sea-greek-international-law-perspective-greek-turkish-disputes>,> accessed November 3, 2023.

⁴⁰ UNCLOS, Article 121

whose principles are currently accepted as customary law.⁴¹ The second issue relates to Articles 74 and 83 of UNCLOS. The aforementioned articles clarify that the issue of delimitation of the continental shelf and the EEZ between states whose coasts are “adjacent or opposite” each other will be resolved through agreements in an equitable manner, preserving “equitable principles”.⁴²

Although the Island of Meis is legally under the sovereignty of Greece, it is defined as the island located on the “opposite side” due to its close proximity to Turkey.⁴³ “Equity” is the main issue to be considered in the continental shelf and the EEZ delimitations in terms of international law. Since the principle of “equity” does not mean “equality”, the request for a delimitation by recognizing full authority to Meis Island, which has a surface area of 10 km, would squeeze Turkey, which possesses the longest coast in the region, into a narrow sea area. The situation in question is in total contradiction with the equitable principles.⁴⁴ The issue related to the extension of the continental shelf of Meis Island to Cyprus, together with the attempt to give complete delimitation authority to the island, will pose significant challenges in terms of the maritime zones of the TRNC.⁴⁵

Another basis for Greece’s claims about Meis is “the Seville Map” prepared by scholars from the University of Seville in the early 2000s. It is claimed that this map was prepared at the request of the EU to resolve the dispute among Turkey, Greece, and Cyprus concerning maritime zones in the Eastern Mediterranean. The prepared map draws the continental shelf of Greece in line with the islands’ borders, completely ignoring the proximity of these islands to the Turkish mainland. The Seville Map takes Meis as the median line and, according to the boundaries envisaged, the continental shelf of Greece begins from the Island of Meis and extends southwards to the middle of the Mediterranean.⁴⁶ The specified borders are such that they will close Turkey to the coasts of Antalya and the Gulf of Iskenderun. Therefore, the borders determined on the Seville map are completely contrary to the principles of equity, proportionality, geographical

⁴¹ 1969 Vienna Convention on Law of Treaties, Article 34.

⁴² UNCLOS, Article 74 - 83

⁴³ Gökhan Ak, “Meis, Karaada, ve Fener Adası’nın Doğu Akdeniz Deniz Yetki Alanları Sorununa Muhtemel Etkileri” (2015) 11 Uluslararası Hukuk ve Politika 123, 135.

⁴⁴ İlkay Türkeş, “Doğu Akdeniz’de Uyuşmazlık Teşkil Eden Deniz Alanlarında Gerçekleştirilen Hidrokarbon ve Doğalgaz Çalışmalarının Kıbrıs Sorunu’na Yansımaları ile Soruna Getirdiği Yeni Dinamikler” (2020) 4 Euro Politika Dergisi 86, 99.

⁴⁵ Derya Okatan, “Prof. Hüseyin Pazarıcı: Akdeniz’de Durumumuz Çok İyi Değil” (Artı Gerçek, September 13, 2020) <<https://artigercek.com/haberler/prof-huseyin-pazarci-akdeniz-de-durumumuz-cok-iyi-degil>> accessed November 5, 2023.

⁴⁶ BBC News, “Sevilla Haritası: Yunanistan’ın Tezini Dayandırdığı, ABD’nin ‘Hukuki Önemi Yok’ Dediği Harita” (BBC News Türkçe, September 22, 2020) <<https://www.bbc.com/turkce/haberler-dunya-54244760>> accessed November 6, 2023.

superiority, and non-encroachment. This map envisages to confine Turkey to an area of 41.000 km². However, it has no legally binding force. Following the regional tensions, it was also announced by the EU officials that the map was not prepared by the EU. In this statement, the officials confirmed that the external reports created by the institutions cannot be considered official documents of the EU, and these reports do not carry any legal or political value.⁴⁷

The Mediterranean hydrocarbon resources have added another dimension to the foregoing Aegean Sea, Cyprus, and the minority issues between the two states.⁴⁸ The process, beginning with geographical limitations, continues with mutual showdowns between states and continuously raises rumors of war.⁴⁹ Following “the Continental Shelf Delimitation Agreement”, signed with the TRNC, Turkey signed an agreement with Libya in 2019, which disrupted the balance in the region. In the “Memorandum of Understanding between the Government of the Republic of Turkey and the Government of National Accord-State of Libya on delimitation of the maritime jurisdiction areas in the Mediterranean”, Turkey highlighted the principle of equitable sharing and has concretely demonstrated the maritime zone that it claims in the region.⁵⁰ The Greek islands’ EEZ claims were not taken into consideration in this agreement.⁵¹ Following this, the boundaries established by the memorandum between Turkey and Libya were disregarded by the agreement concluded between Greece and Egypt in 2020, and this led to a new source of stress in the region.⁵²

Due to the unilateral actions of Greece and the GCASC, Turkey has adopted a military-based de facto protection strategy in the region. Following 2015, the activities of ships violating Turkey’s jurisdictional rights were stopped with the exercises carried out within the scope of the Blue Homeland Operation.

II. GENERAL OVERVIEW

Through the memorandum concluded with Libya, Turkey has concretely demonstrated its continental shelf by considering the criteria of equity and geography and has shown that it is in favor of the concluding agreements by

⁴⁷ Euronews, “AB’den ‘Sevilla Haritası’ Açıklaması: Böyle Bir Harita Hazırlamadık” (September 4, 2020) <<https://tr.euronews.com/2020/09/04/ab-den-sevilla-haritas-ac-klamas-boyle-bir-harita-haz-rlatmad-k>> accessed November 6, 2023.

⁴⁸ Edanur Yıldız, “The Conflict Between Greece and Turkey in the Mediterranean Sea, (International Maritime Law Study)” (2020) 36 *Jurnal Hukum Unissula* 126, 127.

⁴⁹ Kuran (n 12) 268.

⁵⁰ Algür (n 21) 62.

⁵¹ Grigoriadis (n26) 40.

⁵² Walid Fahmy, “The Conundrum of Delimitation of Maritime Boundaries in the Eastern Mediterranean: The Greece-Egypt Agreement in the Face of Turkey-Libya Agreement” (2020) 3 *Pro Justitia* 109,110.

prioritizing the rules of international law.⁵³ Theses developed in the Eastern Mediterranean by Greece are progressing parallel to the GCASC. The only obstacle to the desire to conclude an agreement between the two countries is Turkey's territory. To date, the GCASC has continued all its activities regarding maritime zones as the Republic of Cyprus, acting on behalf of the entire island and ignoring the rights of the Turkish Cypriot community.

While TRNC is trying to be excluded from maritime jurisdiction areas as an internationally unrecognised state, it must be noted that "recognition" is not a requirement to become a state according to international law. The most widely known formulation of the basic standards for "statehood" is laid down by "the Montevideo Convention on the Rights and Duties of States 1933". The prerequisites for statehood are given in Article 1 of the convention as; a defined territory, permanent population, government, and capacity to enter into relations with other states.⁵⁴ However, despite the divergent opinions on TRNC regarding the "capacity to enter into relations with other states" criterion due to the embargo being applied, "recognition" is not listed as a requirement for statehood by the Montevideo Convention. The lack of international recognition of the TRNC does not alter the reality of the TRNC being a state and its position concerning the areas in which it has sovereign and competent rights. It also sets forth the limitations regarding maritime zones within the scope of the agreement it concluded with Turkey.⁵⁵

The claim regarding maritime delimitation through the Island of Meis envisages the determination of a common EEZ between the GCASC and Greece citing the geographical location of Meis and its continental shelf extending to Cyprus. This policy carried out by Greece and the GCASC in the Eastern Mediterranean involves serious disputes regarding the maritime zones of the TRNC as well as Turkey. Turkey's view on Meis Island is that rights should be granted only in terms of territorial waters, and within the framework of "equitable principles", Meis Island cannot establish a maritime zone in the Eastern Mediterranean region with the impact on Turkey's continental shelf. Another suggestion Turkey has made regarding the possible continental shelf of the Island of Meis is that its continental shelf shall be determined in the high sea only towards the west, in a way that does not violate Turkey's continental shelf. Indeed, to find an appropriate and equitable solution to such a limitation in terms of international law, Greece should also sign a delimitation agreement with the TRNC which

⁵³ Türkeş (n 44) 16-17.

⁵⁴ Marshall Goldman, "Turkey, Cyprus, and the Turkish Republic of Northern Cyprus" (SSRN, May 18, 2016) <<https://ssrn.com/abstract=2781735>> accessed November 7, 2023.

⁵⁵ Türkeş (n 44)18.

seems unlikely in the near future.⁵⁶

Upon examination of the current situation, it can be observed that Greece's thesis of restricting the maritime jurisdiction of Turkey over the Island of Meis has been weakened as a result of the agreements it has concluded with different states. Greece's argument for granting full authority to the islands concerning maritime jurisdictions has become self-contradictory following the maritime jurisdiction delimitation agreement it signed with Egypt (which Turkey described as null and void as Greece and Egypt do not have a maritime boundary) to eliminate the agreement between Turkey and Libya. While Greece argues that both the text and the map in the Greece-Egypt agreement specify that "the islands have been considered in the maritime boundary delimitation".⁵⁷ Turkey claims that through this agreement, Greece has documented that it has renounced some of its claims regarding Rhodes and all of its claims over Meis. However, Greece continues to aspire to assert its claim about Meis Island against Turkey, which it could not assert against other states.⁵⁸ By signing a maritime delimitation agreement with the GCASC, Greece aims to prevent a possible Turkey–Egypt agreement in order to revive its claims through Meis. In this respect, such a delimitation is not acceptable for Turkey, TRNC, and Egypt.

An agreement between the GCASC and Greece through the Island of Meis would constitute an arrangement that would restrict Turkey's continental shelf to a narrow area while eliminating the TRNC in terms of maritime zones. The current activities of Turkey reflect the refusal to allow such a delimitation agreement and indicate that such an agreement may lead to a military conflict. The seismic survey operations in the region carried out by the state-owned TPAO are frequently accompanied by Turkish Naval Forces. A Greek and a Turkish frigate clashed in the waters between Crete and Cyprus in August 2020. The incident occurred while the Greek frigate maneuvered close to the Turkish research and survey vessel *Oruç Reis*, which had been sent to areas where both Greece and Turkey claimed their continental shelf. In the months following, the *Oruç Reis* carried out the postponed seismic survey in an extensive region, including areas near Meis.⁵⁹

⁵⁶ Hüseyin Pazarcı, "Deniz Hukuku Işığında Doğu Akdeniz Meselesi Konulu Çevrimiçi Panel" <https://tv.yasar.edu.tr/deniz-hukuku-isiginda-dogu-akdeniz-meselesi-paneli>; accessed November 8, 2023.

⁵⁷ Constantinos Yiallourides, "Part I: Some Observations on the Agreement between Greece and Egypt on the Delimitation of the Exclusive Economic Zone" <<https://www.ejiltalk.org/18969-2/>> accessed November 9, 2023.

⁵⁸ Serkan Demirtaş, "Turkey Says Greek-Egypt Deal Endorses Turkish Thesis over Maritime Rights" <<https://www.hurriyetdailynews.com/turkey-says-greek-egypt-deal-endorses-turkish-thesis-over-maritime-rights-157250>> accessed November 9, 2023.

⁵⁹ Schaller (n 36) 550.



III. JUDICIAL DECISIONS

Despite the fact that islands have a right to a continental shelf under the 1982 UNCLOS, this is not maintained as an absolute rule. Considering the theses put forward by Greece, the Island of Meis shall create a maritime jurisdiction that is four thousand times its geographical size, which is a claim that is incompatible with international law. To evaluate this situation, it is necessary to take into account the decisions made by international judicial bodies in similar cases.

A. The UK and Northern Ireland, v. The French Republic

The Channel Islands, (which are classified as Crown Dependencies rather than forming a part of the UK), are located close to the French mainland (islands on the opposite side/distant islands). Although both the UK and France agreed to conclude an agreement based on “an equidistance line” to delimit the eastern part of the English Channel as a whole and a section of the Western part, France objected to the UK’s request to consider the Channel Islands and delimit the continental shelves following the principle of equidistance and expressed its opinion that the continental shelf right of the islands could not exceed 3 miles. In this opinion, France stated that a limitation based on equidistance would narrow France’s continental shelf in favour of the UK and that the request was completely “disproportionate” to the size of the islands and the length of their coasts. The dispute between the two countries concluded in 1977 with the decision of the International Arbitration Court. In its decision, the Court highlighted that “the boundary should be drawn at a distance of 12 nm from the established baselines of the territorial sea of the Channel Islands”, and did not consider the islands regarding the delimitation of the continental shelf boundary.⁶⁰

B. Bangladesh v. Myanmar

The Island of Saint Martins caused a dispute between Myanmar and Bangladesh in determining maritime zones with its geographical location directly adjacent to Myanmar. While the International Court of Law of the Sea conferred full authority to the island in determining the territorial waters, it did not allow Bangladesh to use the island as a base point to make delimitations within the framework of “the principle of equidistance” in terms of the EEZ and continental shelf, taking the “equitable principles” into consideration.⁶¹

C. Nicaragua v. Colombia

In its decision on the maritime delimitation dispute between Nicaragua and Colombia, which it resolved in 2012, the ICJ made an important distinction

⁶⁰ Reports Of International Arbitral Awards, Delimitation Of The Continental Shelf Between The United Kingdom Of Great Britain And Northern Ireland, And The French Republic, Volume XVIII, 1978, 56-58.

⁶¹ North Sea Continental Shelf, Judgment, I.C.J. Reports, 1969, 53-56.

between mainlands and islands. The ICJ stated that the islands and mainlands cannot be considered equal in status and that the geography of the mainland has superiority over the islands. The decision in question specifically stated that islands located far from their mainland and on the opposite side should have a limited maritime zone. In its decision, the Court considered the principle of “proportionality”, which stipulates that there should be a reasonable ratio between the given maritime zone and coastal lengths, and the principle of “non-encroachment” which specifies that the front of the mainland should not be blocked by the islands of other states. As a result, the ICJ significantly limited the influence of the Colombian islands and granted a significant maritime zone to the Nicaraguan mainland.⁶²

D. Canada v. France

The “distant island” issue was also raised through the dispute between France and Canada on Saint-Pierre and Miquelon islands. In this case, France asserted that the islands should also have their own continental shelf and it would be appropriate to make the delimitation by applying the equidistance principle between the Canadian coast and the islands. On the other hand, Canada claimed that the islands in question are physically situated on the Canadian continental shelf area and cannot establish their own continental shelf. In Canada’s argument, France could only have 12 nm territorial water around the islands.

The Court of Arbitration granted France a unique zone in 1992, consisting of an “equidistant line” between the French islands and Newfoundland, a 24 nm bulge on the west, and a narrow 188 nm corridor south of the islands, allowing access to its EEZ from international waters. The drawn borders resemble the shape of a mushroom.⁶³ The Saint-Pierre and Miquelon Islands decision is highly unusual in that it grants the islands EEZ in international waters while establishing boundaries in a manner that does not impact Canada’s EEZ. Due to the absence of neighboring territories in the Atlantic Ocean, the location of the islands in this instance was of course an obvious opportunity to enjoy a sizable EEZ. This technique may only be applied in situations where there is no other territory across the high sea.

In this instance, Greece might attempt to draw borders across Creete Island or in the shape of a ‘mushroom’ to the north. However, when the situation is viewed through the consideration of the high seas and the proportionality principle, the length of the coastline of Meis Island is not equal to that of Turkey, also Cyprus

⁶² Yunus Emre Açıkgönül, “Nikaragua/Kolombiya Kararı Işığında Doğu Akdeniz’deki Deniz Yetki Alanlarının Sınırlandırılması” (2014) 6 Ortadoğu Analiz Dergisi 68, 69.

⁶³ Charles Cole , “St. Pierre and Miquelon Maritime Boundary Case and the Relevance of Ancient Treaties” (1994) 31 Canadian Yearbook of International Law/Annuaire Canadien De Droit International 265, 281.

is only 166nm away from Meis, so another delimitation must be made in this area with Cyprus. Meis Island is therefore not eligible to have a similar EEZ as the Saint-Pierre and Miquelon islands.⁶⁴

These exemplary cases regarding similar disputes reveal that Turkey's Eastern Mediterranean policy is compatible with international law and international court decisions. The principles supported by international judicial bodies completely reject the maritime jurisdiction policy, which Greece and the GCASC are trying to implement through the Island of Meis.

IV. CONCLUSION

The dispute over the Eastern Mediterranean, developed with mutual showdowns between the states, continues within the framework of the claims made through the island of Meis between the Greece- the GCASC and Turkey - TRNC, which are also parties to the Cyprus issue.

The Seville Map has served as a foundation for a common policy pursued by Greece and the GCASC to extend the Cyprus issue into maritime zones. By submitting diplomatic notes and taking proactive measures in the region, Turkey is striving to protect both its own sovereign rights and the rights of the Turkish Cypriot Community.

In its decisions concerning maritime zones, the GCASC currently acting as the sole administrator of the Republic of Cyprus, is urged to consider the conditions stipulated in the founding agreements emphasizing the participation of Turkish Cypriots in the administration. Adherence to these conditions is essential, as the actions taken by the GCASC will become questionable in the context of potential future agreements involving the Turkish Cypriots.

Considering the international legal precedent, it is not possible for an island like Meis, given its proximity to the mainland of Turkey, to establish maritime zones compatible with Greece's theses. Considering the length of the Turkish coastline and the size of the island of Meis, such a limitation is seen to be in contradiction with the customary rules accepted by international jurisprudence such as proportionality, geographical superiority, and non-encroachment. According to the examined outcome of case decisions, the most feasible approach would be to focus solely on limiting territorial waters between Turkey and the island of Meis.

In this respect, another possibility arises for a delimitation in the high seas between the island of Meis and Cyprus in case Greece signs a delimitation agreement with the TRNC, ensuring that the defined boundaries do not interfere

⁶⁴ Hüseyin Pazarcı, "Deniz Hukuku Işığında Doğu Akdeniz Meselesi Konulu Çevrimiçi Panel" <<https://tv.yasar.edu.tr/deniz-hukuku-isiginda-dogu-akdeniz-meselesi-paneli>>; accessed November 8, 2023.

with Turkey's continental shelf. However, the TRNC is an internationally unrecognised country and, from a political point of view, this has prevented it from concluding delimitation agreements with other states outside of Turkey to date.

Maritime disputes in the Eastern Mediterranean require diplomatic dialogue between the parties, adherence to equitable principles and a comprehensive solution to promote regional cooperation. In the present stage, the competition and geopolitical interests focusing on hydrocarbon resources complicate this process.

The failure to pursue dialogue and agreements will continue to increase tensions in the region due to undefined maritime borders and conflicts over access to energy resources. The risk of a military conflict will increase, which could lead to a confrontation between naval forces in the region.

The regional tensions will also have a negative impact on international relations and may lead to a decline in cooperation, trade and diplomatic relations as the international community has already begun to apply sanctions over the events. In future, these sanctions may include economic restrictions, reduced trade and international isolation.

In the absence of a consensus pertaining to the assertions concerning the island of Meis, Turkey shall continue to conclude delimitation agreements with other coastal States, as it has done in the Turkey–Libya Memorandum, and strengthen its hand with concrete data against any dispute. In this regard, the current violation of international law principles in the region has actually paved the way for Turkey to take the necessary steps within the framework of the “reciprocity” principle.

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