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Circular Letter No.4345  
24 November 2020

To: All IMO Members  
Intergovernmental organizations  
Non-governmental organizations in consultative status

Subject: **Communication from the Embassy of Greece**

The Permanent Representation of Greece to IMO has sent the attached communication, dated 23 November 2020, with the request that it be circulated by the Organization.

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Embassy of Greece  
London

**URGENT**

**Ref. No: 3369**

**NOTE VERBALE**

The Permanent Representation of Greece presents its compliments to the Secretary General of the International Maritime Organization IMO and has the honour to bring to the latter's attention the following:

Turkey recently uploaded on the IMO's GISIS platform revised geographical coordinates of its search and rescue region. The new Turkish search and rescue region was arbitrarily defined in a national Regulation on search and rescue, recently adopted by a Turkish presidential decision. Greece rejects this Turkish national legislation as being contrary to international law and not in conformity with the rules and recommendations of both IMO and ICAO. In particular:

The above Turkish search and rescue region, like the one defined in the Turkish law of 1988 and 2001, is illegal to the extent that it overlaps areas of Greek sovereignty (land and territorial waters). Thus, the relevant national Regulation produces no legal effect.

Moreover, the new Turkish search and rescue region overlaps the Greek search and rescue region for both maritime and aeronautical accidents. Thus, the relevant Turkish Regulation is not in conformity with the rules and recommendations of both IMO and ICAO, as well as with international practice, which provide that maritime SAR regions should coincide with the aeronautical ones.

As you are aware, Greece has assumed maritime search and rescue responsibilities within the limits of the Athinai FIR since its establishment. The exercise of maritime SAR responsibilities within the entire Athinai FIR is consistent with the IMO recommendation on the alignment of SAR boundaries with the corresponding FIR regions. It is also consistent with the joint ICAO-IMO SAR Manual and with the 1979 Hamburg International Convention on Maritime Search and Rescue.

In fact, the part of the Greek search and rescue region arbitrarily included in the recent Turkish Regulation as falling within the limits of the Turkish SAR region, is even larger than the one contained in the Turkish Regulation of 1988 and 2001. It is obvious that this extension was not indicated by operational criteria, does not serve the purpose of protecting human life and



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aims exclusively at promoting Turkish political claims irrelevant to search and rescue purposes.

Greece, through the competent Greek Joint Rescue Coordination Center (JRCC) in Piraeus, will continue to effectively coordinate all search and rescue operations in its search and rescue region, providing relevant services to all ships and aircraft in distress, as it has done uninterruptedly and successfully since its establishment.

In this context, Greece reminds its letter dated 20 January 1989, addressed to the Secretary General of the IMO (circulated within the IMO: SAR.3/Circ.3/Rev.1/Add.7, dated 26 January 1989).

The above Greek positions and concerns have been duly communicated to the Secretary General of IMO by the letter of the Greek Minister of Foreign Affairs, dated 19 October 2020, underlining that the Turkish Regulation of 2020 is not acceptable to Greece.

Greece denounces Turkey's attempt, once again, to redefine SAR boundaries and has called on the said country to reconsider its decision and revise its search and rescue Regulation, so as to bring it in line with international documents in force, in order to prevent possible relevant confusion that might endanger human life.

Greece kindly requests the Secretary General of the IMO to circulate the present Note to the member states of the Organization.

The Permanent Representation of Greece avails itself of this opportunity to renew to the Secretary General of the International Maritime Organization the assurances of its highest consideration.



London, November 23<sup>rd</sup>, 2020

**Secretary General  
International Maritime Organization  
In town**