

4 ALBERT EMBANKMENT  
LONDON SE1 7SR  
Telephone: +44 (0)20 7735 7611 Fax: +44 (0)20 7587 3210

Circular Letter No.4415  
21 May 2021

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

Subject: **Communication from the Government of the Hellenic Republic**

The Government of the Hellenic Republic has sent the attached communication, dated 19 May 2021, with the request that it be circulated by the Organization.

\*\*\*



EMBASSY OF GREECE  
LONDON

Ref. No: 2017

**NOTE VERBALE**

The Permanent Representation of Greece presents its compliments to the Secretary General of the International Maritime Organization (IMO) and, with reference to the Verbal Note of the Permanent Representation of Turkey No Z-2021/25984069/32227543 dated 18 January 2021, circulated with the Circular Letter No. 4373, has the honour to bring to the attention of the Secretary General the following:

The purported Turkish search and rescue (SAR) region defined by the presidential decision 3095/16.10.2020, like the one defined in the Turkish laws of 1988 and 2001, is illegal to the extent that it overlaps areas of Greek sovereignty (land and territorial waters). In this context, it is worth mentioning that, in the Aegean, the purported Turkish SAR region which overlaps that of Greece encompasses 25.029 km<sup>2</sup> of Greek territorial waters which constitutes the 45,3% of that overlapping area.

In this context, it should be underlined that the provision and coordination of SAR services within territorial waters is, according to international law, an exclusive responsibility and competence of the coastal state, derived from its sovereignty therein. Thus, the establishment of SAR regions among parties, as provided in articles 2.1.4 and 2.1.5 of the Annex to the IMO Convention on Maritime Search and Rescue (1979), refers exclusively to the high seas.

Given the above, it is not Greece but Turkey which politicizes SAR issues, since it arbitrarily uses these IMO provisions as a platform to dispute Greek sovereignty by ensnaring Greek islands and their territorial waters within its purported SAR region.

Moreover, it should be underlined that, contrary to the Turkish allegations, Turkey's SAR region is not in conformity with the rules and recommendations of both IMO and ICAO, as well as with international practice, which stipulate that maritime SAR regions should coincide with the aeronautical ones, since the purported Turkish SAR region goes beyond Istanbul and Ankara FIRs and includes a section of the Athinai FIR almost up to the middle of the Aegean.

Greece's SAR region, which was notified to the IMO well in advance of the signature of the 1979 IMO Convention (Document No 44/7.1.1975 of the Greek Ministry of Merchant Marine), is a result of the geographical reality of the area given the dispersed Greek islands therein and constitutes the most appropriate arrangement in the sense of paragraph 2.1.5 of the Annex to that Convention.

Aiming at promoting the safety of life at sea, as well as supporting the provision for response activities to any emergency situation at sea, as required by the 1979 IMO Convention, Greece's policy is to conclude Agreements on cooperation in the field of SAR with all its neighbouring countries. In this respect, Greece has already concluded SAR Agreements with Italy in May 2000, Malta in January 2008 and Cyprus in October 2014, which have been submitted to the IMO. All these Agreements recognize Greece's responsibility within the Greek SAR region. The latter is also respected in practice by all neighbouring states except Turkey.

Concerning Turkey's alleged contribution to alleviating refugee crisis, Greece would like to reiterate its Verbal Note No 3534 dated 3.12.2020, circulated within IMO by circular letter 4352 dated 4.12.2020. In this respect, Greece wishes to remind Turkey's responsibility to undertake immediate action to control and prevent unsafe smuggling boats from leaving Turkish coasts. This would be the real game-changer since it would significantly contribute to safeguarding safety at the Aegean Sea. It would also ensure the smooth operation of shipping, since it would reduce the need for the deviation of the merchant ships' intended voyages in order to disembark rescued persons.

In this regard, Greece would like to present data related to the "unnecessary holding of Turkish flagged commercial vessels" asserted in the above Turkish Verbal Note: For the period 2016-2020, the Greek Joint Rescue Coordination Center (JRCC) in Piraeus coordinated 7.082 SAR operations in the Aegean and Eastern Mediterranean. Only in twenty seven (27) of these operations, vessels under Turkish flag were engaged in order to provide SAR services with an average engagement time of 4,7 hours for each vessel. These numbers speak for themselves and prove that the relevant Turkish allegations are unfounded and politically motivated. Greece, through its competent JRCC, will continue to effectively coordinate all search and rescue operations in its SAR region, providing relevant services to all ships and aircraft in distress, as it has done uninterruptedly and successfully since this region's establishment.

Regarding Turkey's allegation that it "deems it a mission for humanity to provide SAR services to any...aircraft in distress", a matter which falls within the competence of ICAO Rules and Regulations, Greece would like to remind the ICAO's Regional Air Navigation Agreements in the 50s, also joined by Turkey, according to which the SAR region for aircraft in distress coincide with the FIRs. This means that Turkish relevant



responsibility is limited within Istanbul and Ankara FIRs; therefore, it would be prudent for Turkey not to proceed to any unilateral acts beyond these limits, which would potentially jeopardize the safe and effective conduct of SAR operations within Greece's area of responsibility, thus putting human life at risk.

Furthermore, Greece would like to point out that the extension of the claimed Turkish SAR region, declared with the last Turkish Regulation in 2020, is obviously not dictated by operational criteria, does not serve the purpose of protecting human life and aims exclusively at promoting Turkish political claims irrelevant to search and rescue purposes. These purported new Turkish SAR region boundaries, which unsurprisingly coincide with the outer limits of Turkey's expansionist narrative of the "Blue Homeland" (Mavi Vatan), violate Greece's sovereignty and jurisdiction.

Greece, once again, while reiterating the verbal note of the Permanent Representation of Greece No 3369 dated 23 November 2020 (CL No 4345/24.11.2020), as well as the latter's letter dated 20 January 1989 (IMO SAR.3/Circ.3/Rev.1/Add.7//26.1.1989), denounces Turkey's attempt to redefine SAR boundaries and calls on this 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, May 19<sup>th</sup>, 2021

**International Maritime Organization**  
**Secretary General**  
**In town**