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Circular Letter No.4529  
11 March 2022

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 9 March 2022, with the request that it be circulated by the Organization.

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**ANNEX**



**EMBASSY OF GREECE  
LONDON**

**Ref. No: 944**

**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 Note of the Permanent Representation of Turkey No Z-2021/25984069/33649716/15.12.2021 (Circular Letter No. 4493), has the honour to bring to the attention of the Secretary General the following:

The Turkish Note recycles the unsubstantiated and arbitrary allegations contained in its previous related Note (Z-2021/25984069/32227543/18.1.2021, Circular Letter No 4373) and is indicative of Turkey's policy to systematically distort both the relevant international law, as well as the reality on the ground. Greece, while reiterating the Notes of the Permanent Representation of Greece No 3369/23.11.2020 (Circular Letter No 4345) and No 2017/19.5.2021 (Circular Letter No 4415), would also like to underline the following:

Greece reminds 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. Any cursory glance at a map depicting Turkey's purported Search and Rescue (SAR) region manifests that the latter overlaps not only Greek territorial waters but also covers the land area of numerous Greek islands, as well. Therefore, it is worth wondering why Turkey insists that its purported SAR region does not include areas under Greek sovereignty.

Moreover, the point raised by Turkey regarding the issue of infringement of Greek air traffic regulations by Turkish aircraft, on which Greece's positions have already been repeatedly communicated to Turkey bilaterally, is out of the IMO context, given that such air traffic regulations are established for the safety of civil aviation. Apparently, Turkey aims at creating confusion, since its seemingly plausible allegations regarding SAR issues are obviously exhausted.

Greece's capability to effectively provide SAR services within its SAR region, questioned by Turkey in its above Note, is demonstrated by the every-day activities of the Joint Rescue Coordination Center (JRCC) in Piraeus, as well as the statistics of the SAR operations carried out by the JRCC, part of which were displayed in Greece's Verbal Note No 2017/19.5.2021 (Circular Letter No 4415).

The claimed Turkish SAR region declared by the 1988 and 2001 Turkish Regulations, as well as its extension through the 2020 Turkish Regulation, are obviously politically

motivated and constitute misuse of the SAR Convention. Moreover, Greece reiterates that Turkey's claimed 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. In this context, it is underlined that the unilateral extension of a State's SAR region, which violates the basic principles of international law, ignores IMO and ICAO recommendations, disregards applicable effective practices and is based on the supposed capacity of that State to act for humanitarian reasons, lacks any form of legitimacy and is by definition illegal.

Turkey's purported humanitarian concerns, as well as its allegations with regard to treatment by Greece of persons in distress at sea, raised in the Turkish Note, are flatly dismissed by facts. Turkey's unwillingness to safeguard human life and alleviate the refugee crisis is proven every day on the field. The SAR operation carried out under the coordination of the JRCC east of Crete, on 29-30 of October 2020, concerning the Turkish flagged M/V MURAK 729, which had earlier departed from the Turkish coast of Izmir area with approximately four hundred migrants onboard, is indicative of Turkish policies in this regard. Turkey denied to cooperate with the Greek Authorities, despite the latter's requests, for the provision of a place of safety for the persons on board the Turkish M/V MURAK 729. Eventually, the SAR operation led to the rescue of all persons and vessel, as well as to their disembarkation on the Greek island of Kos. Ironically, the Turkish Authorities dismissed Greece's requests for coordination relating to the provision of a place of safety, claiming – correctly – that the SAR operation was conducted within the Greek SAR region by Greek assets.

Concerning the "treatment of refugees in distress at sea", it should be mentioned that the Greek Coast Guard units, tasked with the surveillance of the external maritime borders of Greece and EU and, consequently, the prevention of any unauthorised border crossing, perform their duties at the Greek-Turkish maritime boundary. Any detection of suspicious boats with migrants onboard or vessels in possible distress within the territorial waters of Turkey is immediately communicated with official alert messages to the Turkish Authorities for their actions. Turkey falsely alleges that the "Greek coast guard units do not refrain from attempting to violate Turkish territorial waters and force Turkish authorities to intervene". One cannot help wondering why Turkey needs to be "forced" in order to perform its legal and humanitarian duties within its own territorial waters; namely, to provide SAR services to refugees departing from Turkish coasts and being in danger while attempting to cross Greek-Turkish maritime boundary.

Greece would like to emphasise once again that the illegal and politically motivated Turkish Regulations unilaterally declare a Turkish SAR region which overlaps with parts of Greece's territory and areas of jurisdiction. Greece, as has been already communicated bilaterally, will be ready to discuss SAR issues with Turkey, as soon as such unilateral acts come to an end.



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, March 9<sup>th</sup>, 2022

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

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