



*Director*

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10019  
Cdr. Tim SEWELL  
Chairman, NAVTEX Coordinating Panel  
c/o United Kingdom Hydrographic Office  
Admiralty Way, Taunton  
Somerset TAI 2DN  
UNITED KINGDOM

Cádiz, 10 March 2009.

Dear Cdr Sewell,

*As the NAVAREA III Co-ordinator, and following the guidelines in the NAVTEX International Service Manual, I have been performing the tasks of reception and consideration of a proposal submitted by Turkey last 2008, regarding the amendment of service areas assigned to NAVTEX stations in the Eastern Mediterranean and Aegean Seas, as the aforementioned country expresses to be in disagreement with the current set up. This proposal was circulated among the countries with NAVTEX station service areas bordering the areas affected by the proposal by Turkey, requesting their comments. After receiving the responses from these countries, we can summarize the whole procedure, including the considerations by this NAVAREA III Co-ordinator, as follows:*

*1. Proposal by Turkey*

*A letter dated 3 March 2008 (Ref. 7502) from the Vice Secretary for Maritime Issues of the Shipping General Directorate of Turkey expressed the disagreement of Turkey with the configuration of the limits of NAVTEX station service areas in the Eastern Mediterranean and Aegean Seas, shown in the draft scheme presented by NAVAREA III Co-ordinator during the meeting of Mediterranean and Black Seas national NAVTEX service Co-ordinators (Monaco, 18-19 th January 2006). Specifically:*

- Antalya Station. The limits for this station are considered as inadequate, and conversations among all relevant countries should be started in the appropriate forum so as to resolve this issue, which carries political implications.*
- Izmir Station. Current limits for this station, covering the Aegean Sea, are considered as inadequate, as the area under Turkish responsibility is considered as too small.*

*2. Procedure regarding the Turkish proposal*

*The Director of this Instituto Hidrográfico de la Marina (IHM), as the NAVAREA III Co-ordinator, following the NAVTEX Service Manual, was responsible of receiving the proposal submitted by Turkey, which was reviewed for potential errors and then circulated among the countries with NAVTEX station service areas bordering the new areas proposed by Turkey. The step-by-step timeline has been as follows:*

- Turkey informs the Director of the IHM of their disagreement with the current configuration of the limits of NAVTEX station service areas in the Eastern Mediterranean and Aegean Seas. (03.03.08, Ref.7502).*



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- *The Director of the IHM informs Turkey, with copy to the IMO NAVTEX Panel, that an official proposal should be produced and submitted to the NAVAREA III Co-ordination for review and circulation to relevant countries. Turkey is informed that any such proposal ought to be approved by these countries (31.03.08).*
  
- *Turkey submits to the IHM an initial proposal, with attached graphic, listing the coordinates of eight points limiting their proposed amended service areas, and circles representing Turkish SAR areas. Actually, it encompasses two separate proposals: one to amend the service area of Turkish NAVTEX stations in Antalya (Eastern Mediterranean Sea) and Izmir (Aegean Sea), and another to amend their SAR areas SAR (08.05.08, Ref. 15998). On this issue, it should be noted that during COMSAR 12 sessions in London, on 9 April 2008, Turkey requested a meeting with representatives of the International NAVTEX Panel and the NAVAREA III Co-ordinator, in order to request assistance regarding the proper procedure to submit their disagreement with the limits of NAVTEX station service areas in the Eastern Mediterranean and Aegean Seas. This meeting resulted in vigorous complains by the authorities from Greece and Cyprus when they became aware of it, as they objected that they had not been formally invited to take a part in the aforementioned meeting. Greece and Cyprus have officially proposed that this meeting is considered as if it never took place.*
  
- *The Director of the IHM answered to Turkey (23.05.08) as follows:*
  - *The graphic submitted by Turkey does not show the limits dividing the proposed service areas.*
  - *The service area proposed for the Antalya station partially overlaps the service areas of the stations in Alexandria (Egypt) and Iraklion (Greece) and totally overlaps the station at Cyprus. Consequently, Turkey is informed that it is highly improbable that countries with NAVTEX station service areas bordering the new areas proposed by Turkey will agree to the proposal.*
  - *The limits of proposed amended SAR areas have not been provided.*
  
- *Turkey sent a response to the Director of the IHM on 27.06.08, although the letter arrived at the IHM through the Turkish Embassy in Madrid on 16.07.08, incorporating some of the suggestions and amending the errors pointed out by the IHM Director in his letter dated 23.05.08. This new letter included a map correctly representing the limits of service areas of Turkish NAVTEX stations in Antalya (Eastern Mediterranean Sea) and Izmir (Aegean Sea), as well as the boundary line between them. However, the coordinates for the relevant points were not included. (Ref. 22568).*



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- *On 20.08.08 the Director of IHM requests that Turkey submits the coordinates of the aforementioned points.*
- *Turkey sends a new letter on 17.09.08 including a graphic representing proposed service areas and their coordinates. (Ref. 34657). Please find attached this graphic as an Annex.*
- *The Head of the Navigational Section at the IHM sends a fax to Turkey on 03.11.08 requesting that they provide a digital version of the map submitted on 17.09.08.*
- *After receiving the requested information, the Director of the IHM circulates the proposal by Turkey on 14.11.08, amending one obvious error in the coordinates for one point.*
- *On 19.12.08 Greece responds to the proposal by Turkey, rejecting it absolutely because of considerations listed below. (Rf. 107.65/6/08).*
- *On 15.01.09 Cyprus responds to the proposal by Turkey, rejecting it absolutely because of considerations very similar to those submitted by Greece. They are also listed below.*

### *3. Summarized list of considerations by Greece*

*They disagree with the proposal by Turkey due to the following reasons:*

- *Greek stations at Limnos and Iraklion have been operating successfully in their current service areas since 1986 (IMO COM 31/5/4/13 March 1986) without negative issues and covering the requirements for the safety of navigation in accordance with IMO and OHO rules, guidelines and principles.*
- *No mariner has ever reported any issue regarding the performance of Greek NAVTEX stations since they became operational.*
- *Most of the sea in the relevant service areas fall under Greek sovereignty, and also this country is responsible for the monitoring and maintenance of a great number of lights, lighthouses, fog signals, buoys and other aids to navigation.*
- *Neither IMO nor IHO have ever reported a necessity to amend the limits of Greek service areas.*



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- *When this issue was raised during the meeting of NAVTEX Service national co-ordinators in NAVAREA III (Monaco 18/19 January 2006), the NAVAREA III Co-ordinator stated that there was no intention to amend the limits of service areas in the Aegean Sea, which was not objected to by the Turkish delegation.*

#### *4. Summarized list of considerations by Greece*

*They also disagree with the proposal by Turkey due to the following reasons:*

- *Cyprus was not informed by Turkey of the proposal, which is against established procedure.*
- *The NAVTEX station in Cyprus has been in operation since 1977 (11th IHO Conference, proposals adopted by the 10th IHO Assembly in November 1977, WWNWS planning) with no negative issues.*
- *Despite the high volume of shipping, no issues regarding the performance of this service have ever been reported.*
- *This information can only be broadcast by Cyprus, as most of the relevant service area is under sovereignty of Cyprus.*
- *Neither IMO nor IHO have ever reported any operative need based on technical considerations to amend the limits of the service areas of Cyprus.*
- *Instead, the NAVAREA III Co-ordinator stated in Monaco that there was no intention to amend the limits of the relevant service area (18/19 January 2006).*

#### *5. Closing considerations by the Director of the IHM, NAVAREA III Co-ordinator*

- 1. The procedure followed by this proposal by Turkey has been considerably time-consuming, perhaps due to some errors in the information provided by this NAVAREA III Co-ordinator, which required additional requests for Turkey to provide further details and information.*



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2. *This NAVAREA III Co-ordinator takes into account the comment by Turkish authorities regarding political implications of the amendment of the NAVTEX station service area in Cyprus, with due respect. However, it must be noted again that political considerations have no effect and are of no relevance for the role and responsibility of the NAVAREA III Co-ordinator as such, as the duties attached to that position focus solely on the safety of navigation in its area of responsibility. Consequently, political considerations regarding this issue should be discussed in the appropriate forum with the necessary representation and authority.*
3. *It should be noted that this NAVAREA III Co-ordinator has maintained at all times a neutral position, in accordance with its duties and responsibilities, regarding the proposal by Turkey, and has always attempted to follow the recommendations in the NAVTEX Service Manual regarding proper procedures to be followed in such cases as these. In this regard, the meeting held during the COMSAR 12 sessions with representatives of Turkey and the NAVTEX Panel was solely to provide Turkey with assistance regarding the proper channels to submit their proposal. Even then, the representative of this NAVAREA III Co-ordinator informed Turkey of the requirement to inform all countries with NAVTEX station service areas bordering the areas affected by the proposal by Turkey, and the importance of reaching an agreement with them.*
4. *The International NAVTEX Service Manual includes as a last resort a procedure to try and reach agreements regarding issues related to the Service, in the case that disagreements on the proposals are so strong that there is no possibility to find a satisfactory solution by the usual procedure of submission of proposal and consultation to relevant countries. This procedure involves calling for a meeting attended to by all relevant parties where all proposals will be discussed to reach a result that is beneficial for all. However, considering the responses by Greece and Cyprus as well as the reasons they list for their disagreement, this NAVAREA III Co-ordinator believes that such a last resort procedure recommended by IMO for conflict resolution would not be useful in this case..*



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5. *This NAVAREA III Co-ordinator wishes to stress that the performance by NAVTEX Stations in Greece, Cyprus and Turkey since they became operational has always been excellent, and there has been no complain regarding failures in broadcast or content of maritime safety information from any of the many mariners sailing the Eastern Mediterranean and Aegean Seas. Consequently, this NAVAREA III Co-ordinator considers that there is no operational or technical need for any modification, specially when there is no agreement among the relevant parties. So this letter is submitted to the International NAVTEX Panel requesting a decision on the proposal submitted by Turkey, with copies to Cyprus, Greece, Turkey and the IHO.*

*Best Regards,*

*Francisco J. Pérez Carrillo de*

**- Francisco J. PÉREZ CARRILLO DE ALBORNOZ -  
CAPT. COMMANDER DIRECTOR**

**Copies to:** *Telekomunikasyon Kurumu (TURKEY)*  
*Hellenic Navy Hydrographic Service (GREECE)*  
*Department of Land and Surveys (CYPRUS)*  
*International Hydrographic Bureau (IHB)*  
*Chairman of the MBSHC (TUNISIA)*