

## **S-23 WORKING GROUP**

### **AREAS OF CONCERN**

Responses to IHB Letter S3/7020 of 9 November 2009

31 March 2010

1. France (S-23 WG Member)
2. Japan (S-23 WG Member)
- 2bis. Japan [Supplementary comments received 26 February 2010]
3. Rep. of Korea (S-23 WG Member) [Revised response received 25 February 2010]
4. Malaysia (IHO MS bordering area(s) of concern)
5. Dem. P. Rep. of Korea (S-23 WG Member)
6. Italy (S-23 WG Member)
7. Indonesia (IHO MS bordering area(s) of concern)
8. USA (S-23 WG Member) [Update of US comments, which supersedes the US response to IHB e-mail of 8 July 2009 – Revised 3 March 2010]
9. Argentina (S-23 WG Member)
10. China (S-23 WG Member)



## 1. FRANCE

MINISTÈRE DE LA DÉFENSE



Brest, le 7 janvier 2010  
N° 007 SHOM/DSPRE/NP

**SERVICE HYDROGRAPHIQUE ET  
OcéANOGRAPHIQUE DE LA MARINE**

Direction de la stratégie, de la planification et  
des relations extérieures

Dossier suivi par  
ICETA Yves Guillam

☎ : + 33 1 53 66 97 80  
Fax : + 33 1 41 74 94 25  
Mél : guillam@shom.fr

President du GT sur la S-23  
Dureau hydrographique international  
BP 445  
MC 98011 Monaco cédex  
Principauté de Monaco

Objet : Suggestions de la France relatives à la poursuite des travaux  
au sein du groupe de travail chargé de la révision de la  
publication S-23 de l'OHI.

Référence : Lettre BHI S3/7020 du 9 novembre 2009.

P. jointe : Une fiche.

Messieurs,

Suite aux travaux conduits lors des étapes 1 à 5 par le groupe de travail chargé de la révision de la publication S-23 de l'OHI, et en réponse à la lettre rappelée en référence, la France représentée par Mme Elisabeth Calvarin de la commission nationale de toponymie, mandatée auprès du groupe d'expert des Nations unies pour traiter les questions de cette nature, a l'honneur de vous demander de bien vouloir porter à la connaissance des membres de ce groupe de travail, la fiche donnée en pièce jointe, dont le principal objectif est de proposer un compromis technique, respectueux des normes et usages, permettant de résoudre le cas de l'appellation de l'espace maritime situé entre la péninsule coréenne et l'archipel du Japon.

Cette proposition s'appuie sur les normes, définitions et règles de procédure en vigueur en matière de toponymie<sup>1</sup> dont une synthèse a été élaborée par la France au titre de l'étape 2. Elle anticipe également les recommandations en cours d'élaboration par l'ISO. Elle respecte enfin les positions des différentes parties en apportant une solution, technique et pragmatique, facilitant sa mise en oeuvre.

<sup>1</sup>[http://www.iho-ohi.net/mtg\\_docs/com\\_wg/S-23WG/S-23WG\\_Misc/Toponymy/S-23WG\\_Toponymy\\_FR.pdf](http://www.iho-ohi.net/mtg_docs/com_wg/S-23WG/S-23WG_Misc/Toponymy/S-23WG_Toponymy_FR.pdf) ou [http://www.iho-ohi.net/mtg\\_docs/com\\_wg/S-23WG/S-23WG\\_Misc/Toponymy/S-23WG\\_Toponymy\\_EN.pdf](http://www.iho-ohi.net/mtg_docs/com_wg/S-23WG/S-23WG_Misc/Toponymy/S-23WG_Toponymy_EN.pdf)

La délégation française se tient naturellement à la disposition du président du groupe de travail pour exposer son point de vue à l'occasion d'une réunion de ses membres, comme prévu à l'étape 6 du projet.

Veillez agréer, Messieurs, l'assurance de ma haute considération.

Pour le directeur général du SHOM,  
l'ingénieur en chef des études et techniques de l'armement Yves Guillam  
directeur de la stratégie, de la planification et des relations extérieures,  
*signé Yves Guillam*

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Archives générales – DSPRE2/006

*Uwi i gwaqpu*  
*de la Ht cpeg'tgr wkgu'«'lc 't qwt uwkg deu tt cxcwz*  
*au sein du GT chargé de la révision de la S-23 de l'OHI*

5 janvier 2010

L'Organisation hydrographique internationale (OHI) est empêchée depuis 1953 de mettre à jour officiellement sa liste des espaces maritimes (S-23 *Limites des océans et des mers*) par un différend portant sur la dénomination de l'un de ces espaces.

Cet espace, situé entre l'archipel japonais et la péninsule coréenne, est dénommé la « mer du Japon » en français et *Japan Sea* en anglais dans la dernière version officielle de la S-23 (3<sup>e</sup> édition - 1953). Ces dénominations sont néanmoins contestées par les Coréens, qui revendiquent dans les langues officielles de l'OHI des dénominations calquées sur les dénominations de langue coréenne, désignant cet espace en référence à sa position cardinale relative pour elles, c'est-à-dire à l'est de leur péninsule.

L'OHI souhaite réunir un consensus sur la liste des noms des océans et mers de la S-23, ce qui paraît pouvoir être atteint sur un plan technique, à condition de n'admettre aucune instrumentalisation de quelque nature que ce soit. En effet, à la première Conférence des Nations unies sur les noms géographiques, le Groupe d'experts (GENUNG), reconnaissant « la nécessité de normaliser à l'échelle internationale les noms des détails topographiques océanographiques ou sous-marins afin de promouvoir la sécurité de la navigation et de faciliter l'échange de données scientifiques océanographiques », note dans la résolution I/8 que l'OHI dispose de règles de toponymie (annexe, § A) dont l'application peut conduire à une solution.

Ainsi, dans le cas d'espèce, on peut admettre :

- soit que les noms « mer du Japon » et *Japan Sea* soient internationalement reconnus par le précédent de 1953, et qu'ils s'imposent donc ;
- soit qu'aucun nom ne soit plus internationalement reconnu, compte tenu de l'évolution de la situation depuis lors.

Dans ce second cas, les règles de l'OHI, éventuellement augmentées des résolutions du GENUNG (annexe, § B), donnent la priorité :

- soit aux noms officiels locaux dans les écritures locales (日本海, 동해, Японское море), éventuellement romanisés si nécessaire (*Nippon-kai, Donghae, Japonskoe More*) ;
- soit aux noms d'usage des pays officiellement producteurs des documents (mer du Japon<sup>2</sup>, *Japan Sea* ou *East Sea*<sup>3</sup>, par exemple).

Or, aucune des deux langues officielles de l'OHI ne figure parmi les langues locales. Aussi, **les noms français et anglais de l'espace maritime en question (exonymes) ne peuvent être tirés que de l'usage actuel** des pays francophones et anglophones susceptibles de produire des cartes couvrant cet espace.

<sup>2</sup> S'agissant de la France, l'appellation officielle de 1953 reste seule en usage.

<sup>3</sup> Par déontologie, la France n'a pas ici à se prononcer sur le choix de l'un ou l'autre de ces exonymes, par des producteurs dont la langue d'usage est l'anglais.

Cependant, la toponymie de la liste S-23 étant informative, la commission nationale de toponymie du Conseil national de l'information géographique, mandatée pour représenter la France auprès du GENUNG, recommande d'examiner la possibilité **d'enrichir cette liste des noms locaux dans les écritures locales éventuellement romanisées**, comme l'Organisation internationale de la normalisation (ISO) s'apprête désormais à le faire aussi pour ses propres listes toponymiques. Ainsi, tout producteur d'information géographique pourrait trouver dans la S-23 les équivalences toponymiques qui lui sont nécessaires pour désigner tout espace maritime donné.

Si ces principes fondamentaux et innovants étaient agréés, il resterait simplement à définir les modalités pratiques d'évolution de l'édition de la S-23 pour les zones concernées (tableau à multiples entrées par ex.), les normes, définitions et règles de procédures en matière de toponymie étant jugées satisfaisantes et suffisantes pour ce qui concerne la mise en œuvre relative à la production de cartes marines et ouvrages nautiques.

**ANNEXE**  
**Liste de documents techniques pertinents**

**A – OHI**

Publication S-4 *Règlement de l'OHI pour les cartes internationales (INT) et spécifications de l'OHI pour les cartes marines* < [http://www.iho.shom.fr/publicat/free/files/S4\\_v3.006\\_2009.pdf](http://www.iho.shom.fr/publicat/free/files/S4_v3.006_2009.pdf) >

Section B 500 :

- dans le traitement des données toponymiques, les paragraphes B-552.1 à .3 ;
- pour l'utilisation des noms géographiques, les paragraphes B-510.1 à .3, B-510.5[I] ;
- dans le domaine de la romanisation, la section B-520.

Publication M-3 *Résolutions de l'OHI* < <http://www.iho.shom.fr/publicat/free/files/M3-FR-NOV09.pdf> >

- pour les règles relatives aux noms géographiques, sections A4.1 et .2.

**B- GENUNG**

< <http://unstats.un.org/unsd/geoinfo/25th-GEGN-Docs/GEGN-25-8b.pdf> ;  
<http://unstats.un.org/unsd/geoinfo/25th-GEGN-Docs/GEGN-25-9F.pdf> >

Les résolutions :

- dans le domaine de la normalisation, les résolutions II/31, II/25, III/20 ;
- dans le domaine des exonymes et des noms locaux, les résolutions II/28, II/29, II/35, IV/20, VIII/4, VIII/9 et IX/4.

Les documents :

- dans le domaine de la romanisation, consulter les adresses <http://unstats.un.org/unsd/geoinfo/N0244990.pdf> ;  
<http://unstats.un.org/unsd/geoinfo/gegn22wp48.pdf> .

## 1. FRANCE

[English translation – courtesy IHB]

SHOM LETTER N° 007 SHOM/DSPRE/NP dated 7 January 2010

Chairman of the IHO S-23 Working Group  
International Hydrographic Bureau  
Monaco

Subject: Suggestions from France to progress the work of the WG on the Revision of the IHO Publication S-23.

Ref: IHB letter S3/7020 dated 9 November 2009

Encls: One annex

Dear Sirs,

Further to the work undertaken in steps 1 to 5 by the WG on the revision of the IHO publication S-23 and in response to the above-referenced letter, France, represented by Mrs Elisabeth Calvarin of the *Commission nationale de toponymie* (National Toponymy Commission), appointed to the UN Group of Experts to handle this type of question, would ask you to kindly bring the attached document to the attention of the Working Group members; the main aim of this document is to propose a technical compromise, in accordance with standards and usages, in order to resolve the matter of the naming of the sea area situated between the Korean peninsula and the Japanese archipelago.

This proposal is based on the standards, definitions and rules of procedure in force in toponymy<sup>1</sup> a summary of which was prepared by France as part of step 2. This proposal is made ahead of the recommendations currently being prepared by the ISO and, finally, respects the positions of the various parties by providing a technical and pragmatic solution, facilitating its implementation.

Naturally, the French Delegation remains at the disposal of the WG's Chairman to explain its point of view at a meeting of the WG members, as planned in step 6 of the project.

Yours sincerely,  
Signed for the Director General of SHOM  
Yves Guillam

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<sup>1</sup> [http://www.iho-ohi.net/mtg\\_docs/com\\_wg/S-23WG/S-23WG\\_Misc/Toponymy/S-23WG\\_Toponymy\\_FR.pdf](http://www.iho-ohi.net/mtg_docs/com_wg/S-23WG/S-23WG_Misc/Toponymy/S-23WG_Toponymy_FR.pdf)  
or  
[http://www.iho-ohi.net/mtg\\_docs/com\\_wg/S-23WG/S-23WG\\_Misc/Toponymy/S-23WG\\_Toponymy\\_EN.pdf](http://www.iho-ohi.net/mtg_docs/com_wg/S-23WG/S-23WG_Misc/Toponymy/S-23WG_Toponymy_EN.pdf)



## IHO S-23 Working Group (Step 5)

### Suggestions from France to progress the work of the WG on the Revision of the IHO Publication S-23

5 January 2010

The International Hydrographic Organization (IHO) has been prevented since 1953 from officially updating its list of sea areas (S-23 Limits of Seas and Oceans) due to a disagreement on the naming of one of these areas.

This area situated between the Japanese archipelago and the Korean peninsula is called “*mer du Japon*” in French and *Japan Sea* in English in the last official version of the S-23 (3<sup>rd</sup> edition – 1953). These names are nevertheless contested by both Korea's, who demand names in the IHO official languages, reflecting the names in the Korean language, designating this area in reference to its relative cardinal position, i.e. to the east of their peninsula.

The IHO wishes to reach a consensus on the list of names of oceans and seas contained in the S-23 which seems possible on a technical level, provided that no interference of any kind is accepted. Indeed, at the first UN Conference on Geographical Names, the Group of Experts (UNEGN) recognizing “the need to internationally standardize the names of oceanographic or undersea topographic features in order to promote safety of navigation and to facilitate the exchange of scientific oceanographic data”, notes in Resolution 1/8 that the IHO has toponymic rules (Annex, §A) the application of which may lead to a solution.

Thus in this specific case, we could accept :

- Either that the names “*mer du Japon*” and *Japan Sea* be internationally recognized in view of the precedent set in 1953, and that they are thus officially adopted;
- Or that no name be internationally recognized, bearing in mind how the situation has evolved since.

In this second case, the IHO rules, along with the possible addition of the GENUING resolutions (Annex, §B), would give priority:

- Either to local official names in the local script (日本海, 동해 Ялόνское Море), possibly transliterated into Roman letters, if necessary (Nippon-kai, Donghae, Japonskoe More);
- Or to the names commonly used by those countries which officially produce the documents (*mer du Japon*<sup>2</sup>, *Japan Sea* or *East Sea*<sup>3</sup>, for example).

Now, the local languages do not include either of the two official languages of the IHO. Furthermore, the French and English names of the sea area in question (exonyms) can only be drawn from the current usage of those French-speaking and English-speaking countries likely to produce charts covering this area.

However, as the names contained in the S-23 list are simply provided for information, the National Toponymy Commission of the National Council of Geographic Information, mandated to represent France on UNEG, recommends that the possibility of supplementing this list with local names in local script (possibly Romanized) be examined, as the ISO is on the point of doing for its own toponymic lists. Therefore, any producer of geographical information could find in the S-23 the equivalent toponyms which he needs to designate any given sea area.

If these new fundamental principles could be agreed upon, it would simply remain to define the practical procedures to progress the editing of the S-23 for the zones concerned (e.g. table with multiple entries); the standards, definitions and rules of procedures for toponymy are considered satisfactory and adequate as regards the implementation related to the production of nautical charts and documents.

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<sup>2</sup> in the case of France, only the official name of 1953 remains in use

<sup>3</sup> From an ethical point of view, France has not to give its opinion on the choice of one or the other of these exonyms by producers whose usual language is English.

**ANNEX**  
**List of relevant technical documents**

**A – IHO**

Publication S-4 – Chart Specifications of the IHO and Regulations for International (INT) Charts

[http://www.iho.shom.fr/publicat/free/files/S4\\_v3.006\\_2009.pdf](http://www.iho.shom.fr/publicat/free/files/S4_v3.006_2009.pdf)

Section B 500:

- For the handling of toponymic data, paragraphs B-552.1 to 3;
- For the use of geographical names, paragraphs B-510.1 to 3, B-510.5 [I]
- In the domain of Romanization, section B-520.

Publication M-3 – IHO Resolutions

<http://www.iho.shom.fr/publicat/free/files/M3-FR-NOV09.pdf>

- For the rules related to geographical names, sections A4.1 and 2

**B- UNEGN**

<http://unstats.un.org/unsd/geoinfo/25th-GEGN-Docs/GEGN-25-8b.pdf>

<http://unstats.un.org/unsd/geoinfo/25th-GEGN-Docs/GEGN-25-9F.pdf>

Resolutions

- In the domain of standardization, Resolutions II/31, II/24, III/20;
- In the domain of exonyms and of local names, resolutions II/28, II/29, II/35, IV/20, VIII/4, VIII/9 and IX/4.

Documents:

- In the domain of Romanization, consult the addresses:  
<http://unstats.un.org/unsd/geoinfo/N0244990.pdf>  
<http://unstats.un.org/unsd/geoinfo/gegn22wp48.pdf>

## 2. JAPAN



# HYDROGRAPHIC and OCEANOGRAPHIC DEPARTMENT JAPAN COAST GUARD

3-1, Tsukiji 5-chome, Chuo-ku, TOKYO, 104-0045 JAPAN

Phone: +81-3-3541-3685 Fax: +81-3-3248-1250 Tlx: (0) 252 2222 (JAHYD) E-mail: ico@jodc.go.jp

H.O.D. 01/10

8 January 2010

Vice Admiral Alexandros MARATOS  
Chair of Working Group on the Revision S-23 (Limits of Oceans and Seas)  
President  
International Hydrographic Bureau  
4 quai Antoine 1er  
B.P. 445  
MC 98011 MONACO CEDEX  
MONACO

Reference: IHB File N° S3/7020 dated 9 November 2009, "LIST OF AREAS OF CONCERN, RESPONSES FROM MEMBERS OF S-23 WG ACTION ON STEP 5"

Dear VADM Maratos,

Thank you very much for circulating responses from members of S-23 WG regarding the list of possible areas of concern. I would like to offer Japan's comment on the responses as follows:

First of all, Japan would like to draw the attention of members of the IHO that "Japan Sea" (or "Sea of Japan") is the only name that has been internationally established to describe the sea area concerned since the 17th century. A large number of historical documents and other materials, including those available at national public libraries in many countries, confirm this fact. (For more details, please refer to the attached documents or visit <http://www.mofa.go.jp/policy/maritime/japan/index.html>) The name of "Japan Sea" (or "Sea of Japan") appears in maps and other documents that are published in almost all the countries in the world. The international organizations, including United Nations, also use this name for the concerned sea area in their publications, which clearly show the extent to which the name is firmly established and widely used in international fora.

In this view, there is no dispute concerning the name of Japan Sea or its boundary, and therefore it needs to be deleted from the list of "AREAS OF CONCERN" that has been circulated to the IHO member countries. Japan therefore maintains its position that there is no need to change the name of "Japan Sea", or to add other name thereto, in S-23.

There are one or two countries claiming that the name of "Japan Sea" should be changed. In response to this claim, Japan would like to remind all the IHO members of the following four facts: that the name of "Japan Sea" (or "Sea of Japan") has been internationally established and is now overwhelmingly used, as demonstrated above, that no other country or international organization has ever made a similar claim, that it is only some 10 years ago that these countries suddenly started to make such a claim, and that at least one of these countries had used "Japan Sea" in its national nautical charts until then.

Obviously it is very inappropriate to change, or to allow using another name simultaneously, the historically-established and widely-used names of the high seas on nautical charts merely because one or two countries insist changing the original name without presenting sufficient and concrete evidences. Acceptance of such claims would lead to the situation where any name of high seas can be easily changed by such insufficient claims, which would consequently bring significant confusion to the international nautical charts and seriously undermine the international order of the sea. This is a very important issue that could affect not only the coastal countries to Japan Sea, but all the IHO member countries.

Furthermore, agreement with the claim made against "Japan Sea" would be inconsistent with the fundamental purpose of IHO, namely "to contribute to making navigation easier and safer throughout the world by improving nautical charts and documents" (see Preamble of the IHO Convention). It would also be inconsistent with the fundamental object of the IHO that is established to bring about "the greatest possible uniformity in nautical charts and documents" as "a consultative and purely technical" body (Article II (b) of the IHO Convention).

I would very much appreciate your kind consideration.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Hideo Nishida', written in a cursive style.

Hideo Nishida

Japan Representative to S-23WG

Cc: Ing. en chef Michel Huet, Secretariat of S-23WG



# THE MINISTRY OF FOREIGN AFFAIRS OF JAPAN

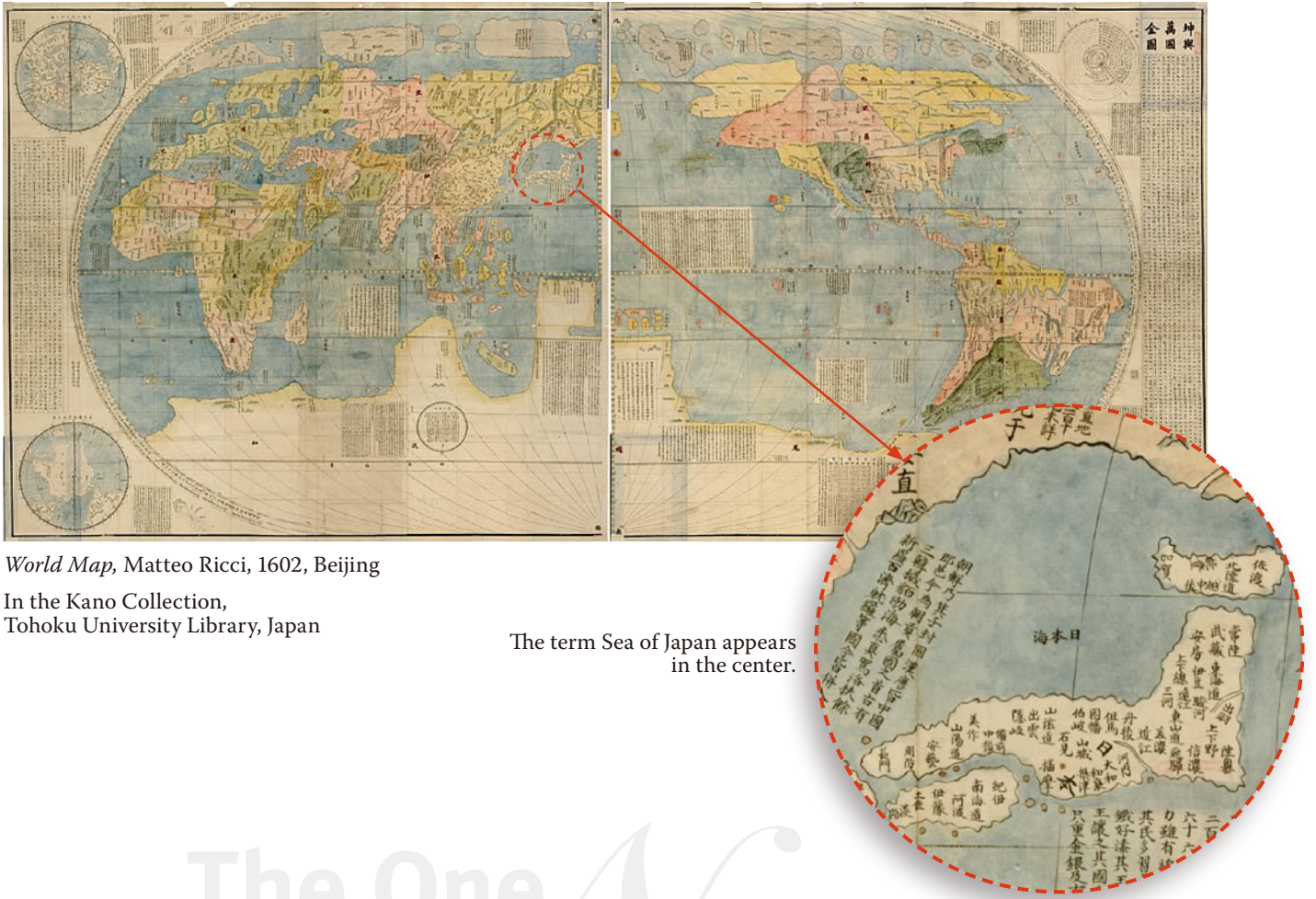
Kasumigaseki 2-2-1, Chiyoda-ku, Tokyo 100-8919, Japan  
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<http://www.mofa.go.jp/> (English version)

THE MINISTRY OF FOREIGN AFFAIRS  
OF JAPAN

The One  
and Only *Name* Familiar to  
the International Community

SEA  OF JAPAN

**1** Sea of Japan is the only internationally established name for the sea area concerned. This has been verified by a survey of historical maps from around the world conducted by the Ministry of Foreign Affairs of Japan.



World Map, Matteo Ricci, 1602, Beijing  
In the Kano Collection,  
Tohoku University Library, Japan

The term Sea of Japan appears in the center.

The One and Only *Name* Familiar to the International Community

SEA OF JAPAN

1) The term Sea of Japan was first used in the early 17th century in the world map created by the Italian Jesuit priest Matteo Ricci. Research by the Ministry of Foreign Affairs has confirmed that while Western maps used a variety of names for the sea through the 18th century, including “Sea of Korea,” “Oriental Sea” and “Sea of China” in addition to Sea of Japan, from the early 19th century Sea of Japan overwhelmingly became the preferred term. Based on this fact, it can be concluded that use of the name Sea of Japan was established in the West by the early 19th century.

2) The Republic of Korea (ROK) has also conducted a survey of historical maps, but the results lack credibility.

**a. Japan’s survey is more comprehensive than the ROK survey of the same collections.**

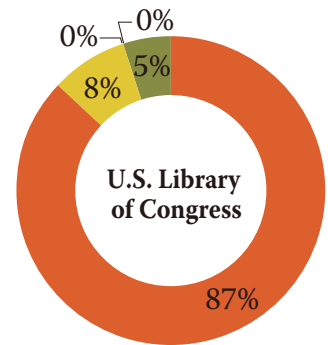
Japan’s survey of historical maps in France’s national libraries included 1,495 maps. The ROK’s survey of the same institutions, on the other hand, consists of only 515, or approximately one-third of the Japanese survey’s total, therefore yielding completely different results. It is evident that Japan’s survey is more comprehensive.

**b. The ROK survey counts “Oriental Sea” and “Sea of Korea” as “East Sea.”**

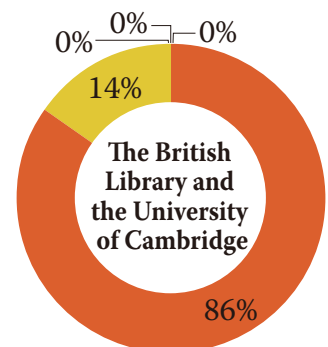
The survey of historical maps conducted by the ROK that asserts “East Sea” as its official name counts the terms “Oriental Sea” and “Sea of Korea” (or “Korea Sea”) as “East Sea,” and compares the number of maps that use one of these terms to the number of maps that use Sea of Japan. It is apparent that “Sea of Korea” and “East Sea” are different names. Moreover, the names “Oriental Sea” and “East Sea” have completely different origins and meanings. “Oriental Sea” refers to *the sea of the Orient from the perspective of the Occident*, while “East Sea” means the sea on *the eastern side of the Korean peninsula*.

**■ Results of the Ministry of Foreign Affairs’ Survey of Historical Maps**

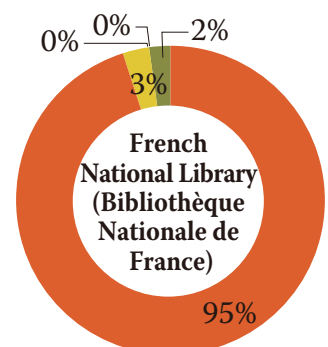
(Percentages indicate the ratio of use of the various names for the sea area concerned)



Survey Period:  
December 2004–March 2005  
Maps Surveyed: 1,213 maps



Survey Period:  
December 2002–June 2003  
Maps Surveyed: 58 maps



Survey Period:  
October 2003–January 2004  
Maps Surveyed: 215 maps

- Sea of Japan
- Sea of Korea
- Oriental Sea
- East Sea
- Other

Note: Maps included in the survey indicated a name for the Sea of Japan area.





# 2 The United Nations and the governments of major nations such as the United States recognize Sea of Japan as the official name.

## 1) United Nations' Policy

The United Nations (UN) recognized Sea of Japan as the standard geographical term in March 2004, and UN policy states that the standard geographical term be used in official UN publications. The UN Secretariat has further clarified its stance on the issue by affirming the need to observe prevailing practice to ensure fairness and neutrality, stating that “without taking sides on the issue, the simultaneous use of both [Sea of Japan and ‘East Sea’] infringes on the neutrality of the United Nations.”

## 2) Policy of the United States and Other Major Countries

The U.S. Board on Geographic Names, an agency of the government of the United States, has formally recognized and acknowledged Sea of Japan as the sole official name for the sea area concerned. All federal agencies of the United States are required to use the name Sea of Japan. Other agencies within the United States are strongly encouraged to use the term as well. The governments of other major countries, including the United Kingdom, France, Germany and China, officially use the name Sea of Japan.



Map from the UN Secretariat

The One and Only *Name* Familiar to the International Community

# SEA OF JAPAN

# 3 In recent years, a few countries have suddenly begun to challenge the sole use of Sea of Japan without solid foundation.

1) Objections to the name Sea of Japan were first raised by the ROK and North Korea at the Sixth United Nations Conference on the Standardization of Geographical Names, held in 1992. Although there had been no prior objections made to the term, either during bilateral talks or at international fora, the ROK suddenly began insisting that the name of the Sea of Japan be changed to “East Sea,” or that both names be used together.

## 2) Rebuttal to the ROK’s assertions

### a. ROK assertion: “The name Sea of Japan became widespread as a result of Japanese expansionism and colonial rule.”

The Japanese government’s survey of historical maps confirms that the name Sea of Japan was already prevalent in the early 19th century. Japan during the Edo Period (1603–1867) had an isolationist policy, and was unable to exercise any influence to establish the name Sea of Japan. Consequently, the ROK’s assertion that the name Sea of Japan became widespread as a result of “expansionism and colonial rule” in the latter half of the 19th century is wholly invalid.

Further, as shown in Part 4 (on page 7), the government of the ROK has recently published a survey that can be interpreted as recognizing that the name Sea of Japan did not become widespread as a result of Japanese expansionism and colonial rule.

### b. ROK assertion: “The UN and IHO have issued resolutions that urge the use of the name ‘East Sea’ together with Sea of Japan.”

The ROK contends that the United Nations (UN) and the International Hydrographic Organization (IHO) have issued resolutions that advocate the name “East Sea” be used together with Sea of Japan. However, neither UNCISGN Resolution III/20<sup>1</sup> nor IHO Technical Resolution A.4.2.6.<sup>2</sup> includes any specific recommendation to use “East Sea” alongside Sea of Japan. Further, these resolutions presume that the geographical feature concerned is under the sovereignty of two or more countries, such as in the case of a bay or

#### Notes:

1. United Nations Conference on the Standardization of Geographic Names (UNCISGN) Resolution III/20 “Names of Features beyond a Single Sovereignty” (1977):

*The Conference,*

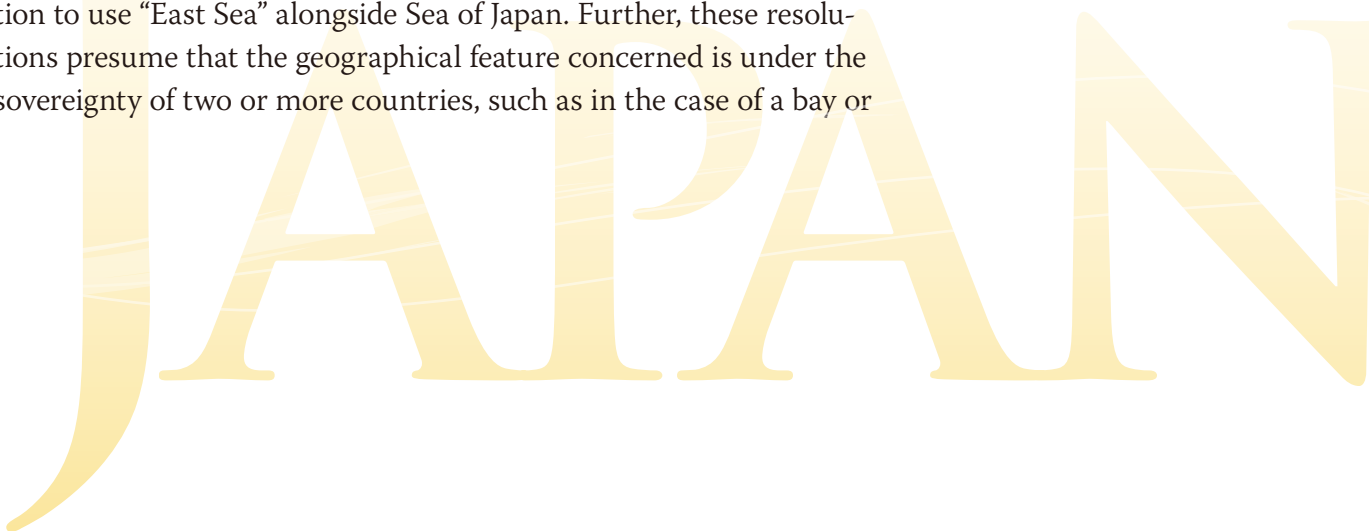
1. *Recommends that countries sharing a given geographical feature under different names should endeavour, as far as feasible, to reach agreement on fixing a single name for the feature concerned;*

2. *Further recommends that when countries sharing a given geographical feature do not succeed in agreeing on a common name, it should be a general rule of international cartography that the name used by each of the countries concerned will be accepted.*

*A policy of accepting only one or some of such names while excluding the rest would be inconsistent in principle as well as inexpedient in practice.*

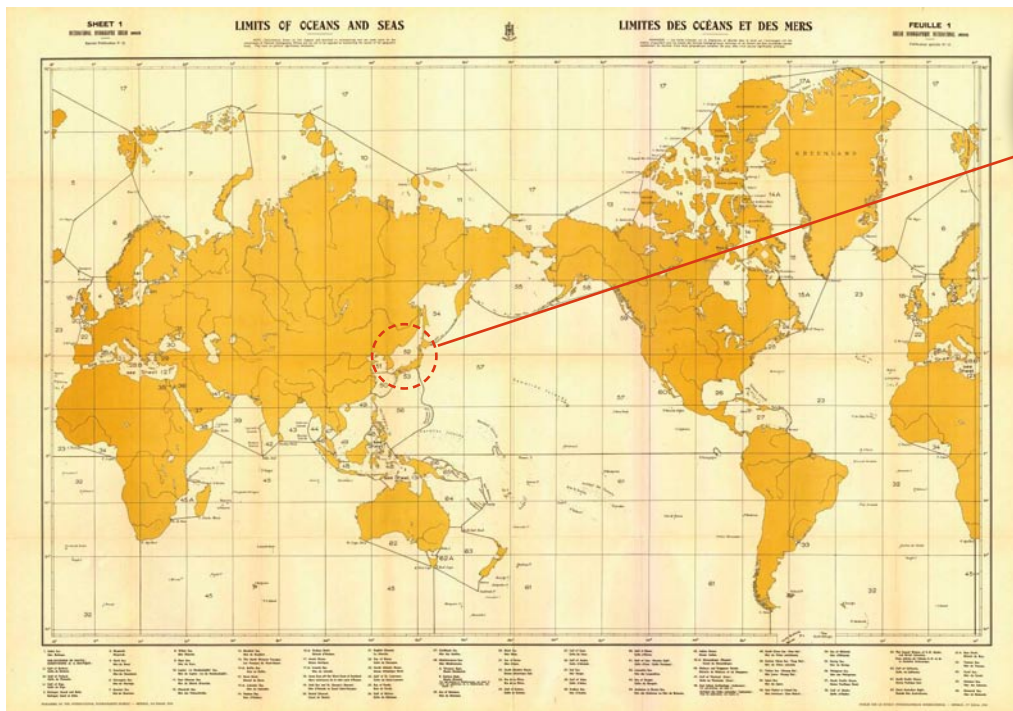
2. IHO Technical Resolution A.4.2.6. (1974):

*It is recommended that where two or more countries share a given geographical feature (such as a bay, a strait, channel or archipelago) under different names, they should endeavor to reach agreement on a single name for the feature concerned. If they have different official languages and cannot agree on a common name form, it is recommended that the name forms of each of the languages in question should be accepted for charts and publications unless technical reasons prevent this practice on small scale charts.*



strait, and do not apply to the high seas such as the Sea of Japan. Following the ROK's assertion, if even one of the countries bordering the Atlantic or the Pacific were to raise an objection to the name of the ocean, it would lead to the use of multiple names, which would clearly be unmanageable. The international community cannot accept such an argument.

Further, as stated previously the UN has already officially confirmed its policy requiring the use of Sea of Japan as the standard geographical term in all official UN publications. The IHO publication "Limits of Oceans and Seas" (S-23) also uses only the name Japan Sea for the sea area concerned. This demonstrates that there is no UN or IHO resolution recommending the use of "East Sea" together with Sea of Japan.



**52.—Japan Sea.**

The IHO publication "Limits of Oceans and Seas" uses only the name Japan Sea for the sea area concerned.

The One and Only *Name* Familiar to the International Community

# SEA OF JAPAN

3) Some maps in use within the ROK show “East Sea” for the sea on the east side, “West Sea” for the sea on the west side, and “South Sea” for the sea on the south side of the Korean peninsula. Japan does not presume to challenge the use of the name “East Sea” by the ROK in its domestic publications or media.

However, Japan cannot accept the assertion to change the name of the Sea of Japan—the name actually used in the international community—to the purely domestic ROK term “East Sea” and to make this an international standard, as the confusion would necessarily have an adverse effect on the safety of international maritime traffic. Sea of Japan is the only internationally established name, a fact for which there is no room for debate. Japan emphatically refutes the assertions of the ROK and North Korea made at the UNCSTGN, IHO and other international conferences.

## 4 The ROK government has recently published a survey that can be interpreted as withdrawing a part of its own assertion.

In November 2007, the ROK’s National Geographic Information Institute (NGII), an agency of the Ministry of Construction and Transportation (currently the Ministry of Land, Transport and Maritime Affairs), published a survey of historical maps. Although the NGII’s survey contains the same flaws (outlined above in Section 3.2.b.), what is notable is that the report states that “there was a rapid increase in the use of the name Sea of Japan *from the 19th century (1830 onward)*” (italics added).

This clearly shows the fallacy of the ROK’s assertion that the name Sea of Japan was the result of the Japanese policy of expansionism and colonial rule (Section 3.2.a.), and can be interpreted as affirming that the name Sea of Japan was in widespread use well before Japan’s colonial rule over the Korean peninsula.

# JAPAN



# HYDROGRAPHIC and OCEANOGRAPHIC DEPARTMENT JAPAN COAST GUARD

3-1, Tsukiji 5-chome, Chuo-ku, TOKYO, 104-0045 JAPAN

Phone: +81-3-3541-3685 Fax: +81-3-3248-1250 Tlx: (0) 252 2222 (JAHYD) E-mail: ico@jodc.go.jp

H.O.D. 05/10

26 February 2010

## **2bis. JAPAN**

Vice Admiral Alexandros MARATOS  
Chair of Working Group on the Revision S-23 (Limits of Oceans and Seas)  
President  
International Hydrographic Bureau  
4 quai Antoine 1er  
B.P. 445  
MC 98011 MONACO CEDEX  
MONACO

### **Subject: Japan's Supplementary Comment to Japan's Comment dated 8 January 2010**

Reference: IHB File N° S3/7020 dated 9 November 2009, "LIST OF AREAS OF CONCERN, RESPONSES FROM MEMBERS OF S-23 WG ACTION ON STEP 5"

Reference: Japan's comment (H.O.D. 01/10) dated 8 January 2010

Dear VADM Maratos,

I would like to take this opportunity to express once again our deep appreciation for your efforts to facilitate the activities of S-23 WG. It is my pleasure to share with you and my colleagues of the WG the following three additional comments which will supplement Japan's comment dated 8 January 2010 with regard to the name of "Sea of Japan."

Firstly, I would like to reiterate the fact that "Sea of Japan" is the only internationally and historically established name for the sea area concerned which spreads between the Korean Peninsula and the Japanese Archipelagoes. This has been verified by the survey that the Ministry of Foreign Affairs of Japan conducted in 2002-2005 to study approximately 1,900 historical maps issued in many countries in the world.

As a result of the survey, for instance, we came to learn that the term "Sea of Japan" was first used in the early 17<sup>th</sup> century in a world map compiled by an Italian Jesuit priest named Matteo Ricci. The extensive research has also confirmed that "Sea of Japan" has become overwhelmingly in use since the early 19<sup>th</sup> century, whereas maps made in Europe in the 18<sup>th</sup> century had used a variety of names for the sea, including "Sea of Korea," "Oriental Sea" and "Sea of China" as well as "Sea of Japan". These facts can indicate, therefore, that the "Sea of Japan" was established in Europe and in the U.S. by the early 19<sup>th</sup> century. As you may be aware, Japan maintained a "close-door" (isolationist) policy toward the rest of the world from the beginning of the 17<sup>th</sup> century through the middle of the 19<sup>th</sup> century, and was not in a position to exercise any influence over the international community for establishing the name "Sea of Japan" at that time.

(For details of these historical facts, please refer to the file attached to the Japan's comment dated 8 January.)

In this regard, a member country mentions in its comment about the current use of "East Sea" in maps issued in other countries. According to the survey that the Japanese Foreign Ministry conducted in 67 countries in 2005, almost 90% of the maps surveyed use only "Sea of Japan" to describe the sea area concerned, whereas 0.2% of them use "East Sea" only.

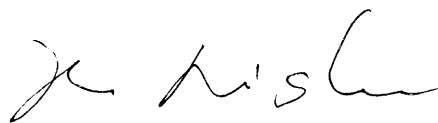
Secondly, Japan is proposing that the revision of S-23 should be conducted in line with the objective of the applicable rules of IHO, including IHO Convention whose preamble reads that IHO was established "to contribute to making navigation easier and safer throughout the world by improving nautical charts and documents." The fundamental purpose of IHO would be significantly undermined if an internationally-established name of the high seas is changed in S-23, or other names to describe the same high seas are simultaneously accepted, due to persistent claims of merely a few countries without presenting convincing historical or otherwise evidences.

In this regard, some member countries seem to refer to the IHO Technical Resolution A.4.2.6 to support their claim that the name "East Sea" can be used together with "Sea of Japan." However, this particular resolution can be applied to the situation where "two or more countries share a given geographical feature (such as, for example, a bay, strait, channel or archipelago) under a different name form." It is obvious therefore that the resolution is irrelevant in case of the high seas such as Sea of Japan. If some countries challenge the internationally -established names such as the Atlantic or the Pacific, application of the resolution A.4.2.6 to the high seas would give in to such a claim. Needless to say, this would cause seriously negative effect on the fundamental objective of the IHO, i.e. to bring about "the greatest possible uniformity in nautical charts and documents" as "a consultative and purely technical" body (Article II (b) of the IHO Convention). This is a very important issue that could affect all the IHO member countries as pointed out in Japan's comment of January 8.

Finally, I would like to emphasize that Japan is only interested in maintaining the order of IHO through reconfirming the internationally-recognized name as it is. Japan has no interest at all to proliferate the local name of "Nippon-kai," instead of "Sea of Japan," to describe the sea area concerned. Japan has never asked for the insertion in S-23 of the local name "Nippon-kai" in the past, and has no intention to pursue this option in the future either.

Thank you in advance for your understanding and cooperation.

Yours sincerely,



Hideo Nishida

Japan Representative to S-23WG

Cc: Ing. en chef Michel Huet, Secretariat of S-23WG



## Korea Hydrographic and Oceanographic Administration

#195 Seohaero, Jung-gu  
INCHEON 400-800, Republic of Korea  
Tel: (82) 32 885-3826, Fax: (82) 32 885-3829

Vice Admiral Alexandros MARATOS  
President  
International Hydrographic Bureau  
4, Quai Antoine 1er  
B.P. 445, MC98011 Monaco Cedex  
Principality of Monaco

25 February 2010

Dear Vice Admiral Alexandros MARATOS,

With reference to IHB File N° S3/7020 dated 9 November 2009 regarding the list of “Areas of Concern,” the Republic of Korea is of the view that the sea area between the Korean Peninsula and the Japanese Archipelago should remain in the list of “Areas of Concern,” and the names “East Sea” and “Sea of Japan” should be used simultaneously to designate this area, on the following grounds:

- Until the 19<sup>th</sup> century, various names had been used to designate the sea area concerned such as “Sea of Joseon (Ancient Korean Dynasty),” “East Sea,” and “Oriental Sea,” while “Sea of Japan” had not been widely used even in Japan. Moreover, many maps at that time did not show any names for this sea area.
- With the rise of Japan as a regional power in Asia in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries, the sea area had become widely known as “Sea of Japan.” Korea, on the other hand, was unable to present its views on naming the sea area when the first and second editions of the “Limits of Oceans and Seas” were published in 1929 and 1937 respectively, since it was under Japanese colonial rule. When the third edition was published in 1953, Korea was in the midst of the Korean War.
- Historically, the name “East Sea” has been used for the past 2,000 years in Korea. Currently, 75 million people living on the Korean Peninsula use the name “East Sea.” The use of “East Sea” in world maps and media outlets has steadily increased. In addition, the simultaneous use of the names “East Sea” and “Sea of Japan” is consistent with the fundamental principles of the International Hydrographic Organization (IHO).
- The IHO adopted Technical Resolution A4.2.6 in 1974, which essentially provides that if two or more countries sharing a given geographic feature under a different name cannot agree on a common name, each of the names should be accepted. This general rule of international cartography is also confirmed by the United Nations

Conference on the Standardization of Geographical Names in its resolution III/20 adopted in 1977.


- Lying between Korea and Japan and extending north towards Russia, the sea area includes the territorial waters and exclusive economic zones of the countries encircling the area, and several countries have jurisdiction and sovereign rights over it. It would therefore be inappropriate to name the sea area after one particular country without the consent of other surrounding countries.
- The argument that the name “Sea of Japan” is authorized by the United Nations (UN) is not valid. The UN Secretariat stated that the use of the name “Sea of Japan” in the Secretariat’s documents does not constitute an official position of the UN, but rather a practice of the Secretariat. Furthermore, it has clarified that the practice should not be interpreted as advocating or endorsing any party’s position, and can in no way be invoked by any party in support of a particular position on the matter. There are therefore no grounds to claim that “Sea of Japan” is firmly established in the international community by invoking this practice of the UN Secretariat.

Detailed information on the grounds for the use of the name “East Sea” is attached herewith.

On “Malacca Strait” and “South China Sea-East China Sea” in the list of “Areas of Concern,” the Republic of Korea has no particular comments to make.

Thank you for your kind consideration.

Yours sincerely,

A handwritten signature in blue ink that reads "Joonho JIN". The letters are cursive and slightly slanted.

Joonho JIN

Representative of the Republic of Korea to S-23 WG



Legitimacy for Restoring the Name

# East Sea



## 1. HISTORICAL BACKGROUNDS

❖ Historically, the sea area between the Korean Peninsula and the Japanese Archipelago has been called “East Sea” in Korea for the past 2000 years.<sup>1)</sup> Until the 19th century, maps published in Europe designated this area with various names such as “Sea of Korea,” “East Sea,” “Sea of Japan,” and “Oriental Sea.” The name “Sea of Japan,” however, was not widely used even in Japan until the mid-19th century. It is worthy of note that, as late as 1870, even many Japanese maps referred to this body of water as “Sea of Joseon (Korea)”<sup>2)</sup> instead of “Sea of Japan.”<sup>3)</sup>

❖ The name “Sea of Japan”, however, came into wider use in the 20th century with the advent of Japanese imperialism and military expansion in Asia. Following continuous onslaughts from Japan in the late 19th century, Korea was colonized by Japan in 1910. But even before that, Korea had already been deprived of its diplomatic representation by Japan in 1905. It was against this backdrop that the International Hydrographic Organization published the first and second editions of *Limits of Oceans and Seas: S-23*<sup>4)</sup> in 1929 and 1937, with “Japan Sea” used to designate the sea area between Korea and Japan. Furthermore, when the third edition of *S-23* was published in 1953, Korea was in the middle of the Korean War<sup>5)</sup> after a short period of liberation from the Japanese colonial rule in 1945.

❖ After the war and with the restoration of law and administration, Korea has steadfastly exerted its vigorous effort to regain the legitimacy of the name “East Sea.” For instance, in the process of negotiations between Korea and Japan on the Fisheries Agreement in 1965, the two countries, unable to reach an agreement on the name of the sea area, agreed to maintain their respective names in each of their texts of the Agreement - that is, “East Sea” in the Korean version and “Sea of Japan” in the Japanese version. Academic circles, historians and cartographers in Korea have continuously endeavored to restore the name “East Sea” on world maps. Such efforts were culminated when the Korean government officially raised the issue at the 1992 United Nations Conference on the Standardization of Geographical Names immediately following its admission to the United Nations as a full member in 1991.

1) Numerous references, such as *History of the Three Kingdoms* (三國史記), the monument of King Gwanggaeto, and *Map of Eight Provinces of Korea*(八道總圖), reveal that “East Sea” has been used in Korea for more than 2000 years.

2) Joseon was the Korean dynasty lasting from 1392 to 1910.

3) Various Japanese maps such as *Simplified Map of Japan's Periphery*(日本邊界略圖) by Takahashi Kageyasu in 1809, *New World Map*(新製輿地全圖) by Mitsukuri Shogoin in 1844, and *Japan's Northeast Marginal Boundary Map*(本邦西北邊界略圖) by Yasuda Raishu in 1850 referred the sea area as “Sea of Joseon”.

4) *S-23* is a major source of reference for the names and borders of waters around the world.

5) The Korean War broke out in 1950 and lasted until 1953. The third edition of *S-23* was approved at the 1952 IHO Conference and published in 1953.

三國史記卷第十三

輸忠定難靖國贊化同德功臣閣府儀同三司檢校太尉守天保門下侍中判尚

書事兼史權部事集賢殿大學士監修國史上柱國致仕臣金富弼奉 宣撰

高句麗本紀第一 太祖東明聖王

始祖東明聖王姓高氏諱朱蒙一云高解先是扶餘王解夫婁老無子祭山川求嗣其兩御馬至銀淵見大石相對流淚王怪之使人轉其石有小兒金色蛙形作蛙王喜曰此乃天賚我令胤乎乃收而養之名曰金蛙及其長立為太子後其相阿蘭弗曰日者天降我曰將使吾子孫

立國於此汝其避之東海之濱有地號曰迦葉

原土壤膏腴宜五穀可都也阿蘭弗遂勸王移

都於彼國就東扶餘其舊都有人不知所從來

自稱天帝子解慕漱來都焉及解夫婁薨金蛙嗣位於是時得女子於太白山南優漱水問之曰我是河伯之女名柳花與諸弟出遊時有一男子自言天帝子解慕漱誘我於熊心山下鴨

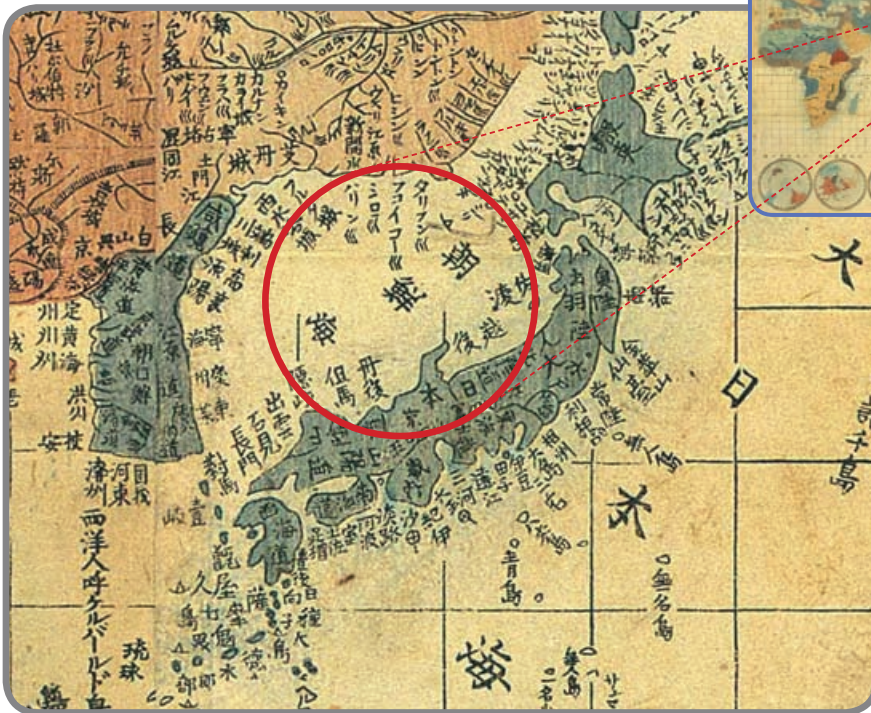
渌邊室中私之即往不返父母責我無媒而從人遂謫居優漱水金蛙異之幽閉於室中為日

所炤引身避之日影又逐而炤之因而有孕生

**DONG HAE**  
(East Sea, 東海)

*History of the Three Kingdoms, Korea*

This seminal book recounts the history of ancient states in Korea and the name "East Sea" was used when describing historical events that occurred around B.C. 50.



**JOSEON HAE**  
(Sea of Joseon, 朝鮮海)

*Newly Revised World Map, Japan*

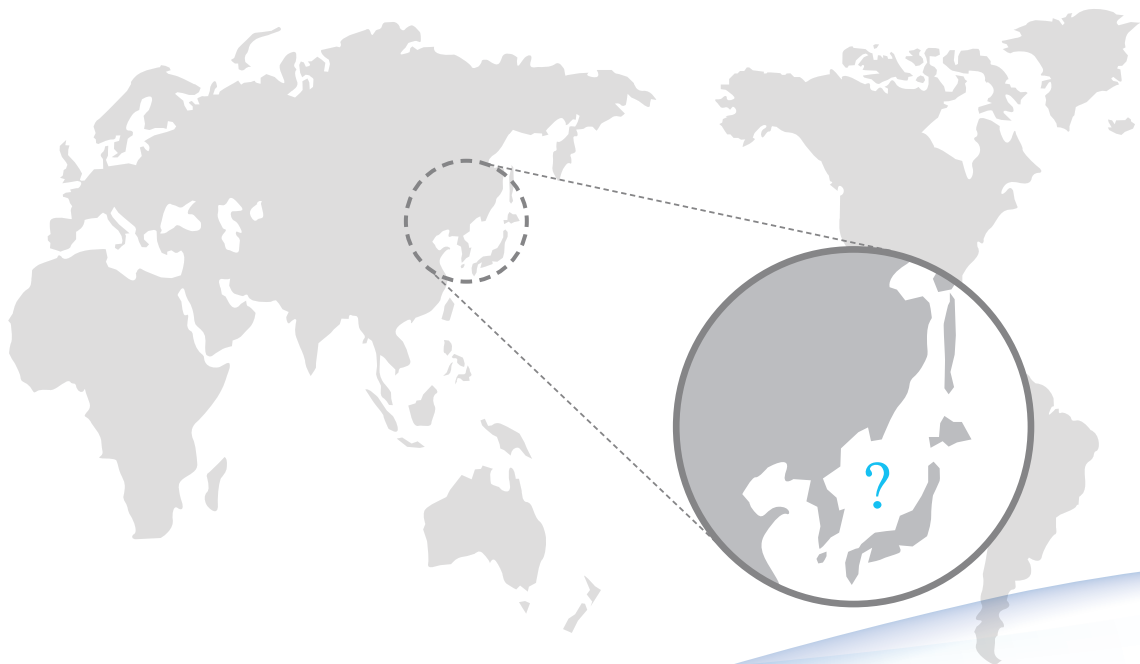
A Japanese map published in 1853 indicates the sea area between the Korean Peninsula and the Japanese Archipelago as the "Sea of Joseon (Korea)"; and the Pacific Ocean on Japan's side as the "Sea of Japan." This world map is based on one of maps by Takahashi, a Japanese government astronomer.

## 2. PRACTICES and RESOLUTIONS for the CONCURRENT USE

- ❖ Lying between Korea and Japan and extending north toward Russia, the sea area includes the territorial waters and Exclusive Economic Zones (EEZs) of the countries encircling the area. In other words, several countries share jurisdiction and sovereign rights over the sea area.
- ❖ When there is a geographical feature shared among two or more countries, its designation is generally standardized through consultations among the countries concerned. If the effort to standardize fails, however, the names used by each of the countries are used concurrently. This general rule of international cartography is also confirmed in the International Hydrographic Organization Technical Resolution A.4.2.6. and the United Nations Resolution on the Standardization of Geographical Names III/20.
- ❖ In following these cartographic rules and resolutions, Korea has made continuous efforts to seek a mutually agreeable solution through bilateral consultations with Japan. However, Japan's intransigence and inflexibility have prevented any meaningful discussion, resulting in constant deadlocks.
- ❖ Therefore, under these circumstances, Korea is of the view that both "East Sea" and "Sea of Japan" should be used concurrently in accordance with the established general rule of international cartography. <sup>6)</sup>

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6) The concurrent use of different names is well evident in such cases as English Channel / La Manche, Dover Strait / Pas de Calais, and Bay of Biscay / Golfe de Gascogne.



## International Hydrographic Organization Technical Resolution

### A4.2.6. International Standardization of Geographical Names (1974)

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It is recommended that where two or more countries share a given geographical feature (such as, for example, a bay, strait, channel or archipelago) under a different name form, they should endeavour to reach agreement on fixing a single name for the feature concerned. If they have different official languages and cannot agree on a common name form, it is recommended that the name forms of each of the languages in question should be accepted for charts and publications unless technical reasons prevent this practice on small scale charts. e.g. English Channel/La Manche.

## United Nations Resolution on the Standardization of Geographical Names

### III/20 Names of features beyond a single sovereignty (1977)

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The Conference,

Considering the need for international standardization of names of geographical features that are under the sovereignty of more than one country or are divided among two or more countries,

1. Recommends that countries sharing a given geographical feature under different names should endeavour, as far as possible, to reach agreement on fixing a single name for the feature concerned;
2. Further recommends that when countries sharing a given geographical feature do not succeed in agreeing on a common name, it should be a general rule of international cartography that the name used by each of the countries concerned will be accepted. A policy of accepting only one or some of such names while excluding the rest would be inconsistent in principle as well as inexpedient in practice. Only technical reasons may sometimes make it necessary, especially in the case of small-scale maps, to dispense with the use of certain names belonging to one language or another.

### 3. INCREASING INTERNATIONAL SUPPORT for CONCURRENT USE

- ❖ The international community is increasingly supporting the Korean view on the concurrent use of the names in question, that is, “East Sea” and “Sea of Japan.” The steady increase in the use of both names by many internationally respected cartographers and the media clearly indicates that the legitimacy of “East Sea” is gaining wide acceptance.
- ❖ For instance, studies carried out independently by Japan and Korea show that the maps using both names concurrently are on the increase, rising from 2.8 percent in 2000 to 10.8 percent (18.1 percent in case of commercial maps) in 2005, and then to 23.8 percent in 2007. This suggests growing support and understanding for the legitimacy of the name “East Sea.”



► *Family Reference Atlas of the World, Second Edition, National Geographic, 2007*



► *Meyers Universalatlas mit Länderlexikon, Meyers Lexikonverlag, 2008*



► *Webster's Concise World Atlas, Barnes & Noble Books, 2002*



► *Asia, Kummerly+Frej, 2003*

## 4. JAPAN'S MISLEADING INTERPRETATION of the UN PRACTICE

- ❖ Japan has continuously put forward a false argument that the name “Sea of Japan” is authorized by the United Nations. However, this is totally untrue. It is the United Nations Secretariat, not the United Nations itself, that uses the name “Sea of Japan.” The Secretariat explains that it has been using this name just for practical reason in the absence of an internationally agreed appellation. For certain, the United Nations Secretariat has neither authorized the name “Sea of Japan” nor has the authority to do so.
- ❖ In this regard, the United Nations Secretariat stated that the use of the name “Sea of Japan” in the Secretariat’s documents is not an official position of the United Nations, but rather a practice of the Secretariat. Furthermore, it has clarified that this practice is without any prejudice to the position of any Member States of the United Nations on a particular appellation and that it does not imply the expression of any opinion whatsoever on the part of the Secretariat. It also emphasized that the practice should not be interpreted as advocating or endorsing any party’s position, and can in no way be invoked by any party in support of a particular position on the matter.

## 5. LEGITIMACY for RESTORING the NAME ‘EAST SEA’

- ❖ Geographical names are part of cultural heritage and a reflection of people’s identity and history. “East Sea” is a name that has been used for more than 2000 years and is still in use by 75 million Koreans. While “East Sea” is less known today due to historical circumstances of the late 19th and early 20th centuries, its legitimacy is firmly grounded in historical documents and world maps.
- ❖ In addition, given the geographical feature of the sea area, the concurrent use of both names “East Sea” and “Sea of Japan” is in line with the general rules of international cartography.
- ❖ As such, many of the world’s prominent map producers and the media have begun to use “East Sea” and “Sea of Japan” simultaneously. With increasing awareness of the legitimacy of the name “East Sea” in the international community, this trend of concurrent use is expected to rise continuously.

## Legitimacy for Restoring the Name 'East Sea'



Ministry of Foreign Affairs and Trade, The Republic of Korea  
[www.mofat.go.kr](http://www.mofat.go.kr)



Northeast Asian History Foundation  
[www.historyfoundation.or.kr](http://www.historyfoundation.or.kr)

May 2009



## 4. MALAYSIA



NATIONAL HYDROGRAPHIC CENTRE  
BANDAR ARMADA PUTRA  
PULAU INDAH  
42009 PELABUHAN KLANG  
SELANGOR DARUL EHSAN  
MALAYSIA

Tel : 603 - 3169 4400 ext 4403  
Faks : 603 - 3101 3111  
Email: [mnodc@tm.net.my](mailto:mnodc@tm.net.my)  
Web: [www.hydro.gov.my](http://www.hydro.gov.my)

Ref : PHN/N3/3285 Jil. 1 - ( 8 )

Date : 25 Jan 10

Vice Admiral Alexandros MARATOS  
Chairman of S-23 Working Group  
International Hydrographic Bureau  
4, quai Antoine Ier, B.P. 445  
MC 98011 MONACO Cedex  
Principality of Monaco

Dear Admiral Maratos,

### COMMENTS ON THE AREAS OF CONCERN ON S-23 WORKING GROUP

#### Reference:

A. IHB File No. S3/7020 dated 12 November 2009.

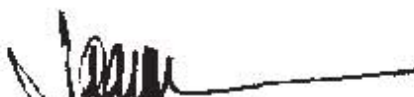
1. In reference to IHB's letter and fax addressed to Member States bordering those areas but not participating in S-23 Working Group in seeking opinion on areas of concern.

2. I would like to offer Malaysia's comment on two areas of concern as recommended in the draft of S-23.

a. Malacca Straits. Whilst agreeing that Malacca Straits seemed to appear as a single continuous waterways widely spanning through West Malaysia and Singapore and is frequented by mariners for the purpose of navigation to South China Sea, Malaysia, strongly feel that Malacca Strait be retained as part of Indian Ocean and not South China Sea. Furthermore, the international community have widely accepted Malacca Strait as part of Indian Ocean and not South China Sea.

b. South China Sea. Malaysia's concern is limited to Natuna Sea. It is recommended that Natuna Sea retains it's name and not be absorbed as part of South China Sea.

Yours sincerely,

  
ZAIM BIN HASAN  
First Admiral  
Director General



5. D.P.R. OF KOREA (received 8 Feb 2010)

Hydrographic Department of  
D. P. R. K



1/3  
조선민주주의인민공화국  
수령국

INTERNATIONAL HYDROGRAPHIC BUREAU  
4, quai Antoine 1er  
B.P.445  
MC 98011 MONACO CEDEX

Fax: +377 93 10 81.40

**Vice Admiral Alexandros MARATOS**  
**IHB President Chairman of the S-23WG**

COPIED TO : Michel HUET  
Secretary of the S-23 WG

Dear sir

I make a grateful acknowledgement for the effort of IHB and S-23 WG members to publish the 4<sup>th</sup> edition of IHO publication S-23.

We went deep into the study of the response from members of S-23 WG to the IHB e-mail of 8 July 2009 "LIST OF AREAS OF CONCERN" and the standards, definitions and rules of procedure for toponymy which were proposed by France.

Based on the study, let us clarify our stand concerned the matter again in the present stage when the work of the S-23WG is in progress at the step 6. As you know, it is a self-evident truth that the essential solution to the problem what the different views come forward regarding the name of a geographical feature is to treat the problem in accordance with the resolution, regulation and recommendations of the international organizations concerned.

2/3

According to the Document of 3<sup>rd</sup> UN Conference on the Standardization of Geographical Name, further recommends that when countries sharing a given geographical feature do not succeed in agreeing on a common name, it should be a general rule of international cartography that the name used by each of the countries concerned will be accepted.

A policy of accepting only one or some of such names while excluding the rest would be inconsistent in principle as well as inexpedient in practice.

And the principle and solution for the simultaneous use of both names are clearly defined on the IHO technical resolution A 4.2.6.

Now the provision is regarded as the most fair solution acceptable for the standardization of the geographical name in dispute and therefore it becomes the way and trends that many countries and cartographers aspire currently in the world.

That is why the simultaneous writing of both names was recommended when the draft 4<sup>th</sup> edition of S-23 was being prepared in 2002, and it appears that the geographical names such as "English Channel(La Manche)", "Dover Strait(pas de Calais)" and "Bay of Biscay (COLFE de Gascogne)" don't cause any objection between the neighbouring countries concerned.

But Japan is alone in the position against the proposal for the "simultaneous writing" and even objects the inclusion of the matter in the "list of areas of concern" for the settlement of the dispute.

It is regarded as not proper conduct, as the IHO Member State, that interferes plainly with the work of the dignified IHO.

Though Japan argues that the name "Sea of Japan" has been used on the world maps produced in various countries since 17<sup>th</sup> century, the sea area

3/3

had been named and called "East Sea" or "Sea of Korea" by our ancestors since B.C period, very far before 17<sup>th</sup> century, and was also designated in such name forms on other old maps and documents of foreign countries including Japan.

It is a well - known fact that was proved and declared through the several international meetings and papers.


According to the view point of historicism and the international principle and official tradition for the geographical naming, the name of the sea-area must be corrected and written as "East Sea" or "Sea of Korea" in principle. But giving full consideration to the prevailing situation, we think that the proposal for the "simultaneous writing of both names" is the most fair and realistic way acceptable for the settlement of the problem under the present conditions.

Therefore, I state definitely again that it is our inflexible position that the name of the sea area located between the Korean Peninsula and the Japanese Archipelago which is included in the "list of areas of concern" of the S-23 WG must be written with both names simultaneously.

I recommend strongly above mentioned our position to you and S-23-WG members.

Expressing thanks again for the deep concern of the S-23WG members and you to settle the problem, we wish the positive result in response to our position.

Yours sincerely.

Rear Admiral Kim Chang Sik   
Director of Hydrographic Department

DPRK

## 6. ITALY

### Italy's response to IHB letter S3/7020 of 9 November 2009

*Received 19 February 2010*

Dear Colleagues,

I think that the most important thing is to try to find the consent on the way ahead we would like to follow.

My opinion is that the solution will be possible only if we work on the subject just on a technical point of view.

In fact, we perfectly know the nature of IHO: “a consultative and purely technical body...” as recalled by Art. II (b) of the IHO Convention.

And in this view, IHO is not entitled to decide the name to be assigned to a specific area. The Organization (or the Bureau) can not interfere with the decisions of different Countries.

The only possibility it has, is to try to persuade the Countries members of the Organization to find a solution or, at least, a compromise.

If a compromise is not possible, I think that IHO, as a technical body, should be entitled to make a picture of the situation.

Considering this introduction, the solution presented by France could be an option or, at least, it could be considered a starting point.

From this starting point, it could also be possible to find other options such as the following one.

If the name of a specific area is not unequivocally and unanimously defined, because of different reasons, especially political ones, in which IHO is not entitled to interfere (as remembered before), IHO could maintained the name reported on the current edition of S 23, adding a footnote explaining that “some Countries” or “a, b ...n Countries” use the name x, or names x,y,z.

In this case, it will be recognized that the specific name reported in the page is the name that has been internationally used up today but, also, it will be reported that one or more countries decided to use another name to define that specific area (it could also be specified “since the year xxxx”).

Of course, this is another suggestion made in order to try to find a solution or, at least, the first step for a shared solution.

Regards  
Paolo Lusiani

## 7. INDONESIA



### Dinas Hidro-Oseanografi

Jl. Pantai Kuta V No. 1 Ancol Timur Jakarta Utara

Tel: +62 21 64714810, Fax: +62 21 64714819

Email: infohid@dishidros.go.id

Reference: B / 03 / II / 2010

Jakarta, 25 February 2010

#### Vice Admiral Alexandros Maratos

Chairman of S-23 Working Group  
International Hydrographic Bureau  
4, quai Antoine 1er  
BP 445, MC98011 Monaco Codex  
Principality of Monaco

Dear Admiral,

#### **RE: COMMENTS ON AREAS OF CONCERN DRAFT 4<sup>TH</sup> EDITION S-23 (2002)**

With reference to International Hydrographic Bureau (IHB) e-mail of 8 July 2009 forwarding a draft list of areas of concern, and IHB File N° S3/7020 dated 9 November 2009 inviting Member States of the International Hydrographic Organization (IHO) that is not represented in the S-23 Working Group (S-23 WG) to provide comments on the said areas of concern as contained in the Draft 4<sup>th</sup> Edition of the S-23 "Limits of the Oceans and Seas", June 2002, Indonesia hereby would like to convey its comments:

1. For the **Malacca Strait** (page 6-15), Indonesia is of the opinion that it could not be included neither as part of Indian Ocean nor South China Sea. This is due to the fact of its unique characteristics which makes it different from bodies of water adjacent to it:
  - a. By definition, it is a channel joining two larger bodies of water separating the island of Sumatera and the Malaysian Peninsula. Therefore, the area of the Malacca Strait should begin from the Northernmost point of Sumatera.
  - b. Together with Strait of Singapore, it is commonly considered as a single continuous waterway connecting Indian Ocean and South China Sea. The Straits are considered waters of critical importance to international navigation, shipping and world commerce. The Littoral States of the Straits have agreed on managing the Straits since 1971 for the purpose of safety of navigation and environmental protection. The Littoral States also established strategic policy mechanisms for the management of the Straits through the meetings

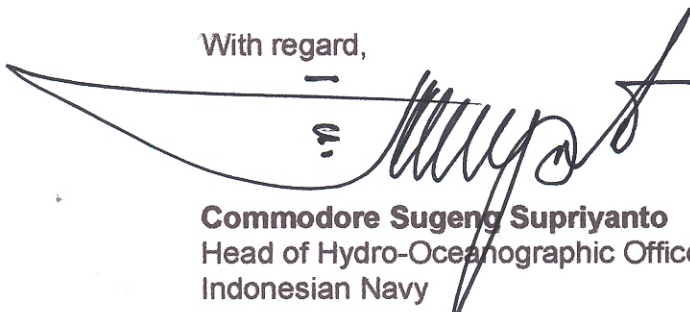
of Foreign Ministers. At global level, it is widely accepted as such by the International Maritime Organization (IMO).

2. Indonesia, therefore is of the view that IHO should consider the Straits of Malacca and Singapore as a unity, independent from either Indian Ocean or South China Sea. Indonesia propose that IHO should consider such designation in future publication of "the Limits of the Oceans and Seas". Pending decision on this matter, the original designation of the Straits on the 3<sup>rd</sup> Edition of the S-23 (1953) shall be retained.
3. For the **South China Sea**, Indonesia agrees with the current limits as contained in page 6-11 of the Draft 4<sup>th</sup> Edition of S-23 (2002) that shows Natuna Sea as an individual body of water and not included as part of South China Sea. Indonesia has already used Natuna Sea, since 1951 on chart no. 38. As referred on The UN Conference Resolution on the Standardization of Geographical Names (UNCSGN) no 4 year of 1967 Recommendation B on Geographical Names Collections, which is geographical names should be collected from local names.

Furthermore, Indonesia would also like to take this opportunity to inform the IHB that we are currently in the process of establishing "**Indonesian Limits of the Seas**" throughout Indonesia's archipelagic waters that could be considered as an addition to the IHB S-23 publications. This is currently an on going work which require harmonization with the partial list of geographical names that Indonesia had submitted to the Economic and Social Council of the United Nations in 2008. Consequently, Indonesia could not provide any detailed information at this stage but will convey it to the IHB upon its completion.

I thank you.

With regard,



**Commodore Sugeng Supriyanto**  
Head of Hydro-Oceanographic Office  
Indonesian Navy



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL OCEAN SERVICE  
Office of Coast Survey  
Silver Spring, Maryland 20910-3282

FEB 26 2010

**8. USA**

Vice Admiral Alexandros MARATOS  
Chairman of the Working Group on the Revision of Special Publication 23  
International Hydrographic Bureau  
4 quai Antoine 1er  
B.P. 445  
MC 98011 MONACO CEDEX

Dear VADM Maratos:

This letter is in regard to a request for comments in IHB Letter S3/7020 of 9 November 2009. In addition to responding to Step 5 of the Work Plan to revise S-23, the United States would like to revise its initial response to the 8 July 2009 IHB letter with the enclosed document. The document, which is formatted to match the original list of areas of concern, includes the United States' comments denoted in blue.

Sincerely,

Meredith Westington  
U.S. Representative to the Working Group on the Revision of Special Publication 23

Enclosure

Cc: RADM Christian ANDREASEN  
Ing en chef Michel HUET



Printed on Recycled Paper





## S-23 – AREAS OF CONCERN (U.S. comments in blue)

### 1. Sea area between the Korean Peninsula and the Japanese Archipelago

Japan, on one side, and Republic of Korea and DPR of Korea, on the other side, have a different view on naming this area.

This issue pertains to the name of the feature and not its areal extents. The Government of the United States uses geographic names as determined by the U.S. Board on Geographic Names.

### 2. Malacca Strait

India's comments (July 2003) on the draft 4<sup>th</sup> edition of S-23 which was circulated to Member States with IHB Circular Letter 30/2002, are reproduced hereafter:

Issue	Recommendation
Shifting of Malacca Strait from Chapter V (Indian Ocean) to Chapter VI (South China Sea)	India recommends that status-quo should be maintained in this regard by retaining Malacca Strait with its existing limits under Chapter V.

The United States concurs that this feature should remain in Chapter V (Indian Ocean) and not be shifted to Chapter VI (South China Sea). However, from a navigation perspective, the United States has concerns about separating this feature from Singapore Strait.

### 3. South China Sea – East China Sea

China's comments (January 2003) on the draft 4<sup>th</sup> edition of S-23 which was circulated to Member States with IHB Circular Letter 30/2002, are reproduced hereafter:

1. As the traditional geographical concept with a clear definition, "South China Sea" refers to the vast water area to the south of China mainland, the east of Indochina peninsula, the north of Lathu Jawa, and the west of Philippine archipelago. It would not match the traditional name, and also easily result in illegibility in the geographic concept, if the "South China Sea" is considered as the part of "South China Sea and Eastern Archipelagic Seas". So, we suggest, following the practice in the 3<sup>rd</sup> version of this publication in 1953, "South China Sea" be an absolute sub-division.

If "Lathu Jawa" is meant to mean the Java Sea (Laut Jawa in Bahasa Indonesia), then the United States broadly agrees with the spatial definition in the first section of this sentence. We do not agree with the recommendation to split the section currently titled "South China and Eastern Archipelagic Seas and its Subdivisions" and create a separate entity for the South China Sea.

2. To mark out "Natuna Sea" from "South China Sea" has no any basis and would also not match the traditional name of this water area. The "Natuna Sea" area also belongs to the "South China

Sea". We suggest "Natuna Sea" be cancelled and the southern limits of "South China Sea" be maintained in accordance with the demarcation of 1953.

The body of water south of the Natuna and Anambas Islands and north of Bangka and Belitung Islands and the Java Sea has the characteristics of a distinct sea feature, and the name "Natuna Sea" would be a potentially appropriate name for this sea body. However, absent some sort of agreement with or evidence of use by its other littoral states (Malaysia and Singapore), the United States agrees that this name should not be applied at this time.

3. Early in 1950s, "Gulf of Tonkin" was changed to "Beibu Gulf", which means "The gulf in the north of South China Sea". Both China and Vietnam have accepted the "Beibu Gulf". We request this water area be named as "Beibu Gulf". In addition, "Beibu Gulf" is a part of "South China Sea", therefore, should not juxtaposed with "South China Sea".

The Government of the United States uses geographic names as determined by the U.S. Board on Geographic Names. The United States favors retaining "Gulf of Tonkin" over "Beibu Gulf." However if both China and Vietnam, as the sole littoral states, have agreed on the latter name as the Chinese representative claims, then the United States would not object to a name change for use in an international context. However, the last sentence in this section seems to suggest that this feature be removed as a separate entity in S-23 and subsumed into the South China Sea. The United States does not agree with that suggested revision.

4. The northern limit of the "South China Sea" is suggested to be modified as: "From the mouth of Han Jiang (23° 28'N-116° 52'E), the coast of China, eastward to Changshan Jiao (23° 26'N-116° 56'E), the western extremity of Nao'ao Dao; from Changshan Jiao eastward, along the southern coast of this island, to Dongdun Jiao (23° 24'N-117° 07'E); from Dongdun Jiao southeastern, through Dongmu Jiao (23° 12.3'N-117°13.9'E) of NanPeng Liedao, to Maobi Tou (21° 55'N-120° 43'E), the northern<sup>1</sup> extremity of Taiwan Dao; thence eastward, along the southern coast of this island, to E'luan Bi (21° 54'N-120° 52'E); thence to Amianan (21° 07'N-121° 57'E)".

The United States sees no reason to change the definition of the northern limits of the South China Sea that is in the current draft standard, but has no strong objection to the proposal above.

Accordingly, the southern limits of Taiwan Strait" should be adjusted.

Only up to Maobi Tou (21° 55'N-120° 43'E); any extension eastward would be omitted.

5. "Taiwan Strait" is a part of "East China Sea", therefore, it should not be juxtaposed with "East China Sea". Taiwan is the indivisible domain of China, so "Taiwan" cannot be labeled with the font used for the national name, but only be labeled as "Taiwan Dao".

The United States opposes China's proposal for making Taiwan Strait a sub-division of East China Sea. As an international waterway of some significance, it deserves its current designation as a distinct component of the North Pacific Ocean section of S-23.

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<sup>1</sup> IHB comment: we think it should read "southern".

6. Some Pacific Ocean areas eastern to Taiwan Dao belong to the “East China Sea”. The limits of “East China Sea” should be adjusted to “the line joining Hateruma to Amianan, thence a line from Amianan to E’luan Bi, the southern extremity of Taiwan Dao”.

The western limits of “Phillippine Sea” should be adjusted accordingly.

The United States strongly disagrees with this proposal.

7. Both “Bo Hai” and “Liaodong Wan” are not the composition of “Yellow Sea”. According the geographic character of Bo Hai, Bo Hai is Chinese internal water, but not the part of Yellow Sea, and Liaodong Wan is one of three Bo Hai’s gulfs. Our suggestions are:

- a) Cancelling the demarcation of “Liaodong Wan”, and merge this area into “Bo Hai”;

The United States would prefer that Liaodong Wan still be treated as a sub-sub-division under Bo Hai (i.e. 7.X.1 – see the next sentence).

- b) “Bo Hai” being marked off “Yellow Sea” and juxtaposed with “Yellow Sea” as an absolute sub-division;

The United States does not object to Bo Hai having its own subdivision marking (i.e. 7.X vs. the current 7.4.1).

- c) The limits of “Yellow Sea” and “Bo Hai” are “from Laotieshan Xijiao (38° 44’N-121° 08’E), the southwestern extremity of Liadong Bandao, southward to Dazhushan Dao (38° 01’N-120° 57’E); thence to Penglai Tou (37° 50’N-120° 45’E), the northern extremity of Shandong Bandao”.

A line running from the southern extremity of the Liaodong Peninsula passing through Beihuangcheng Dao, the island about 22 nautical miles south of it, then along the chain of islands that could also include Dazhushan Dao, represents a more natural separation of the bay from the Yellow Sea.

8. Some Chinese geographical names in this publication should be labeled with the new spelling form of standard Chinese geographical name. The details are:

The Government of the United States uses geographic names as determined by the U.S. Board on Geographic Names. The United States defers to IHO on the spelling of these features and whether the “additive” ones are necessary for use in an international context.

Original Spelling	On page	Standard spelling
Nanao	6-1 6-2 6-3 6-6 6-7 7-8	Nan’ao Dao
(additive)	6-1 6-2 6-3 6-6 6-7 7-8 7-9	Dongdun Jiao
(additive)	6-1 6-2 6-3 6-6 6-7 7-8 7-9	Dongmu Jiao
(additive)	6-1 6-2 6-3 6-6 6-7 7-8 7-9	Maobi Tou

San-tiao Chiao	7-4 7-6 7-10 7-11	Sandiao Jiao
Fu-kuei Chiao	7-8 7-9 7-10 7-11	Fugui Jiao
O'luan Pi	6-1 6-2 6-3 6-6 6-7 7-4 7-6 7-8 7-9	E'luan Bi
T'ai-wan	6-3 6-7 7-1 7-2 7-3 7-4 7-6 7-8 7-9 7-10 7-11	Taiwan Dao
Teng-lou Chiao	6-6 6-7 6-8 6-10	Denglou Jiao
Lei-chou Bandao	6-6 6-7 6-8 6-10	Leizhou Bandao
Ying-Ko Tsui	6-6 6-8	Yingge Zui
Hai-nan Tao	6-6 6-8 6-10	Hainan Dao
Lin-Kao Chiao	6-6 6-8 6-10	Lin'gao Jiao
Gulf of Tonkin	6-6 6-9 6-10	Beibu Gulf
Hainan Strait	6-10	Qiongzhou Haixia
T'ai-wan Strait	7-8 7-9 7-11	Taiwan Strait
(additive)	7-12 7-13	Dazhushan Dao
Penglai Xijiao	7-12 7-13	Penglai Tou

9. ARGENTINA



2010 – Año del Bicentenario de la Revolución de Mayo

*Ministerio de Defensa*  
*Servicio de Hidrografía Naval*

REF: SIHN, HC4 N° 16/10

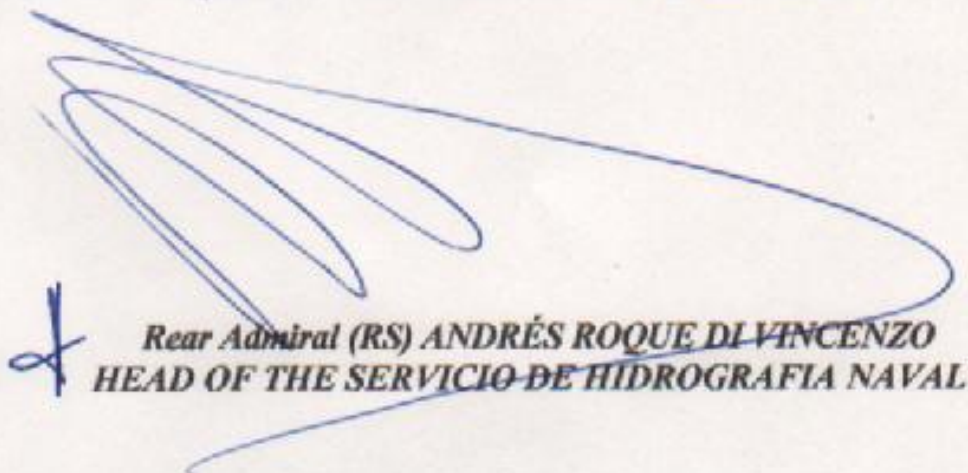
BUENOS AIRES, February 28th, 2010.

Dear Vice Admiral Maratos,

I have the pleasure to address you in response to letter IHB File N° S3/7020 dated 9 November 2009 regarding step 5 of the agreed "Ways of Progressing the Work of the S-23 WG".

I find moving on with the proposal made by France making use of both UN and IHO regulations would be an appropriate approach to a purely technical supported solution for maintaining the publication into the frame of the requested environment, keeping in mind its nautical purpose.

Finally, I would like to make use of this opportunity to express my recognition to your effort in carrying on this WG in order to bring a renewed version of the S-23 to the hydrographic community.



*Rear Admiral (RS) ANDRÉS ROQUE DIVINCENZO*  
*HEAD OF THE SERVICIO DE HIDROGRAFIA NAVAL*

Vice Admiral Alexandros Maratos  
Chairman of the S-23 Working Group  
President of the INTERNATIONAL HYDROGRAPHIC BUREAU

March 31, 2010

Vice Admiral Alexandros MARATOS,  
Chair of S-23 Working Group  
President of International Hydrographic Bureau  
4 Quai Antoine 1<sup>er</sup>  
B.P.445 MC 98011 MONACO CEDEX  
Principality of MONACO  
Fax: +377 93 10 81 40

Reference: IHB e-mail of 8 July 2009 forwarding a draft list of areas of concern  
IHB letter to S-23WG members dated 9 November 2009

CHINESE COMMENTS ON  
THE "LIST OF AREAS OF CONCERN" ON THE S-23

Dear Vice Admiral MARATOS,

Refer to the email of 8 July 2009 and IHB letter to S-23 WG members dated 9 November 2009. Chinese comments on the list of the possible areas of concern which have been identified at the International Hydrographic Bureau as follow:

1. As the traditional geographical concept with a clear definition, "South China Sea" refers to the vast water area to the south of China mainland, the east of Indochina peninsula, the north of Lathu Jawa (Laut Jawa in Bahasa Indonesia), and the west of Philippine archipelago. It would not match the traditional name, and also easily result in illegibility in the geographic concept, if the "South China Sea" is considered as the part of "South China and Eastern Archipelagic Seas". So, we strongly suggest, following the practice in the 3<sup>rd</sup> version of this publication in 1953, "South China Sea" be an absolute sub-division.
2. To mark out "Natuna Sea" from "South China Sea" has no any basis and would also not match the traditional name of this water area. The "Natuna Sea" area also belongs to the "South China Sea". We suggest "Natuna Sea" be cancelled and the southern limits of "South China Sea" be maintained in accordance with the demarcation of the 3<sup>rd</sup> version of this publication in 1953.
3. Early in 1950s, "Gulf of Tonkin" was changed to "Beibu Gulf", which means "The gulf in the north of South China Sea". Both China and Vietnam have accepted the "Beibu Gulf". We request this water area be named as "Beibu Gulf". In addition, "Beibu Gulf" is part of "South China Sea", therefore, should not be juxtaposed with "South China Sea".

# 中華人民共和國海警局

MARITIME SAFETY ADMINISTRATION OF PEOPLE'S REPUBLIC OF CHINA

中國·北京建國門內大街 11 號 11 Jianguomennei Ave. Beijing, China

- 
4. For the northern limit of the “South China Sea”, we request that the geographic point ( $23^{\circ} 24' N-117^{\circ} 07' E$ ) be named as “Dongdun Jiao”, and that two additional points, Dongmu Jiao ( $23^{\circ} 12.3' N-117^{\circ} 13.9' E$ ) of NanPeng Liedao and Maobi Tou ( $21^{\circ} 55' N-120^{\circ} 44' E$ ) of the southern extremity of Taiwan Dao, be inserted. So the northern limit of the “South China Sea” is suggested to be modified as: “From the mouth of Han Jiang ( $23^{\circ} 28' N-116^{\circ} 52' E$ ), the coast of China, eastward to Changshan Jiao ( $23^{\circ} 26' N-116^{\circ} 56' E$ ), the western extremity of Nao'ao Dao; from Changshan Jiao eastward, along the southern coast of this island, to Dongdun Jiao ( $23^{\circ} 24' N-117^{\circ} 07' E$ ); from Dongdun Jiao southeastern, through Dongmu Jiao ( $23^{\circ} 12.3' N-117^{\circ} 13.9' E$ ) of NanPeng Liedao, to Maobi Tou ( $21^{\circ} 55' N-120^{\circ} 44' E$ ), the southern extremity of Taiwan Dao; thence eastward, along the southern coast of this island, to E'luan Bi ( $21^{\circ} 54' N-120^{\circ} 52' E$ )”.

Accordingly, the southern limits of Taiwan Strait” should be adjusted.

5. “Taiwan Haixia (Strait)” is a part of “East China Sea”. Just as all the other straits in S-23 had been sub-divisions of some seas, So “Taiwan Haixia (Strait)” should be an sub-division of the “East China Sea”. Taiwan is the indivisible domain of China, so “Taiwan” cannot be labeled with the font used for the national name, but only be labeled as “Taiwan Dao”.
6. Both “Bo Hai” and “Liaodong Wan” are not the composition of “Yellow Sea”. According the geographic character of Bo Hai, Bo Hai is Chinese internal water, but not the part of Yellow Sea, and Liaodong Wan is one of three Bo Hai's gulfs. Our suggestions are:
- Cancelling the demarcation of “Liaodong Wan”, and merge this area into “Bo Hai”;
  - “Bo Hai” being marked off “Yellow Sea” and juxtaposed with “Yellow Sea” as an absolute sub-division;
  - The traditional limits of “Yellow Sea” and “Bo Hai” are “from Laotieshan Xijiao ( $38^{\circ} 44' N-121^{\circ} 08' E$ ), the southwestern extremity of Liadong Bandao, southward to Dazhushan Dao ( $38^{\circ} 01' N-120^{\circ} 57' E$ ); thence to Penglai Tou ( $37^{\circ} 50' N-120^{\circ} 45' E$ ), the northern extremity of Shandong Bandao”. It has been accepted by our people for several centuries, and our government has setup some marks on the three points above.
  - The southern limit of the “Yellow Sea” being modified as: “From the southernmost extremity of the coast of Korea southward to Soan-gundo, from Soan-gundo to Chuja-gundo, from Chuja-gundo southeastward to the western extremity of Jejudo ( $33^{\circ} 17' N -126^{\circ} 10' E$ ), and thence a line joining the western extremity of Jejudo

# 中華人民共和國海事局

MARITIME SAFETY ADMINISTRATION OF PEOPLE'S REPUBLIC OF CHINA

中國·北京建國門內大街 11 號 11 Jianguomennei Ave. Beijing, China

southwestward to Changiangkou Beijiao (31°42'N - 121°54'E), the northernmost point of the mouth of Chang Jiang (Yangste River), on the coast of China.”

7. we have taken note of some comments on “the list of the possible areas of concern” by other member states, and we consider that Singapore’s comments on the “Malacca Strait” and “Singapore Strait” conform to the traditional customs and actual situation.

8. Our measurement indicates that the coordinates of the following geographic points should be corrected.

Geographical name	error coordinate	On Page	Correct coordinate
The mouth of Han Jiang	23°28'N-11°52'E	7-3	23°28'N-116°52'E
The western shoals of Balabac Island	7°55'-116°49'	6-7	7°56'-116°56'

9. Some Chinese geographical names in this publication should be labeled with the new spelling form of standard Chinese geographical name. The details are:

Original spelling	On Page	Standard spelling
Nanao	6-1 6-2 6-3 6-6 6-7 7-8	Nan'ao Dao
Han Jiang Gan	6-4 7-1 7-2 7-8 7-9	Han Jiang
<b>(additive)</b>	6-1 6-2 6-3 6-6 6-7 7-8 7-9	Dongdun Jiao
<b>(additive)</b>	6-1 6-2 6-3 6-6 6-7 7-8 7-9	Dongmu Jiao
<b>(additive)</b>	6-1 6-2 6-3 6-6 6-7 7-8 7-9	Maobi Tou
Changshan Jiǎo Jiǎà (Chinese) = Head	6-3 6-7 7-8 7-9	Changshan Jiao Jiao (Chinese) = Head
Fu-kuei Chiao	7-8 7-9 7-10 7-11	Fugui Jiao
O'luan Pi	6-1 6-2 6-3 6-6 6-7 7-3 7-4 7-6 7-8 7-9	E'luan Bi
T'ai-wan	6-1 6-2 6-3 6-6 6-7 7-1 7-2 7-3 7-4 7-5 7-6 7-8 7-9 7-10 7-11	Taiwan Dao
T'ai-wan Strait	6-7 7-8 7-9 7-11	Taiwan Haixia(Strait)
Teng-lou Chiao	6-6 6-7 6-8 6-9 6-10	Denglou Jiao
Lei-chou Bandao	6-6 6-7 6-8 6-9 6-10	Leizhou Bandao



# 中華人民共和國海事局

MARITIME SAFETY ADMINISTRATION OF PEOPLE'S REPUBLIC OF CHINA

中國·北京建國門內大街 11 號 11 Jianguomennei Ave. Beijing, China

Original spelling	On Page	Standard spelling
Ying-Ko Tsui	6-6 6-8 6-9 6-10	Yingge Zui
Hai-nan Tao	6-6 6-8 6-9 6-10	Hainan Dao
Lin-Kao Chiao	6-6 6-8 6-9 6-10	Lingao Jiao
Gulf of Tonkin	6-8 6-9 6-10	Beibu Gulf
Hainan Strait	6-10	Qiongzhou Haixia
Sungai(Chinese)= River	6-10	Sungai (Malaysia)= River
San-tiao Chiao	7-4 7-6 7-10 7-11	Sandiao Jiao
Xiang Jiǎo	7-8 7-9 7-10 7-11	Xiang Jiao
Changjiangkou Beijiǎo	7-10 7-11 7-12 7-13	Changjiangkou Beijiao
Liadong Hai	7-12	Liaodong Wan
Liadong Bandao	7-12 7-13	Liaodong Bandao
<b>(additive)</b>	7-12 7-13	Dazhushan Dao
Penglai Xijiao	7-12 7-13	Penglai Tou

We hope you consider our opinions above at the revision of the final version.

Best wishes,

Yours sincerely,



Chen Aiping

Director-General

Maritime Safety Administration of

The People's Republic of China