

**G E B C O**  
GENERAL BATHYMETRIC CHART OF THE OCEANS

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INTERNATIONAL HYDROGRAPHIC  
ORGANIZATION  
ORGANISATION HYDROGRAPHIQUE  
INTERNATIONALE  
MONACO

**G E B C O**

SUB-COMMITTEE  
ON  
UNDERSEA FEATURE NAMES  
(SCUFN)



INTERGOVERNMENTAL OCEANOGRAPHIC  
COMMISSION  
COMMISSION OCEANOGRAPHIQUE  
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IHO File No. S3/2643

6 March 2018

**SCUFN Letter No. 01/2018**

**To:** The Permanent Delegation of the Republic of the Philippines to UNESCO  
**Copy:** IHO Secretariat, IOC Secretariat, GEBCO Guiding Committee (Chair/Secretary),  
SCUFN Vice-Chair  
**Subject:** Undersea Feature Names: Haidongqing Seamount, Jinghao Seamount, Tianbao  
Seamount, Jujiu Seamounts and Cuiqiao Hill

**References:**

- A. Letter from the Permanent Delegation of the Republic of the Philippines to UNESCO dated 28 February 2018.
- B. IHO-IOC Publication B-6 – Ed. 4.1.0, September 2013, updated February 2017 – *Undersea Feature Names: Guidelines, Proposal Form, Terminology*.
- C. GEBCO SCUFN Terms of Reference and Rules of Procedure (SCUFN TORs and ROPs).

Your Excellency,

1. As Chair of the GEBCO Sub-committee on Undersea Feature Names (SCUFN), I respectfully acknowledge reception of your letter in Reference A by which you request:
  - a. the nullification of decisions pertaining to five undersea feature names accepted by SCUFN at previous meetings (Haidongqing Seamount, Jinghao Seamount, Tianbao Seamount, Jujiu Seamounts and Cuiqiao Hill),

- b. and the rejection of pending proposals in the Philippines' EEZ and extended continental shelf.

2. After careful consideration of the arguments raised in your letter, I offer you my analysis of the situation:

- a. UNCLOS has legally no explicit effect with regard to the naming of undersea features in EEZs, and therefore cannot be used as an argument for preventing SCUFN, as the designated international authoritative body, from reviewing naming proposals, as long as these features (more than 50%) are located outside the external limits of the territorial sea (Reference B, Art. I.A).
- b. SCUFN Members, who are subject matter experts representing their parent organizations (International Hydrographic Organization (IHO) and International Oceanographic Commission (IOC) of UNESCO), are well aware of the Marine Scientific Research (MSR) procedures of UNCLOS for conducting surveys in the areas of jurisdiction of foreign countries. However, and in accordance with References B and C, it is not in the remit of SCUFN to assess whether the data provided in support of naming proposals have been collated in compliance with UNCLOS MSR. Such investigations are clearly out of the scope of SCUFN activities and possibilities.
- c. The noted naming proposals have been made by China in full conformity with the SCUFN procedures in force. It was the appreciation of SCUFN Members during the reviewing process at the time of their submission, that specific terms (Haidongqing, Jinghao, Tianbao, Jujiu and Cuiqiao) associated to generic terms (seamount, hill), had no political sensitivity at all and therefore no SCUFN Member deemed it necessary to invoke Art. 2.10 of the SCUFN Rules of Procedure for these proposals.

3. As a consequence, and based on the aforementioned comments, it is my view as responsible chair, that SCUFN should not recommend the nullification of the decisions already made on these five proposals, because they have been made in accordance with the guidelines and rules of all SCUFN procedures in force. Treating this particular case differently, would give precedence and may lead to the call for other possible revisions of adopted names based on various interpretations of their appropriateness.

4. The only option for nullification covered by the SCUFN procedure in force would be a submission of China to withdraw from their proposed naming. I recommend that the nominated authority of the Republic of Philippines considers such an approach by means of direct communication with the nominated authority of China via diplomatic channels.

5. Though there has been a number of comparable cases in the past, where submissions made to the SCUFN affecting features located in an EEZ did not relate to the waters under the responsibility of the proposer, this is the first time ever that SCUFN received this sort of objection of a country which claims authority about the affected EEZ. Now, with regard to the future naming proposals that may affect undersea features located within the Philippines' EEZ and its Extended Continental Shelf, it is well noted that the nominated authority of the Republic of Philippines requests to be consulted by the proposers. I confirm that as SCUFN Chair, I will take the appropriate measures to request the evidences by the proposers that Art. III.D (mutual consultation) of Reference B has been applied when the proposals are submitted for review.

6. I hope that my analysis and explanation clarifies the situation sufficiently. It is my intention to report on this topic at the next SCUFN meeting in October 2018 to seek for potential needs of improvement of the current guidelines and procedures in the light of this case. Finally, this issue will be reported to the GEBSCO Guiding Committee for further guidance and recommendations in application of Art. 2.11 of Reference C.

Yours sincerely,

A handwritten signature in blue ink, reading "Hans W. Schenke". The signature is written in a cursive style with a prominent initial 'H' and a long, sweeping tail.

Prof. Dr. Hans Werner SCHENKE  
Chair of SCUFN