



PERMANENT DELEGATION OF THE REPUBLIC OF THE
PHILIPPINES
TO UNESCO

LTR-03-2022

01 March 2022

Dear Mr. Chairperson,

With reference to SCUFN Letter no. 03/2020 dated 20 December 2021, I refer to the Philippine proposals submitted for the 34th meeting of the Sub-Committee on Undersea Feature Names (SCUFN-34), which were taken up at its VTC03 held on 16-17 November 2021. SCUFN-34 kept pending nine (9) of the Philippine proposals, requesting “mutual consultation” between interested parties.

I wish to reiterate the Philippine Government’s position on the request to conduct “mutual consultation by all interested parties,” initially submitted at the 32nd meeting of SCUFN (SCUFN-32)¹, as follows:

- In accordance with the 2016 Award on the South China Sea Arbitration and Articles 56 and 60 of the 1982 United Nations Convention on the Law of the Sea (1982 UNCLOS), all proposals from the Philippines, including the nine (9) proposals kept pending by SCUFN, are entirely, irrefutably, and conclusively located within the Philippines’ exclusive economic zone and continental shelf, over which the Philippines exercises sovereign rights and jurisdiction;
- The 1982 UNCLOS, as the constitution of the oceans, provides maritime entitlements, rights, and jurisdictions to coastal States. The 2016 Award on the South China Sea Arbitration upheld the Philippines’ maritime entitlements and rights in the West Philippine Sea. The Award is a milestone in the corpus of international law, the cornerstone of a rules-based international order;
- The GEBCO SCUFN, as a body created under the auspices of the United Nations, must respect the Award. It is the only way that the SCUFN process could move forward and address the issue of naming proposals submitted in the West Philippine Sea;

//: The Philippines, as...

DR. HYUN-CHUL HAN

Chairperson

General Bathymetric Chart of the Oceans

Sub-Committee on Undersea Feature Names

Organisation Hydrographique Internationale

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CEDEX Principauté de MONACO

Cc : Mr. Yves Guillam
SCUFN Secretary

¹ 20 naming proposals of the Philippines in the West Philippine Sea were kept pending by SCUFN-32, requesting “mutual consultation between interested parties.”

- The Philippines, as the coastal State exercising sovereignty and sovereign rights, must be given priority in naming undersea features within its waters, including those found in its exclusive economic zone and continental shelf;
- The nine (9) pending Philippine proposals, located in the West Philippine Sea, do not overlap with any other country's exclusive economic zone and continental shelf; hence, mutual consultation is not necessary². SCUFN's consideration and review of the proposed undersea feature names submitted by the Philippines in the West Philippine Sea should not be impeded by baseless claims and unwarranted encumbrance; and
- The Philippines has been consistently submitting naming proposals within its exclusive economic zone and continental shelf, which supports the mandate of SCUFN and the standardization of undersea feature names.

With the assurances of my highest consideration and esteem.

Sincerely yours,



Junever M. Mahilum-West
JUNEVER M. MAHILUM-WEST
Ambassador and Permanent Delegate

² The Philippines also expressed this view in SCUFN-32 for the 20 naming proposals in the West Philippine Sea. (cf. note 1)