



## Permanent Delegation of the Republic of the Philippines to UNESCO

28 February 2018

Dear Mr. Chairperson:

I have the honor to convey the position of the Philippine Government on the naming of undersea features located in the Philippines' exclusive economic zone (EEZ) submitted by China and accepted by the General Bathymetric Chart of the Oceans (GEBCO) Sub-Committee on Undersea Feature Names (SCUFN) at its meetings in 2014, 2015 and 2017; namely Haidongqing Seamount, Jinghao Seamount, Tianbao Seamount, Jujiu Seamounts, and Cuiqiao Hill.

The Philippines objects to and does not recognize the aforementioned Chinese names on the following grounds:

1. The Philippines has sovereign rights and jurisdiction over its exclusive economic zone as provided by the 1982 United Nations Convention on the Law of the Sea (UNCLOS).
2. Under Presidential Decree No. 1599 (s.1979) the conduct of research in the Philippine exclusive economic zone is not allowed without Philippine consent. It should be underscored that in 2002, China also passed a law requiring China's approval for all surveys and mapping activities in its EEZ. Thus, when China conducted the hydrographic surveys in the Philippines in 2004, it was fully aware that said activities may be prohibited since Chinese domestic law prohibits foreigners from conducting surveys within its EEZ.
3. Although the Chinese proposals are in conformity with the SCUFN guidelines of naming undersea features, the way the submitted data was collected is not in accord with the UNCLOS since China was not granted consent to undertake hydrographic surveys in the EEZ of the Philippines in 2004. There was no consultation made with interested parties prior to submission to the SCUFN which is one of the requirements for naming features.
4. While there are no disputed territories in the Pacific Ocean where the undersea features are located, China's nine dash line claim on the South China Sea and disregard for Philippine consent in undertaking the marine surveys in 2004 would make the Chinese naming of seamounts politically sensitive.
5. Furthermore, the Philippines invokes Rule 2.10 of the Sub-Committee's Terms of Reference and Rules of Procedure which states "The Sub-Committee will not consider undersea feature name proposals that are politically sensitive." Given the complex geo-political situation in the region, the Philippines is of the view that the Sub-Committee should not have accepted the said proposals.

In this regard, the Philippines requests for the nullification of decisions pertaining to the abovementioned features and rejection of pending proposals located in the Philippines' EEZ and extended continental shelf on the aforementioned grounds.

With the assurances of my highest consideration.



**MA. THERESA P. LAZARO**

Ambassador and Permanent Delegate

**Dr. Hans Werner SCHENKE**  
Chairperson  
GEBCO Sub-Committee on Undersea Feature Names

**Cc: Dr. Yasuhiko OHARA, Vice-Chair of SCUFN**  
**Mr. Yves Guillam, Secretary of SCUFN**  
**Mr. David Wyatt, Permanent Secretary, GEBCO**  
**Mr. Julian Barbieri; Mr. Tetsushi Komatsu, IOC Secretariat**  
**Dr. Vladimir Ryabinin, Executive Secretary, IOC**  
**Dr. Mathias Jonas, Secretary General, IHO**