



No. Sixth-LS/7/2025

PAKISTAN MISSION TO THE UNITED NATIONS

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The Permanent Mission of the Islamic Republic of Pakistan to the United Nations presents its compliments to the Secretary-General of the United Nations and has the honour to refer to the Notification CLCS.48.2009.LOS.Add.1 (Continental Shelf Notification) dated 8 April 2025.

Pakistan would like to draw attention to the two amended executive summaries in respect of "Western Offshore Region (Central Arabian Sea region)" and "Western Offshore Region (Northern Arabian Sea region)" submitted by Republic of India on 3 April 2025 to "[amend] the Executive Summary of the partial submission made by India[...] on 11 May 2009" and "supersede, in part, the corresponding portions of the 2009 partial submission with regard to the Western Offshore Region in the Arabian Sea and...."

Pakistan considers that the procedure adopted by India is not in consonance with the Rules of Procedures of CLCS. India has submitted two new claims with CLCS in continuation of the earlier submission of 2009 which was suspended by the commission in 2023 on account of objection raised by Pakistan in terms of Rule 46 and Annex I (Para 2) of the Rules of Procedure of the Commission. India has made major changes to outer limits of CS claim without referring to the dispute which resulted in suspension of their previous claim, therefore may not be considered merely as amendment to the earlier claim of 2009.

The Government of Pakistan requests the Commission that further consideration of any of the amended Partial Submission(s) made by India on 3 April 2025 be scrutinized in light of Rules of Procedures of CLCS as well as Statement by the Chair (Item 15 of CLCS/57/2).

Permanent Mission requests that this Note Verbale, along with its enclosures, be circulated to all members of the Commission and to all State Parties to the UNCLOS.

The Permanent Mission of the Islamic Republic of Pakistan to the United Nations avails itself of this opportunity to renew to the Secretary-General of the United Nations the assurances of its highest consideration.


New York, 11 July 2025

H.E. Mr. Antonio Guterres,
United Nations Secretary-General,
New York

CC:

Ms. Elinor Jane Britt Hammarskjold,
Under Secretary-General, Legal Affairs/Legal Counsel,
New York





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The Permanent Mission of the Islamic Republic of Pakistan to the United Nations presents its compliments to the Secretary-General of the United Nations and has the honour to draw his attention to Note Verbale No. NY/PM/443/3/2010 dated 17 November 2020 by the Republic of India, responding to Note Verbale No. Sixth/LS/7/2020 dated 6 July 2020 addressed to the Secretary-General of the United Nations by the Permanent Mission of Pakistan to the United Nations, which objected to the partial Submission related to Western offshore region (Arabian Sea) presented by the Republic of India to the Commission on the Limits of the Continental Shelf (CLCS).

Based on the consideration of the Executive Summary of the Indian Submission and its subsequent response, Pakistan regrets that India was unable to address the procedural inconsistencies and violations of the 1982 United Nations Convention on the Law of the Sea (UNCLOS) as well as the Rules of Procedure of the CLCS in its Submission. Therefore, the Government of Pakistan rejects the Indian contentions as contained in its Note Verbale No. NY/PM/443/3/2010 dated 17 November 2020 and wishes to observe the following:

- i) It is reiterated that the contents of the Executive Summary of Indian Submission, as contained in Section-V "Relevant Delimitation", fail to highlight the dispute between Pakistan and India in Sir Creek area due to which the determination of agreed Land Terminus and subsequent delimitation of maritime boundary is pending. Indian contention equating "outstanding maritime delimitations" with "dispute" does not comply with Rule 46 and Clause 2(a) of Annex I of the Rules of Procedure of the Commission, which categorically necessitates the coastal state(s) to inform the Commission of "such disputes";
- ii) India's claim to have made its Submission "without prejudice to matters relating to delimitation of boundaries with its neighbouring States" is contrary to what India has submitted under Section-VI (paragraph 7), "Region-by-Region Overview", which highlights that the outer limits of the Indian extended Continental Shelf (Western offshore region, Arabian Sea) is defined by 220 fixed points – out of which 19 points (a segment of more than 100 nautical miles) are located on the potential maritime boundary between Pakistan and India. This is in violation of Article 76 (10) and Article 9 of Annex II of UNCLOS as well as the Rules of Procedure of the Commission;
- iii) India's argument that Pakistan's Submission was considered by the Commission despite "outstanding maritime delimitation" is misleading, as Pakistan's Submission neither had any segment of bilateral boundary, nor did it undertake any unilateral construction of potential maritime boundary with India. Pakistan

also unambiguously mentioned the boundary dispute over Sir Creek with India in its Submission; and

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- iv) India's assertions that "the potential maritime boundary is based on median line equidistance principle" and that "Pakistan has also followed the same" is again an attempt to divert the Commission's attention from the main issue. Using equidistance principle is not fundamentally under consideration at present. What is critical to note is that, while using the equidistance principle, Pakistan never included any part of the potential maritime boundary with India in its Submission for the consideration of CLCS.

The Government of Pakistan reiterates that by failing to reflect the Sir Creek dispute and by unilaterally constructing the median lines as a potential maritime boundary with Pakistan and presenting it to the Commission for review, India is in violation of the UNCLOS and the Rules of Procedure of the CLCS.

The Government of Pakistan, therefore, in accordance with Article 5(a) of Annex-I to the Rules of Procedure of the CLCS, requests the Commission once again not to consider and qualify the partial Submission of India pertaining to its Western offshore region in North Arabian Sea, as it would prejudice the matters related to the delimitation of boundaries between Pakistan and India.

The Government of Pakistan reiterates its commitment to make every effort to resolve the boundary dispute and reach an agreement with India on the dispute over Sir Creek, and, therefore, until such time, the Commission should not consider the matter related to the delimitation of the boundaries between States with adjacent or opposite coasts, as is the case with Pakistan and India, in accordance with Article 76 and Annex II of the UNCLOS.

Pakistan has also responded to India bilaterally on the subject in response to a note verbale dated 1 December 2020 addressed to the Ministry of Foreign Affairs, Islamabad, by the Indian High Commission in Islamabad. A copy of the note verbale sent to India is enclosed.

The Permanent Mission requests that this Note Verbale, along with its enclosure, be circulated to all members of the Commission and to all State Parties to the UNCLOS.

The Permanent Mission of the Islamic Republic of Pakistan to the United Nations avails itself of this opportunity to renew to the Secretary General of the United Nations the assurances of its highest consideration.

Encl: as above

H.E. Mr. Antonio Guterres,
United Nations Secretary-General,
New York



2021

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CC:

Mr. Miguel de Sepra Soares,
Under-Secretary-General,
Legal Affairs/Legal Counsel,
New York



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MINISTRY OF FOREIGN AFFAIRS
ISLAMABAD

No. UN(III)-3/10/2020

The Ministry of Foreign Affairs of the Islamic Republic of Pakistan presents its compliments to the High Commission for the Republic of India in Islamabad and has the honour to refer to the latter's Note Verbale No. ISL/108/2/2020 dated 1 December 2020 responding to Note Verbale No. Sixth/LS/7/2020 dated 6 July 2020 addressed to the Secretary-General of the United Nations by the Permanent Mission of Pakistan to the United Nations in New York on India's partial submission related to Western offshore region (Arabian Sea) to the Commission on the Limits of the Continental Shelf (CLCS).

Based on the consideration of the Executive Summary of the Indian Submission and its subsequent response, the Government of Pakistan regrets that India was unable to address the procedural inconsistencies and violations of the 1982 United Nations Convention on the Law of the Sea (UNCLOS) as well as the Rules of Procedure of the CLCS in its Submission. Therefore, the Government of Pakistan rejects the Indian contentions as contained in its Note Verbale No. ISL/108/2/2020 dated 1 December 2020 and wishes to observe the following:

- i. The contents of the Executive Summary of Indian Submission, as contained in Section-V "Relevant Delimitation", fail to highlight the dispute between Pakistan and India in Sir Creek area due to which the determination of agreed Land Terminus and subsequent delimitation of maritime boundary is pending. Indian contention equating "outstanding maritime delimitations" with "dispute" does not comply with Rule 46 and Clause 2(a) of Annex I of the Rules of Procedure of the CLCS, which categorically necessitates the coastal state(s) to inform the CLCS of "such disputes";
- ii. India's claim to have made its Submission "without prejudice to matters relating to delimitation of boundaries with its neighbouring States" is contrary to what India has submitted under Section-VI (paragraph 7), "Region-by-Region Overview", which highlights that the outer limits of the Indian extended Continental Shelf (Western offshore region, Arabian Sea) is defined by 220 fixed points – out of which 19 points (a segment of more than 100 nautical miles) are located on the potential maritime boundary between Pakistan and India. This is in violation of Article 76 (10) and Article 9 of Annex II of UNCLOS as well as the Rules of Procedure of the CLCS;

- iii. India's argument that Pakistan's Submission was considered by the CLCS despite "outstanding maritime delimitation" is misleading, as Pakistan's Submission neither had any segment of bilateral boundary, nor did it undertake any unilateral construction of potential maritime boundary with India. Pakistan also unambiguously mentioned the boundary dispute over Sir Creek with India in its Submission; and
- iv. Till such time that the Indian Submission is under consideration, Pakistan is well within its right to lodge an objection. There is no limitation of time prescribed under UNCLOS which constrains the CLCS from considering Pakistan's objection. It is pertinent to mention that 12 rounds of bilateral talks have been held between Pakistan and India on Sir Creek dispute till 2012. The said talks were discontinued by India in 2013 and need to be resumed to arrive at a mutually acceptable solution.

The Government of Pakistan wishes to highlight that by failing to reflect the Sir Creek dispute and by unilaterally constructing the median lines as a potential maritime boundary with Pakistan and by presenting it to the Commission for review, India is in violation of the UNCLOS and the Rules of Procedure of the CLCS.

The Government of Pakistan reiterates its commitment to make every effort to resolve the boundary dispute and reach an agreement with India on the dispute over Sir Creek. Until such time, Pakistan has every right to protect its interests in maritime zones from actions that may have prejudicial outcome.

The Ministry of Foreign Affairs of the Islamic Republic of Pakistan avails itself of this opportunity to renew to the High Commission for the Republic of India in Islamabad the assurances of its highest consideration.



Islamabad, 13 January 2021

High Commission of the Republic of India,
Islamabad



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The Permanent Mission of the Islamic Republic of Pakistan to the United Nations presents its compliments to the Secretary-General of the United Nations and has the honour to draw his attention to the partial Submission related to Western offshore region (Arabian Sea) presented by the Republic of India to the Commission on the Limits of the Continental Shelf (CLCS). Based on the consideration of the Executive Summary of the Indian Submission, the Government of Pakistan observes the following:

- i. The contents of the Executive Summary of Indian Submission as contained in Section-V "Relevant Delimitations" fails to highlight the dispute between Pakistan and India in Sir Creek area due to which the determination of agreed Land Terminus and subsequent delimitation of maritime boundary is pending. Pakistan also objected to the Indian Baseline System that was posted on the website of the Division for the Ocean Affairs and the Law of the Sea (copy of the note verbale attached). Failing to reflect Sir Creek dispute is in contravention of Rule 46 and Annex I (para 2) of the Rules of Procedure of the Commission; and
- ii. Section-VI (paragraph 7) "Region-by-Region Overview", highlights that the outer limits of Indian extended Continental Shelf (Western offshore region, Arabian Sea) is defined by 220 fixed points out of which 19 points are located on the potential maritime boundary between Pakistan and India. This is a unilateral action, not recognized by Pakistan, and is in contravention of Article 76 (10) and Article 9 of Annex II to the United Nations Convention on Law of the Sea (UNCLOS) and Rules of Procedure of the Commission.

The Government of the Islamic Republic of Pakistan believes that failing to reflect Sir Creek dispute and unilaterally constructing the median lines as a potential maritime boundary between Pakistan and India is in violation of the UNCLOS and Rules of Procedures of the CLCS.

The Government of Pakistan, therefore, in accordance with Article 5(a) of Annex-I to the Rules of Procedures of the CLCS, requests the Commission not to consider and qualify the partial Submission of India pertaining to its Western offshore region in North Arabian Sea, as it is being prejudicial to delimitation of boundaries between Pakistan and India.


The Government of the Islamic Republic of Pakistan reiterates its commitment to make every effort to resolve the boundary dispute and reach a bilateral agreement with India on dispute over Sir Creek, and therefore until such time, the Commission should not prejudice the matter related to the delimitation of the boundaries between States with

adjacent or opposite coasts, as enshrined in Article 76 and Annex II of the UNCLOS (1982).

The Permanent Mission of the Islamic Republic of Pakistan to the United Nations requests that this Note Verbale be circulated to all members of the Commission and all States Parties to the UNCLOS.

The Permanent Mission of the Islamic Republic of Pakistan to the United Nations avails itself of this opportunity to renew to the Secretariat-General of the United Nations, the assurances of its highest consideration.

Encl: (as above)


New York, 6 July 2020

H.E. Mr. António Guterres,
United Nations Secretary-General,
New York



CC:

Mr. Miguel de Serpa Soares,
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No. Sixth/LS/7/2011

6 December 2011

The Permanent Mission of the Islamic Republic of Pakistan to the United Nations presents its compliments to the Secretary-General of the United Nations and with reference to Government of India's Notifications No. S.O.1197(E) dated 11 May 2009 and S.O. 2962(E) dated 20 November 2009, specifying list of geographical coordinates of base points defining Baseline System of India to measure its maritime boundaries, posted on the website of Division for Ocean Affairs and the Law of the Sea (UN circular No. M.Z.N. 76.2010.LOS of 17 February 2010) and published in Law of the Sea Bulletin No. 71 & 72 has the honour to state the following:-

- a. The Government of Pakistan is of the view that the following sections of the baseline points notified by India are inconsistent with international law, including the relevant provisions of 1982 United Nations Convention on the Law of the Sea (UNCLOS). The Government of Pakistan therefore, reserves its rights and those of its nationals in this regard.
- b. India's Base Points 1 to 3 of Schedule-I of India Notification (coordinates mentioned below), impinge upon Pakistan's territorial limits in Sir Creek area and encroach upon its territorial waters, which are within its sovereign jurisdiction. This encroachment by India in Pakistan's limits is a grave violation of international principles and established practices and clear violation of UNCLOS-82 Article 7(6) which states that system of straight baseline may not be applied by a State in such a manner as to cut off the territorial sea of another state from the high seas or EEZ.

i)	Sir Mouth N.	-	23° 40' 20.80" N, 68° 04' 31.20" E
ii)	Sir Mouth S.	-	23° 36' 30.30" N, 68° 07' 00.90" E
iii)	Plr Sanni Creek	-	23° 36' 15.20" N, 68° 07' 28.50" E
- c. The Government of Pakistan notes that disregarding the provisions of UNCLOS 82 Article 5, straight baseline segments joining base points No.24-25, 27-28, & 18-19 have been drawn by India on relatively smooth coast which is not indented

or fringed by islands. India should have used normal baseline, the low water line, as required by UNCLOS 82. Pakistan is of the view that this creeping appropriation of sea due to excessive baselines have infringed the rights of international community as a whole being part of res communis in international Seabed Area and Pakistan in particular being adjacent Coastal State.

- d. The Government of Pakistan further notes that straight baselines have been drawn by India to and from low-tide elevations in West/East Coast of India, which do not have lighthouses or similar installations on them or any international recognition, contravening Article 7(4) of UNCLOS-82.
- e. Coordinates of normal baseline segments have not been given in the Notification.
- f. Lengthy segments of straight baseline, which is against the spirit and practices of UNCLOS have been used to maximize the area of internal waters.

In view of the above, the Government of Pakistan does not recognize the Baseline System promulgated by India. While the Government of Pakistan reserves its right to seek suitable revision of this notification, any claim India makes on the basis of above cited Indian Notification to extend its sovereignty/jurisdiction on Pakistan waters or extend its internal waters, territorial sea, Exclusive Economic Zone and Continental Shelf is therefore, not acceptable to Pakistan being in contravention to the provisions of UNLCOS 1982.

The Permanent Mission of the Islamic Republic of Pakistan to the United Nations avails itself of this opportunity to renew to the Secretariat of the United Nations the assurances of its highest consideration.



The United Nation Secretariat,
Ms. Patricia O'Brien -
Under Secretary-General/Legal Counsel,
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