

In case of reply the number and date of this Letter should be quoted REPUBLIC OF GHANA

13 February, 2017

P. O. BOX MB. 60

ACCRA.

ATTORNEY-GENERAL'S DEPT

My Ref: ILD/SCR/132/SF.5 Your Ref No. Fax No. 0302-667609 Tel. No. 0302-682106

Mr. Philippe Gautier Registrar International Tribunal for the Law of the Sea Am Internationalen Seegerichtshof 1 22609 Hamburg Germany

By email: RegistrarOffice@itlos.org

Dear Mr. Gautier,

Re: C23 — Dispute concerning Delimitation of the Maritime Boundary between Ghana and Côte d'Ivoire in the Atlantic Ocean (Ghana/Côte d'Ivoire)

Pursuant to Article 75(2) of the Rules of the International Tribunal for the Law of the Sea, please find attached a copy of text of the Final Submissions of the Republic of Ghana in the above-captioned case.

Please accept, Sir, the assurances of my highest consideration.

Yours Sincerely,

Gloria Afua Akuffo (Miss) Attorney General & Minister for Justice Agent of the Republic of Ghana

cc: Minister Adama Toungara, Agent of the Republic of Côte d'Ivoire



FINAL SUBMISSIONS OF THE REPUBLIC OF GHANA

On the basis of the facts and law set forth in its Memorial and Reply, and its oral presentations, Ghana respectfully requests the Special Chamber to adjudge and declare that:

- Ghana and Côte d'Ivoire have mutually recognised, agreed, and applied an equidistance-based maritime boundary in the territorial sea, EEZ and continental shelf within 200 M.
- 2) The maritime boundary in the continental shelf beyond 200 M follows an extended equidistance boundary along the same azimuth as the boundary within 200 M, to the limit of national jurisdiction.
- 3) In accordance with international law, by reason of its representations and upon which Ghana has placed reliance, Côte d'Ivoire is estopped from objecting to the agreed maritime boundary.
- 4) The land boundary terminus and starting point for the agreed maritime boundary is at Boundary pillar 55 (BP 55).
- 5) As per the Parties' agreement in December 2013, the geographic coordinates of BP 55 are 05° 05' 28.4" N and 03° 06' 21.8" W (in WGS 1984 datum).
- 6) Consequently, the maritime boundary between Ghana and Côte d'Ivoire in the Atlantic Ocean starts at BP 55, connects to the customary equidistance boundary mutually agreed by the Parties at the outer limit of the territorial sea, and then follows the agreed boundary to a distance of 200 M. Beyond 200 M, the boundary continues along the same azimuth to the limit of national jurisdiction. The boundary line connects the following points, using loxodromes (the geographic coordinates are in WGS 1984 datum):

Point	Latitude	Longitude
CEB-1 (LBT)	05° 05' 28.4" N	03° 06' 21.8" W
CEB-2	04° 53' 39" N	03° 09' 18" W
CEB-3	04° 47' 35" N	03° 10' 35" W

CEB-4	04° 25' 54" N	03° 14' 53" W
CEB-5	04° 04' 59" N	03° 19' 02" W
CEB-6	03° 40' 13" N	03° 23′ 51" W
CEB-7	01° 48' 30" N	03° 47' 18" W
(200 M)		
CEB-8	01° 04' 43" N	03° 56' 29" W
(Limit of		
National		
Jurisdiction)		

- 7) Côte d'Ivoire's claim alleging violation of the Special Chamber's Order of 25 April 2015 is rejected.
- 8) Côte d'Ivoire's claim alleging violation of Article 83 of UNCLOS and Côte d'Ivoire's sovereign rights is rejected.

Gloria Afua Akuffo

Agent of the Republic of Ghana

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13 February 2017