

13 DEC 2002  
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INTERNATIONAL TRIBUNAL FOR THE LAW OF THE SEA

**THE VOLGA – APPLICATION FOR RELEASE OF VESSEL AND  
CREW**

**THE RUSSIAN FEDERATION v THE COMMONWEALTH OF AUSTRALIA**  
(Applicant) (Respondent)

SUBMISSION OF RUSSIAN FEDERATION

13 DECEMBER 2002

The Russian Federation asks that the Tribunal make the following orders and declarations:

- (a) A declaration that the Tribunal has jurisdiction under Article 292 of the United Nations Convention for the Law of the Sea 1982 ("UNCLOS") to hear the application.
- (b) A declaration that the application is admissible.
- (c) A declaration that the Respondent has contravened article 73(2) of UNCLOS in that the conditions set by the Respondent for the release of the *Volga* and three of its officers are not permitted under article 73(2) or are not reasonable in terms of article 73(2).
- (d) An order that the Respondent release the *Volga* and the officers and its crew if a bond or security is provided by the owner of the vessel in an amount not exceeding AU\$500,000 or in such other amount as the Tribunal in all the circumstances considers reasonable.
- (e) An order as to the form of the bond or security referred to in paragraph 1 (d).
- (f) An order that the Respondent pay the costs of the Applicant in connection with the application.

Dated 13 December 2002

**Signed by the appointed agent for the Russian Federation**



**Pavel Grigorevich Dzubenko**  
Deputy Director, Legal Department,  
Ministry of Foreign Affairs of the  
Russian Federation