



REVIEWING THE SCOPE AND LIMITATIONS OF INTERNATIONAL LEGAL FRAMEWORKS IN RESOLVING MARITIME DISPUTES

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ABSTRACT

The maritime disputes in which boundaries, resources and the right of passage are being claimed by various entities continue to emerge in the rapidly changing geopolitical domain. Such conflicts can be dealt with in a structured manner in the international legal system and more specifically in the international legal framework of the United Nations Convention on the Law of the Sea (UNCLOS). Nonetheless, even with these legal instruments, the settlement of maritime disputes is full of challenges usually affected by national interests and power politics. In this article, we discuss and analyze the extent and the limitation of international laws in solving maritime disputes. It examines the principles laid down at the UNCLOS and customary international law, as well as evaluates the functional operation of the major international dispute settlement institutions, including the International Court of Justice (ICJ), the International Tribunal on Law of the Sea (ITLOS) and arbitral tribunals. The effectiveness of these mechanisms in the attainment of equitable and sustainable solutions is also taken into account in the analysis. Some relevant structural and political limitation identified in the discussion are the question of enforcement, jurisdictional confusion and unwillingness of powerful states to abide by the rulings. Examining paradigmatic cases and current controversies, the article outlines the fields of change, as well as provides recommendations designed to increase the corpus of credibility and effectiveness of the international legal regime in the field of maritime governance.

Keywords: Maritime disputes, UNCLOS, international law, dispute resolution, ICJ, ITLOS, arbitration, enforcement, legal frameworks, sovereignty.

I. INTRODUCTION

Maritime territory has been the center of cooperation and war waged by nations; maritime territory has a long history. With the ocean covering more than two-thirds of the Earth's surface, maritime zones are critical not only for global trade and communication but also for their vast natural resources, strategic importance, and ecological value. Maritime issues have been related to the need to assert sovereignty, gain access to resources, and extend the sphere of interest and influence of coastal states and have increased because of conflicts around maritime boundaries, territorial waters, and territorial jurisdiction. Such disputes are usually

protracted, which includes having claims of the historic, having competing entitlements, and different views on international law.

The international community has thus come up with a variety of legal frameworks meant to govern and solve maritime problems. "Principal among them is the United Nations Convention on the Law of the Sea (UNCLOS), which provides a complete law on the ocean or the legal framework that defines the ocean as well as procedures guaranteeing the settlement of disputes." Treaty-based norms are not the only kinds of norms that are important, however; the customary international law and the institutions such as: the International Court of Justice (ICJ) and the International Tribunal of the Law of the Sea (ITLOS) also have a role to play.

Nonetheless, the international legal regimes are still contentious even though they have these mechanisms. Most conflicts remain unresolved and legal decisions tend to be selectively obeyed or made subject to politics. This paper carries out a critical evaluation of the scope and limitations of the present international legal influence on maritime disputes with an attempt to acknowledge strong points as well as the weaknesses that are inherent in them in the light of emerging geopolitical realities.

II. NATURE AND CAUSES OF MARITIME DISPUTES

Maritime dispute mainly occurs as a result of competing claims of space, resources and sovereign rights in the ocean. These conflicts may be based on a varied number of factors which include delimitation of boundaries and fisheries access, control of shipping routes and resource harvesting of the ocean bed floor. The character of these conflicts is complicated in itself, because such conflicts usually contain tortuous legal, historical, geographic and political issues.

1. Sovereignty and Boundary Delimitation

The non-clarity of boundaries between the states is identified as one of the most frequent reasons why the maritime conflicts arise. The coastal states have a right to diverse regions of the sea as stipulated by international law (coastal states may enjoy the following exclusive rights in the sea: a territorial sea (12 nautical miles); exclusive economic zone (EEZ, 200 nautical miles) and continental shelf rights). Nevertheless, when areas of maritime jurisdiction overlap, such as regularly happens with the states that are neighbours or on opposite sides of the coastline, a conflict may emerge over the exact location of maritime frontiers. These disputes may either involve territorial waters or rights to the wide range of resource endowed areas on the continental shelf.

2. Value of and Control of Natural Resources

Maritime zones become attractive not only due to their economic prospects, especially in the form of fisheries and oil and gas reserves as well as underwater mineral resources. Since the demand of these resources is increasing, states tend to make more claims that guarantee them

the sole right of access. Disputes often occur when one state's activities, such as fishing or offshore drilling, are perceived to infringe on the rights or sovereignty of another. Such limited or disputed borders, such as those in the South China Sea or the Arctic region, are the particularity of the phenomena of such resource-driven conflicts.

3. Control and Strategic Navigation

Another area of serious conflict is the freedom of navigation. Although UNCLOS grants the right of innocent passage through territorial waters and freedom of navigation on the high seas and the EEZs, the interpretation of the rights may diverge. Other states along the coast have limitations or have the wider ambition to take control of strategic maritime routes and this creates difficulties and lawsuits between states. These problems are actually enhanced in the military sensitive region where seaways regulation of control directly impacts the national security.

4. All the above led to historical and colonial tools and legacies.

Modern maritime disputes are influenced by historical claims usually based on pre-modern maps, treaties, or usage. Historical use or ancient discovery can be used by the states as the foundation of their territorial claims even though these arguments are not consistent with modern international law requirements. This historical aspect may complicate legal adjudication and lead to durable rivalry as it has been the case in various issues between China and some countries in the South East Asia concerning portions of the South China Sea.

5. Environmental and Jurisdictional issues

As the number of people who are concerned with the environmental problems on the sea is growing, the jurisdiction issues over the environment as well as responsibility in conservation are also becoming a matter of discussion. The contradictions between national legislations and national priorities of crime control in the matters of marine pollution, conservation of biodiversity, and response to climate change have emerged as a new focus of tensions especially at the transboundary level.

Overall, maritime issues are not singular and tend to be entangled with the wider geopolitical, economic, and environmental interests. The crucial aspect of assessing the ability of international legal systems to raise them and get them resolved is to understand their causes.

III. KEY INTERNATIONAL LEGAL FRAMEWORKS

Treaty law and customary international law, combined together, represent the dominant factors that influence the international legal regime that regulates the debate about maritime disputes. The constructions form legal grounds to defining maritime zones, establishing rights and obligations of states as well as offering dispute resolution mechanisms of peaceful means. The principal sources of this regime are the United Nations Convention on the Law of the Sea (UNCLOS) and the Developing structure of customary International law.

UNCLOS and Its Provisions

In 1982, the United Nations Convention on the Law of the Sea (UNCLOS), as well as its Sea in 1994, is considered the most comprehensive legal document that regulates the use and management of the oceans all over the world. Often referred to as the 'Constitution of the Oceans,' UNCLOS codifies rules concerning navigation rights, maritime boundary delimitation, environmental protection, and access to marine resources.

UNCLOS sets a number of maritime zones:

- **Territorial Sea:** The tail up to 12 nautical miles of the baseline of a coastal state which gives that state complete sovereignty, but with the exception of innocent passage.
- **Contiguous Zone:** This is a 12-24 nautical mile zone whereby states are able to apply laws in line with customs, taxes, and immigration.
- **Exclusive Economic Zone (EEZ):** The zone is composed of up to 200 nautical miles zone that give the coastal state sovereign freedom to hunt, exploit, conserve and run natural resources.
- **Continental Shelf:** It reaches a distance of 200 nautical miles or more based on geological factors, which grants the right of access to sea bed resources.

Along with these spatial rights, UNCLOS provides the procedures of the dispute resolution (Part XV) which comprises such practices as the binding arbitration, the adjudication of the International Tribunal for the Law of the Sea (ITLOS) and the settlement of the International Court of Justice (ICJ). It also contains systems of technical support, environment of the seas protection and regulation of the liberties in high seas.

Nevertheless, although most states agree with UNCLOS, in certain cases, its application is not uniform, and other states, in particular, the United States signed but did not ratify the Convention, which created problems with universality in the world.

Role of Customary International Law

Customary international law The customary international law is a set of legal standards based upon the general and stable practice of the international community, and is in turn obeyed as a matter of legal obligation (*opinio juris*). Although there are no formal treaties, even in that case the customary law supports the maritime behavior- especially among states that are not a signatory of UNCLOS.

Most of the principles contained in UNCLOS, including the right of innocent passage, the forbidding of encroachment by the maritime boundary, and the duty of environmental protection, are all accepted as a part of the customary law. In this sense, they are binding to all the states; they are irrespective of the ratification of a treaty.

Customary international law is particularly desirable wherever UNCLOS lacks clarity, fails to address certain aspects, or does not apply to all the situations. It also legally gives the basis of adjudicating maritime disputes when disputes occur over the interpretation of a treaty or a party not accepting a formal procedure of resolving the dispute under UNCLOS.

However, the customary norms may be dynamic and subjective which makes them a source of less rigidity as well as a possible source of lack of legal certainty. The interplay between the treaty law and the customary law is still being developed especially with the emerging maritime issues like the rise of sea level, false island creation, and climate induced migration.

In combination, UNCLOS and the customary international law constitute legal framework upon which to resolve maritime disputes. They are central to a peaceful solution to conflicts, as well as to the promotion of order in the seas, in terms of their scope and effectiveness and in terms of flexibility in the interpretation of them.

IV. MECHANISMS FOR DISPUTE RESOLUTION

Peaceable means of settling maritime disputes has been one of the keystones of the international law and various legal systems have been provided to settle the conflicts on the background of the UNCLOS, as well as general international practice. The mechanisms contrast by way of jurisdiction, procedure, and enforceability and so provide states several ways of settling disputes based on the character of the dispute and the desires of the parties included. These three main mechanisms are the ICJ or JIC (International Court of Justice), the International Tribunal of the Law of the Sea (ITLOS) and arbitral tribunals, where ad hoc mechanisms are included.

International Court of Justice (ICJ)

The International Court of Justice (ICJ) is the major judicial body of the United Nations that is highly involved in a resolution of maritime disputes between states. Under the ICJ, the jurisdiction is attained once both sides agree that its jurisdiction be conducted whether it be by a treaty clause (compromissory clause) or a special agreement. The ICJ rendered remarkable judgements concerning boundary delimitation, sovereignty over maritime features as well as the interpretation of provisions of UNCLOS.

Aggression, which can be said to be one of the strengths of ICJ, happens to be among the most significant of these forms of law. Its decisions are binding to the law and really matter internationally judicially. Nevertheless, the ICJ does not have implementation measures, and we find that the decisions by the ICJ are enforced by the choice of the states to honor the rulings.

International Tribunal of the Law of the Sea (ITLOS)

The International Tribunal for the law of the Sea (ITLOS), which is a specialized Judicial body constituted under the UNCLOS was established and functioning since the year 1996 at Hamburg in Germany. ITLOS only has jurisdiction over disputes that have been presented

directly by the interpretation and application of the provisions of the UNCLOS. "It is also able to grant provisional measures in cases of urgency and to hear cases involving prompt release of vessels and its crew."

ITLOS offers an abridged more exclusive platform in resolving maritime disputes as compared to the ICJ and has been utilized as a means of success in various well-known disputes. For example, the M/V Saiga and Arctic Sunrise cases demonstrated ITLOS's role in protecting navigation rights and environmental interests. However, the jurisdiction of ITLOS is restricted on a limited number of parties to UNCLOS and the states to whom the dispute resolving procedures have not been objected by the UNCLOS.

Arbitral Tribunals and Ad hoc Mechanism

UNCLOS permits additionally arbitration by ad hoc tribunals of Annex VII and this mechanism has gained more popularity being flexible and secret. The arbitration in Annex VII does not presuppose the parties to agree on the jurisdiction, and this is one of the means that can result in successful unilateral action when the consent of the disputants cannot be achieved.

An interesting case is the case of South China Sea arbitration (Philippines v. the arbitral tribunal held an Annex VII tribunal in 2016 (China, 2016) and held that several of the purported Chinese claims are not consistent with UNCLOS. Although the award was legally important, the way China rejected the jurisdiction of the tribunal, as well as openly refused its compliance, points to the impracticality of enforcement.

Besides arbitration on the basis of UNCLOS, ad hoc processes which include special commissions or diplomatic talks can also be employed, especially when states are not interested that the dispute is resolved with the help of various jurists. Although such methods enable more control and discretion, they are not complied with by law, or they may not be transparent.

Finally, given the variety of the dispute resolution performed, there is a choice that suits the claimants of the states in accordance to the circumstances of the legal as well as political context of the situations. The efficiency of the given mechanisms, however, often depends on the political desire of actors involved, the clearness of the existing norms of the law and the general geopolitical situation.

V. SCOPE AND EFFECTIVENESS OF EXISTING LEGAL FRAMEWORKS

The frameworks of international laws on maritime issues, namely, the regime of the UNCLOS with reference to the complementary rules of customary international law, provide the comprehensive and systematic regime regulating the use of the seas and allowing further defining maritime entitlements and resolving the disputes. In as much as these frameworks

have brought about a lot of clarity and order in ocean governance, their practical application and viability depends on how they are understood, applied and even enforced by states.

1. Broad Coverage of Sea Related Problems

UNCLOS provides elaborate regulations guiding the maritime areas, such as the territorial waters, EEZ and continental shelf, high seas and deep ocean bed. It has set guidelines on navigation, environment conservation, scientific study as well as use of resources. The Convention also gives the procedure in solving the disputes, and it is ensured that the states have a scope of seeking legal solutions to the occurrence of disputes. In its legal architecture, UNCLOS is a vast document and has done much to codify international law of the seas.

Further, the interaction between the UNCLOS and the general principles of the customary international law allows the application of general principles of the law and the harmonization and consideration to follow the basic principles of the law on maritime also to the non-signatory countries.

2. Institutional Functioning and Successes

The available models have worked in a range of commendable cases. That is, in the case of Bangladesh and Myanmar as well as Bangladesh and India, maritime boundary disputes, the issues have been effectively settled using ITLOS and arbitral tribunals. Such instances witnessed the usefulness of international legal instrument in settling difficult technical as well as legal cases peacefully.

Moreover, international law is usually explained and advanced using judicial decisions. The award that was made in 2016 by the South China Sea arbitration tribunal played a significant role in giving meaning to the rights to maritime areas as well as the status of maritime features under the UNCLOS and it has established some legal precedents despite the fact that China did not take part and did not accept the award.

3. Enforcement and Compliance Limits

Even though they are global in nature, international legal mechanisms remain acutely handicapped by the lack of enforcement. International tribunals and courts are non-coercive; they depend on the free consent of a state. Politically sensitive cases, at least when a major power is involved or when it concerns a major waterway, tend to disregard legal results or dispute them.

Moreover, such global frameworks may not be suitably designed to deal with current transforming matters like militarization of contested waters, setting up of artificial islands or consequences of the climate on the base and function of waters. Such shifts infiltrate the flexibility of the current law standards.

4. Asymmetrical Partaking and Tactical Action

The weakness associated with the frameworks is that not every state is a signatory to the UNCLOS and others that have signed do this selectively with regard to its provisions. Those states which can afford legal resolution readily use it, but states which are centrally concerned about the issues then take the diplomatic or one-sided action. Consequently, the choice of resorting to legal machinery can represent power relations, instead of adherence to the law.

Overall, international law offers a broad and well-developed structure of mechanisms to resolve a maritime dispute, but it is unlikely to be effective when states are unwilling and the institutions lack sufficient powers. They have been effective at some levels, but have experienced a great deal of weakness when it comes to their ability to deal with increased complexity in geopolitical realities as well as enforcement.

VI. LIMITATIONS AND CHALLENGES

Although the international legal frameworks are very elaborate such as UNCLOS and the mechanisms developed to resolve maritime disputes, there are still many shortcomings that affect their performance negatively. These barriers are both political and structural hurdles and affect the regularity, authenticity and the execution power of legal consequences. There are three main areas of concern, and this is a matter of enforcement, general political and strategic limitations as well as vague or even holes in the laws themselves.

Enforcement Issues

The huge inconsistency with the international maritime law is that it does not have direct enforcement mechanisms. Judge organs like the International Court of Justice (ICJ), the International Tribunal of the Law of the Sea (ITLOS), arbitral tribunals, are capable of making a binding decision yet do not have the power or instruments to force states to be obedient. Consequently, the success of these decisions is totally based on the predispositions of the involved parties to adhere to them.

Prominent one's examples include the 2016 arbitration in the South China Sea (Philippines v. China). China had ignored the ruling of the tribunal and dismissed the tribunals jurisdiction despite having detailed legal responses against the broad claims. This shows how legal prognoses may be nullified by stronger states merely by disregarding them thus diminishing the strength and integrity of the legal system.

Political and Strategic restraints

In geopolitically sensitive areas, laws are always taken second to strategic and security considerations, with maritime disputes being the topics in these regions. States can escape legal processes at all when they are afraid that a ruling will turn out negative to them both politically and economically. Where this happens, the juridical resolution is frequently avoided in order to resort to bilateral negotiations, coalition arrangements or even bullying

measures like deployment of the navy and development of infrastructure on conflicting features.

Moreover, when the legal instruments are applied selectively, because the states only go to court when it is in national interest, they contribute to the undermining of the trust in the universality and lack of biases of the system of law. Such tactical action generates the impression that the international maritime law is unnecessary or political conveniences, weakening the normative effect.

Confusion and Lack of Beliefs concerning the Legal Texts

Although UNCLOS offers a detailed structure, some of its provisions are so varied or ambiguous, hence worsening the disputes instead of solving them. Indicatively, The Convention fails to clearly stipulate legal status of features such as rocks and low-tide elevations in every case, it also fails to provide an exact framework on the issue of delimitation of boundaries at sea mainly concerning overlapping areas of jurisdiction. This ambiguity gives states the prerogative to use the text in their interest to their own advantage, making the law uncertain and long-lasting conflicts.

Also new issues like sea level rise due to climate change which is impacting baselines, and innovative technologies in deep sea mining and the creation of made islands were not envisaged during the drafting process of UNCLOS. The current legal issues disclose the necessity of evolution of the law which can be performed by means of re-interpretation, supplementary agreements or amendments all of which are politically and diplomatically challenging to accomplish.

To round up, international legal systems offer fundamental mechanisms of settling maritime disagreements but their attempt is curtailed by lack of enforcement, geo-political conditions and ambiguity of the law. Legal refinement is not the only issue that needs to be addressed when referring to these challenges, but also a greater international dedication to rule of the law at sea.

VII. CONCLUSION AND RECOMMENDATIONS

The international legal frameworks that regulate the maritime disputes especially UNCLOS and the conventionalized international law, have been crucial in creating order, predictability and peaceful means of international disputes resolution in the seas. Such frameworks provide an organized manner of defining maritime rights, demarcation and resolution of disputes with the aid of judicial and arbitral organizations. Nevertheless, their effectiveness in use is constrained by enforcement, strategic behavior of the states and legal imprecision, as the analysis in this paper shows.

Notwithstanding, these limitations, the legal framework offers an essential basis of navigation governance in the international sea. The reason why rules-based resolution is valuable is confirmed by its success in some of the more notable cases even though it is not always

guaranteed. Nonetheless, it needs to be recognized that the legal norms and political realities should be reconciled in order to ensure the system will not only be credible but relevant in the new reality of a maritime world under challenge.

Recommendations:

1. **Intensification of Compliance Mechanisms:** Diplomatic, financial or institutional means by the international community should be considered to enhance the delivery of judgments and judicial opinions of the tribes, especially those made by powerful states. This could be in the form of greater peer pressure using multilateral institutions or increased responsibilities of regional organizations in implementing norms.
2. **Interpretive Declarations, Supplementary Protocols, or Development of Law in future should clarify the Ambiguous Provisions:** ambiguities in such provisions as those concerning the status of maritime features, as well as the overlapping maritime claims, are thus to be resolved through interpretive declaration, through supplementary protocols, or by the development of law in future occurring through case law and scholarly consensus.
3. **Facilitate Legal Capacity Building:** this is because many developing countries do not have the legal expertise or institutional smarts to make most effective assertions or defenses following their maritime rights. Global assistance in professional training, technical assistance and institutional support may play a role in securing a fairer access to dispute resolution mechanisms.
4. **Respond to the Arising Challenges:** Legal solutions will have to be adapted to new maritime problems like rise in sea-levels, construction of artificial islands, and exploitation of resources in areas of controversy. This may be in the form of revised guidelines of the already existing institutions or may be multilateral negotiation to straighten up the role and rights of states in such areas.
5. **Promote Multilateral Involvement:** States would be encouraged to pledge their participation in third party forms of disputing, and to accept the activities of the same, whether or not seeing it long-term considerations. Establishing confidence in the neutrality and legitimacy of international law procedures is the key to the stability and collaboration in the medium term in the oceans.

To sum up, international systems of resolving maritime disputes cannot be listed among the perfect ones but, nevertheless, they are the best possible measures allowing to regulate conflicts between different parties vying in their interests and peacefully. This can only be achieved by their further formulation, strengthening, and evolution requiring a consistent and

peaceful maritime order under the influence of increasingly threatening demographical geopolitical pressures as well as environmental factors.

REFERENCES

- [1]. Permanent Court of Arbitration. (2016). *PCA Case No. 2013-19 press release and award documents*. Retrieved from <https://pca-cpa.org/cn/cases/7/PCA-CPA>
- [2]. United Nations Office of Legal Affairs. (2014). *RIAA Volume XXXIII: The South China Sea Arbitration (award on jurisdiction and admissibility and award)*. New York, NY: United Nations. Retrieved from https://legal.un.org/riaa/cases/vol_XXXIII/1-152.pdfPCA CPA Docs+4United Nations Legal Affairs+4United Nations Legal Affairs+4
- [3]. United Nations Office of Legal Affairs. (2012). *RIAA Volume XXXII: The Bay of Bengal Maritime Boundary Arbitration (Bangladesh/Myanmar)*. New York, NY: United Nations. Retrieved from https://legal.un.org/riaa/cases/vol_XXXII/1-182.pdfUnited Nations Legal Affairs+1CNA+1
- [4]. Rosen, M. E. (2013). The implications of the ITLOS decision on the Bangladesh–Myanmar maritime boundary for international law of the sea. *CNA Occasional Paper*. Retrieved from https://www.cna.org/archive/CNA_Files/pdf/cpp-2013-u-004603-final.pdfCNA
- [5]. Balaram, R. A. (2012). *Case study: The Myanmar and Bangladesh maritime boundary dispute*. Göttingen: SSOAR. Retrieved from <https://www.ssoar.info/ssoar/handle/document/37443>ICSID+10SSOAR+10CNA+10
- [6]. Chinese Society of International Law. (2024). *The South China Sea Arbitration Awards: A Critical Study*. Retrieved from https://www.mfa.gov.cn/eng/wjb/zzjg_663340/bianhaisi_eng_665278/plpbo/202406/P020240606690256291745.pdfChina Foreign Affairs
- [7]. Jus Mundi. (n.d.). *Dispute concerning delimitation of the maritime boundary between Bangladesh and Myanmar in the Bay of Bengal – ITLOS Judgment (14 Mar 2012)*. Retrieved from <https://jusmundi.com/en/document/decision/en-dispute-concerning-delimitation-of-the-maritime-boundary-between-bangladesh-and-myanmar-in-the-bay-of-bengal-judgment-wednesday-14th-march-2012>ITLOS+6Jus Mundi+6ResearchGate+6
- [8]. ResearchGate. (2014). *The International Tribunal for the Law of the Sea on maritime delimitation: The Bangladesh v. Myanmar case*. *Ocean Development & International Law*, 45(1), 123–150. Retrieved from

- https://www.researchgate.net/publication/290193526_The_International_Tribunal_for_the_Law_of_the_Sea_on_Maritime_Delimitation_The_Bangladesh_v_Myanmar_CaseResearchGate+1ResearchGate+1
- [9]. International Tribunal for the Law of the Sea. (2012, March 14). *Dispute concerning delimitation of the maritime boundary between Bangladesh and Myanmar in the Bay of Bengal* (Case No. 16). Hamburg, Germany. Retrieved from https://www.itlos.org/fileadmin/itlos/documents/cases/case_no_16/published/C16-J-14_mar_12.pdfUnited Nations+9ITLOS+9CNA+9
- [10]. Permanent Court of Arbitration. (2016, July 12). *The South China Sea Arbitration (The Republic of the Philippines v. The People's Republic of China)*, PCA Case No. 2013-19. The Hague, Netherlands. Retrieved from <https://docs.pca-cpa.org/2016/07/PH-CN-20160712-Award.pdfJus Mundi+4PCA CPA Docs+4Andrew Erickson+4>
- [11]. Erickson, A. (2016, July 12). *PCA press release: Case No. 2013-19 – The South China Sea Arbitration*. Retrieved from <https://www.andrewerickson.com/2016/07/pca-press-release-pca-case-no-2013-19/PCA CPA Docs+5Andrew Erickson+5DocumentCloud+5>
- [12]. Jus Mundi. (n.d.). *The South China Sea Arbitration Award (12 July 2016)*. Retrieved from <https://jusmundi.com/en/document/decision/en-the-south-china-sea-arbitration-the-republic-of-philippines-v-the-peoples-republic-of-china-award-tuesday-12th-july-2016DocumentCloud+3Jus Mundi+3Andrew Erickson+3>