

THE AEGEAN SEA CONTINENTAL SHELF DISPUTE: GREEK AND TURKISH INTERPRETATIONS

Alex Paulenoff

The collapse of the Ottoman Empire sent ripples through the international arena, as states formerly within its territory suddenly found themselves independent and responsible for the maintenance and defense of their own boundaries. For the thousands of islands and islets in the Aegean Sea, there were simply too many to list in a single treaty. The burden fell upon Greece and Turkey to delineate under whose jurisdiction each island fell. Despite the 1923 Treaty of Lausanne specifying the nationality of a few particular islands, there has been general disagreement between Greece and Turkey over the majority of them. The dispute over the Aegean islands extends to the delimitation of the continental shelf and access to raw materials, as well as to all other associated rights including the identification of national airspace, territorial waters and exclusive economic zones. The Aegean issue has soured Greco-Turkish relations since the 1970s and has repeatedly threatened stability in the region, as both sides are virtually unable to view minor disagreements outside of the lens of the larger conflict.

The Aegean Sea Continental Shelf: An Issue of Law

The primary legal issue facing Greece and Turkey in the Aegean Sea is the delimitation of the continental shelf. The most relevant documents pertaining to the case are the 1958 Geneva Convention on the Continental Shelf and the 1982 United Nations Convention on the Law of the Sea (UNCLOS).

Article 6 of the 1958 Geneva Convention states:

Where the same continental shelf is adjacent to the territories of two or more States whose coasts are opposite each other, the boundary of the continental shelf appertaining to such States shall be determined by agreement between them. In the absence of agreement, and unless another boundary line is justified by special circumstances, the boundary is the median line, every point of which is equidistant from the nearest points of the baselines from which the breadth of the territorial sea of each State is measured.¹

The convention provides a method of determining the demarcation line for states sharing a continental shelf; namely, through agreement between them or through simple equidistance between the states' respective territorial seas. However, since Greece took a reservation to Article 6 of the convention upon ratification in 1972, and since Turkey has not yet signed the convention, the

¹ Convention on the Continental Shelf, Done at Geneva 29 April 1958.
<<http://fletcher.tufts.edu/multi/texts/BH366.txt>>

methods put forth by the Geneva Convention do not hold legal authority over the Aegean dispute.

Article 83 of the 1982 UNCLOS treaty states:

1. The delimitation of the continental shelf between States with opposite or adjacent coasts shall be effected by agreement on the basis of international law, as referred to in Article 38 of the Statute of the International Court of Justice, in order to achieve an equitable solution.
2. If no agreement can be reached within a reasonable period of time, the States concerned shall resort to the procedures provided for in Part XV.²

The UNCLOS treaty provides even less comprehensive instructions for states looking to find a solution to a continental shelf issue than the Geneva Convention, as it merely directs the states to bring their issue to the International Court of Justice (ICJ) or agree upon another method of dispute settlement. And, similar to the Geneva Convention, Turkey is not a signatory, so the treaty cannot be applied to the Aegean continental shelf dispute.

Nonetheless, if the case were successfully brought to the ICJ, the court could look to the Geneva Convention and UNCLOS treaties to inform it on the customary law that established those treaties. However, according to Dr. Haralambos Athanasopoulos, “there exist no uniform and mandatory rules of international law providing a concrete set of legal methods and techniques to achieve the equitable delimitation of all continental shelf disputes.”³ Athanasopoulos supports his statement by arguing that the law has been judged differently in a variety of continental shelf cases, with no clear uniform continental shelf law being used in practice.⁴

A U.N. Security Council Resolution urging Greece and Turkey to resolve the Aegean dispute peacefully prepared for a Greek petition to the ICJ in 1976. Greece requested that the court examine the case to determine if the Greek islands located between the Greek and Turkish mainlands have their own continental shelf. In the meantime, Greece asked the court to provide interim measures to prevent Turkish exploitation of the continental shelf. The court rejected Greece’s request for interim measures after hearing the Turkish representative’s argument that “in the absence of an agreed delimitation of the

² United Nations Convention on the Law of the Sea.

<http://www.un.org/Depts/los/convention_agreements/texts/unclos/closindx.htm>

³ Athanasopoulos, Haralambos. Greece, Turkey and the Aegean Sea: A Case Study in International Law. Jefferson, NC: 2001. McFarland & Company, Inc. 58.

⁴ The cases mentioned were the *North Sea Continental Shelf* Case (1969), the *Gulf of Maine* Case (1984), the *Tunisian-Libyan* Case (1982), and the *Libyan-Maltese* Case (1985). Additionally, Courts of Arbitration have ruled differently on the *Anglo-French Case on Channel Islands* (1975) and the *Guinea/Guinea/Bissau* Case (1985). Found in Athanasopoulos, 58.

continental shelf, Greece could not claim to have sovereign rights in the Aegean beyond its territorial waters.”⁵

The Court ultimately took two years before deciding that it held no jurisdiction over the case since Turkey did not consent to having been brought to the court in the first place.⁶ The judgment of the court hinged on two issues of law: 1) Greece had taken a reservation to the 1928 treaty on Pacific Settlement of Disputes which prohibited “disputes relating to the territorial status of Greece, including disputes relating to its rights of sovereignty over its ports and lines of communication,” from being decided by the Permanent Court of International Justice (PCIJ), the predecessor of the ICJ;⁷ and 2) a joint communiqué between the Greek and Turkish prime ministers in 1975 that agreed to a peaceful settlement of disputes held no legal basis since it “did not constitute an immediate and unqualified commitment on the part of the Prime Ministers of Greece and Turkey to accept the submission of the dispute to the Court unilaterally by application.”⁸

It is important to note that the court ended its judgment with the following statement: “The Court adds that nothing it has said may be understood as precluding the dispute from being brought before the Court if and when the conditions for establishing its jurisdiction are satisfied.”⁹ That is to say, if Greece and Turkey could agree upon a *compromís*, then the court would be willing to entertain the case.

Pointing Fingers at Inequity: Turkey’s ‘Grey Areas’

A special agreement, treaty or optional clause declaration notwithstanding, Turkey and Greece have made sporadic attempts to reach a solution over the continental shelf since the issue was first raised in 1973. Unfortunately, the two sides cannot decide on a form of dispute settlement since they cannot agree upon precisely the issues in dispute. “Greece advocates that there is no problem in the Aegean...other than the delimitation of the continental shelf, [while] Turkey traditionally argues that there exist various problems in the Aegean which should be solved through bilateral negotiations.”¹⁰ This is the core problem facing Greece and Turkey in the Aegean. Greece wishes to use a legal

⁵ Bahcheli, Tozun. Greek-Turkish Relations Since 1955. Boulder, CO: Westview Press, 1990. 135.

⁶ “...the Court, viewing the matter in the context of Article 41 of its Statute, is unable to find in the alleged breach of Greece’s rights such a risk of irreparable prejudice to rights in issue as might require the exercise of the power to indicate interim measures of protection.” In *Aegean Sea Continental Shelf (Greece v. Turkey)* Judgment of 11 September 1976. < <http://www.icj-cij.org/docket/index.php?sum=324&code=gt&p1=3&p2=3&case=62&k=81&p3=5>>

⁷ *Aegean Sea Continental Shelf (Greece v. Turkey)* Judgment of 19 December 1978.

< <http://www.icj-cij.org/docket/index.php?sum=327&code=gt&p1=3&p2=3&case=62&k=81&p3=5>>

⁸ *Ibid.*

⁹ *Ibid.*

¹⁰ Aydin, Mustafa. “Contemporary Turkish-Greek Relations: Constraints and Opportunities.” In Turkish-Greek Relations: The Security Dilemma in the Aegean. New York: Routledge, 2004. 31.

basis to decide the case, while Turkey wants to reach a solution without the interference of the international community or any binding body.

It would appear that purely as an issue of law, Greece has the upper hand due to the territories granted to it by the 1923 Treaty of Lausanne and the 1947 Treaty of Paris, which determine its Aegean territories. Article 12(1) of the Lausanne treaty states: “Regarding the sovereignty of Greece over the islands of the Eastern Mediterranean, other than the islands of Imbros, Tenedos and Rabbit Islands, particularly the islands of Lemnos, Samothrace, Mytilene, Chios, Samos and Nikaria, is confirmed.”¹¹ The treaty also served to enforce a zone of control for Turkey for islands that lay within three miles of the Anatolian mainland.

The remaining Aegean islands belonging to the defunct Ottoman Empire went to Italy in the Lausanne Treaty. However, apart from the largest islands of the Dodecanese chain, the explicit naming of these islands has never been laid down in a treaty.¹² The drafters of the treaty at Lausanne likely left out the names of all the islands for the sake of brevity, since there are nearly 2,500 islands in the Aegean and a text naming them all would have overshadowed the purpose of the treaty. However, by letting the treaty’s greater purpose – to redefine Turkey’s borders after its successful campaign for independence from Ottoman control and great power occupation – take priority, the drafters of the treaty neglected to consider the unintended consequences of not explicitly identifying to which state each of the Aegean’s many islands belonged.

The Treaty of Lausanne unambiguously granted Turkey the islands of Imbros, Tenedos and the Rabbit Islands; however, the Turkish interpretation of the treaty in recent years has been that the islands not explicitly identified in the treaty are what have become known as so-called grey zones – territories without sovereignty and therefore stateless.¹³ By not indicating each and every one of the islands meant to go to Greece, Turkey argues that the missing information in the treaty lends weight to its protest of Greek sovereignty over the Aegean. This follows the same line of thinking that led to a Turkish Foreign Ministry announcement in 1978 that Turkey would never permit the Aegean to turn into a “Greek lake.”¹⁴ This political maneuvering is largely an issue over the rights to

¹¹ Treaty of Peace with Turkey Signed at Lausanne, July 24, 1923, Article 12(1).
<<http://net.lib.byu.edu/~rdh7/wwi/1918p/lausanne.html>>

¹² The Dodecanese islands named at the Paris peace treaty were “Stampalia (Astropalia), Rhodes (Rhodos), Calki (Kharki), Scarpanto, Casos (Casso), Piscopis (Tilos), Misiros (Nisyros), Calimnos (Kalymnos), Leros, Patmos, Lipso (Lipso), Simi (Symi), Cos (Kos) and Castellorizo, a well as the adjacent islets.” In Treaty of Peace with Italy, Signed in Paris, February 10, 1947. Article 14(1).
<http://www.istrianet.org/istria/history/ww2/1947_treaty-italy.htm#pi-v>

¹³ Turkish President Suleyman Demirel stated the following in a 1998 interview with the Turkish daily newspaper *Hurriyet*: “There are 132 rocky islets in the Aegean which are ours, [they are] rocks or rocky islets which we call ‘grey zones,’ namely, their ownership has not been determined on the basis of agreements. They do not belong to [Greece]. On the basis of succession, they belong to us.” In “Greece calls latest Demirel statements ‘fossils from the past.’” Athens News Agency, 27 August 1998.

¹⁴ CSIA European Security Working Group. “Instability and Change on NATO’s Southern Flank.” *International Security*, Vol. 3, No. 3. (Winter 1978-1979). 150-177.

the continental shelf. If many of the uninhabited islands and islets have an undetermined status, then the territorial sea of Greece cannot be extended to include them. This would provide Turkey with a legal basis for resource exploitation of the Aegean continental shelf.

Turkey's argument for the continental shelf has traditionally been one of equity, claiming that the Aegean should be shared evenly. Indeed, "Greek leaders assert that their islands are surrounded by continental shelf beyond that of the Greek mainland. In the Turkish view, the Greek Aegean islands lie within Turkey's continental shelf as a natural extension of the Anatolian peninsula."¹⁵ This is why the issue over grey zones lends credit to an otherwise weak Turkish legal argument. If the islands in the grey zones are in fact disputable, then the territorial waters of those islands are disputable as well, and the legality of exclusively Greek exploitation of the continental shelf cannot be determined.

To Law or Not to Law: The Real Issues on the Turkish side

The Turkish claims to the Aegean stem from a series of larger issues, namely: 1) the Greek militarization of the North East Aegean and Dodecanese islands, which was prohibited by the Treaties of Lausanne and Paris; 2) the Athens Flight Information Region (FIR) having jurisdiction over the eastern Aegean Sea, effectively preventing the Turkish air force from carrying out training and war games over the Aegean; and 3) a Greek-led coup d'état in Cyprus in the hope of unifying it with Greece in 1974 despite both Greece and Turkey agreeing not to pursue their own territorial ambitions in Cyprus at the Zürich and London agreements of 1959.¹⁶

Since the Treaty of Paris insisted that Greece keep the Dodecanese islands demilitarized, Turkey argues that any Greek military presence on those islands is in direct violation of the treaty.¹⁷ Turkey uses Greece's alleged violation of the Paris treaty to justify its objections to Greek claims of sovereignty over the eastern Aegean continental shelf as well as its basis for establishing the grey zones. Turkey also uses the militarization of the Dodecanese to justify its strong military force along the western Anatolian coast and in the eastern Aegean.

¹⁵ Bahcheli, Tozun. "Turning A New Page in Turkey's Relations with Greece? The Challenge of Reconciling Vital Interests." In Turkish-Greek Relations: The Security Dilemma in the Aegean. New York: Routledge, 2004. 100.

¹⁶ Article 2 of the Treaty of Guarantee in the Zürich and London Agreements states: "Greece, the United Kingdom and Turkey, taking note of the undertakings by the Republic of Cyprus embodied in Article I, recognise and guarantee the independence, territorial integrity and security of the Republic of Cyprus and also the provisions of the basic articles of its Constitution. They likewise undertake to prohibit, as far as lies within their power, all activity having the object of promoting directly or indirectly either the union of the Republic of Cyprus with any other State, or the partition of the Island." From Zürich and London Agreements. < <http://www.cyprus-conflict.net/Treaties%20-1959-60.htm>>

¹⁷ Treaty of Peace with Italy, Signed in Paris, February 10, 1947. Article 14 (2). <http://www.istrianet.org/istria/history/ww2/1947_treaty-italy.htm#pi-v>

Additionally, Turkey uses the Greek militarization of those islands to rationalize its defiance of Greek airspace and the International Civil Aviation Organization's (ICAO) identification of the Athens FIR as the rightful flight information region for the eastern Aegean.¹⁸ As the basis of this argument, Turkey asserts that Greek control over the Aegean airspace prevents Turkey from defending its own coastline; in this way, Turkey tacitly and defensively suggests that in the event of a conflict between Greece and Turkey, Athens would have the upper hand. In effect, Turkey proposes that "by militarizing the eastern Aegean islands...Greece had engaged in illegal acts aimed at transforming the international air space of the Aegean into national Greek air space."¹⁹ Turkey interprets the Greek military presence in the Aegean as a direct threat to its sovereign right to defend its territory. Therefore, Turkey often outright ignores the Athens FIR and carries out air force exercises whenever it sees fit.

Finally, Turkey justifies its invasion and occupation of northern Cyprus in 1974 by arguing that the Greek-sponsored coup led the former Cypriot leader, Archbishop Makarios III, to call upon the United Kingdom, Greece or Turkey to take action in Cyprus as set forth by the 1959 Treaty of Guarantee in the case of internal strife on the island.²⁰ While the Turkish invasion and subsequent establishment of the Turkish Republic of Northern Cyprus in 1983 caused significant turmoil in the international community, Turkey insists that its defense of the Turkish Cypriot minority was justified in response to Greece's involvement in the Cypriot civil war and the ensuing governmental collapse.

Turkey is accused of grouping these issues with the continental shelf issue in order to politicize the situation and attract international sympathy for its cause. According to Evangelos Raftopoulos, "Turkey attempted – and seems to have been rather successful in this respect – to distract exclusive attention from the public-interest regime of the LOS Convention which is already in force. The Aegean dispute, Turkey now seems to say, is not only a question of delimitation of maritime zones, but also of sovereignty."²¹ Raftopoulos makes direct reference to these grey zones in his article and how they call into question Greece's

¹⁸ According to the website of the Turkish Ministry of Foreign Affairs, "The FIR arrangement on the Aegean Airspace devised in 1952 within the framework of ICAO (International Civil Aviation Organization), is a technical responsibility. Greece, however, is using it to further its claims of de facto sovereignty over the Aegean airspace by demanding flight plans from Turkish state aircraft and allegations of 'infringements of the Athens FIR.'" "Background Note on Aegean Dispute." Turkish Ministry of Foreign Affairs. <<http://www.mfa.gov.tr/background-note-on-aegean-dispute.en.mfa>>

¹⁹ Bahcheli, 1990. Op. cit.

²⁰ Article 3 of the Treaty of Guarantee in the Zürich and London Agreements states: "In the event of any breach of the provisions of the present Treaty, Greece, the United Kingdom, and Turkey undertake to consult together, with a view to making representations, or taking the necessary steps to ensure observance of those provisions. In so far as common or concerted action may prove impossible, each of the three guaranteeing Powers reserves the right to take action with the sole aim of re-establishing the state of affairs established by the present Treaty."

²¹ Raftopoulos, Evangelos. "Crisis over the Imia Rocks." In The Aegean Sea After the Cold War: Security and Law of the Sea Issues. New York: St. Martin's Press, Inc., 2001. 143.

sovereignty over some of the smaller islands and islets in the eastern Aegean not explicitly identified at Lausanne or Paris.

Follow the Money Trail: Oil and Natural Gas in the Aegean Seabed

The *zeitgeist* in 1973 was one of significant tension between the two nations when a Greek expedition found petroleum and natural gas off the coast of Thasos in the Eastern Aegean. After the subsequent search for oil carried out by the Turkish Petroleum Company in 1974, both Greece and Turkey claimed sovereignty over the continental shelf, and therefore the right to exploit any resources found within it.

Greece's claims to the oil and natural gas deposits in the Aegean were based on its rights to its territorial waters as set forth in the Geneva Convention; Turkey's resided on the principle of equity. It seemed that "for Turkey the principle of equidistance [as indicated in the Geneva Convention] is not an option...it rather chooses the principle of equity for the delimitation of the continental shelf."²² Turkey, attempting to invoke the principle of equity as customary international law in its continental shelf dispute with Greece (and also with the former Soviet Union in the Black Sea), meant to establish the exploitation of the natural resources in the continental shelf as its inalienable sovereign right. However, the ICJ "reached the conclusion that equity does not mean that it can be used to refashion the geographical nature and geomorphological inequalities between states with common continental shelf areas...for the purpose of effecting the equal distribution of their continental shelves."²³ This crucial point is the reason why Turkey has not agreed to go to the ICJ or a court of arbitration. On purely legal grounds Turkey's case would likely fail with the ICJ statement lending weight to the customary maritime law that codified the Geneva Convention on the Continental Shelf and the UNCLOS treaty, despite Turkey not being a signatory to either.

In 1976, both parties came to the negotiating table again in order to establish a new framework for addressing the Aegean continental shelf issue. The talks produced a bilateral agreement known as the Berne Protocol, which outlined the rules of engagement for the two states with regard to the continental shelf and functioned as an agreement that would prevent the operations of either side from taking action in the Aegean with the hope of exploiting resources.²⁴

From 1976 to 1987, neither Greece nor Turkey made any outright attempt to break the rules laid forth in the Berne Protocol, despite both parties' inability to agree upon a manageable framework for the Aegean. However, in 1987 Greek politicians began toying with the idea of drilling for oil in the Aegean seabed,

²² Sioussiouras, P. "Legal Interpretations of Turkey's Strategic Aspirations in the Aegean Sea." Aegean Working Papers. Issue 1, December 2003.

²³ Athanasopoulos. Op. cit.

²⁴ Bahcheli, 1990. Op. cit. Appendix 1: The Berne Declaration.

leading Turkey to send an exploratory vessel escorted by warships to the area just outside Greece's territorial waters. Former Turkish Ambassador to Greece Nazmi

Akiman recounts the situation in the following manner:

At the end of February 1987, a consortium called the Northern Aegean Petroleum Company announced that it would start drilling for oil on the continental shelf ten miles off the island of Thasos. It was also announced that a new law was being formulated to grant the Greek government the sole authority to decide where the drillings would take place. Upon receiving instructions from Ankara, I saw [Greek Ambassador] Kapsis and warned him of Greece's obligations to abide by the rules of the Berne Declaration of 1976 that was agreed to by Turkey and Greece. But Kapsis retorted that the Greek government considered the Berne Declaration "inoperative," therefore it would decide to drill when and wherever it liked in the Aegean. To Ankara this meant that Greece felt entitled to drill beyond its territorial waters, in violation of the agreement reached at Berne. In effect, Greece decided on a unilateral change of the territorial status quo in the Aegean.²⁵

Ultimately the issue over the drilling off Thasos was defused after anxious face-saving negotiations by both sides, with Greece agreeing not to drill beyond its territorial waters and Turkey replying that it would not drill in the Aegean so long as Greece did not attempt to do so outside of its territorial zone.²⁶

The drilling issue remained unresolved after 1987 and, as if to acknowledge the culmination of the greater issues at hand, the most recent confrontation erupted on one of Turkey's grey zone islets in 1996. The most controversial territory in the grey zone has been Imia/Kardak, a pair of small, uninhabited islets 3.8 nautical miles from the Turkish coast on which a Turkish cargo ship ran aground in 1996.²⁷ The Turkish captain allegedly refused Greek help, claiming that he was on Turkish territory. The mayor of a nearby Greek island planted a Greek flag on Imia/Kardak which Turkish journalists quickly replaced with a Turkish flag. This led to an international incident over which state had jurisdiction to carry out the salvage operations. Unable to agree on the sovereignty of the islets, Turkey sent a contingent of naval special forces accompanied by helicopters to Imia/Kardak, and Greece sent warships. The issue was defused only after American and NATO intervention demanding that both sides stand down; however, the incident exacerbated already tense Greco-Turkish relations.²⁸ The sovereignty of Imia/Kardak remains unresolved, as does

²⁵ Akiman, Nazmi. "Turkish-Greek Relations: From Uneasy Coexistence to Better Relations? A Retired Ambassador Takes Stock." *Mediterranean Quarterly*. 13.3 (2002) 22-32.

²⁶ Ibid.

²⁷ Imia is the islet's name in Greek; it is known as Kardak in Turkish.

²⁸ Kalaitzaki, Theodora. "US Mediation in Greek-Turkish Disputes since 1954." *Mediterranean Quarterly*. 16.2 (2005) 106-124.

that of a handful of other “grey zone” islands whose instability threatens to erupt into violence in the Aegean.

After Imia/Kardak: The Aegean Sea Today

The primary problem in adjudicating the Aegean Sea continental shelf issue is that the two sides cannot agree upon precisely what is in dispute or on an acceptable forum for resolution. In order to justify its position, Greece has consistently relied upon international treaties and conventions, lending credence to the position that the law is in Greece’s favor. However, without Turkey’s consent to deal with the Aegean continental shelf in the ICJ or in a court of arbitration, Greece will not have a chance to plead its case. Turkey has, for its part, left the issue ambiguous, hoping that it can set a legal precedent by disputing the sovereignty of particular territories in the Aegean. Turkey will continue to reject calls for a legal international solution until the grey zone islands are acknowledged by the international community as possessing questionable sovereignty.

In the meantime, Turkish requests for bilateral negotiations have softened the strained diplomatic relationship by at least averting direct confrontation and leading to negotiated solutions over related issues that complicate Turkey’s position. For instance, the so-called “earthquake diplomacy” between Greece and Turkey brought the two parties together during relief operations after the Izmit and Athens earthquakes in 1999 and substantially warmed relations.²⁹ So long as lines of positive communication like these are kept open, Greece and Turkey may yet have their day in court.

²⁹ Keridis, Dimitris. “Earthquakes, Diplomacy and New Thinking in Foreign Policy.” The Fletcher Forum of World Affairs. Vol. 30:1, Winter 2006.

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- * Alex Paulenoff, M.S. is Marketing Manager for EmPower Clean Energy Solutions, a renewable energy company in Long Island, NY. He earned his M.S. from NYU in Global Affairs and Energy Policy, where he focused on international legal disputes and integrating clean energy technologies into the North American electrical grid. Alex also holds a B.A. from McGill University in Montréal.