


Maritime Boundary Delimitation Settlement Strategy in East Segment II of the Singapore Strait Through the Three Stage Approach

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Article Info	ABSTRACT
Keywords: Settlement Strategy, Maritime Boundary Delimitation, East Segment II of the Singapore Strait, 3-Stage Approach	This research explores strategic legal pathways for addressing the unresolved maritime boundary delimitation in East Segment II of the Singapore Strait, a maritime area jointly bordered by Indonesia, Singapore, and Malaysia. The lack of formal delimitation in this segment has resulted in a jurisdictional vacuum, often referred to as a legal grey zone, which has significant implications for state sovereignty, international legal compliance, and regional maritime security. Through a qualitative legal analysis grounded in empirical research methods, this study investigates the intricate legal issues surrounding the Trijunction Point—a critical zone of overlapping claims. As a potential solution, the study supports the application of the Three-Stage Approach, comprising the construction of a provisional equidistance line, adjustment based on relevant geographic and legal considerations, and the application of a disproportionality test. Widely employed in international maritime adjudication, this method is recommended as a viable and equitable framework to facilitate legal certainty, foster regional cooperation, and uphold the rights and obligations of the littoral states involved.
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INTRODUCTION

The Singapore Strait, situated at the confluence of Indonesia, Malaysia, and Singapore, plays a strategic role in regional and global maritime connectivity. This strait is conventionally divided into three major segments—western, central, and eastern—where the eastern portion is further subdivided into East Segment 1 and East Segment II. While bilateral agreements have successfully clarified the maritime boundaries between Indonesia and Singapore across most segments—including East Segment 1, which borders the waters between Batam and Changi—a critical section, namely East Segment II, remains legally undefined. This area lies in the proximity of Pedra Branca and constitutes a sensitive maritime zone adjacent to the tripoint where the jurisdictions of the three littoral states converge (Susmoro et al., 2019).

The absence of a legally determined boundary in East Segment II gives rise to a complex set of jurisdictional ambiguities. These so-called "grey zones"—maritime spaces lacking clear sovereign attribution—complicate law enforcement, resource management, and navigational governance. Such uncertainty heightens the potential for inter-state friction and inadvertently creates conditions conducive to cross-border illegal practices, such as the unauthorized discharge of marine pollutants (Tanaka, 2019; ASPI, 2018). Despite its informal labeling as

"Outside Port Limits" (OPL), this zone does not qualify as high seas under the United Nations Convention on the Law of the Sea (UNCLOS), and the mischaracterization of its legal status has exacerbated misperceptions among transiting vessels (Bulletin, 2022; Ferdi et al., 2023).

Given the role of the Malacca and Singapore Straits as vital arteries for international shipping and energy flows, legal precision in defining maritime boundaries is not merely a bilateral or trilateral concern but a matter of global maritime governance. These straits constitute major Sea Lines of Communication (SLOC) and Sea Lanes of Traffic (SLOT), rendering their legal clarity essential for ensuring navigational safety and regional stability. Article 38 of UNCLOS reaffirms the principle of transit passage and underscores the need for defined boundaries in straits used for international navigation (UNODC, 2019).

At the heart of the East Segment II issue lies the unresolved legal status of several maritime features. Pedra Branca, awarded to Singapore by the ICJ in 2008, is situated nearly equidistant from the Malaysian and Indonesian coastlines. Adjacent to it, Middle Rocks has been attributed to Malaysia, while South Ledge remains under legal contention, with no definitive ruling on its sovereignty. The ICJ's decision did not address maritime delimitation, leaving the allocation of maritime zones surrounding these features unsettled (Braverman, 2020).

Efforts to establish a tripartite boundary delimitation in the East Segment II are further complicated by the incomplete bilateral negotiations between Singapore and Malaysia. The unresolved status of South Ledge inhibits the initiation of trilateral discussions involving Indonesia. This diplomatic stalemate has created a legal vacuum where enforcement actions are often hindered by conflicting jurisdictional claims, generating operational inefficiencies and complicating state responses to maritime incidents (Kemenhan, 2019; Kemenkumham, 2015).

To resolve this impasse, there is a pressing need for a structured legal framework that balances the interests of all involved parties. The Three-Stage Approach, a widely recognized method in international adjudication, offers a promising avenue for achieving an equitable maritime boundary. It enables a systematic assessment of geographic, legal, and contextual factors in maritime delimitation. Therefore, this study seeks to examine the unresolved legal questions surrounding maritime boundary delimitation in East Segment II, with specific attention to issues of sovereignty, jurisdictional authority, and international legal obligations. The research also evaluates how the Three-Stage Approach can be applied to facilitate a fair and legally robust resolution to the boundary uncertainties among Indonesia, Singapore, and Malaysia.

RESEARCH METHODS

This study is anchored in a philosophical foundation that informs the overall orientation of the research process. Drawing from an interpretivist paradigm, the inquiry recognizes that legal and jurisdictional complexities—such as those surrounding the unresolved maritime boundary in East Segment II of the Singapore Strait—cannot be fully captured through purely positivist frameworks. Instead, this research adopts a constructivist understanding of knowledge, whereby insights are developed through

critical engagement with empirical realities and contextual interpretation (Alharthi, 2016; Grix, 2019).

Ontologically, the research acknowledges the existence of a tangible problem—namely, the absence of an agreed maritime boundary in a strategic zone near the trijunction of Indonesia, Malaysia, and Singapore. Epistemologically, knowledge is approached as context-bound and emergent, constructed from a synthesis of empirical data and legal analysis. As such, the research applies a qualitative methodology designed to uncover nuanced legal and policy implications. The methodological structure allows for flexibility in interpretation while maintaining analytical rigor (Ganiyu et al., 2020).

To guide the inquiry, the study employs a multi-method design combining empirical legal research with doctrinal analysis. This hybrid approach enables the examination of both the legal instruments governing maritime boundaries and the real-world challenges in implementing such norms (Salim & Nurbani, 2013; Marzuki, 2017). The primary focus of the investigation is to assess the potential application of the Three-Stage Approach as a strategic model for resolving the boundary issue in East Segment II. This model offers a structured path to equitable delimitation, as recognized in international jurisprudence.

Empirical data collection was conducted through purposive sampling, targeting key informants with direct involvement or expertise in maritime governance. Structured interviews and observational techniques were used to obtain in-depth, context-rich information from relevant stakeholders. These field data were supplemented by an extensive review of legal literature and instruments. The secondary materials include three categories: authoritative legal texts such as treaties and statutes; analytical commentaries by legal scholars; and reference materials like legal encyclopedias and dictionaries (Olson, 2021).

Data processing followed a systematic framework involving several key steps: collection, transcription, validation, editing, and thematic coding (Huberman, 2014; Mahpur, 2017). The qualitative analysis was conducted using content analysis, which entails the iterative examination of legal texts and empirical findings. Through this process, recurring themes and patterns were identified, allowing the formulation of informed legal arguments and prescriptive recommendations. Ultimately, the methodology adopted in this study enables a dual-layered analysis: one that interrogates legal norms and frameworks, and another that captures lived experiences and institutional responses in the field. By doing so, the research not only explains the current state of boundary uncertainty but also contributes to the development of actionable legal solutions within the framework of international maritime law.

RESULTS AND DISCUSSION

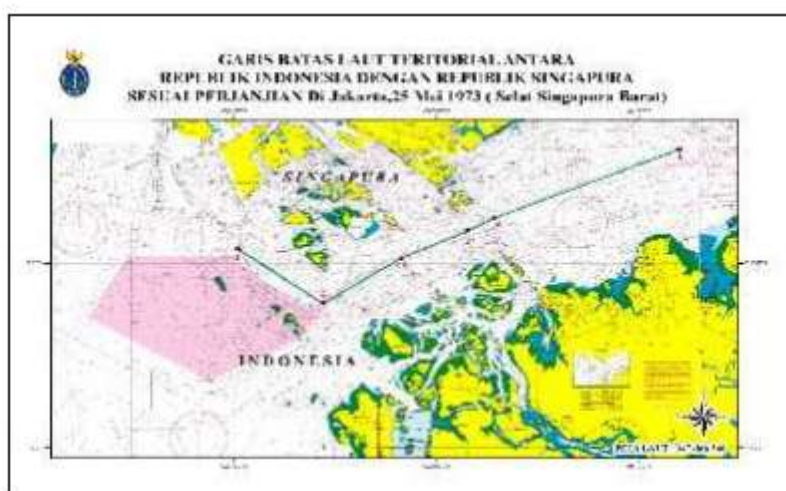
Maritime boundary delimitation in the East Segment II of the Singapore Strait between adjacent states Indonesia, Malaysia and Singapore. The maritime space known as East Segment II of the Singapore Strait is widely referred to in navigational practice as the "Outside Port Limits" (OPL) area. Despite this designation, the perception that this zone constitutes part of the high seas is legally unfounded. Under the framework of international maritime law—particularly the United Nations Convention on the Law of the Sea (UNCLOS)—this area

does not fulfill the criteria to be classified as international waters. As a result, the prevailing misinterpretation of its legal status has generated considerable jurisdictional uncertainty, especially concerning authority over vessels transiting between the waters of Bintan (Indonesia), Malaysia, and Singapore (Bulletin, 2022). This ambiguity becomes particularly problematic in cases of maritime infractions where questions of legal responsibility, enforcement competence, and financial restitution arise (North, 2022).

In an effort to provide legal clarity, Indonesia and Singapore have undertaken a segmented approach to the delimitation of their territorial seas within the Singapore Strait. This structured arrangement divides the maritime boundary into three principal sectors: the western, central, and eastern segments. The eastern sector itself is subdivided into East Segment 1—which includes the waters between Batam Island and Changi—and East Segment II, which encompasses the maritime space surrounding Bintan, South Ledge, Middle Rocks, and Pedra Branca. This segmentation model reflects the commitment of both states to structure their maritime jurisdictions in alignment with established principles of international maritime law (Kemenkumham, 2015).

The delineation of the territorial sea in the central segment was first formalized through the Agreement between the Republic of Indonesia and the Republic of Singapore concerning the Delimitation of the Territorial Seas of the Two Countries in the Singapore Strait, signed in Jakarta on May 25, 1973. This bilateral treaty was later ratified by the Indonesian government through Law No. 7 of 1973. Subsequently, a separate treaty addressing the western segment—specifically the waters between Nipa Island and Tuas—was signed on March 10, 2009, and ratified through Law No. 4 of 2010 (Prawira, 2022). The progression of these agreements represents a systematic and incremental approach to boundary delimitation, with official charts published by Indonesia's Hydro-Oceanographic Center providing visual confirmation of the agreed lines.

Figure 1. Territorial sea boundary line between the Republic of Indonesia and Singapore in the western part of the Singapore Strait based on negotiations on 25 May 1973.

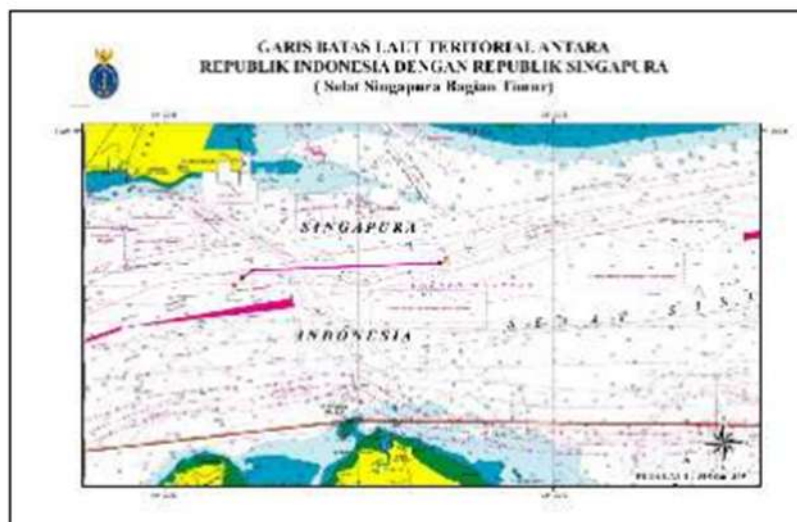


Source: Susmoro et.al, Anthology of Determination of Maritime Boundaries between Indonesia and Neighboring Countries, Pushidrosal (Jakarta: Pushidrosal, 2019).

Diplomatic efforts between Indonesia and Singapore to delineate their territorial seas in the eastern section of the Singapore Strait were initiated in June 2011. Over the course of ten negotiation rounds, both nations engaged in sustained dialogue to reconcile their maritime claims in this strategically significant zone. These bilateral discussions culminated in a formal agreement, signed on 3 September 2014 in Singapore, entitled the Agreement Between the Republic of Indonesia and the Republic of Singapore on the Delimitation of the Territorial Seas of the Two Countries in the East Part of the Singapore Strait (Kemenkumham, 2015).

This treaty signifies the successful conclusion of maritime boundary demarcation between the two countries in East Segment 1, particularly in the area adjacent to the Batam–Changi corridor. The legal demarcation laid out in this agreement provides greater jurisdictional certainty and reinforces navigational security in a high-traffic maritime zone. The finalized boundary is officially documented in the nautical chart issued by the Hydro-Oceanographic Center of the Indonesian Navy (Pushidrosal, 2019), which visually delineates the agreed-upon lines between Indonesian and Singaporean territorial seas.

Figure 2. The officially recognized boundary line between Indonesia and Singapore in East Segment 1 of the Singapore Strait, based on the bilateral agreement signed on 3 September 2014..



Source: Susmoro et.al, Anthology of Determination of Maritime Boundaries between Indonesia and Neighboring Countries, Pushidrosal (Jakarta: Pushidrosal, 2019).

Although Indonesia and Singapore have successfully concluded maritime boundary agreements in other parts of the Singapore Strait, negotiations concerning the delimitation of territorial seas in East Segment II have yet to yield a formal agreement (Susmoro et al., 2019). As a result, the area remains undelimited, giving rise to a legal grey zone—a maritime space marked by overlapping jurisdictional claims and the absence of clear sovereign authority. These conditions create considerable legal uncertainty, particularly in relation to enforcement, regulatory oversight, and access to marine resources.

The tripoint maritime zone where the territorial waters of Indonesia, Malaysia, and Singapore converge has become a focal point of legal ambiguity. This persistent stalemate is

primarily attributed to two interconnected legal challenges. First, the unresolved sovereignty status of key maritime features—namely Pedra Branca, Middle Rocks, and South Ledge—continues to obstruct the initiation of trilateral delimitation talks. Second, the absence of a finalized bilateral maritime boundary agreement between Singapore and Malaysia in the area surrounding these features has made it impossible to move forward with broader delimitation processes involving Indonesia.

Maritime Features and Their Legal Significance under UNCLOS

Under the United Nations Convention on the Law of the Sea (UNCLOS), maritime features are subject to classification based on their physical and legal characteristics. These classifications—*islands*, *rocks*, and *low-tide elevations (LTEs)*—determine the extent of maritime entitlements a coastal state may claim:

1. *Islands* are naturally formed landmasses that remain above sea level at all times and are capable of sustaining human habitation or economic activity. These features can generate territorial seas, contiguous zones, and exclusive economic zones (EEZs).
2. *Rocks*, while permanently above water, do not support human life or economic functions and are therefore limited to generating territorial seas and contiguous zones, but not EEZs or continental shelves.
3. *Low-tide elevations (LTEs)* are exposed only at low tide and submerged at high tide. These features do not generate maritime zones independently, unless located within 12 nautical miles of land, in which case they may be used as base points for drawing baselines but not for claiming extended maritime zones (Freund, 2017).

Sovereignty Disputes and the ICJ Ruling

In 2003, Malaysia and Singapore jointly submitted a case to the International Court of Justice (ICJ) seeking adjudication over the sovereignty of three closely situated maritime features located in the eastern sector of the Singapore Strait: Pedra Branca, Middle Rocks, and South Ledge (Braverman, 2020). The Court delivered its decision on 23 May 2008, assigning Pedra Branca to Singapore and Middle Rocks to Malaysia. However, it refrained from issuing a decision on maritime boundary delimitation or maritime entitlements, and it declined to award sovereignty over South Ledge—classifying it as a low-tide elevation, whose ownership depends on its placement within a state's territorial sea (ICJ, 2008).

The ICJ's narrow focus on sovereignty, without extending the ruling to address delimitation, left unresolved the critical question of how maritime zones should be allocated around those features. In the absence of bilateral consensus between Singapore and Malaysia, and given the lack of a trilateral framework including Indonesia, the East Segment II of the Singapore Strait remains legally undefined. This unresolved status continues to pose obstacles for regional cooperation, enforcement of maritime regulations, and the prevention of disputes over overlapping claims.

Settlement of Maritime Boundaries Delimitation in the East Segment II of Indonesia, Malaysia and Singapore using the 3 Stage Approach Method

Resolving maritime boundary disputes is a matter of legal and geopolitical urgency, as unresolved delimitations may lead to enduring uncertainty and friction among states (Nashir, 2019). According to international maritime law, particularly the United Nations Convention

on the Law of the Sea (UNCLOS), the delimitation of maritime zones between adjacent or opposite coastal states must be based on mutual consent and conducted through negotiation (Tanaka, 2019). In cases where overlapping claims arise, establishing a definitive boundary line is essential to avoid disputes over jurisdiction, resource control, and maritime law enforcement.

While bilateral negotiations are the preferred mechanism, impasses may require recourse to international dispute settlement bodies such as the International Court of Justice (ICJ) or the International Tribunal for the Law of the Sea (ITLOS) (Arsana, 2014). Even prior to adjudication, UNCLOS Articles 74(3) and 83(3) oblige states to adopt provisional arrangements and abstain from actions that might hinder a final agreement (Sodik, 2014; Rothwell et al., 2015). Despite the UNCLOS framework, the persistence of maritime disputes in regions such as the Bay of Bengal, the Black Sea, and the Pacific reflects the need for a systematic method of settlement. Judicial and arbitral decisions have thus played a vital role in elaborating Articles 15, 74, and 83 concerning the delimitation of territorial seas, exclusive economic zones (EEZs), and continental shelves (Jensen, 2020).

Among the tools available for achieving equitable maritime boundaries, the Three-Stage Approach has emerged as one of the most robust and widely applied methods. This technique, frequently employed by the ICJ and other tribunals, offers a structured pathway to just outcomes and has shaped jurisprudence in numerous landmark cases (Dundua, 2007).

Key Elements of the Three-Stage Approach

The method proceeds in three distinct phases:

1. Provisional Equidistance Line

The process begins with the construction of a baseline equidistance line—drawn between the nearest points along the coasts of the disputing states. This line, often calculated using the bisector method, serves as a neutral starting point for the delimitation process (Evans, 2016; Jaya et al., 2022).

2. Adjustment Based on Relevant Circumstances

The second stage assesses whether particular geographical or legal factors justify a shift in the provisional line. In the East Segment II context, relevant factors include maritime features such as Pedra Branca, Middle Rocks, and South Ledge, whose sovereignty was partially resolved by the ICJ in 2008. Pedra Branca was awarded to Singapore, Middle Rocks to Malaysia, and South Ledge's ownership was left undetermined—pending its location relative to established territorial seas. These elements, combined with disparities in coastal length and coastal configurations, must inform any boundary adjustments to ensure legal balance (Jaya et al., 2022).

3. Disproportionality Test

The final phase involves evaluating whether the revised boundary leads to a disproportionate allocation of maritime space in relation to each state's coastal frontage. This step acts as a safeguard, ensuring the outcome is not only geometrically sound but also substantively equitable (DOALOS, 2000).

Application in Precedent Cases

The effectiveness of this methodology has been affirmed in several well-documented

cases:

1. Romania v. Ukraine (2009) – The ICJ excluded Serpent Island from having full effect to ensure balance in the Black Sea delimitation.
2. Bangladesh v. Myanmar (2012) and Bangladesh v. India (2014) – ITLOS and the Permanent Court of Arbitration (PCA) applied the approach in the Bay of Bengal, adjusting for Bangladesh’s concave coast.
3. Nicaragua v. Colombia (2012–2014) – The ICJ implicitly followed the three-stage logic, downplaying the role of small maritime features.
4. Guyana v. Suriname (2007) and UK v. France (1977) – Adjustments were made to equidistance lines based on equitable considerations.
5. Denmark/Greenland v. Norway (1993) – The early application of a modified equidistance approach paved the way for what is now codified as the three-stage framework.

Relevance to the East Segment II Dispute

In the case of East Segment II of the Singapore Strait, where Indonesia, Malaysia, and Singapore intersect, the Three-Stage Approach offers a viable and internationally grounded model for resolving the boundary impasse. The method’s ability to accommodate sovereign determinations, legal ambiguities, and geographic asymmetries makes it particularly suitable for this complex maritime zone. Its application would enable the parties to progress toward a delimitation that is not only legally defensible but also consistent with the principles of equity under UNCLOS.

CONCLUSION

This research concludes that the East Segment II of the Singapore Strait, situated at the maritime tripoint of Indonesia, Singapore, and Malaysia, remains legally undelimited, thereby constituting a jurisdictional grey zone. The absence of a clearly defined maritime boundary in this area poses serious legal and operational challenges, especially in terms of jurisdictional authority, enforcement capacity, and the regulation of transboundary activities. Two major factors have sustained this legal ambiguity: The partial resolution of sovereignty over Pedra Branca, Middle Rocks, and South Ledge by the International Court of Justice (ICJ) in 2008, which determined ownership but did not address maritime delimitation. The continued lack of a bilateral maritime boundary agreement between Singapore and Malaysia, particularly regarding South Ledge, which prevents the initiation of trilateral negotiations with Indonesia. Due to this legal vacuum, the area is often mistakenly regarded as either international waters or part of the Outside Port Limits (OPL) zone. However, such designations have no legal basis under UNCLOS and contribute to regulatory confusion, undermining law enforcement efforts and enabling maritime infractions such as illegal discharges of oil sludge. To resolve this issue, the study recommends the adoption of the Three-Stage Approach, a methodology recognized for its procedural clarity and fairness in maritime boundary delimitation. This framework involves: Drawing a Provisional Equidistance Line, providing an objective baseline between opposing or adjacent coasts; Adjusting the line based on relevant legal and geographical factors, including coastal configurations and

maritime features of legal consequence; Applying a Disproportionality Test to verify that the final boundary reflects an equitable allocation of maritime space, considering coastal lengths and access to marine resources. This approach has been successfully utilized in several influential cases, such as Romania v. Ukraine, Bangladesh v. India, Bangladesh v. Myanmar, and Nicaragua v. Colombia. Its consistent application across different legal and geographic contexts affirms its relevance and adaptability. In summary, a trilateral agreement based on international maritime law and guided by the Three-Stage Approach is imperative for establishing legal certainty in East Segment II. Such a resolution would reinforce regional stability, uphold sovereign rights, and contribute to the effective governance of shared maritime spaces.

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