
*Dedicated to the memory of
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sea' and it dominates it 'by the intermediary of the coastal front'".⁴⁰ As the International Court of Justice has commented: "The delimitation line to be drawn in a given area will depend upon the coastal configuration."⁴¹ The coastal geography is regarded as "the leading factor in maritime delimitation"⁴² and the coastal fronts and the physical configuration of the coasts are the principal parameters in this regard.

136. The importance of the coastline, or rather the coastal front, has been underlined by the International Court of Justice: "[I]t is by means of the maritime front of this landmass, in other words by its coastal opening, that this territorial sovereignty brings its continental shelf rights into effect."⁴³ Moreover, "...the attribution of maritime areas to the territory of a State, which, by its nature, is destined to be permanent, is a legal process based solely on the possession by the territory concerned of a coastline."⁴⁴

137. The coast with its own characteristics plays an important role. The two coasts may be of different lengths, concave or convex, or even have other special features. The Court in the Gulf of Maine case stressed that "...the facts of geography are not the product of human action amenable to positive or negative judgment, but the result of natural phenomena, so that they can only be taken as they are".⁴⁵ All this does not mean that the delimitation process based on the configuration of a coast is an objective operation.

138. Various interpretations and positions may be adopted as to:

- The general direction of the coastline;
- Any changes of its direction;
- Whether to take minor features into account, and what constitutes a "minor" or "major" feature for this purpose;
- The existence of one or more coastal fronts;

⁴⁰ Prosper Weil, The Law of Maritime Delimitation-Reflections (Cambridge, Grotius Publications Limited, 1989), p. 51.

⁴¹ I.C.J. Reports 1984, p. 330, para. 205.

⁴² Prosper Weil, "Geographical considerations in maritime delimitation", International Maritime Boundaries (The American Society of International Law), J. I. Charney and L. M. Alexander eds., (Dordrecht, Boston, London; Martinus Nijhoff Publishers, 1993), vol. I, p. 115.

⁴³ I.C.J. Reports 1985, pp. 40-41, para. 49.

⁴⁴ I.C.J. Reports 1993, pp. 73-74, para. 80.

⁴⁵ I.C.J. Reports 1984, p. 271, para. 37.
