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## MALAYSIA-SINGAPORE MARITIME DELIMITATION: A COMPLEX PATH OF RESOLUTION?

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### Abstract:

The Malaysia-Singapore delimitation issue has continued to be an intricate and significant bilateral concern since the 2008 decision by the International Court of Justice (ICJ) on Batu Puteh. The 2008 judgment was perceived as removing at least one of the obstacles for Malaysia, Singapore and Indonesia to establish clear boundaries for their maritime territories in the Singapore Strait. Yet, the ruling also creates “grey area” in which maritime delimitation on overlapping territorial waters between Malaysia and Singapore need to be resolved. The delimitation becomes more complex with the awarding of Middle Rocks to Malaysia. Indonesia’s potential involvement in future negotiation adds an additional level of complexity. This is a qualitative study, employing content analysis and literature study methodology. The study aims to analyse and examine Malaysia’s outstanding maritime delimitation issue with Singapore. It is submitted that the Malaysia-Singapore maritime delimitation is a complex issue with historical, legal and geographical dimensions. While efforts have been made to address and manage the issue, achieving a comprehensive resolution remains a challenging task. Both parties seem to continue navigating the complexities of their maritime delimitation issue with a blend of legal frameworks, diplomatic negotiations and mutual cooperation. It is imperative for both parties to expedite the negotiating process and achieve a definitive agreement on the delimitation boundary in the vicinity of Batu Puteh.

### Keywords:

Malaysia-Singapore Maritime Boundary, Maritime Delimitation, Unresolved Maritime Boundary, 1982 UNCLOS

## Introduction

Enacted on 16 November 1994, the 1982 United Nations Convention on the Law of the Sea (UNCLOS) is the most extensive treaty on the law of the sea. The Convention defines several marine zones, each of which grants distinct exclusive rights and jurisdiction to coastal states. According to Article 3, a coastal state can assert ownership of a territorial sea extending up to 12 nautical miles. The state may also assert a continuous zone of up to 24 nautical miles (Article 33), an exclusive economic zone of 200 nautical miles (Article 57), and a continental shelf that stretches for a minimum of 350 nautical miles (Article 76), measured from the baseline. The coastal states have absolute sovereignty over their territorial sea area. Beyond this 12 nautical miles limit, the coastal states are only allowed to exercise sovereign rights to explore and exploit the natural resources.

Given the geographic position of coastal states and the configuration of their coastlines, it is unavoidable for maritime zones to overlap among these states. Consequently, maritime delimitation is required to establish the boundaries of their maritime zones. The delineation of maritime boundaries between coastal states is regulated by the principles and rules of international law. The resolution of maritime boundary delimitation typically occurs through negotiation between the parties involved or the engagement of a third party, such as a judicial settlement.

The Malaysia-Singapore delimitation issue has continued to be an intricate and significant bilateral concern since the 2008 decision by the International Court of Justice (ICJ) on Pedra Branca, known as Batu Puteh in Malay. The judgment was perceived as removing at least one of the obstacles for Malaysia, Singapore and Indonesia to establish clear boundaries for their maritime territories in the Singapore Strait. Yet, the ruling also creates “grey area” in which maritime delimitation on overlapping territorial waters between Malaysia and Singapore need to be resolved. The delimitation becomes more complex with the awarding of Middle Rocks to Malaysia. Indonesia’s potential involvement in future negotiation adds an additional level of complexity, considering existing delimitation agreements in the area. This study aims to analyse and examine Malaysia’s outstanding maritime delimitation issue with Singapore.

## Methodology

This is a qualitative study. In conducting this study, content analysis and literature study methodology is applied. Content analysis examines the documents and previous literature available from the legislations, treaties, reports and journal articles related to the Batu Puteh disputes. According to Hsieh and Shannon (2005), content analysis involves a systematic methodology to examine and analyse data from texts. Through this methodology, the background of the Batu Puteh dispute and the outstanding Malaysia-Singapore maritime delimitation issue are examined and analysed. As stated by Shava, GN et al. (2021) the results of content analysis can provide thick descriptions of particular settings or phenomenon.

## Discussion and Findings

### *Malaysia-Singapore Maritime Boundary*

At the heart of the Malaysia-Singapore maritime delimitation issue lie historical treaties and colonial-era agreements that sought to delineate territories between the British-administered regions of Malaya (now Malaysia) and Singapore. These agreements dating back to the 19<sup>th</sup> and early 20<sup>th</sup> centuries, often lack clarity and precision in defining maritime boundaries. The

Malaysia-Singapore border was established in the 19th century when the Sultanate of Johore ceded sovereignty of the island to the British East India Company in 1824. Before then, Singapore was a fundamental component of the Johor Sultanate and later the Johor-Riau Sultanate (Mutalib & Dahari, 2017). An Agreement was struck on 19 October 1927 between the British, as the colonial supreme authority of the Straits Settlement including Singapore, and the Sultanate of Johor. The objective of the Agreement was to define the boundary between the island of Singapore and Johor, specifically along the Straits of Johor. (Haller-Trost, 1998). Upon achieving independence, both Malaysia and Singapore became successor states of the Agreement.

The existing maritime boundary between Malaysia and Singapore in the Johor Strait is defined in accordance with the 1927 Agreement. The 1927 Agreement serves as the basis for the 1995 Agreement, which aims to establish the limits of respective territorial seas (Mohd Rusli et al., 2014). The 1995 Agreement superseded the 1927 Agreement in so far as there is any consistency. It was contended that the Agreement was not really establishing a formal border between Malaysia and Singapore in the Singapore Straits. Instead, it focused on defining and establishing basepoints to the east and west of Singapore where it is assumed that the Johor Straits intersects with the Singapore Straits (Charney & Alexander, 1998). Beyond the defined boundary, there is still no formal agreement to delimit their overlapping claims, some of which even overlap with Singapore and Indonesia boundary.

### The Origin of Batu Puteh Dispute

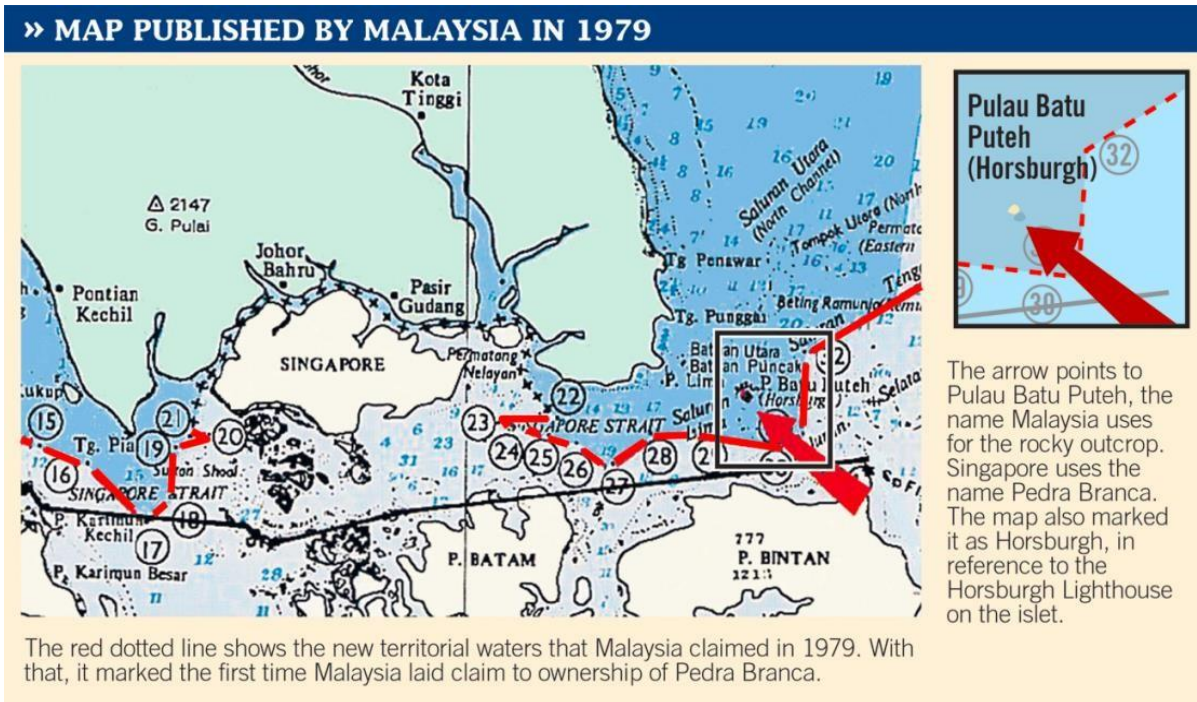


Figure 1: Batu Puteh as portrayed in 1979 Map

Source: www.icj-cij.org



**Figure 2: Batu Puteh**

(Source: The Star, 2008)

The dispute on the sovereignty of Batu Puteh, a little rocky island located 7.7 nautical miles south of Johor and around 24 nautical miles east of Singapore, arose on February 14, 1980. Singapore lodged a protest against Malaysia's publication of the 1979 Map which illustrated its territorial waters and continental boundaries (1979 Map). The Map claimed that Batu Puteh was located within Malaysia's territorial waters (Haller-Trost, 1998). It is worth noting that Malaysia did not provide a formal statement specifying the precise coordinates of its straight baselines from which these claims are measured as mandated by Article 16 of the 1982 UNCLOS (Mohd Rusli et al., 2014). Singapore contended that Batu Puteh had been part of its territory as indicated in six Malaysia official maps prior to the 1979 Map. Consequently, Singapore requested that the map to be rectified accordingly (Mohamad, 2009; Lathrop, 2008).

Acting on the spirit of neighbourhood, both states attempted to address the disagreement through dialogue and bilateral consultations. Eventually, several rounds of formal exchanges of legal documents and series of governmental talks took place. The sovereignty status of Middle Rocks and South Ledge was also addressed during the initial round of negotiations. Unfortunately, it failed to reach a consensus. In September 1994, Malaysia and Singapore reached a bilateral agreement to resolve the Batu Puteh problem by bringing it to the ICJ. (Mohamad, 2009).

### **Batu Puteh Judgment and Its Legal Implication**

The Batu Puteh dispute, which lasted for over twenty years, was finally resolved by the ICJ on Friday, May 23, 2008. The court has determined that Singapore has sovereignty over Batu Puteh, whereas the Middle Rocks are under Malaysia's sovereignty. As for the South Ledge the court only determined that it belongs to the state territorial water where it is located (Hamid, 2011a; Beckman & Schofield, 2009; Forbes, 2008). The 2008 decision regarding the sovereignty of Batu Puteh and Middle Rocks has removed at least one of the obstacles for

Malaysia, Singapore and Indonesia to delimit their maritime boundaries delimitation in the Singapore Strait. However, this settlement has affected the demarcation of maritime borders in the Singapore Strait, particularly concerning Malaysia and Singapore, as it results in the existence of overlapping territorial waters between both states.

The territorial waters of Malaysia and Singapore were delineated in 1995, but Batu Puteh was not included. There is a contention that the 1995 Agreement does not establish a maritime boundary between Malaysia and Singapore in the Singapore Straits. In fact, the Agreement was deemed to have no immediate influence on the Malaysia-Singapore conflict about Batu Puteh. The maritime delimitation problem in that area remained unresolved.

Since maritime delimitation of Batu Puteh was not put before the court to decide, it is crucial for both parties to establish maritime boundaries in the waters around Batu Puteh following the 2008 decision (Churchill, 2009; Tan, 2008). Otherwise, it would result in further complications and uncertainty, especially in the management of the area (Arsana et al., 2010). Furthermore, the determination of ownership for South Ledge, was contingent upon the definitive demarcation of the Batu Puteh area. Another aspect that contributes to the complexity is the possibility of Indonesia intervening at a later stage of negotiation, considering the existing delimitation agreements in the area (Hamid, 2011b; Arsana et al., 2010; Churchill, 2009). The absence of a defined territorial sea boundary in the Batu Puteh area would complicate the ability of coastal states to establish their sovereignty or sovereign claims over the contested or overlapping maritime areas (Mohd Rusli et al., 2014) which potentially resulting in ineffective maritime law enforcement (Mon, 2022).

### ***Land Reclamation Case and Its Impact on Maritime Delimitation***

Due to its limited geographical area and scarcity of land, Singapore must depend on land reclamation to develop more physical space to meet its housing, industrial, and commercial requirements (Koh & Lin, 2006). In 2002, Malaysia initiated its official condemnation of Singapore's "land reclamation operations" in Tuas and Pulau Tekong, which are situated in the Straits of Johor. By that juncture, the reclamation effort had been underway for almost one and a half year. Malaysia has alleged the reclamation activities in Tuas of infringing into its territorial waters. Singapore classified the area as an "anomaly" that arose from Malaysia unilaterally declaring its territorial waters limit as seen in the 1979 Map.

Malaysia invoked Article 286 of the 1982 UNCLOS and commenced arbitration under Annex VII to rectify its concern. Both parties, who were signatories to the Convention, eventually reach an agreement to hold negotiations in Singapore on 13 and 14 August 2003. The meeting included the discussion of forming technical working groups to specifically tackle technical issues. Malaysia set a prerequisite for the talks to proceed that all reclamation activities must be stopped pending the outcome of the negotiations. Singapore declined the request since its research and reports had showned that the reclamation activities had not caused and would not have a substantial effect on Malaysia's concern (Koh & Lin, 2006).

Malaysia proceeded to file an application with the International Tribunal on the Law of the Sea on 4 September 2003, requesting temporary measures in accordance with Article 290 (5) of the 1982 UNCLOS. The Tribunal declined Malaysia's motion and instead mandated both parties to form a panel of specialists to evaluate jointly the impact of Singapore's land reclamation

activities and suggest suitable actions to address any negative consequences (Wan A. A. Jafri, 2018).

Both parties acknowledged the report and suggestions by the Group of Independent Experts (GOE) as the foundation for their following discussions aimed at settling the conflict. The conducted investigation revealed that Singapore's reclamation efforts did not result in any significant consequences. (Koh & Lin, 2006). The dispute was resolved through an "ad referendum agreement" between the two parties on January 9, 2005. This resulted in the signing of the "Settlement Agreement" on April 26, 2005. In general, the Agreement represent a fair and balance outcome of the dispute reached by amicable means between the two states through a series of bilateral negotiations. Both parties also agreed to settle outstanding boundary issues through amicable negotiations.

In October 2018, a dispute resurfaced regarding the maritime area in the Johor Straits, located adjacent to Singapore's reclaimed land area known as Tuas. Malaysia issued a gazette notice declaring the alterations of Johor Bahru port limits to which Singapore protested and claiming that the new port limits were intruding its territorial waters (Strating, 2019; Wan A. A. Jafri, 2018). According to Wan A. A. Jafri (2018) the extensive reclamation works in the Tuas area had dramatically affected Singapore's coastline. Nevertheless, this does not give Singapore the right to claim a new baseline for the measurement of their maritime boundaries. Land reclamation does not alter the baseline of states, and hence does not expand the territorial waters of the state.

### **Maritime Delimitation in the Area of Batu Puteh, Middle Rocks and the South Ledge**

The issue on maritime delimitation was not asked by both parties for the court to decide. Therefore, resulting from the 2008 judgment, what is the appropriate method for delineating the territorial sea between the two states? Article 15 of the 1982 UNCLOS dealing with the demarcation of territorial sea provides that the contesting states have to "delimit their territorial sea by means of negotiation with a view to reach an agreement" on that matter. Should the negotiation failed, "neither states can claim more than beyond the median line every point of which is equidistant from the nearest point on the baselines of the two states."

How Article 15 should be applied in the context of Malaysia and Singapore case, considering geographical setting and distance of these geographical features which is less than 24 nautical miles from each other? The equidistance principle is typically applied by Malaysia in reference to past boundary agreements with adjacent states. This is consistent with the statement issued by Malaysia upon its ratification of the 1982 Convention in 1996. In most instances, the principle of equidistance has been shown to be the preferred approach in state practice Furthermore, the present patterns observed in the courts and tribunals also indicate deference to the "equidistance-base principle; the "drawing of provisional equidistance line as the first step in the determination of maritime delimitation".

Therefore, it is suggested that maritime delimitation negotiation between Malaysia and Singapore should incorporate the application of the "equidistance principle". Referring to the principle, the initial step is to establish a "provisional equidistance line" within the designated area. The modification to the line can be made having considered relevant circumstances such as the configuration of the coast, the presence of island or assertions based on historical ownership in the contested area. In the present situation, Batu Puteh, Middle Rocks and South

Ledge perhaps can be considered as “circumstances” relevance to the determination of delimitation line (Arsana et al., 2010). Irrespective of the approach employed, the final result should be an “equitable solution” for both parties as consistently emphasised by legal precedent.

Singapore has indicated its intention to claim exclusive economic zone if Batu Puteh is considered as an island. Malaysia through its Ministry of Foreign Affairs responded by saying that “to simply claim that Singapore’s maritime territory included an exclusive economic zone is against the spirit of ASEAN” and the legal framework thereof. Such a claim was “unacceptable and unreasonable and contradicts the principles of international law” (Hong, 2008). Article 121 (1) of the 1982 UNLCOS defined an island as “naturally formed area of land surrounded by water, above water tide”. An island satisfying the requirements is entitled to “territorial sea, contiguous zones, exclusive economic zone and continental shelf”. Article 121 (3) stipulates that a rock “incapable of supporting human habitation” is only allocated a territorial sea of 12 nautical miles. Should Batu Puteh be officially designated as an island, it would be eligible for territorial sea, exclusive economic zone, and continental shelf. Alternatively, if it qualifies as a rock, it will not be eligible for its own exclusive economic zone or continental shelf.

Malaysia of the view that Batu Puteh does not satisfy the requirements to be classified as an island – “land that is inhabited by human that had economy activity”. The court itself has pronounced Batu Puteh as a “granite island”. In fact, it is described as a “tiny uninhabited and uninhabited island”. The issue whether Batu Puteh constitute an island, or a rock continues to impact both parties involved in the negotiation process.

In light of the current situation, Singapore's assertion of its territorial sea is restricted to a 6-nautical mile radius. This limitation is due to its geographical conditions and close proximity to Malaysia, which is less than 24 nautical miles away (Forbes, 2009). According to Hamid (2011b) Malaysia territorial sea limit extends up to 5 nautical miles to the east of Batu Puteh. Given the complexities of the situation, it is imperative for both states to engage in negotiations to determine the boundaries of their territorial seas. This should be done in compliance with the rule specified in Article 15 of the 1982 UNLCOS, while also considering the legal decisions by courts and tribunals.

The determination of maritime boundaries near Batu Puteh necessitates the consideration of established agreements, including the “1969 Continental Shelf Boundary Agreement between Malaysia and Indonesia” and the “1973 Territorial Sea Agreement between Singapore and Indonesia”. Singapore has indicated that the borders between Indonesia and Singapore, as well as Malaysia and Singapore, in this vicinity will not extend uninterrupted from the waters next to the main Singapore island to the Batu Puteh area. Beckman and Schofield (2009) stated that there is a section of the border between Malaysia and Indonesia that lie in between. The awarding of Middle Rocks to Malaysia further complicates the delimitation process.

The Middle Rocks comprise of two clusters of small rocks. At high tide, these clusters are located above the water, around 2 nautical miles south-southwest of Batu Puteh. Middle Rocks play a crucial role in determining the territorial maritime boundary between Malaysia and Singapore due to their geographical location, specifically between Batu Puteh and South Ledge. It appears that the territorial sea of Batu Puteh is blocked by the territorial sea associated with

Middle Rock. From a different perspective, Middle Rocks can serve as a new basepoint for Malaysia, and similarly, Singapore can utilise Batu Puteh as its new basepoint (Forbes, 2017; Hamid, 2011b; Arsana et al., 2010).

In its 2008 ruling, the court simply affirms that the South Ledge is the property of the state situated in the territorial seas associated with it. South Ledge is located within the overlapping territorial waters of the Malaysia's mainland and Middle Rocks. Since Middle Rocks is under the ownership of Malaysia, it appears that South Ledge lie within Malaysia's territorial sea (Forbes, 2017; Hamid, 2011b; Arsana, 2010).

According to Article 13 of the 1982 UNCLOS, as a low-tide elevation, South Ledge lacks the legal entitlement to assert its own territorial sea. Yet, its strategic position within a state's territorial sea can establish a reference point for measuring the state's territorial sea and hence raise the territorial sea limit of that state (Hamid, 2011b). However, it is important to consider that when a state employs straight baselines, these baselines cannot be determined based on low tide heights, unless specific conditions are met, such as the presence of a constructed lighthouse or other permanent installations that are below sea level.

The determination of sovereignty over South Ledge remains unresolved to this day, despite a series of discussions between the two governments (Wan A. A. Jafri, 2018). The ownership of South Ledge can only be determined by the final result of negotiations over the demarcation of territorial seas claims by both parties. Respectfully, it appears that Malaysia has two options on South Ledge issue; either considering it as part of Middle Rock or treating it as a distinct entity until a later stage in which case Malaysia may risk losing a portion of its maritime territory during the negotiation process (Personal Communication, 2012). Proximity of the ultimate demarcation line between Malaysia and Singapore to Indonesian territory may greatly affect the maritime borders between the two states (Forbes, 2017).

### **Malaysia-Singapore Joint Technical Committee (MSJTC)**

The Malaysia-Singapore Joint Technical Committee on the Implementation of the ICJ Judgment on Batu Puteh, Middle Rocks and South Ledge (MSJTC) was established following the 2008 judgment with an objective of demarcating the maritime boundary and resolving the issue of ownership over South Ledge. The Committee is comprised of two subcommittees: the Joint Survey Work, led by Department of Mapping and Survey which responsible on technical matters such as waterline, basepoints and maritime features; and the Airspace and Aviation subcommittee, led by National Security Council which deals matters such as fisheries, surveillance and aviation control (Personal Communication, 2012).

The 6<sup>th</sup> MSJTC meeting, which took place on 22 - 23 February 2012, praised the Sub-Committee Joint Survey Work for successfully completing its tasks. The meeting also approved the Report of Survey conducted by the Joint Hydrographic Survey over the maritime features and recognised the Summary of Work produced by the Sub-Committee. Having completed Joint Survey Works, both parties reached an agreement for the MSJTC to proceed with the delimitation of the maritime boundary.

The inaugural Malaysia-Singapore Committee Meeting towards the delimitation of maritime boundaries took place in Singapore on 13 May 2019 (Press Release, 2019; Yuen-C, 2019). At the 8<sup>th</sup> MSJTC meeting held on 21 January 2020, both parties agreed for the Sub-Committee



on Maritime Boundary Delimitation to commence negotiations (Press Release, 2020). During the 9<sup>th</sup> MSJTC meeting, the parties endorsed the Terms of Reference (TOR) for the Sub-Committee on the Boundary Delimitation and a consensus was achieved on the Sub-Committee's ongoing work in accordance with the TORs (Niazi, 2021). The recent Malaysia-Singapore Maritime Boundary Delimitation meetings occurred on 18-19 April 2022 in Singapore. Little information was disclosed except for the fact that both parties are continuing with the negotiation talks.

It is uncertain how Malaysia and Singapore intend to delineate the waters and thereby determine the status of South Ledge. It appears that Malaysia and Singapore continue to navigate the complexities of their maritime delimitation issue with a blend of legal frameworks, diplomatic negotiations and mutual cooperation (Bernama, 2021). Both states acknowledge the importance of adhering to international law, keeping transparent line of communication and pursuing feasible resolutions while safeguarding their respective interests and sovereignty (Bernama, 2024). It is worth noting that one of the lessons learnt from this Batu Puteh case is that sovereignty of the state must be safeguard and strengthened with realistic actions (Suhaimy et al., 2020).

### Conclusion

The Malaysia-Singapore maritime delimitation is a multifaced problem with historical, legal and geographical dimensions. While efforts have been made to address and manage the issue, achieving a comprehensive resolution remains a challenging task that necessitates ongoing discussion and cooperation between two states. The authors are of the view that the negotiation is progressing at a modest pace. The existing condition of ambiguity over the limits of the state has restricted genuine foreign policy efforts to formally define the state's borders with its neighbouring states and impeded regional moves towards collaborative maritime agreements. Hence, it is crucial for both parties to prioritise the resolution of the current lingering boundary issue. The lack of a mutually accepted formal boundary in the area can cause friction and unwelcome incidents among the states. Hence, it is imperative for both parties to expedite the negotiating process and achieve a definitive agreement on the delimitation boundary in the vicinity of Batu Puteh.

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