

3.192. The relevant coasts of Suriname and Guyana together form an angle, not a straight line. Suriname's relevant coast runs west to east; there is no difference between the Parties on this point. Guyana's relevant coast runs generally in a northwest by west direction. Depending on how Guyana's relevant coast is evaluated, one might say that it runs at one specific bearing or another—but no matter how it is evaluated, it clearly runs in a direction different from that of Suriname's coast, and it runs generally in a northwest by west direction. But the provisional equidistance line does not respect that general relationship of the two relevant coasts. It is influenced at the outset by the coastal configuration immediately to Guyana's side of the 1936 Point. That configuration has the same influence on the equidistance line in this case as is shown on Professor Jaenicke's headland diagram which the Court noted.

3.193. Thus, the original orientation of the provisional equidistance line is disadvantageous to Suriname because of the convex nature of Guyana's coast that contributes the basepoints for the first part of the provisional equidistance line and the corresponding relatively few basepoints on Suriname's recessed coastal configuration leading toward the Coppename River. It is only when Suriname's basepoints on Hermina Bank come into play that the provisional equidistance line turns (in its second segment) along a bearing that is more in keeping with the orientation of the relevant coasts of the Parties to the case. Guyana's Reply has discovered Hermina Bank and calls it "an irregular feature of the coastline that should be discounted in order to achieve an equitable solution."⁴²⁸ Elsewhere it refers to Hermina Bank as a "convex irregularity."⁴²⁹ Hermina Bank is not a geographic anomaly. It is aligned along the relevant coast of Suriname that runs along 6° N latitude, as Guyana recognizes. The effect of the basepoints on Hermina Bank is simply to counter the influence of basepoints on Guyana's convex coast between the Corantijn and Berbice Rivers that cause the first segment of the provisional equidistance line to swing out in front of the coastal front of Suriname.

3.194. This examination of the coastal concavities and convexities that fall along the relevant coasts of the Parties demonstrates that the direction taken by the provisional equidistance line as it leaves the coast in its first segment is not consistent overall with the orientation of the relevant coastal fronts of the Parties. Guyana's argument that the basepoint on Hermina Bank has an undue effect on the provisional equidistance line makes the case against equidistance in this circumstance because it illustrates the problem with equidistance in adjacent state situations: it is not the coast that controls the direction of the boundary, but rather it is isolated points on neighboring coasts and their relative position to one another. For this reason, Suriname believes the angle bisector method should be employed, which in fact is simply the median line between two generalized representations of the coastal fronts of the Parties.

D. Guyana's Relevant Maritime Area Does Not Properly Identify the Area To Be Delimited

3.195. The area to be delimited in this case lies in front of the relevant coasts of the Parties. Suriname depicted its view of the area to be delimited at Figure 33 of the Counter-Memorial. For Suriname, the area to be delimited is the area where the coastal front projections of Suriname and Guyana converge and overlap. Guyana has countered with what it calls the area of appurtenance and relevance. Guyana creates this area on the theory that the relevant coasts in this case project radially. It suggests that all of the ocean space that is within 200 nautical

⁴²⁸ RG, para. 7.59, pp. 137-38.

⁴²⁹ *Id.* at para. 7.53, p. 136.

Figure 7

