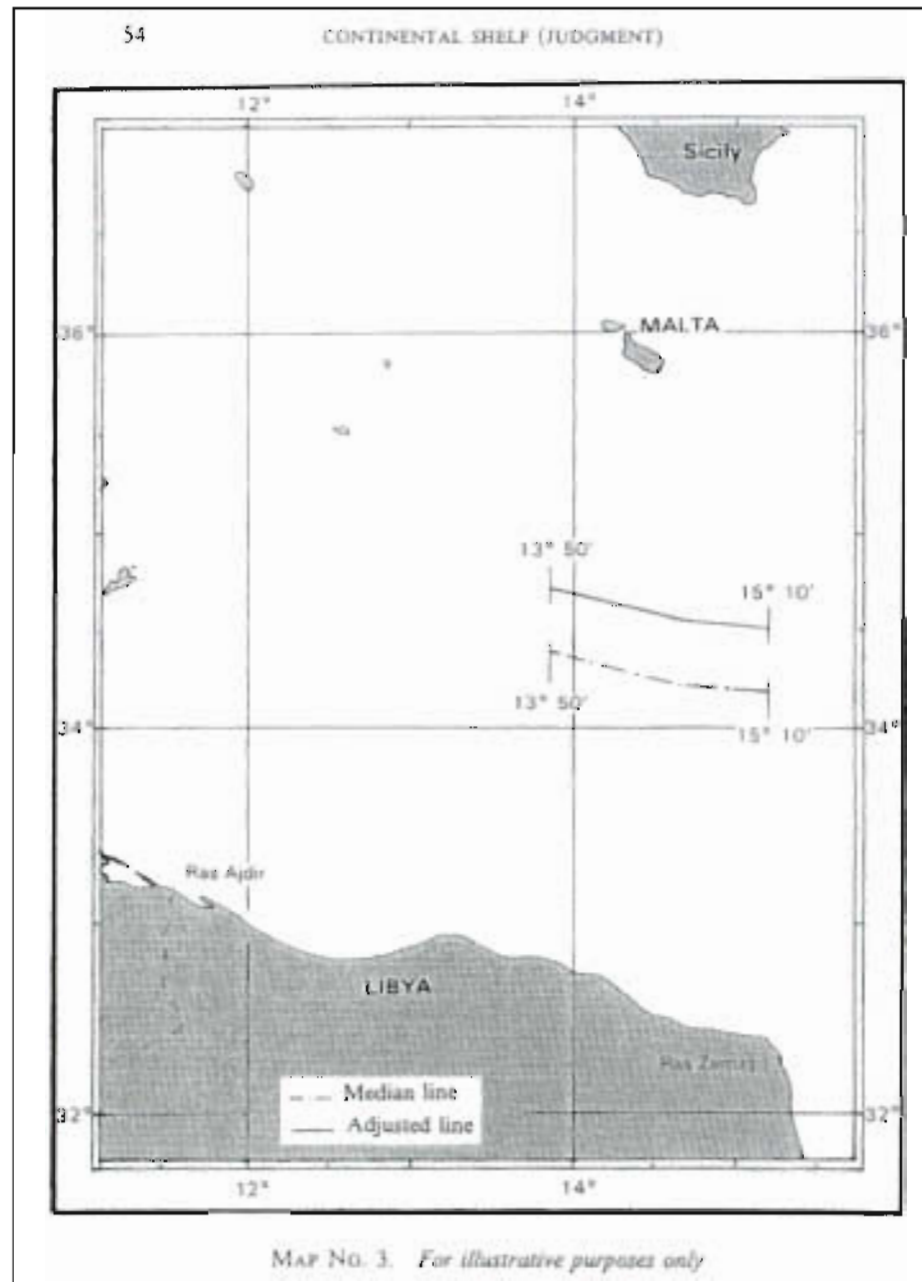
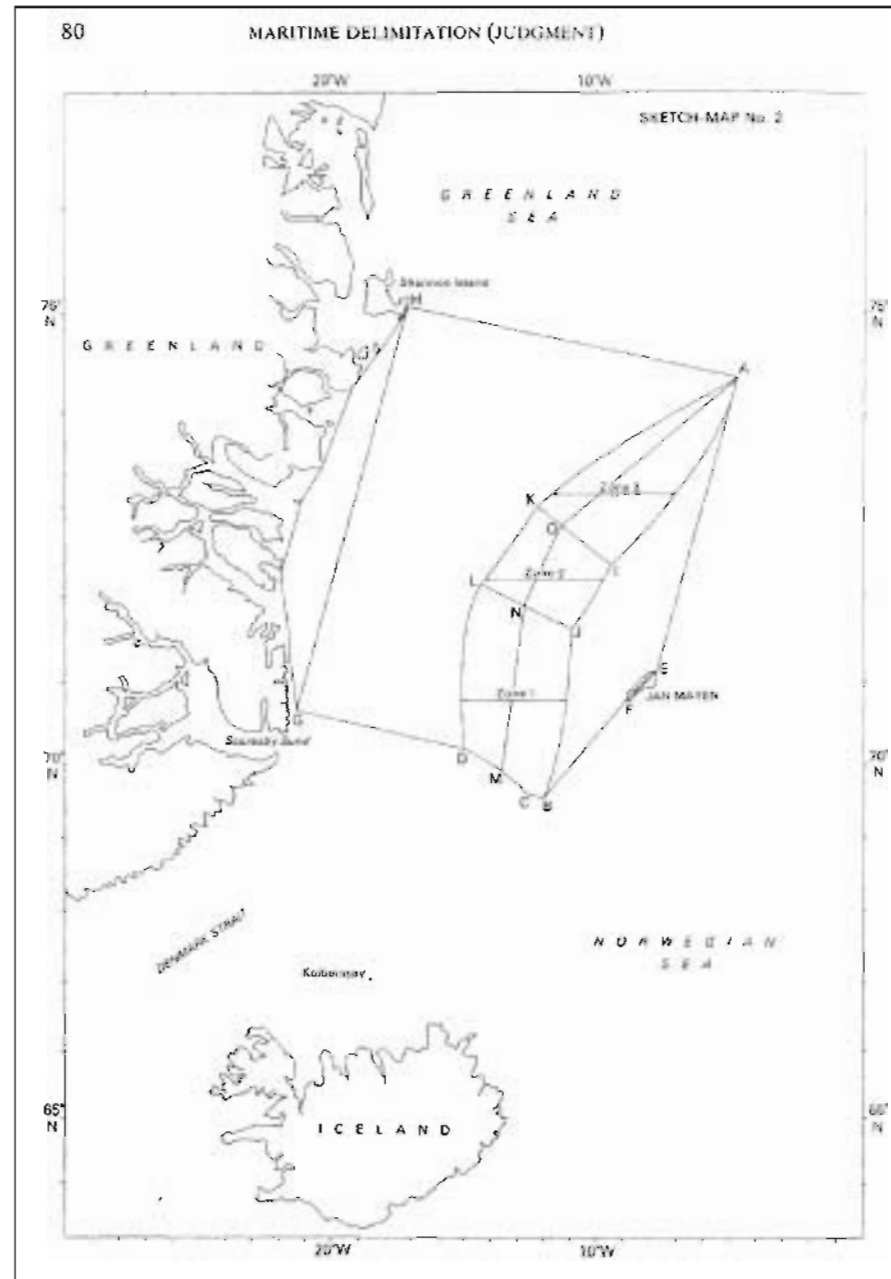


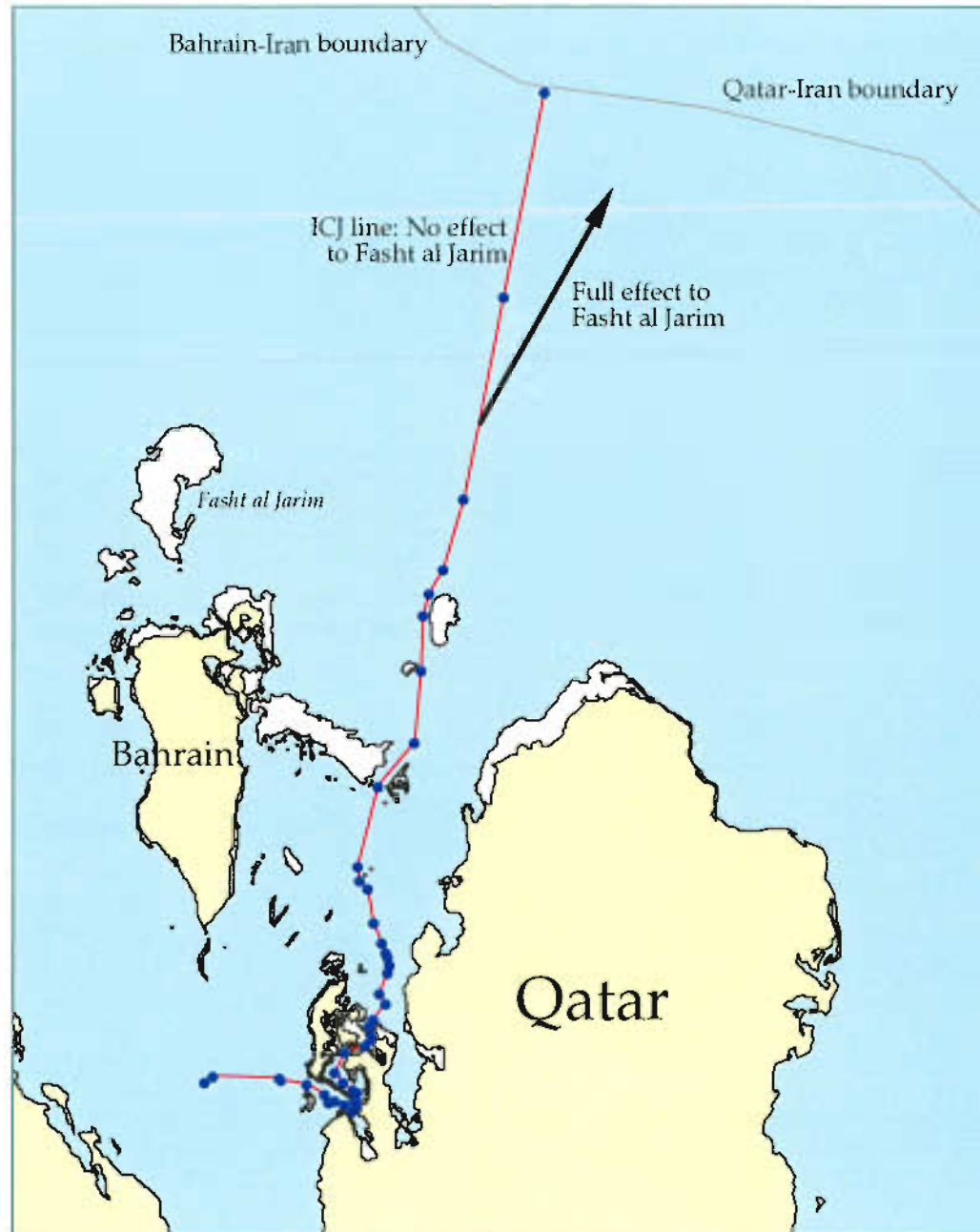
Libya v. Malta



Jan Mayen (Denmark v. Norway)



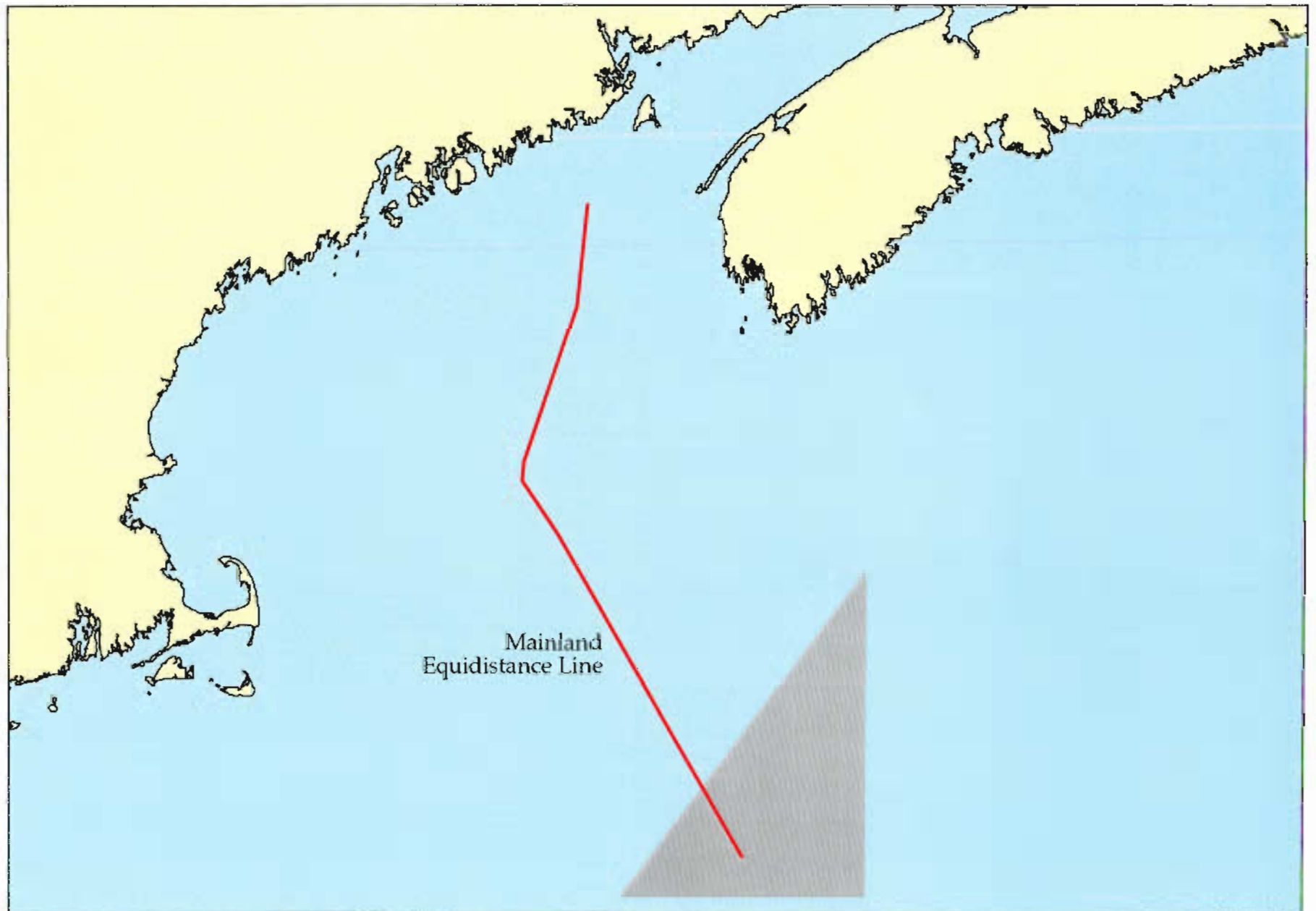
Qatar v. Bahrain



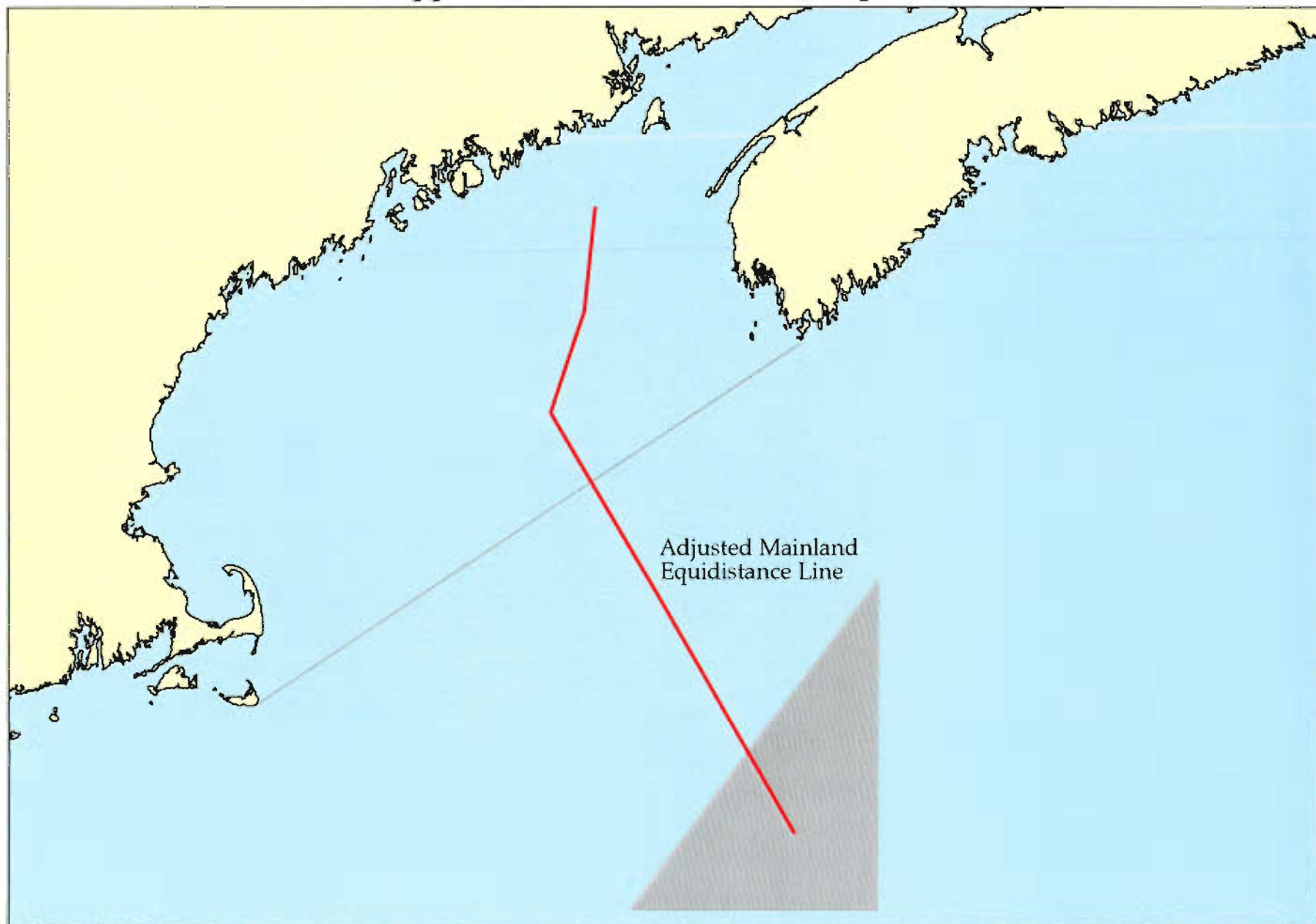
Based on *Qatar v. Bahrain*, [2001] (16 March 2001) (I.C.J. General List No. 87).

Oral Presentation, Phase Two, Figure: 99

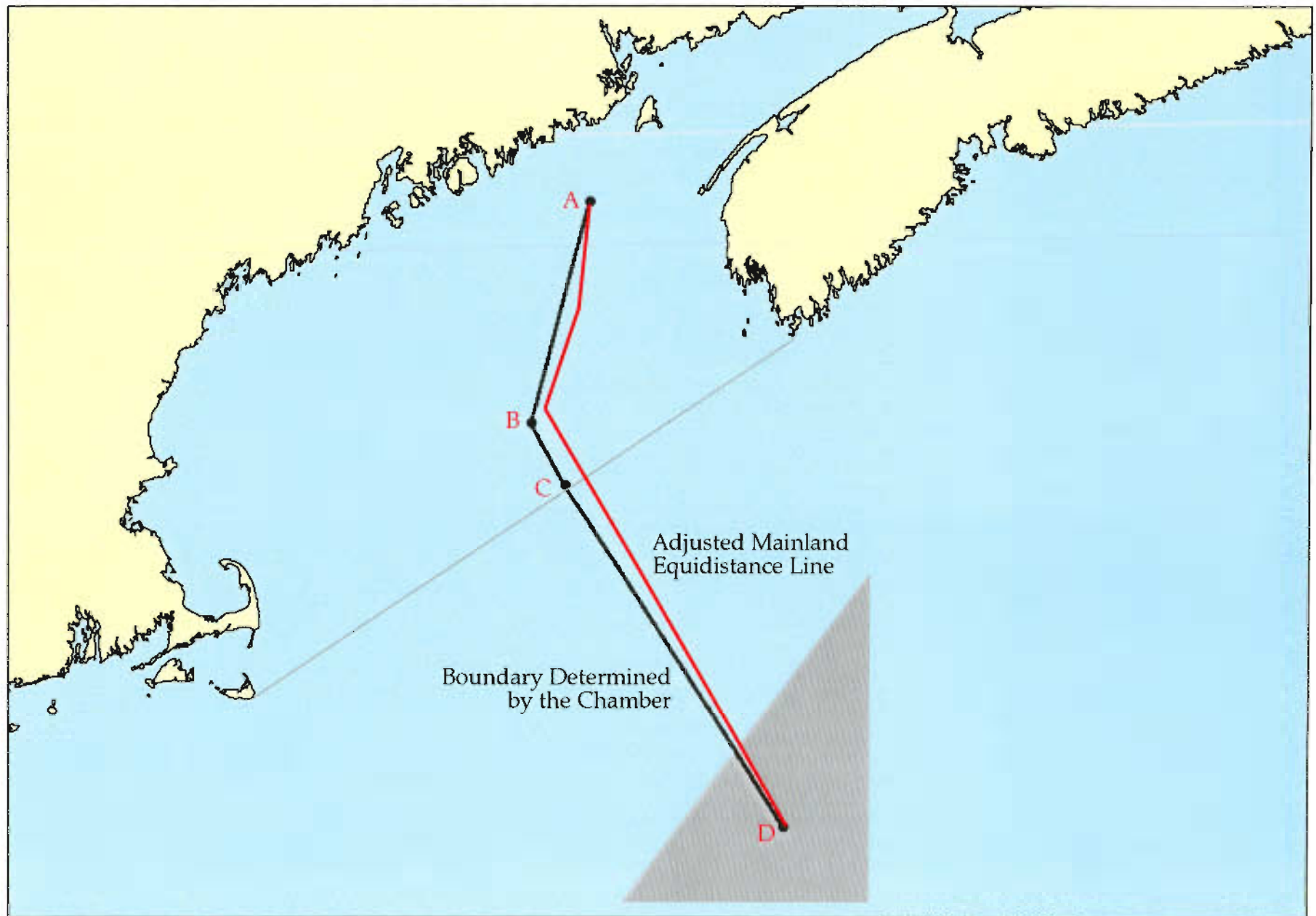
Gulf of Maine - Equidistance Line Using Only Mainland Base Points



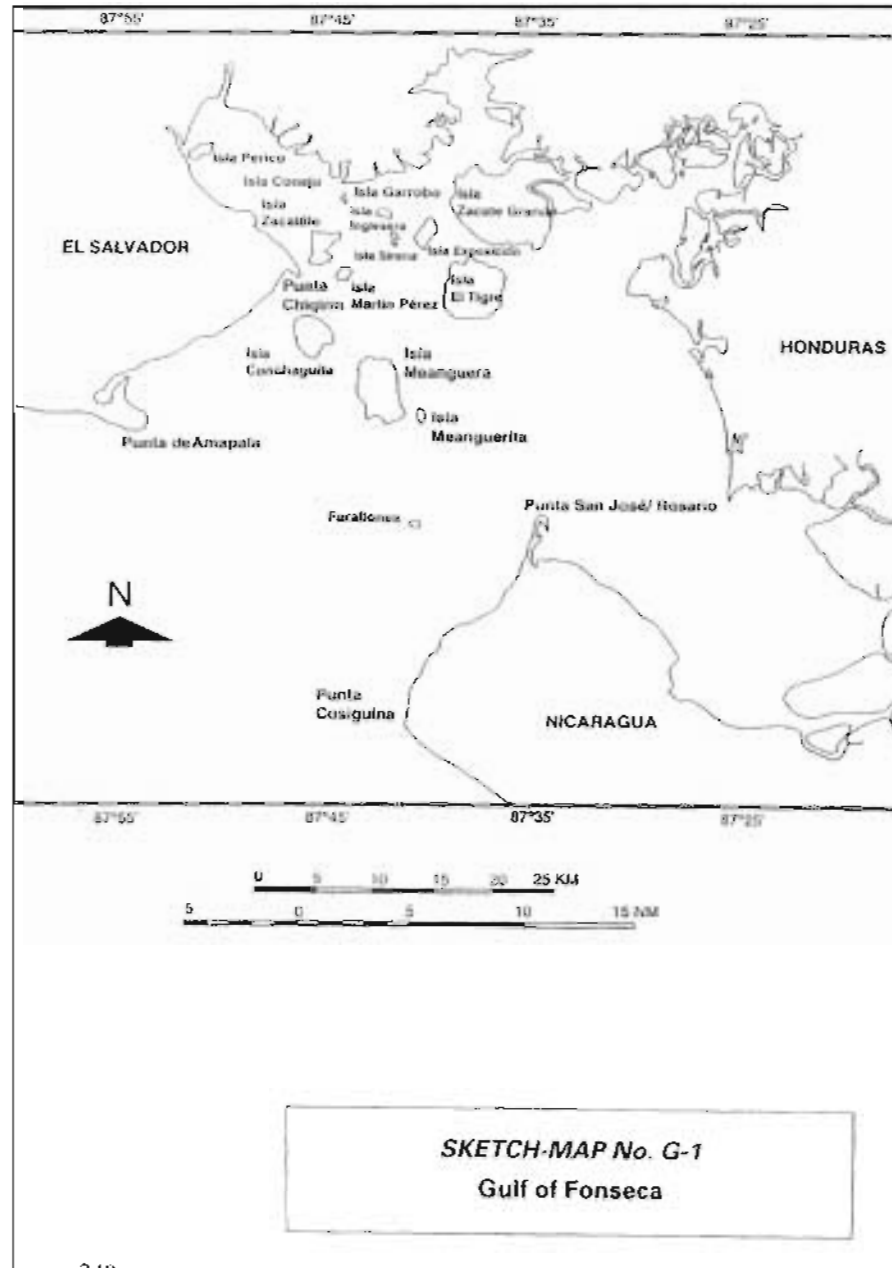
*Gulf of Maine - Adjusted Mainland Equidistance Line Based on Coastal Ratio of 1.38 : 1
Applied on Gulf of Maine Closing Line*



Gulf of Maine - Adjusted Equidistance Line and the Chamber's Line



El Salvador v. Honduras (Nicaragua Intervening) Gulf of Fonseca



Eritrea v. Yemen

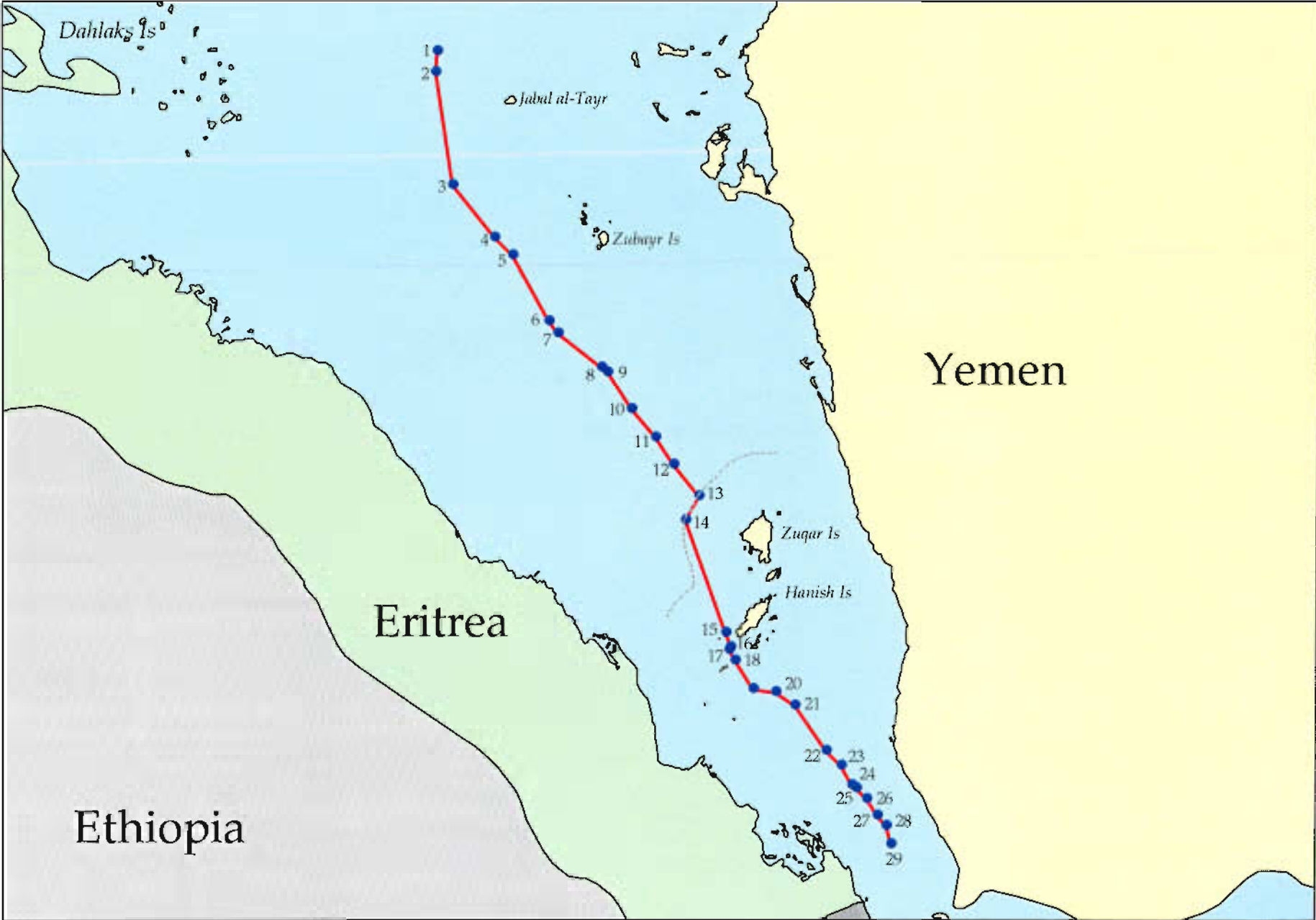


Figure 11, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 104

Application of Half Effect in the *Anglo-French Continental Shelf Case*

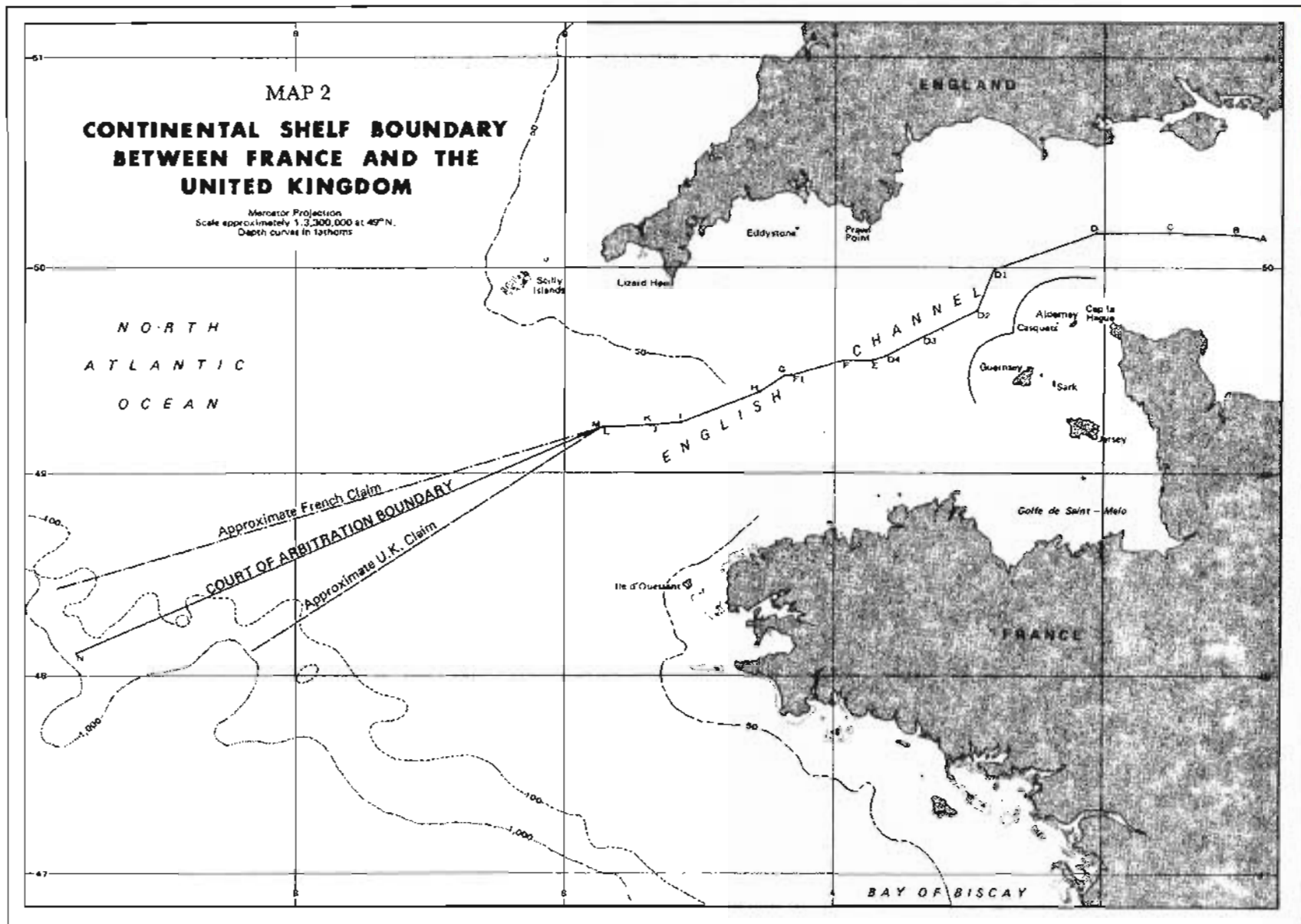
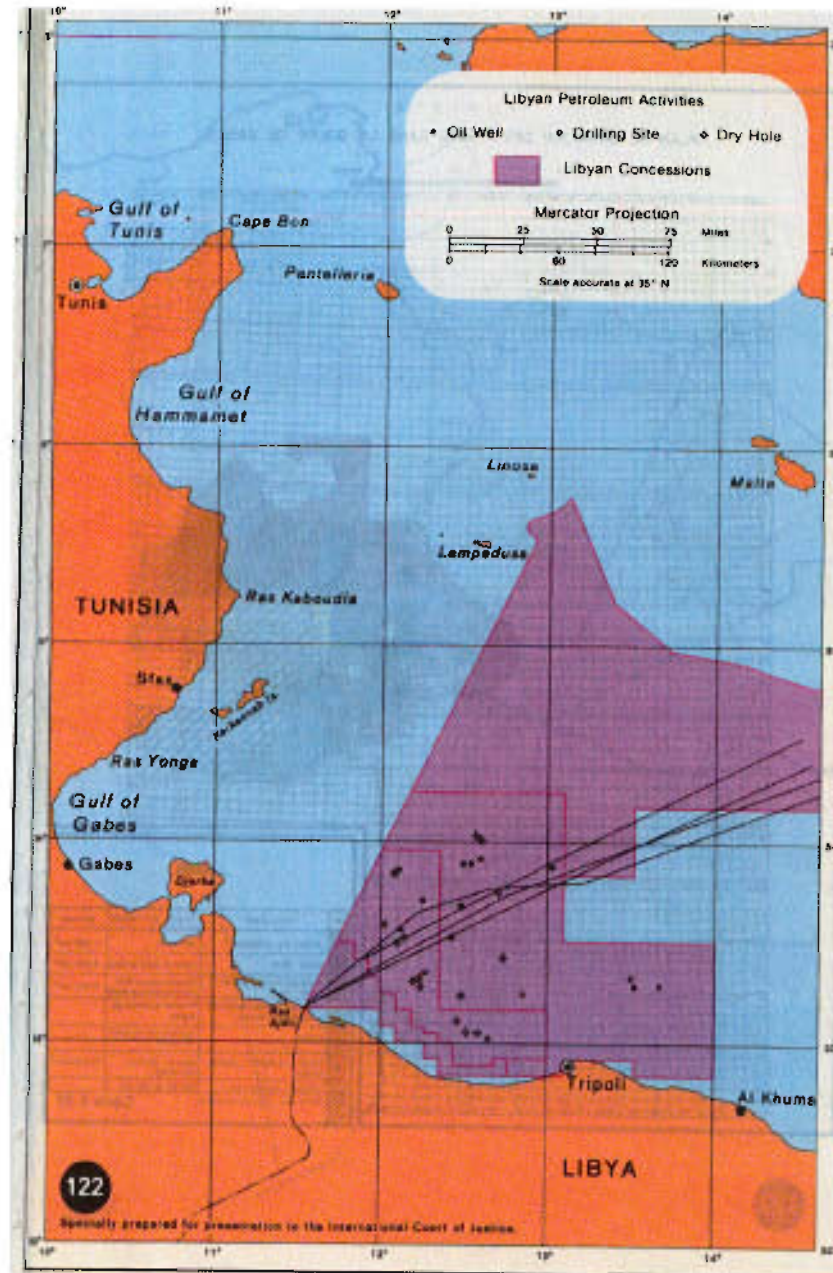


Figure 8, N&L Memorial, Phase Two

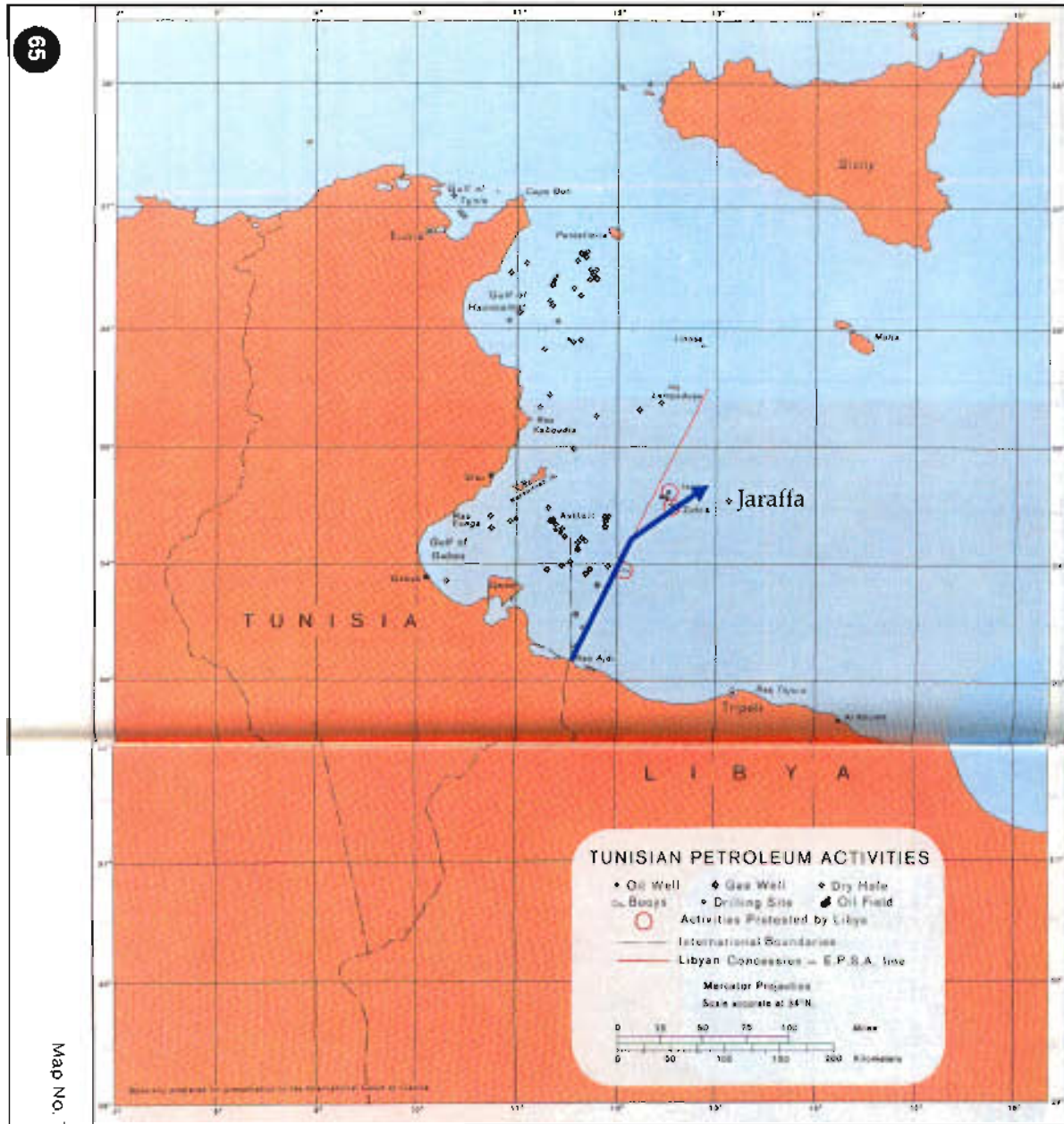
Libyan Petroleum Activities



Based on Map 122 *Tunisia v. Libya*, ICJ Pleadings (Vol. VI).

Oral Presentation, Phase Two, Figure: 106

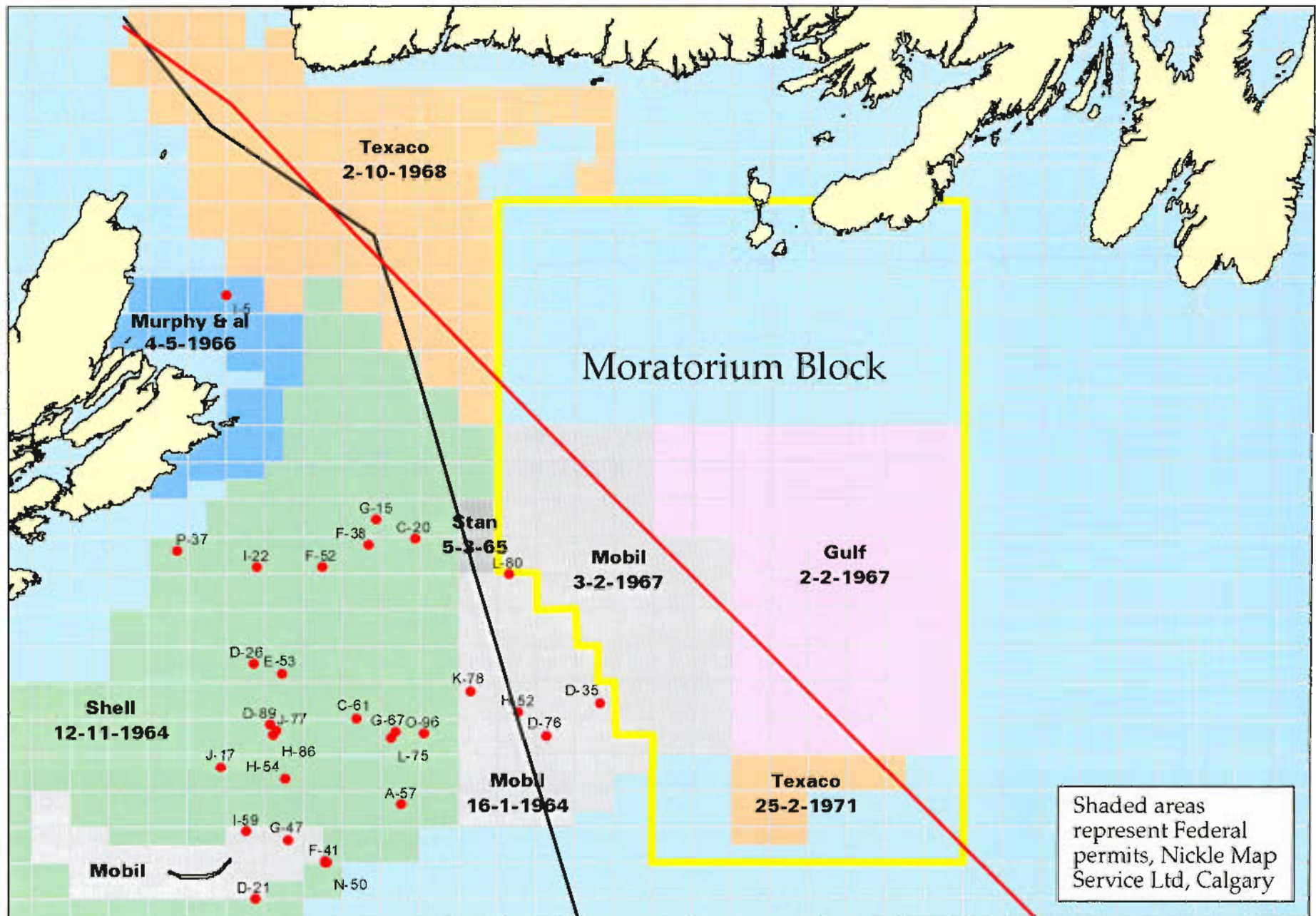
Tunisian Petroleum Activities



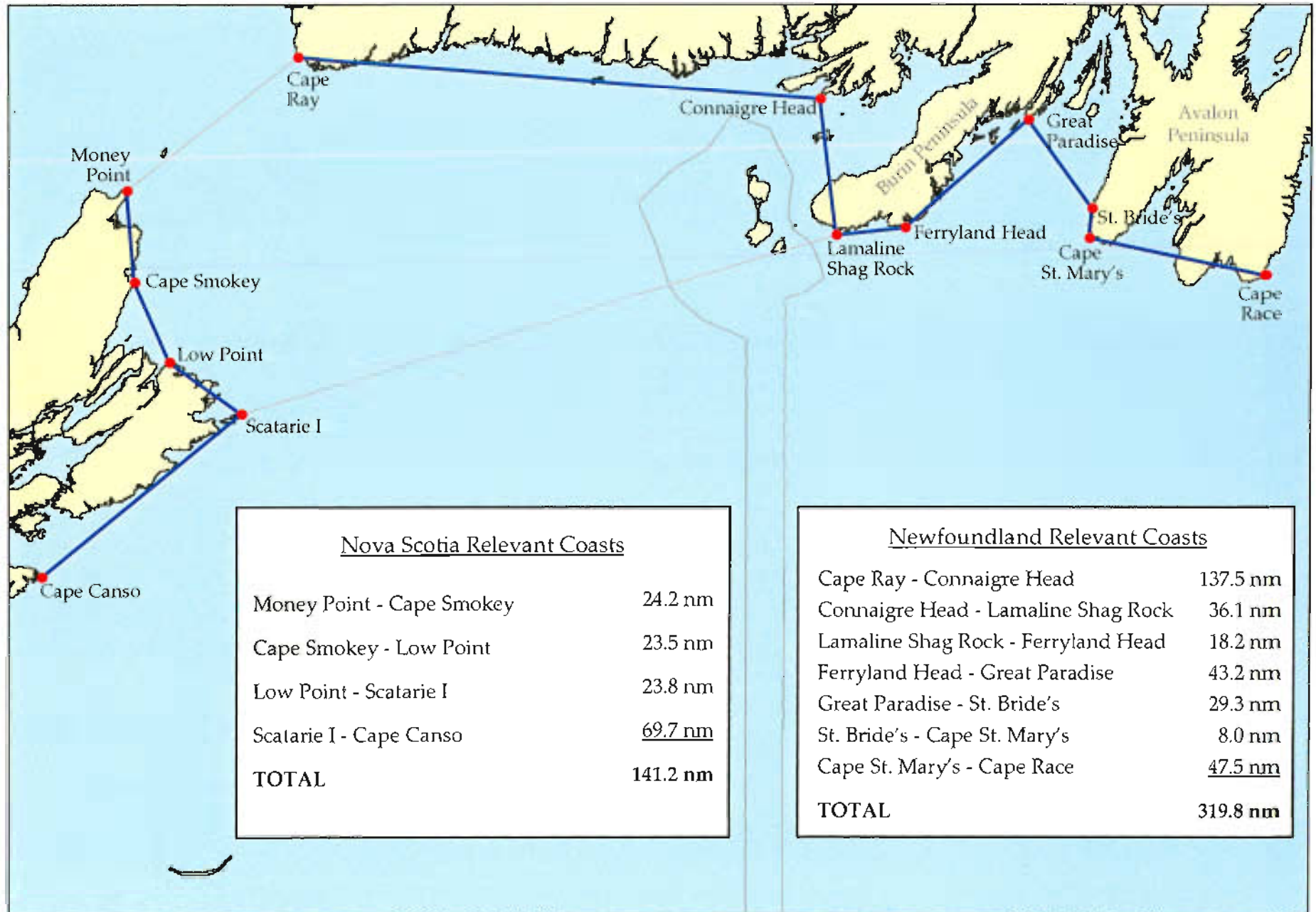
Based on Map 65 *Tunisia v. Libya*, ICJ Pleadings (Vol. VI).

Oral Presentation, Phase Two, Figure: 107

Drill Site Locations Referred to by Nova Scotia and Selected Federal Permit Areas Circa 1971-76



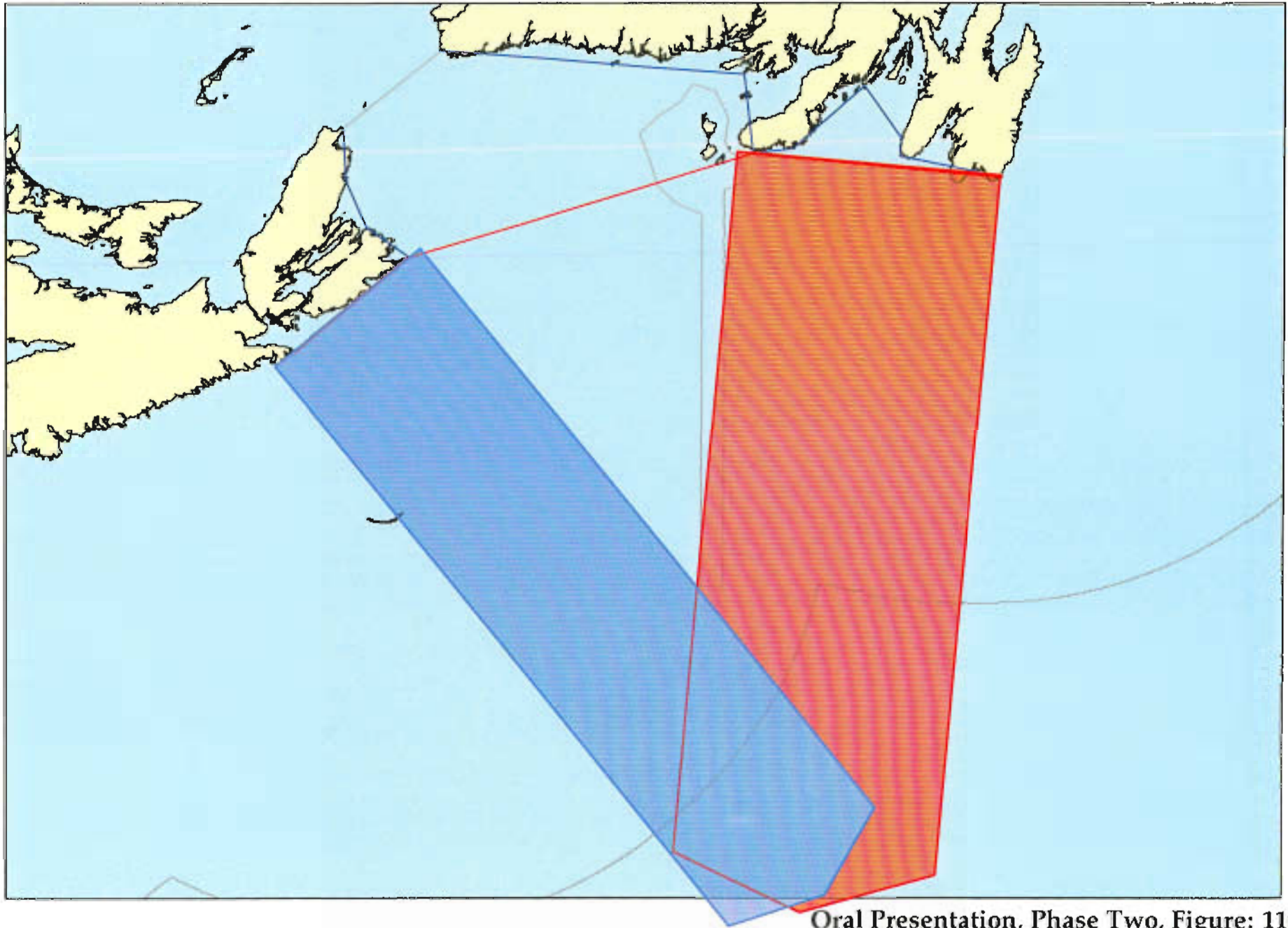
The Relevant Coasts



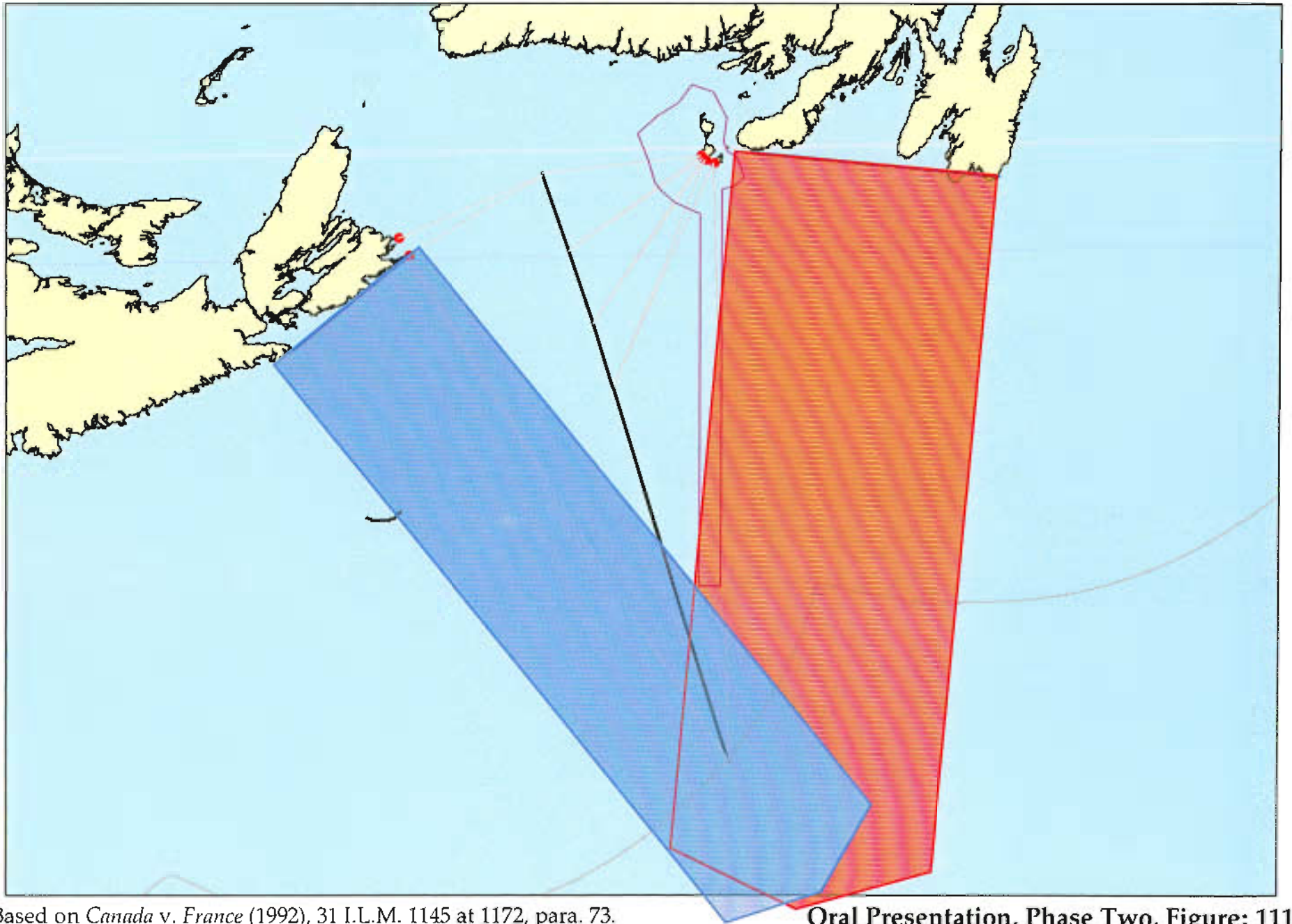
Based on Figure 3, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 109

Convergence and Overlap of Outer Coasts



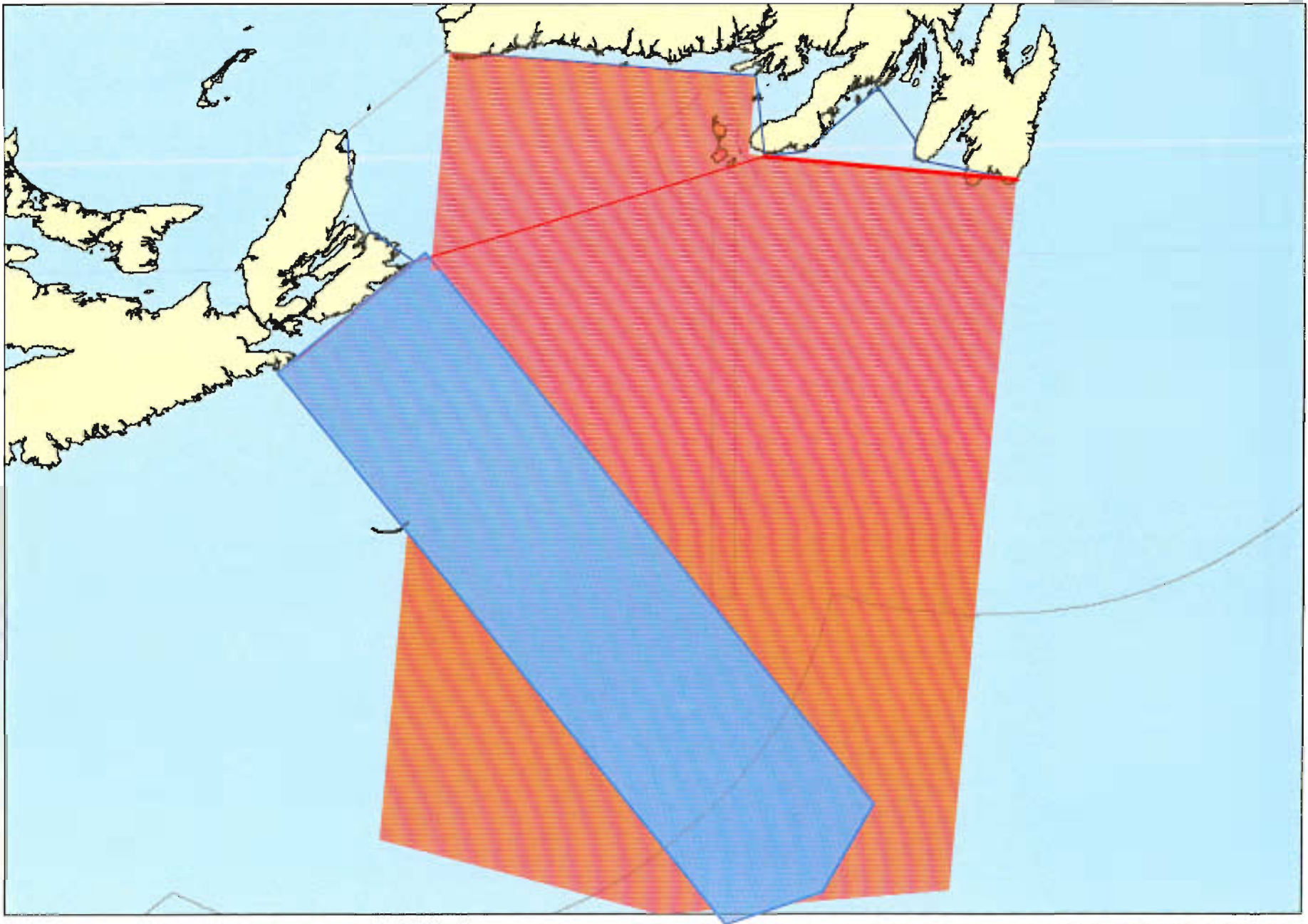
Application of Para. 73 From *Canada France*



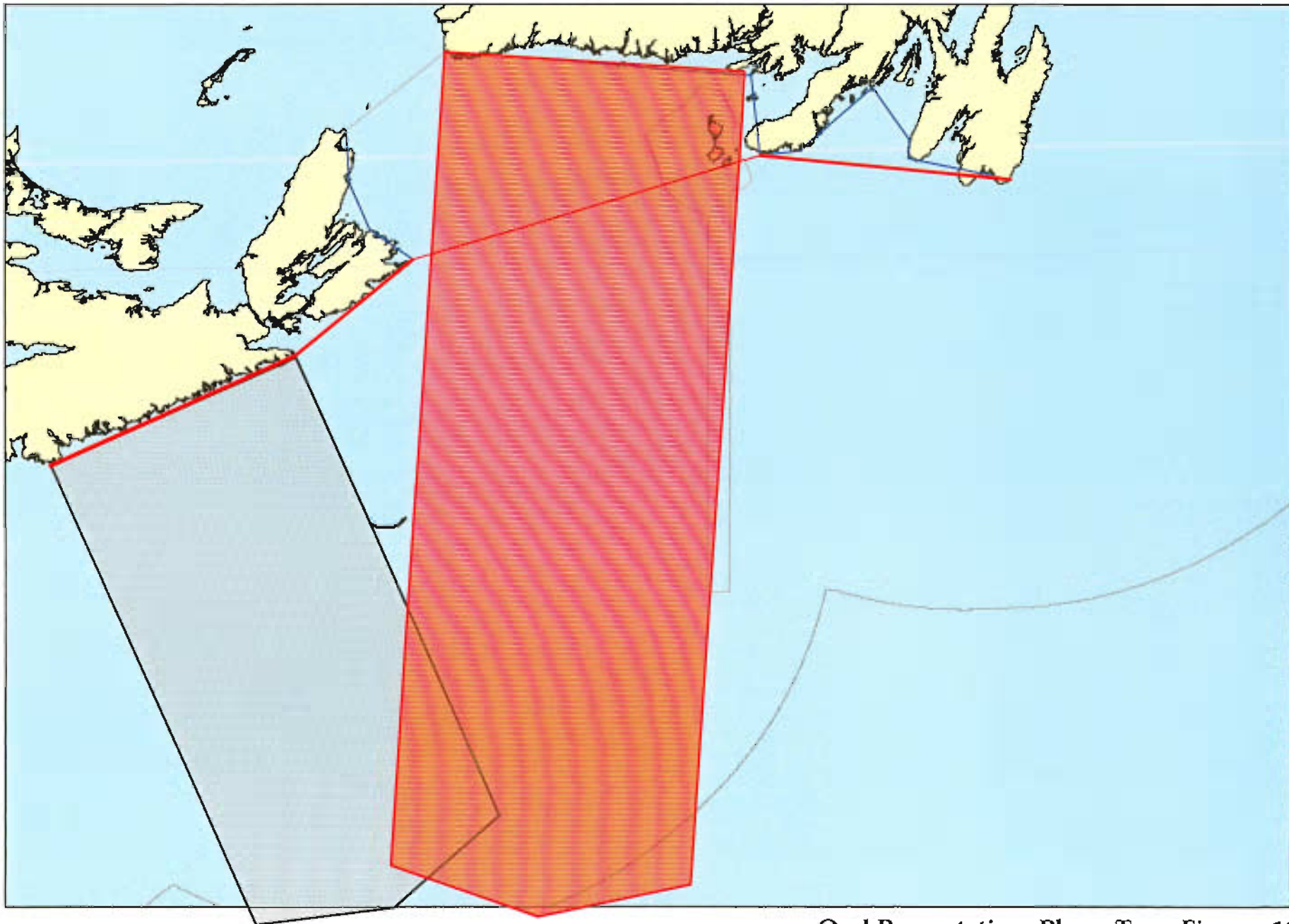
Based on *Canada v. France* (1992), 31 I.L.M. 1145 at 1172, para. 73.

Oral Presentation, Phase Two, Figure: 111

Convergence and Overlap of South Facing Coasts

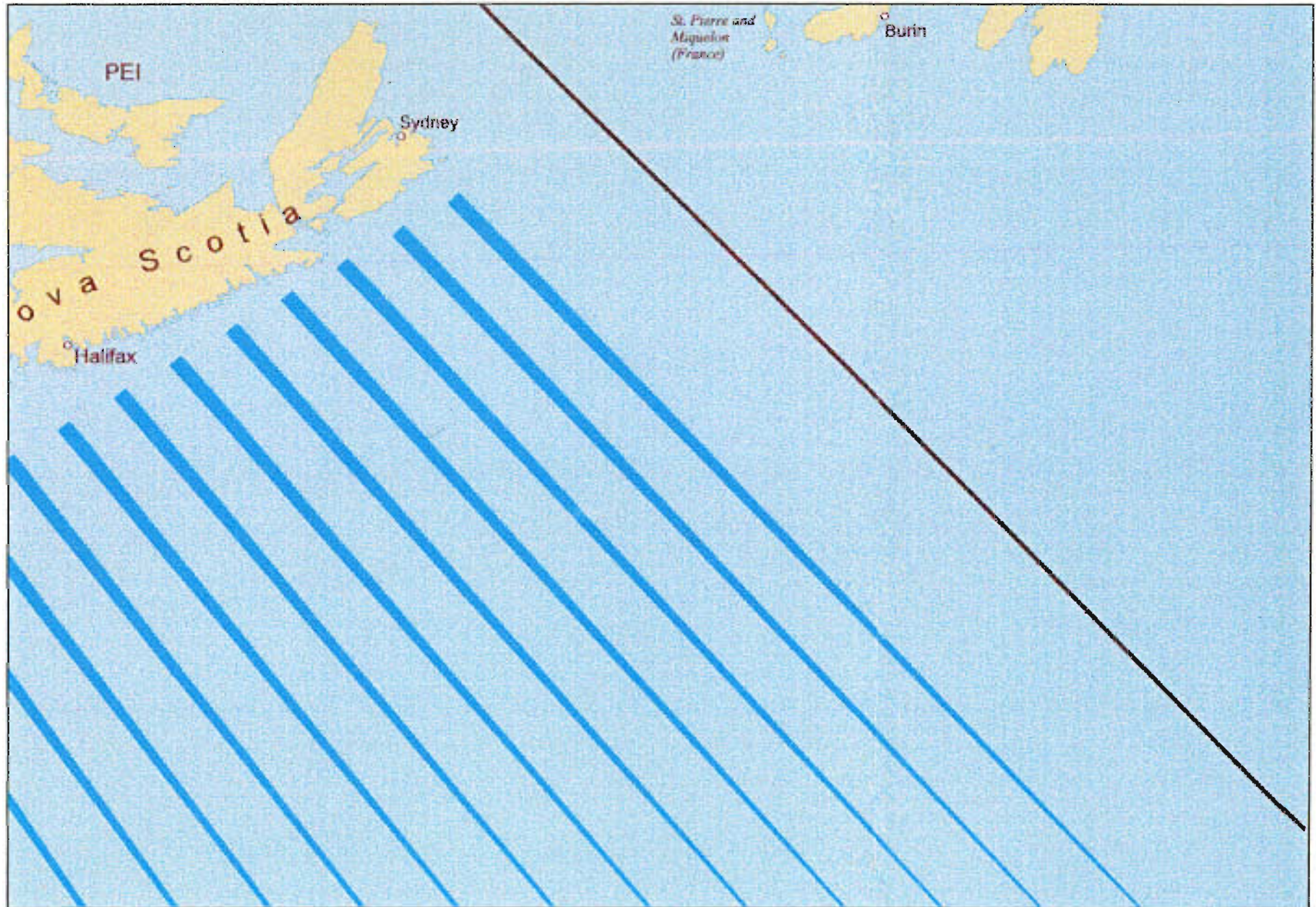


Convergence and Overlap of NS Coasts Beyond Cape Canso is Insignificant



Oral Presentation, Phase Two, Figure: 113

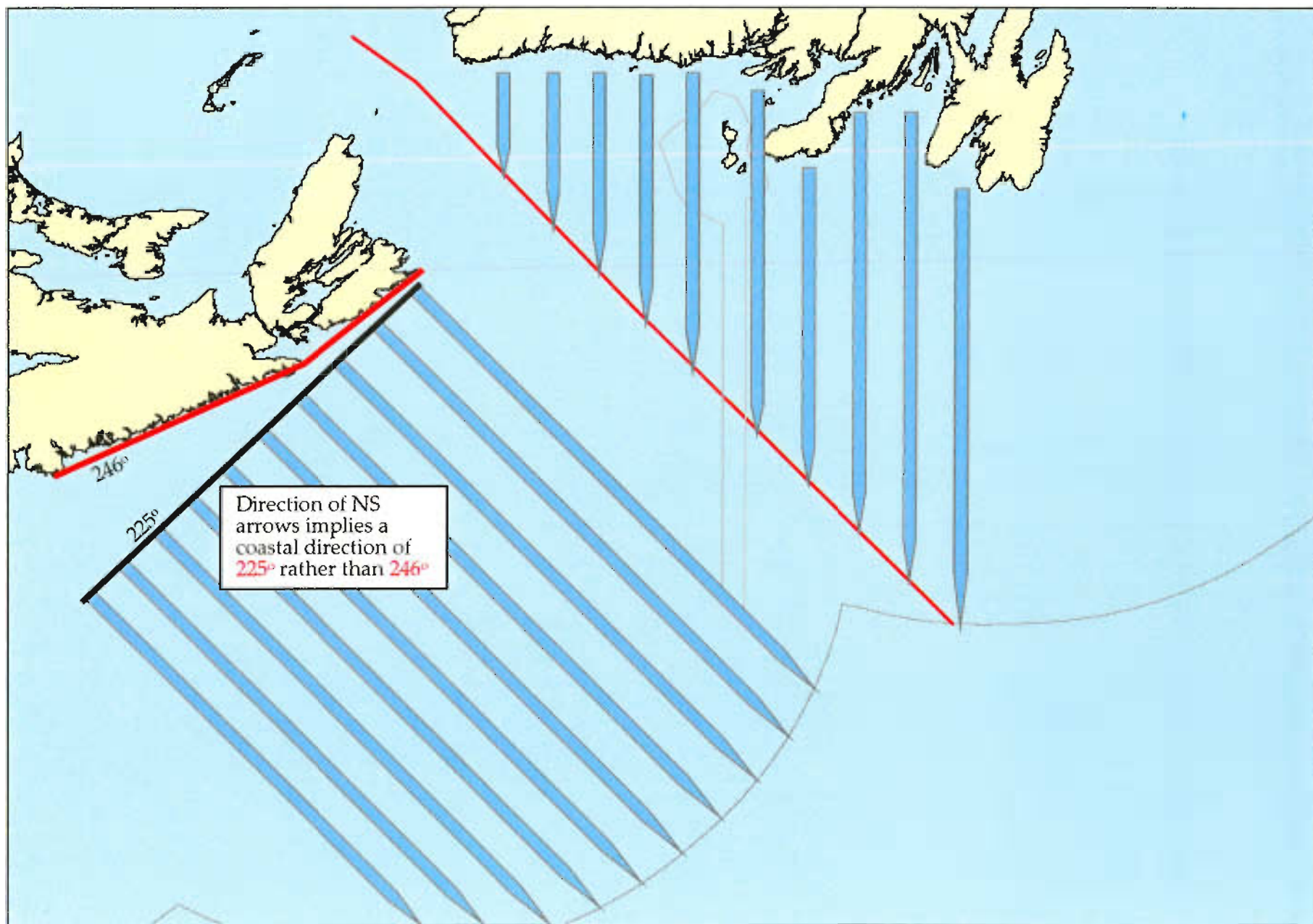
Depiction of NS Coastal Projection Aligned to 135° Line



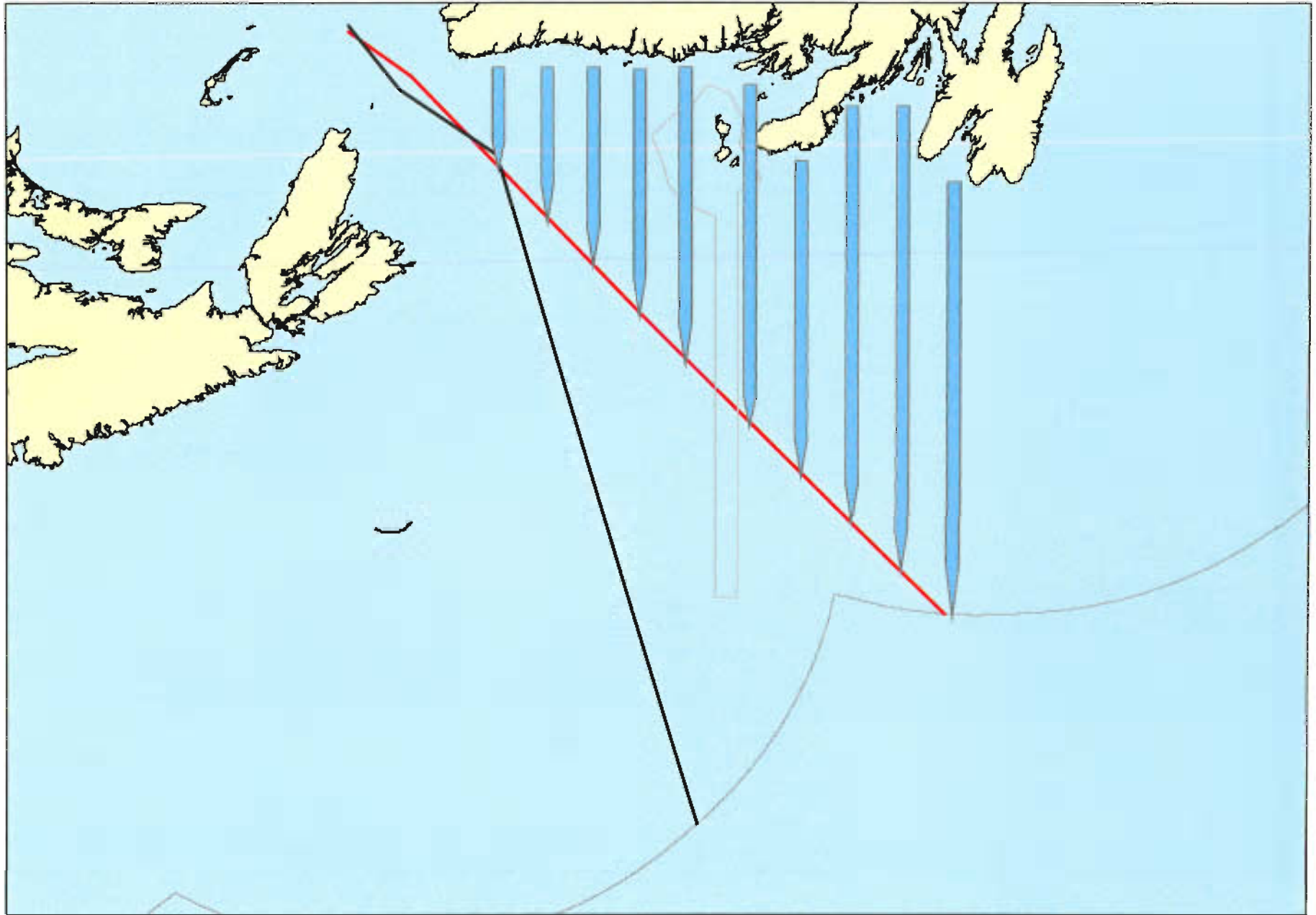
Based on Figure 42, NS Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 114

Distortion of the Nova Scotia Coastal Direction

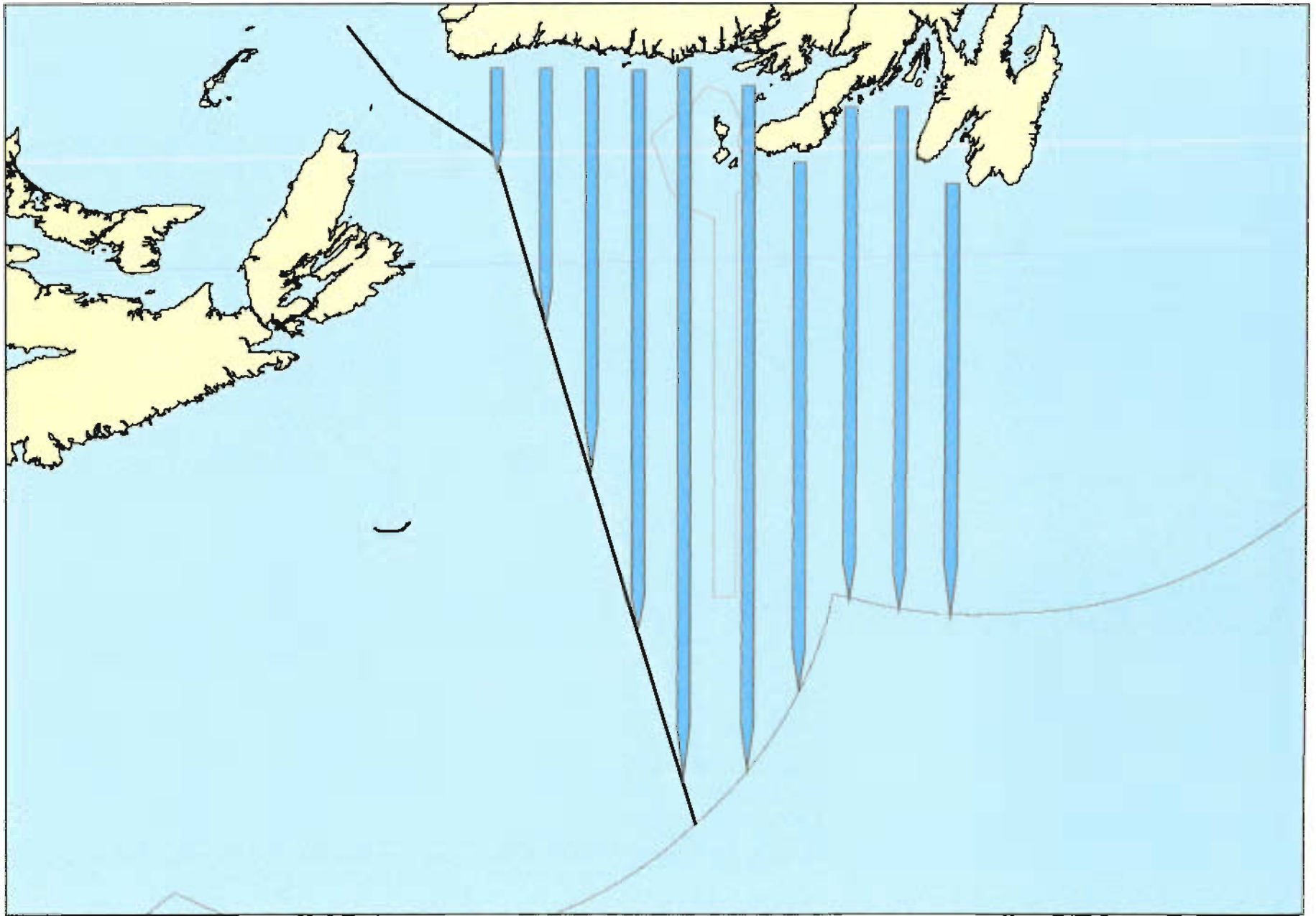


NS Line Completely Blocks the Coastal Projection of the South Coast of Newfoundland

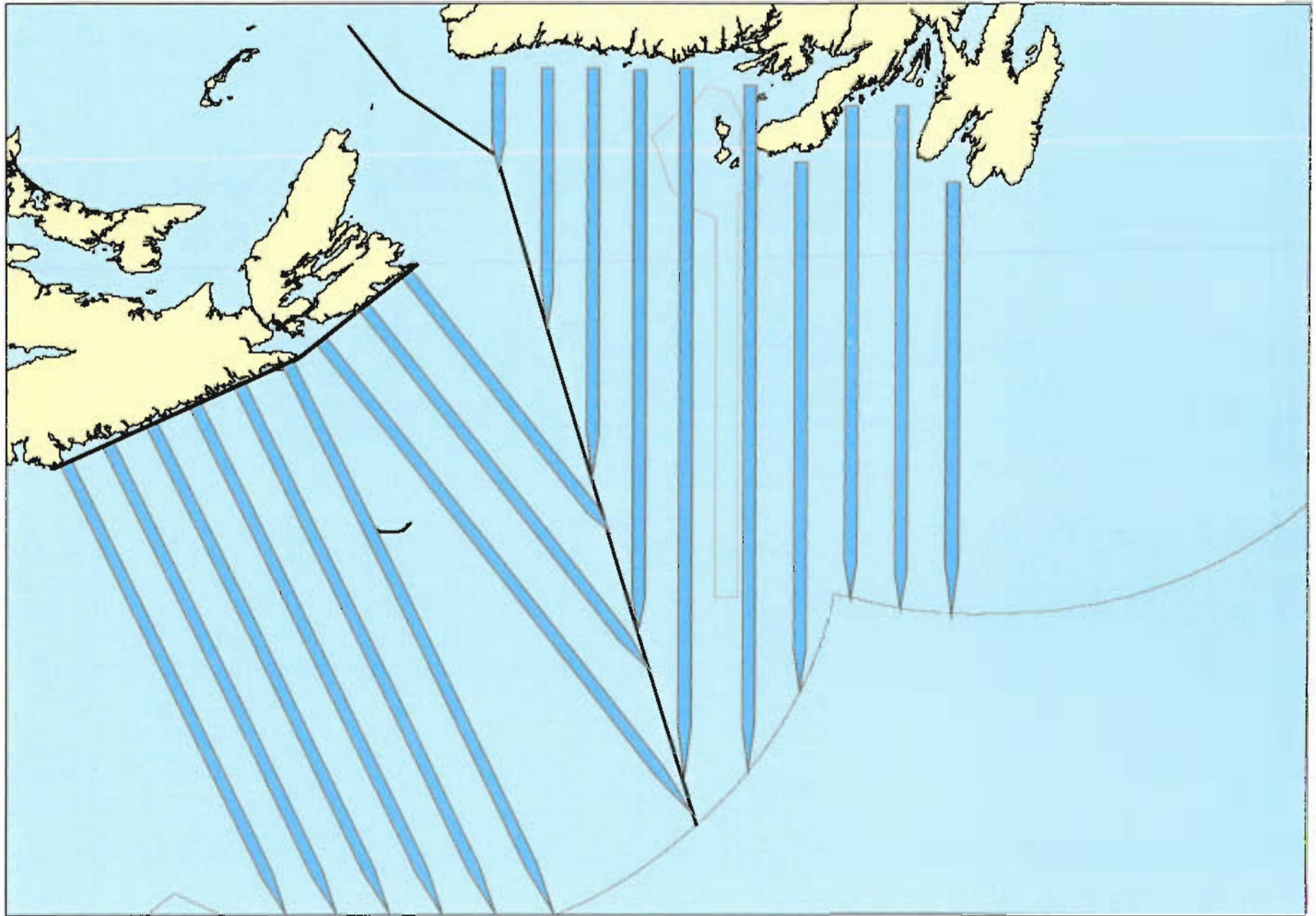


Oral Presentation, Phase Two, Figure: 116

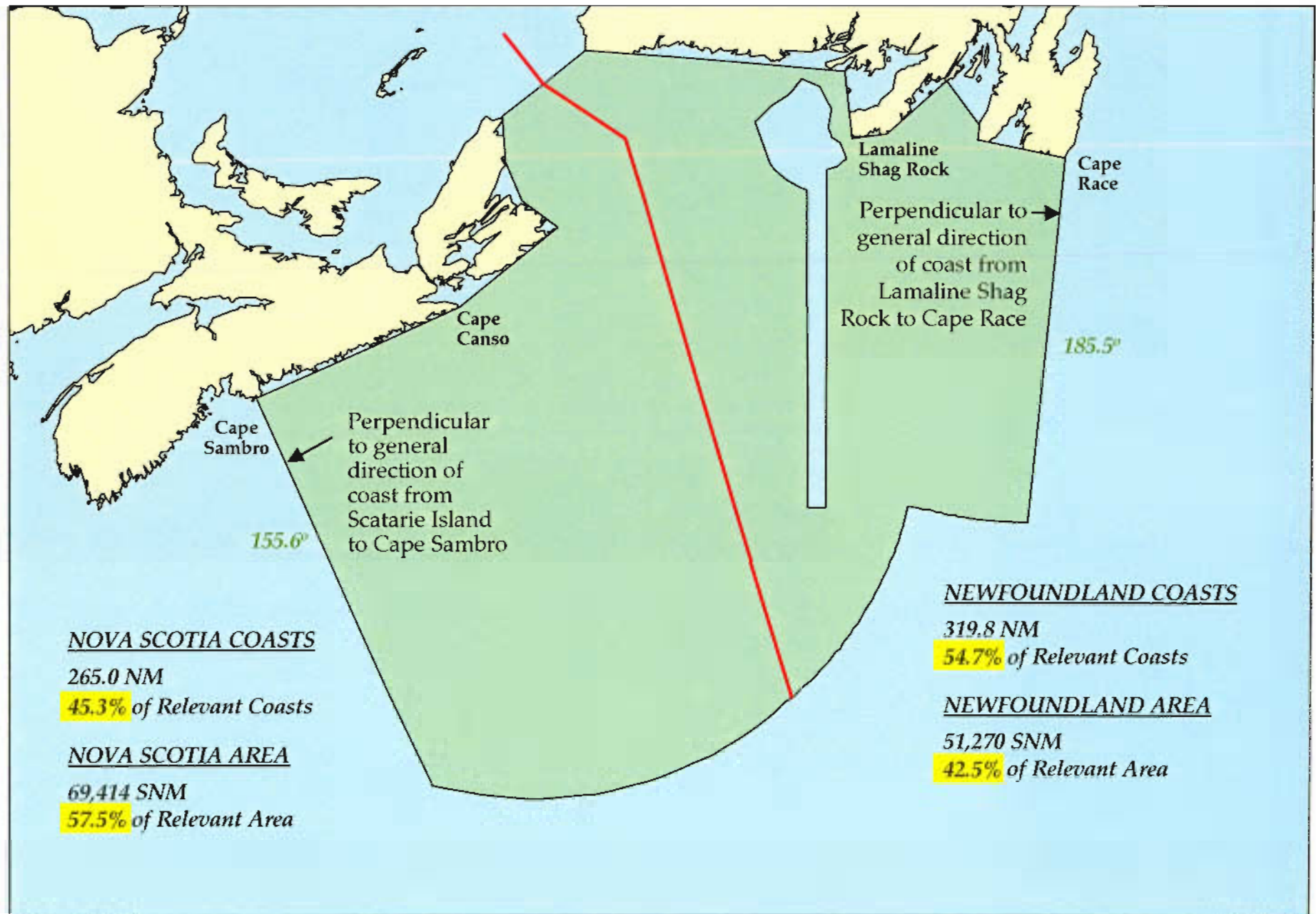
N&L Line Reduces the Cut-Off of the Newfoundland Coast



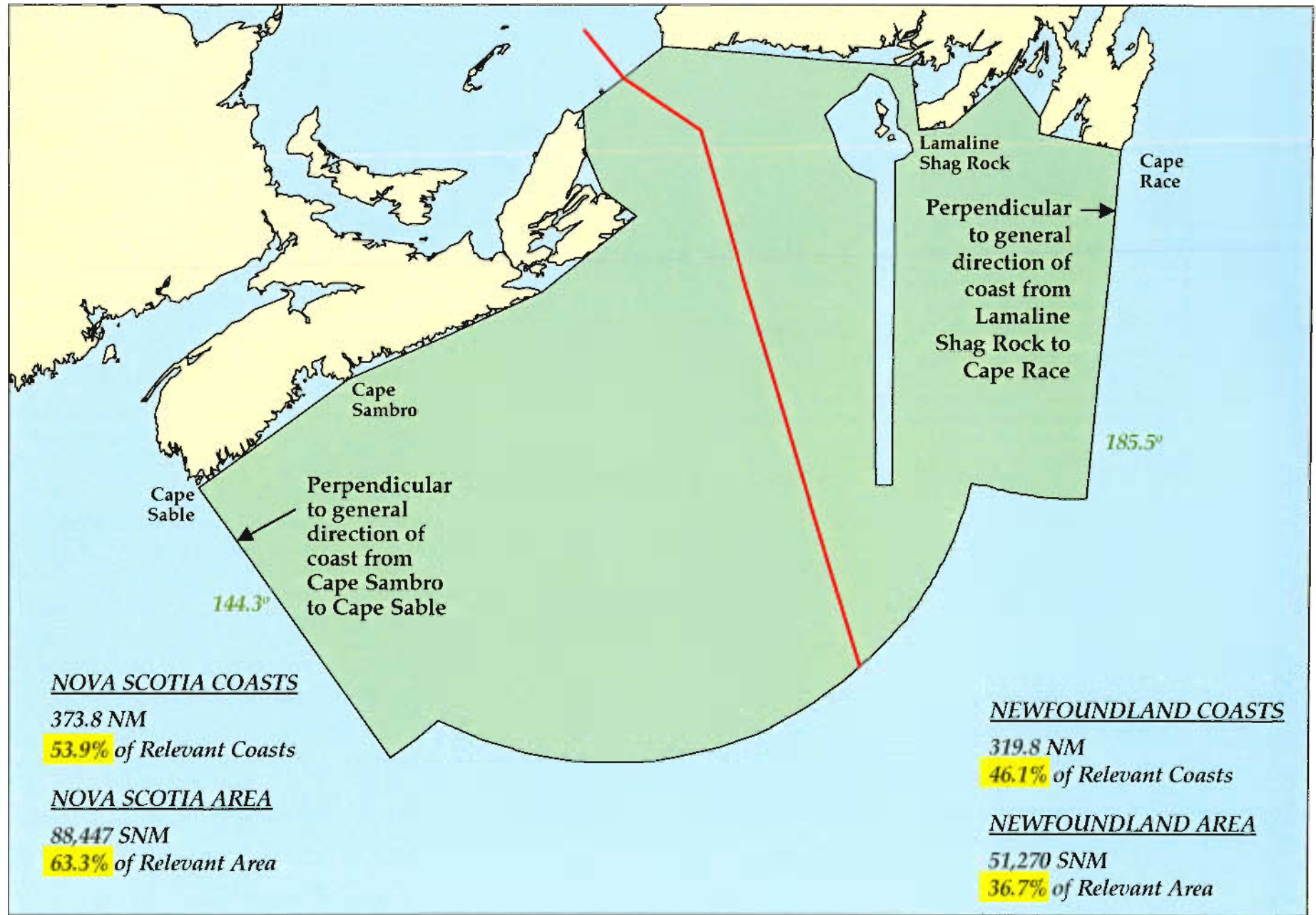
N&L Line Shares the Cutoff Between the Parties



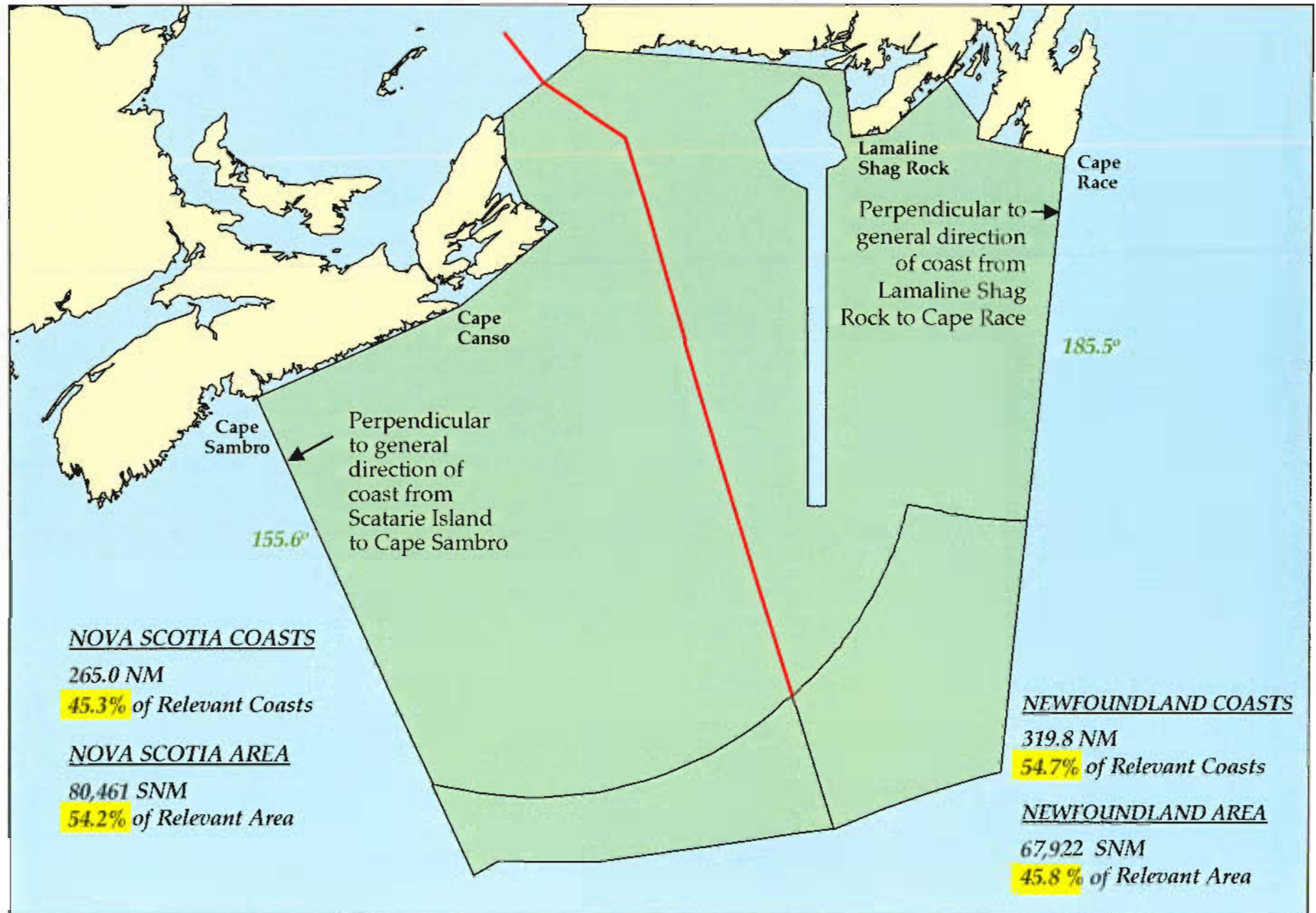
Equity of Result - Proportionality Test Using NS Coasts to Cape Sambre



Equity of Result - Proportionality Test Using NS Coasts to Cape Sable

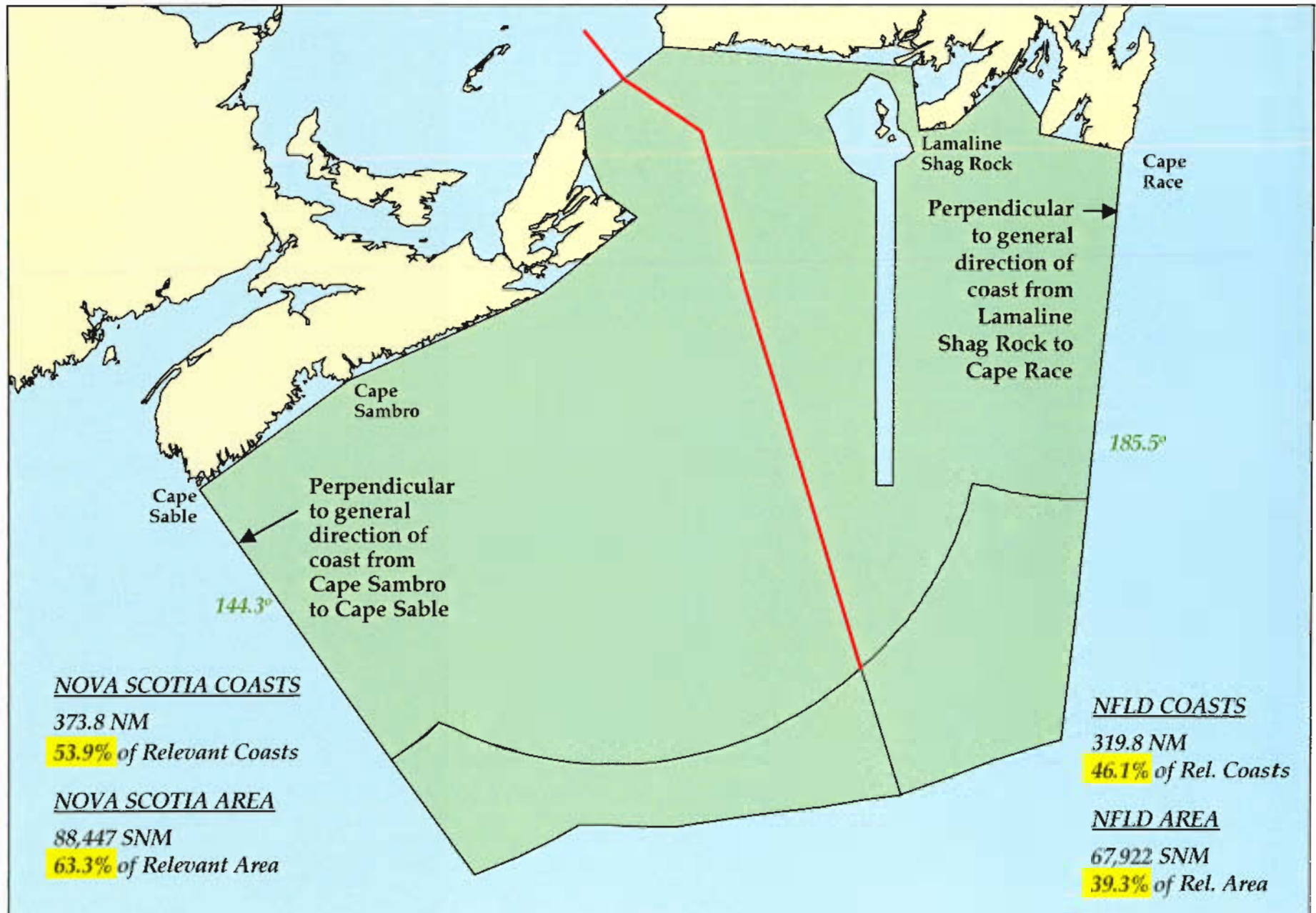


Equity of Result - Proportionality Test Using NS Coasts to Cape Sambre

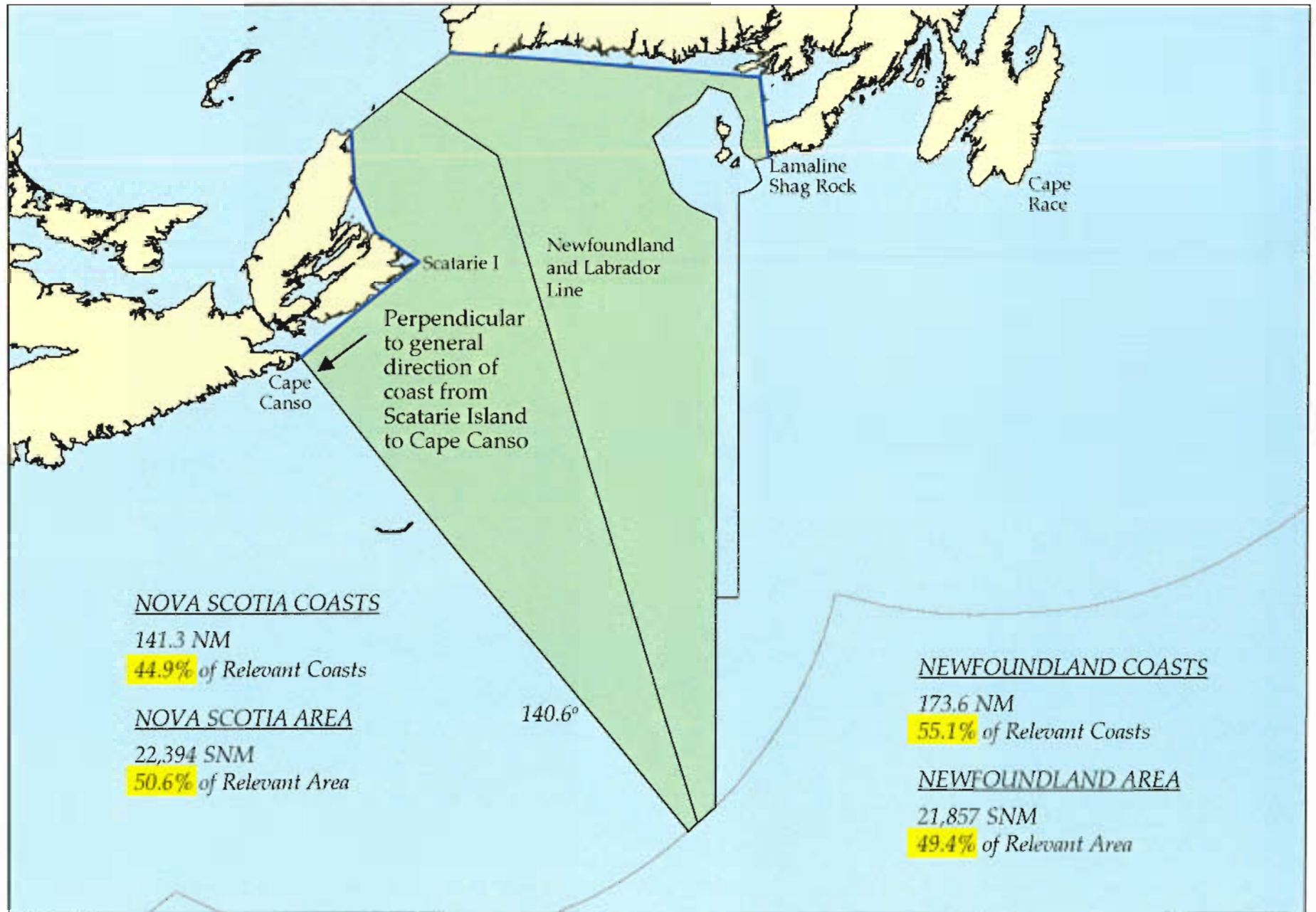


Oral Presentation, Phase Two, Figure: 121

Equity of Result - Proportionality Test Using NS Coasts to Cape Sable

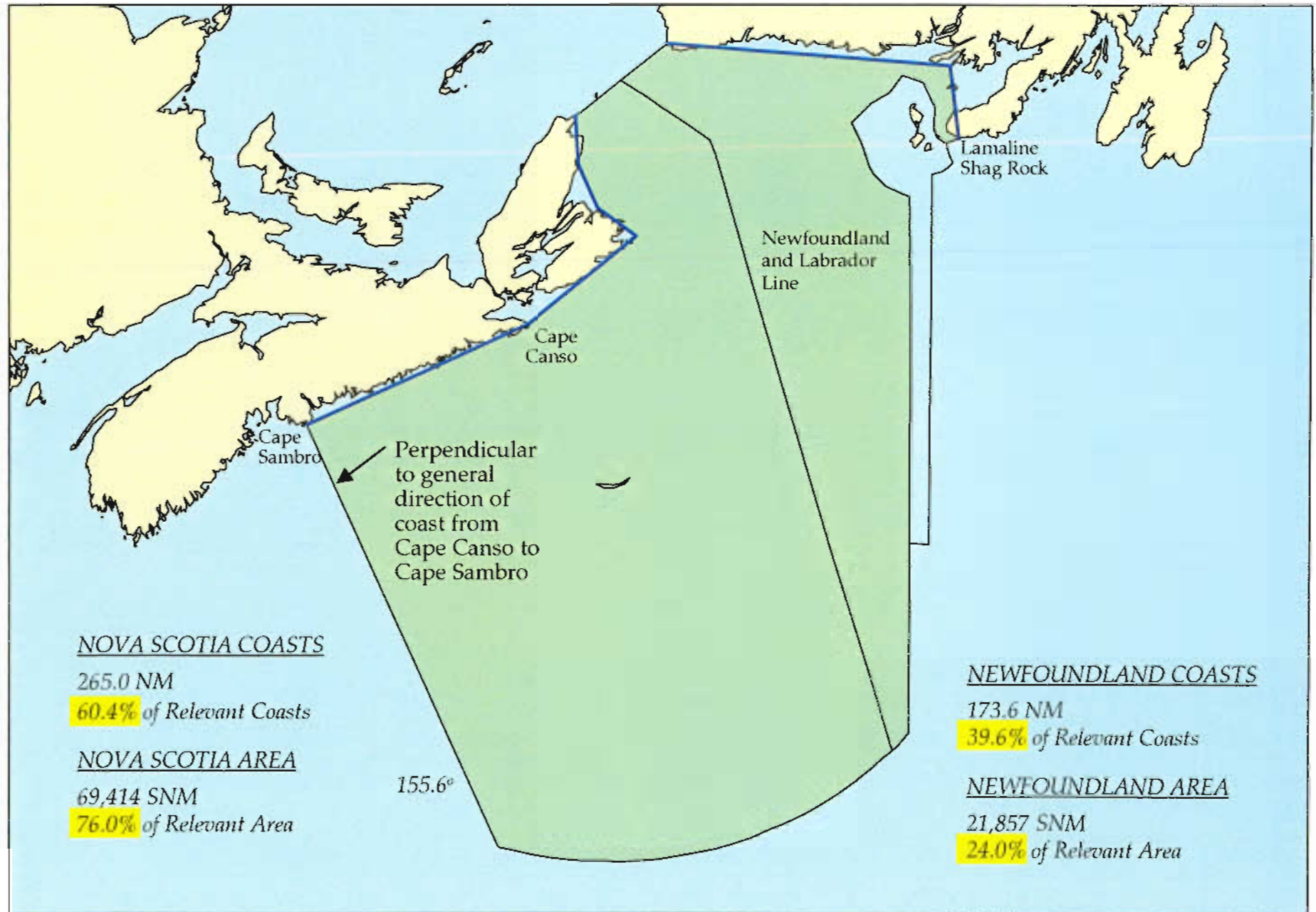


Equity of Result - Proportionality Test Excluding Coasts East of Lamaline Shag Rock



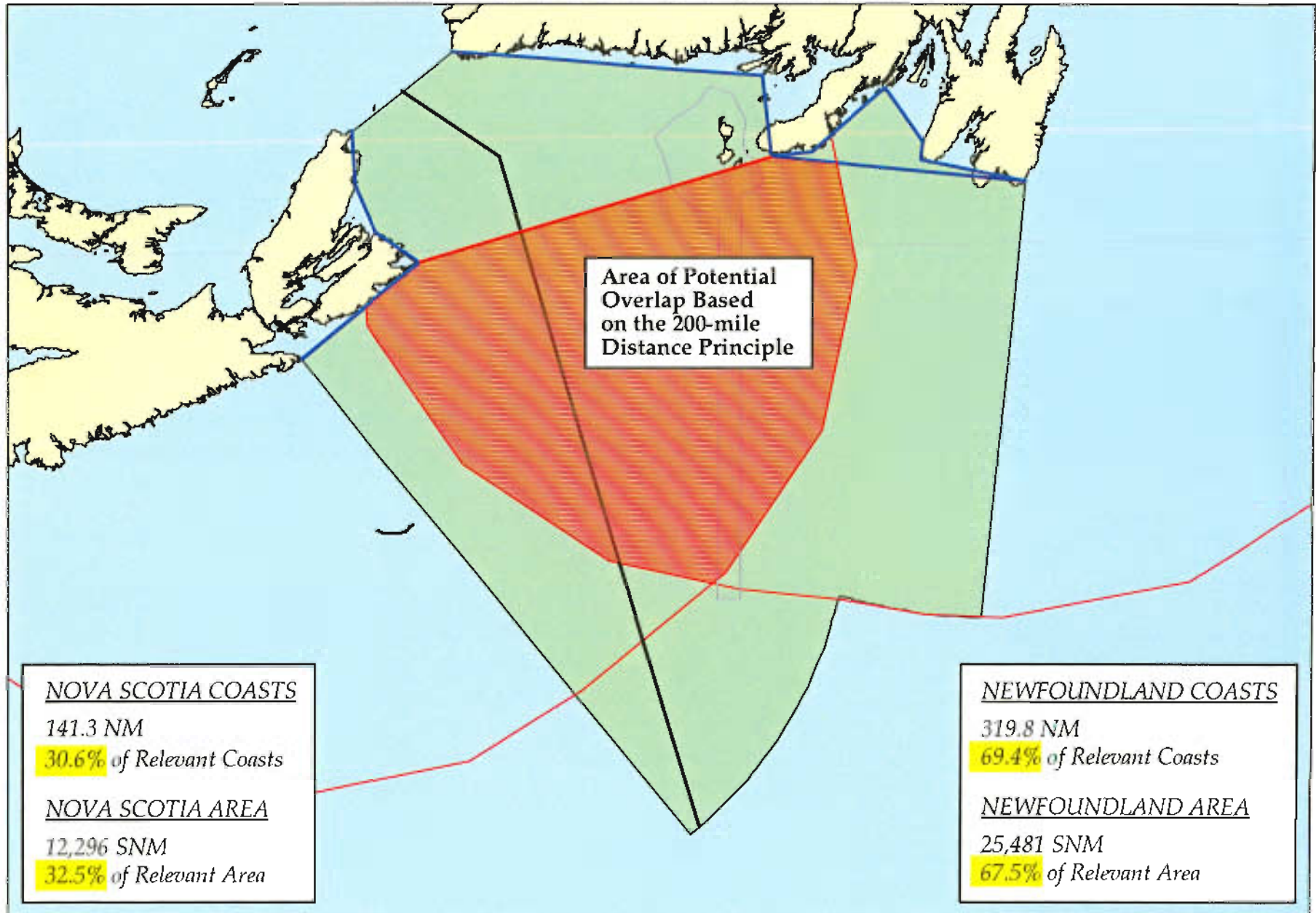
Oral Presentation, Phase Two, Figure: 123

Equity of Result - Proportionality Test Excluding Coasts East of Lamaline Shag Rock

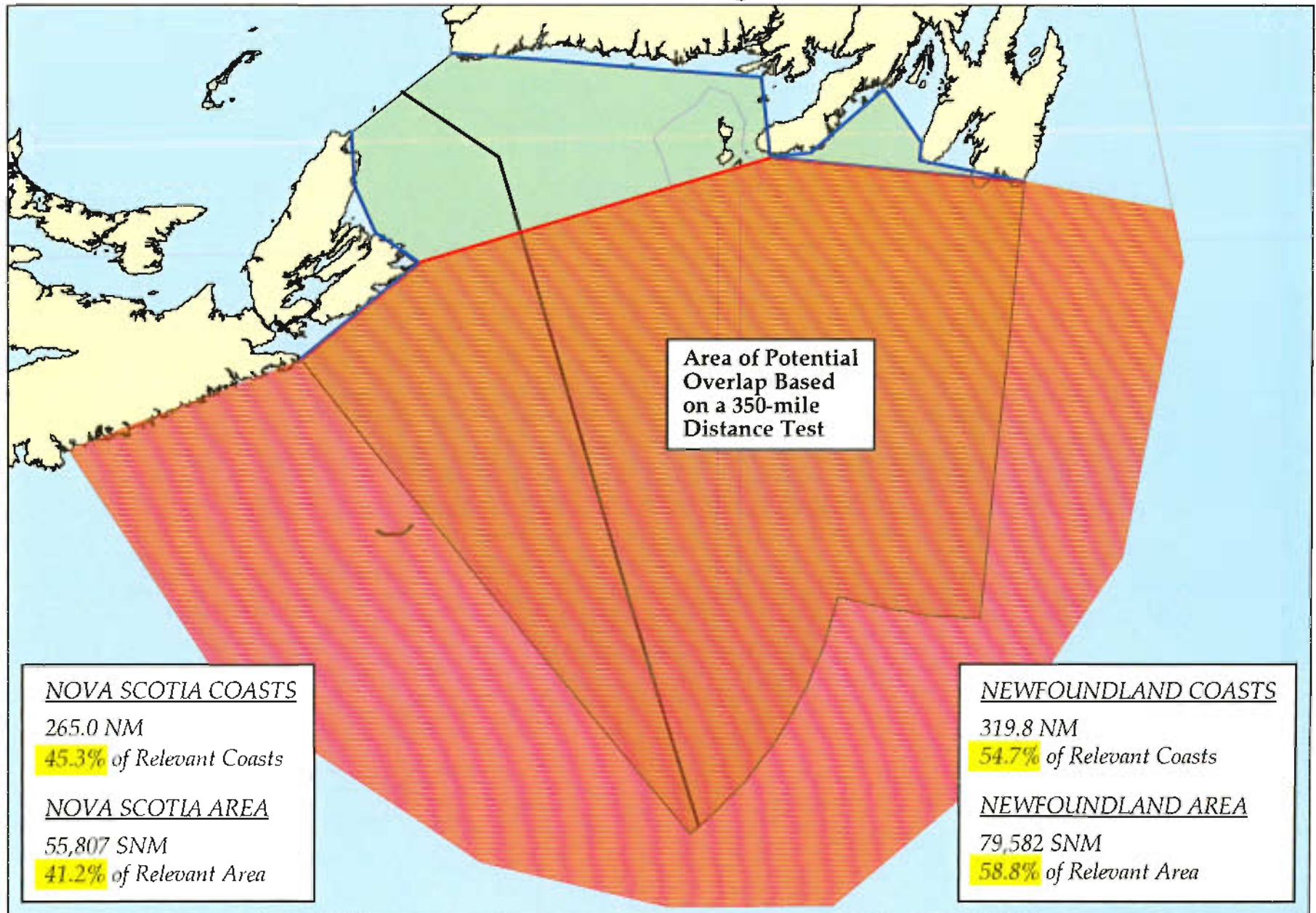


Oral Presentation, Phase Two, Figure: 124

Proportionality Using the Area of Overlap Defined by 200 NM Arcs
From the Coasts Controlling the Outer Area



Proportionality Using the Area of Overlap Defined by 350 NM Arcs
From the Coasts Controlling the Outer Area



Equity of the Result - Proportionality Test

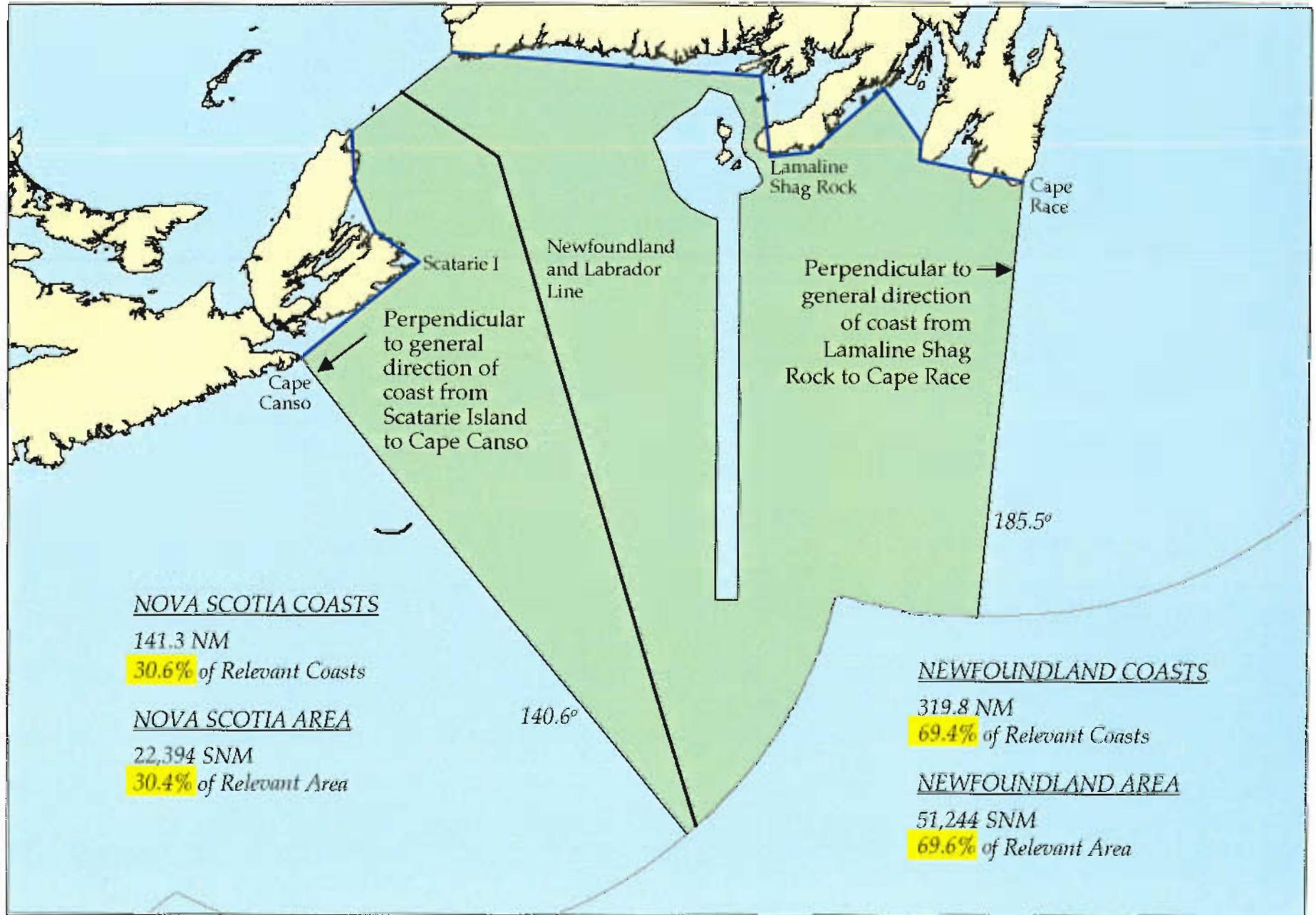
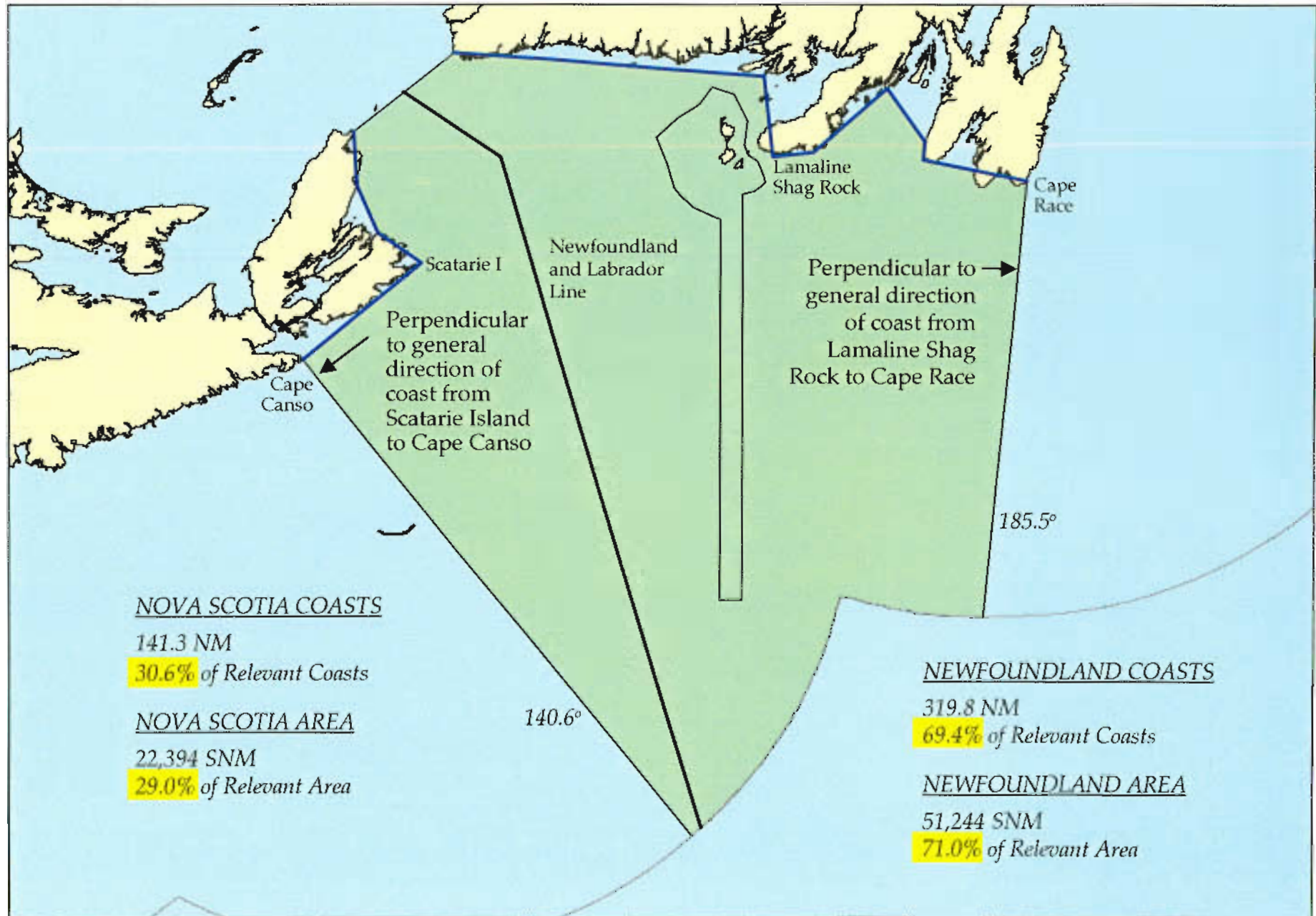


Figure 24, N&L Memorial, Phase Two.

Equity of the Result - Proportionality Test Including French Zone



The First Segment - A Bisector in the Area of Cabot Strait

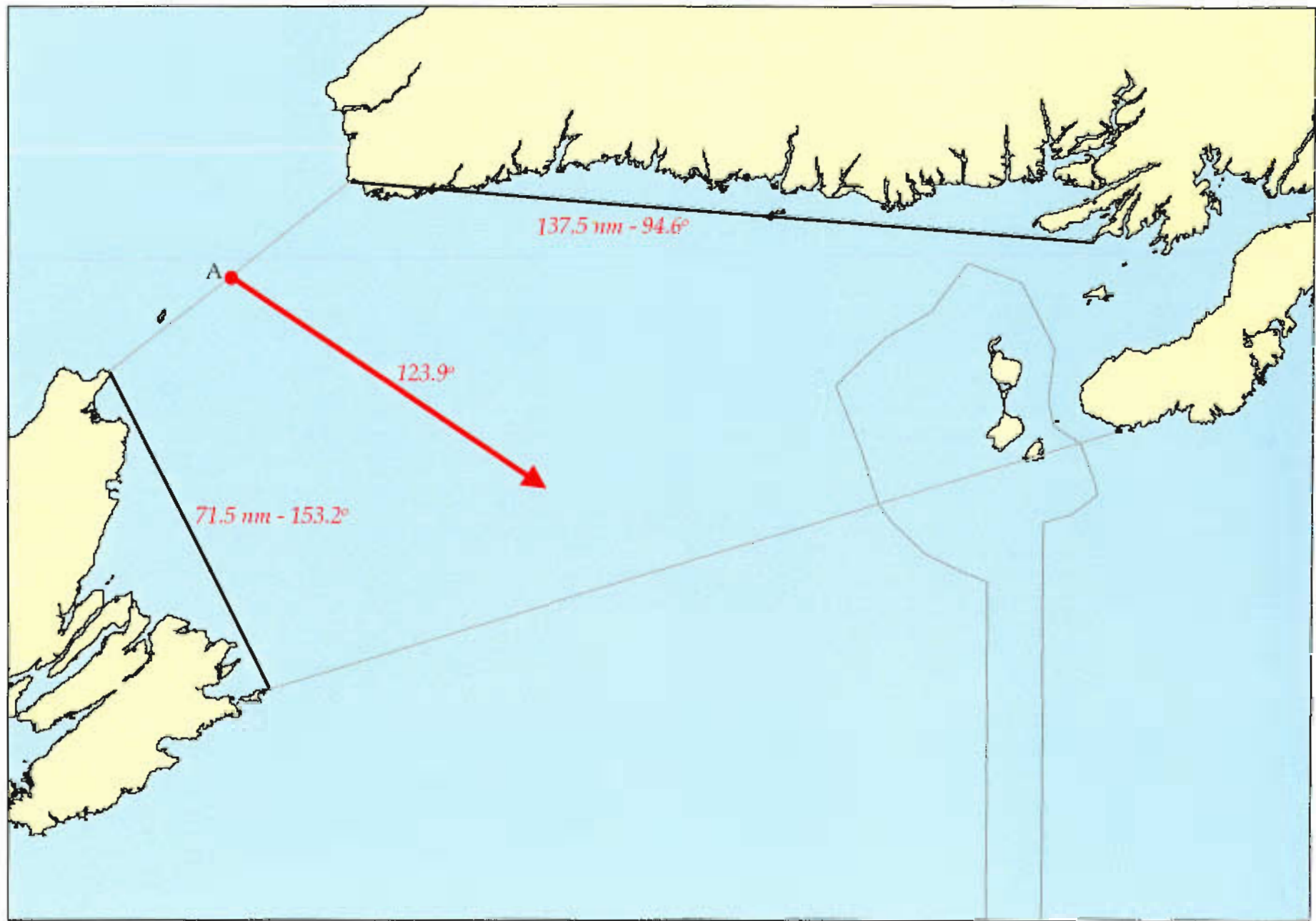
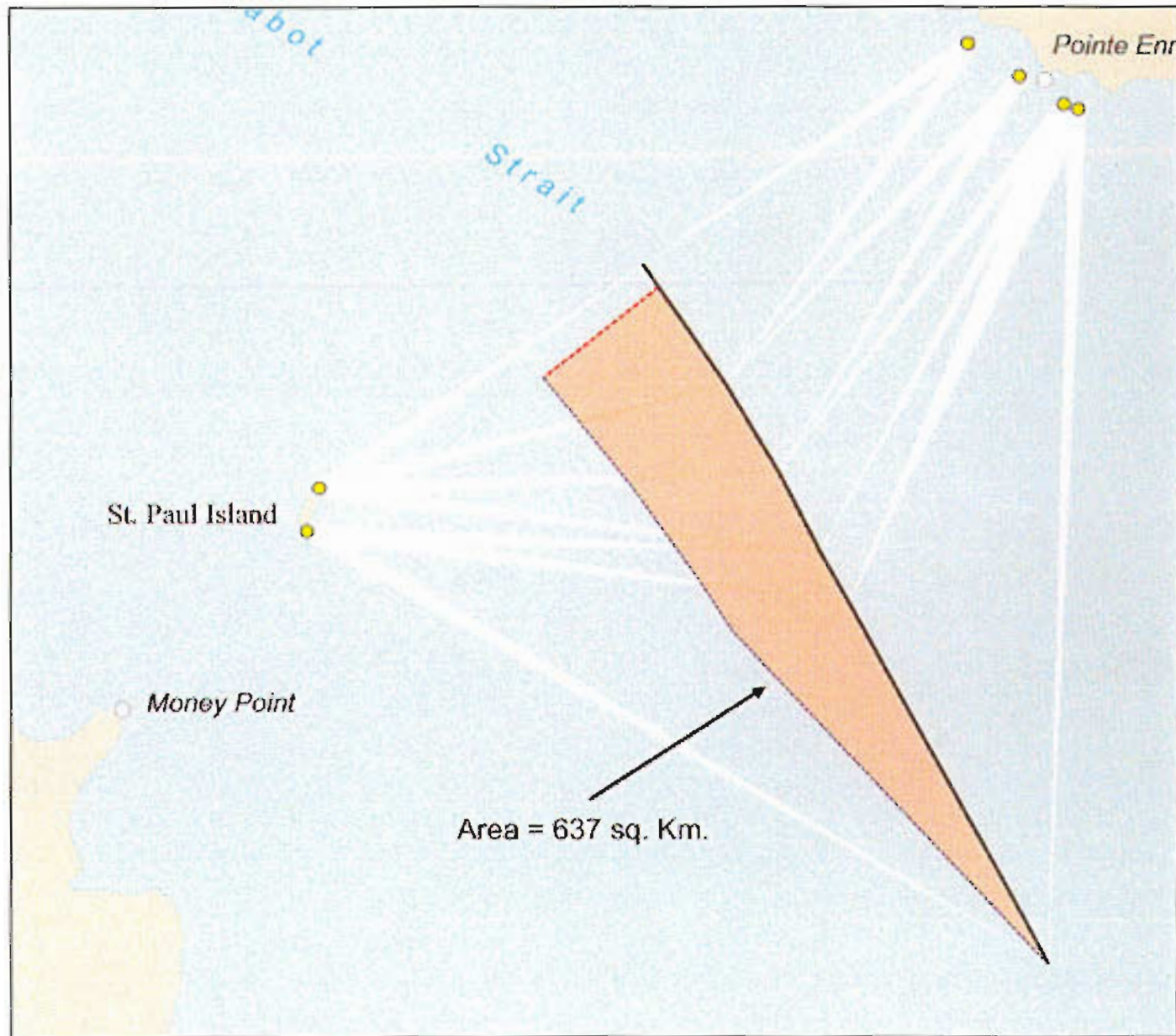
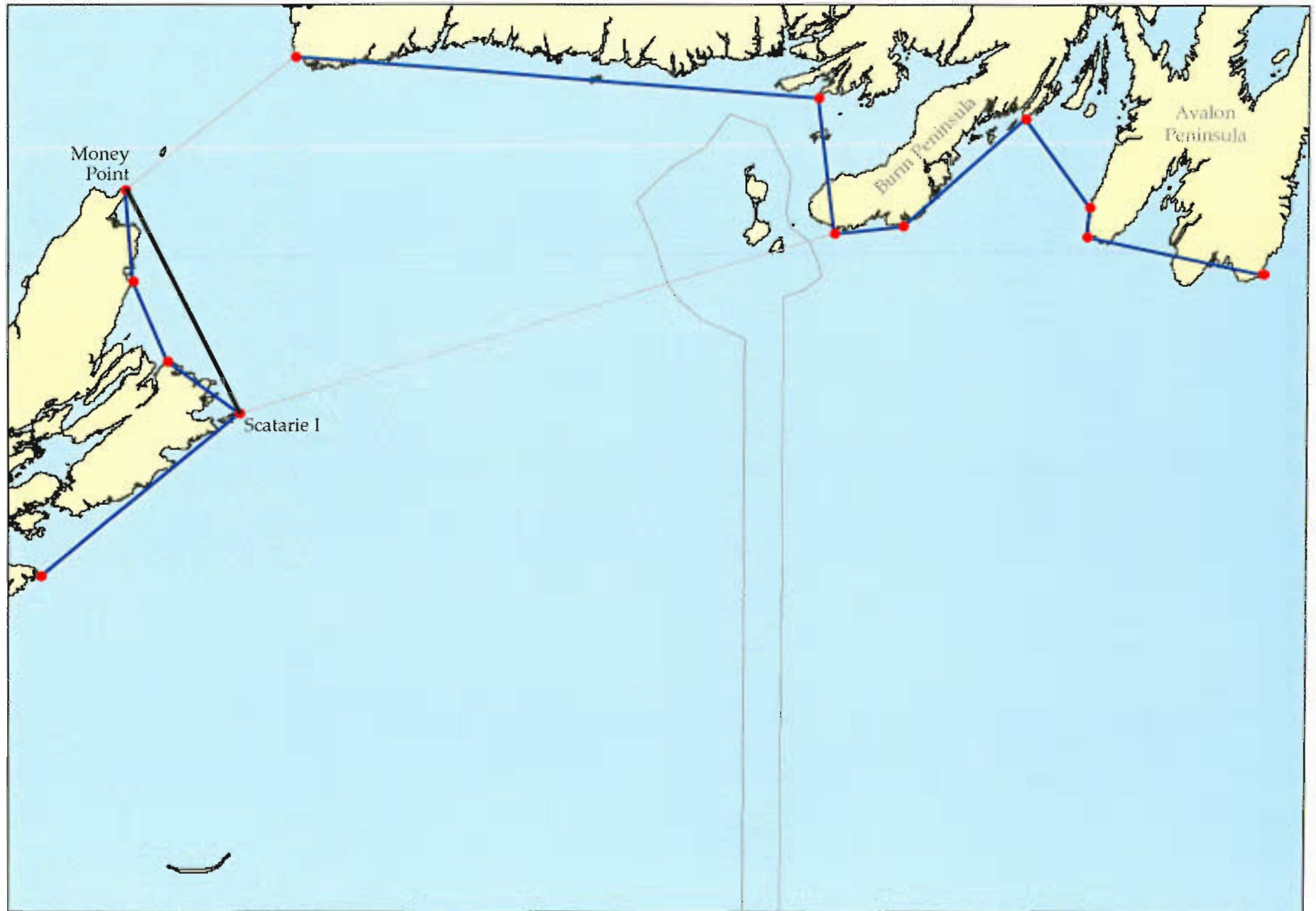


Figure 68 of the Nova Scotia Counter Memorial



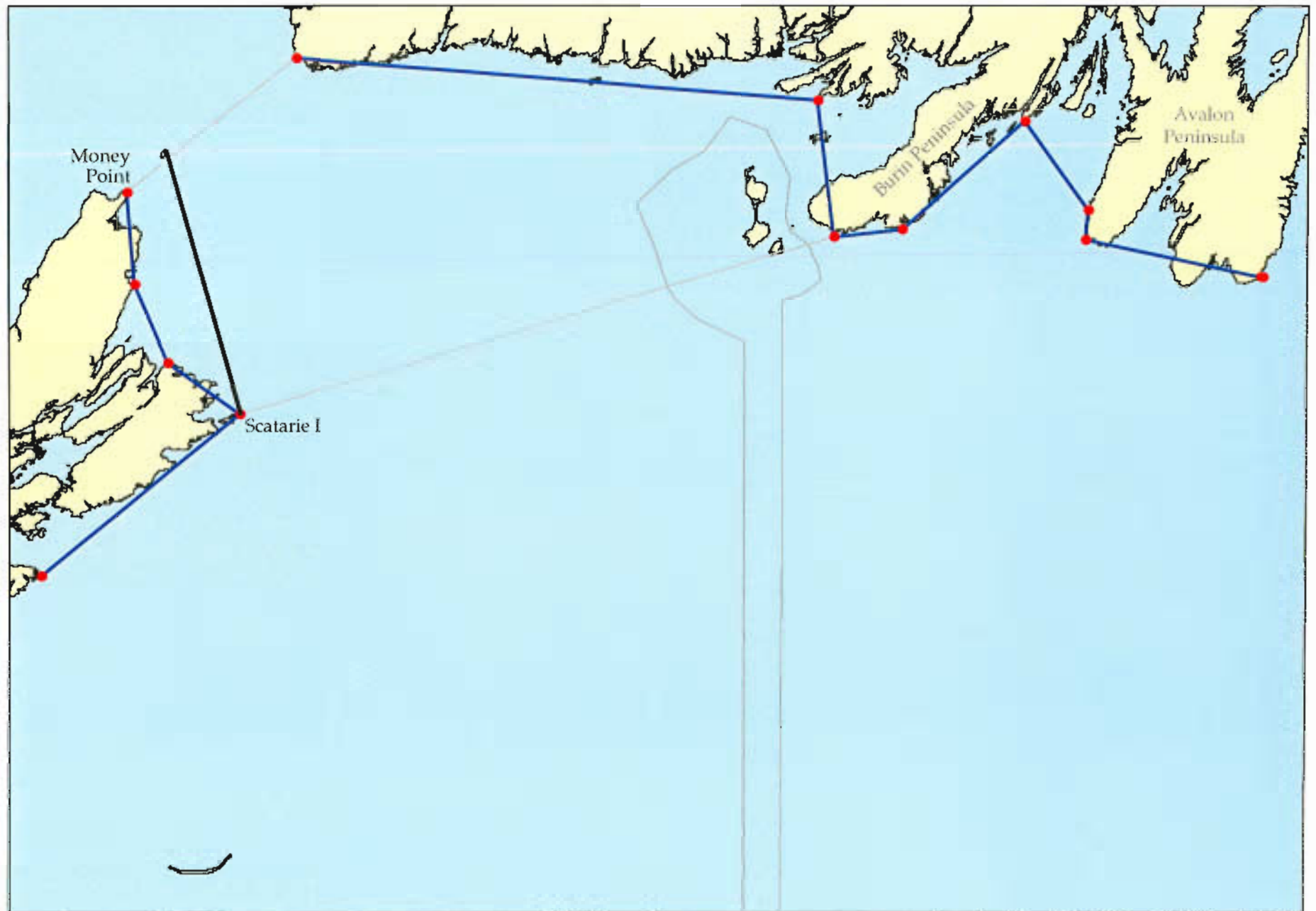
The Relevant Coasts



Based on Figure 3, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 131

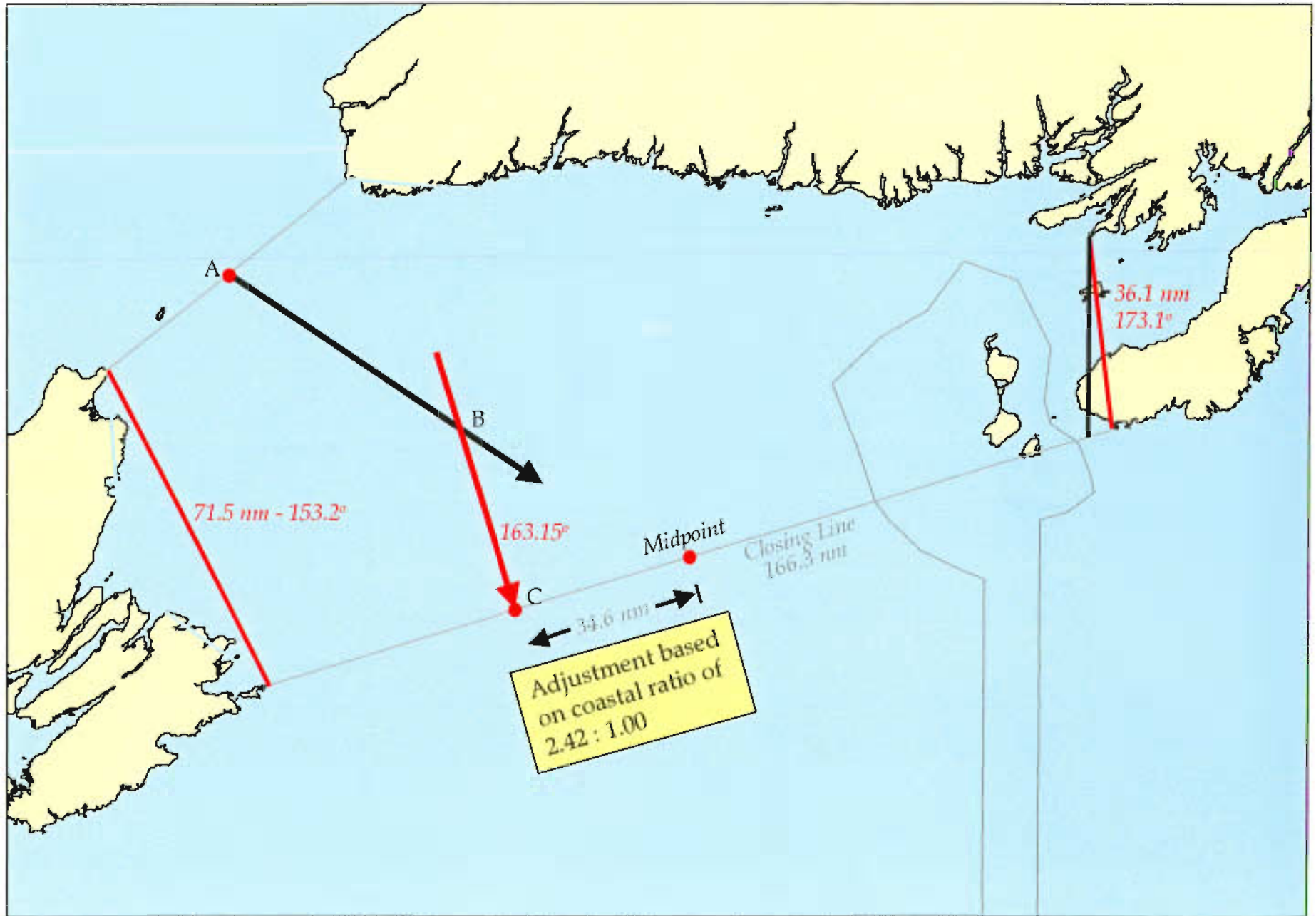
The Relevant Coasts



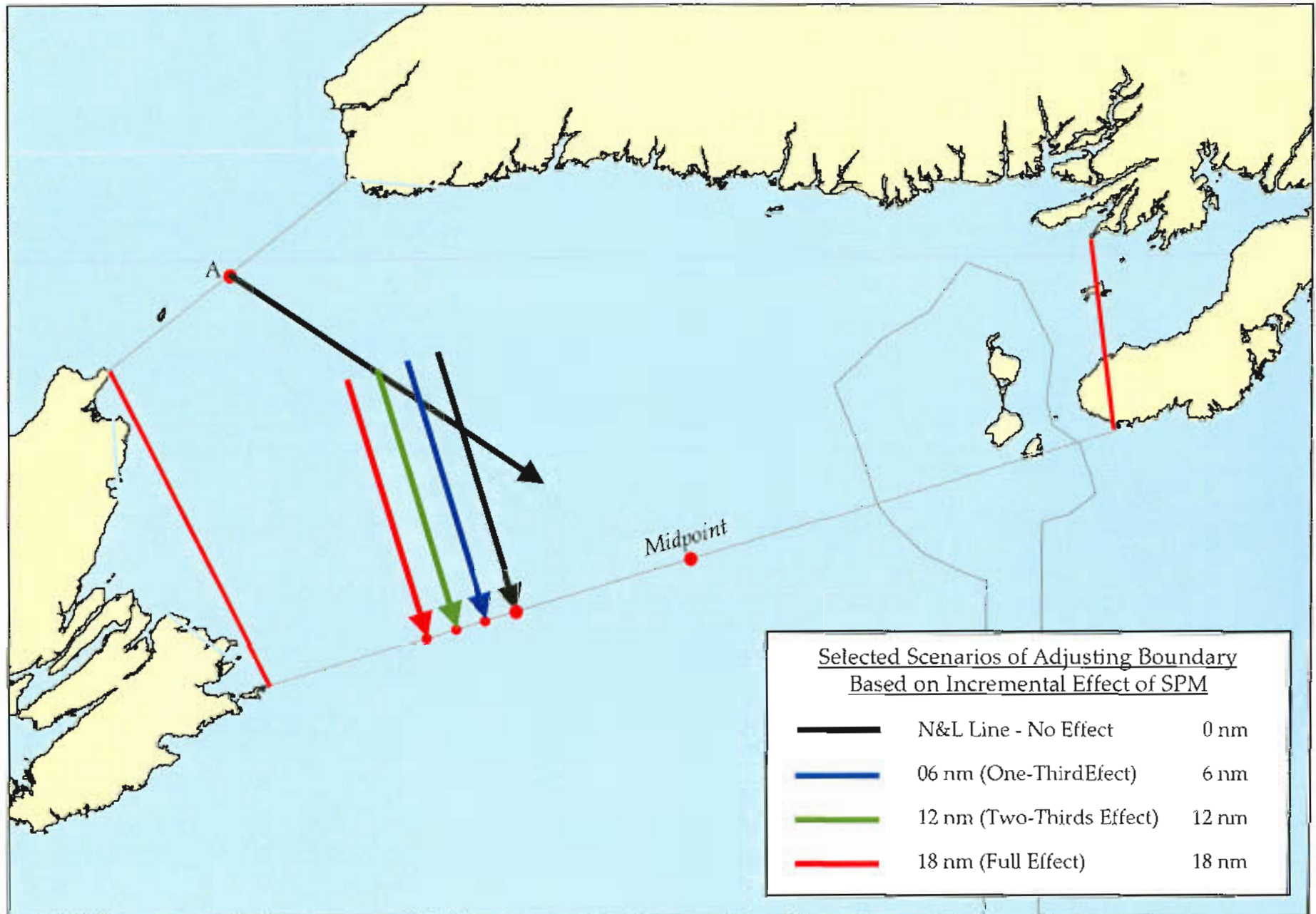
Based on Figure 3, N&L Memorial, Phase Two

Oral Presentation, Phase Two, Figure: 132

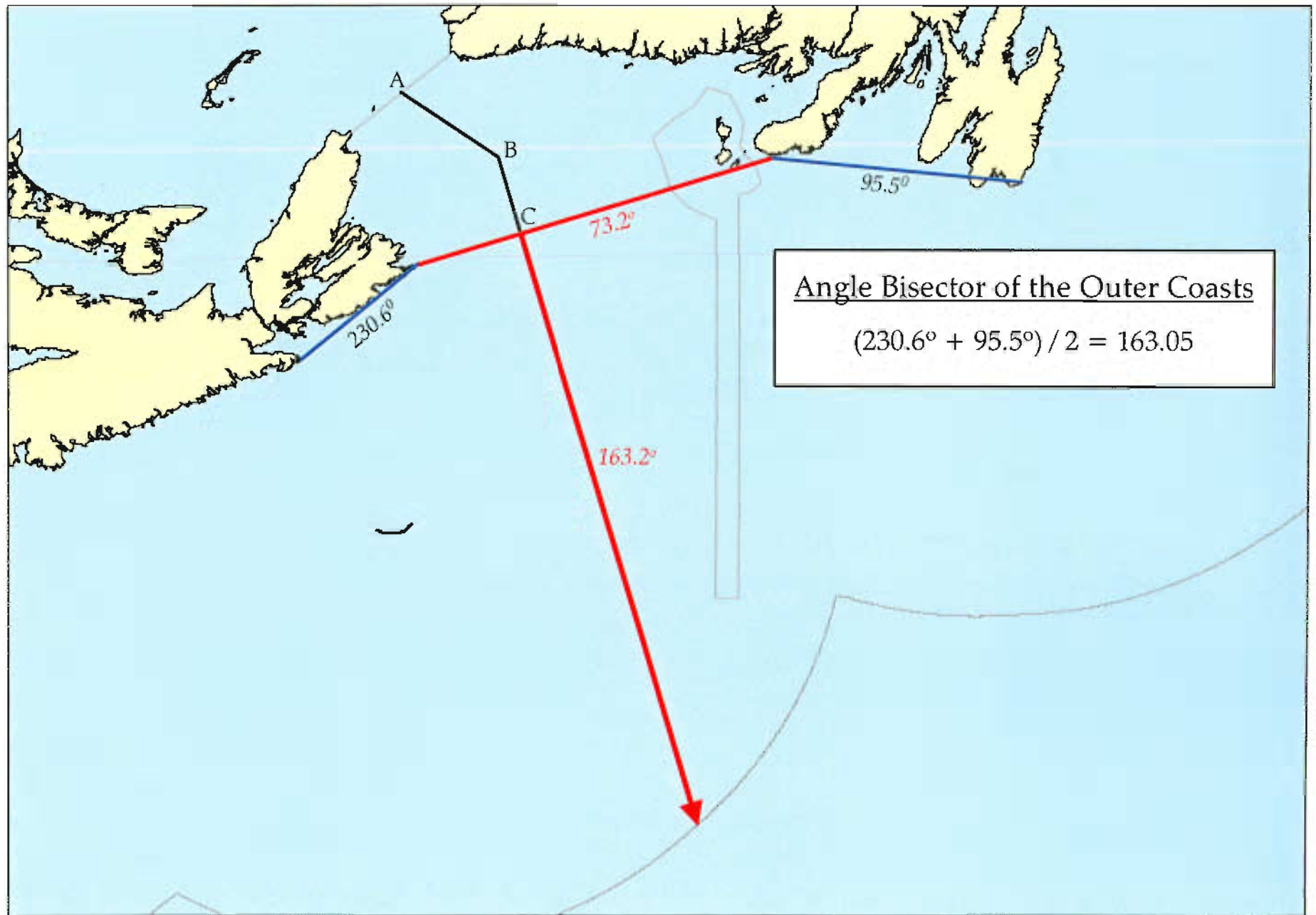
The Second Segment - An Adjusted Bisector Intersecting the Closing Line of the Inner Concavity



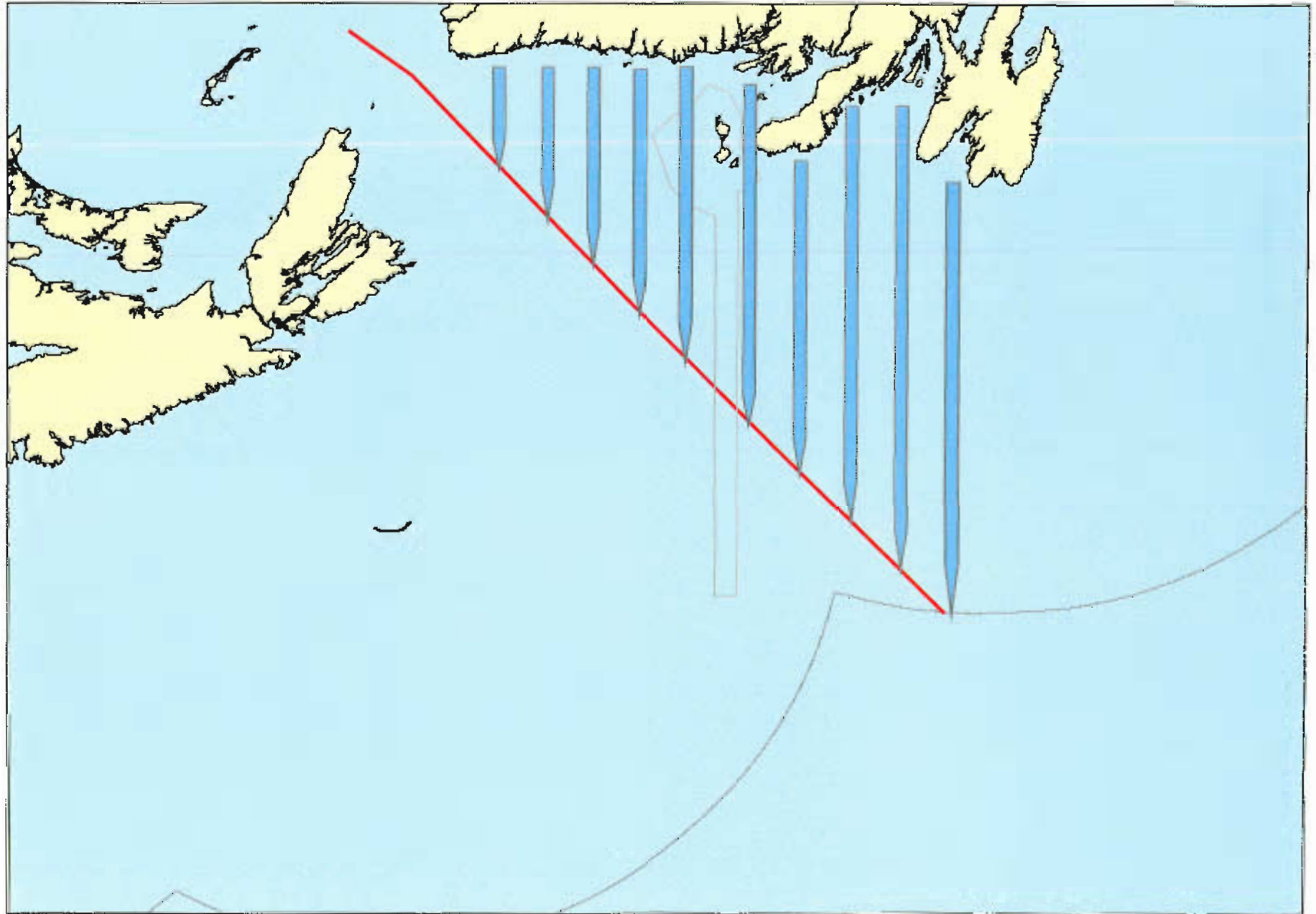
Selected Scenarios of Adjusting Boundary Based on Incremental Effect of SPM



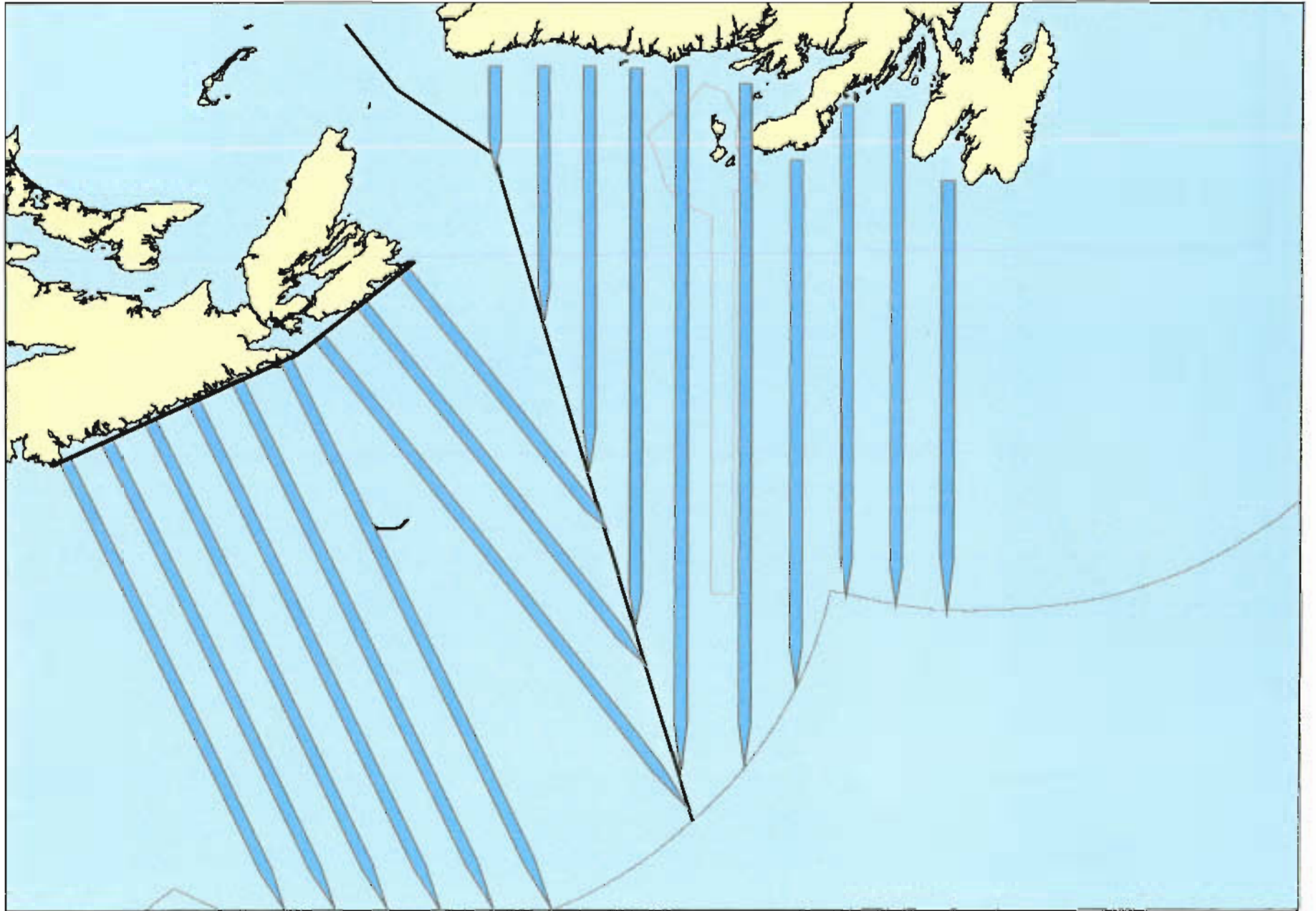
A Perpendicular Reflects the Basic Structure of the Coastal Geography in the Outer Area



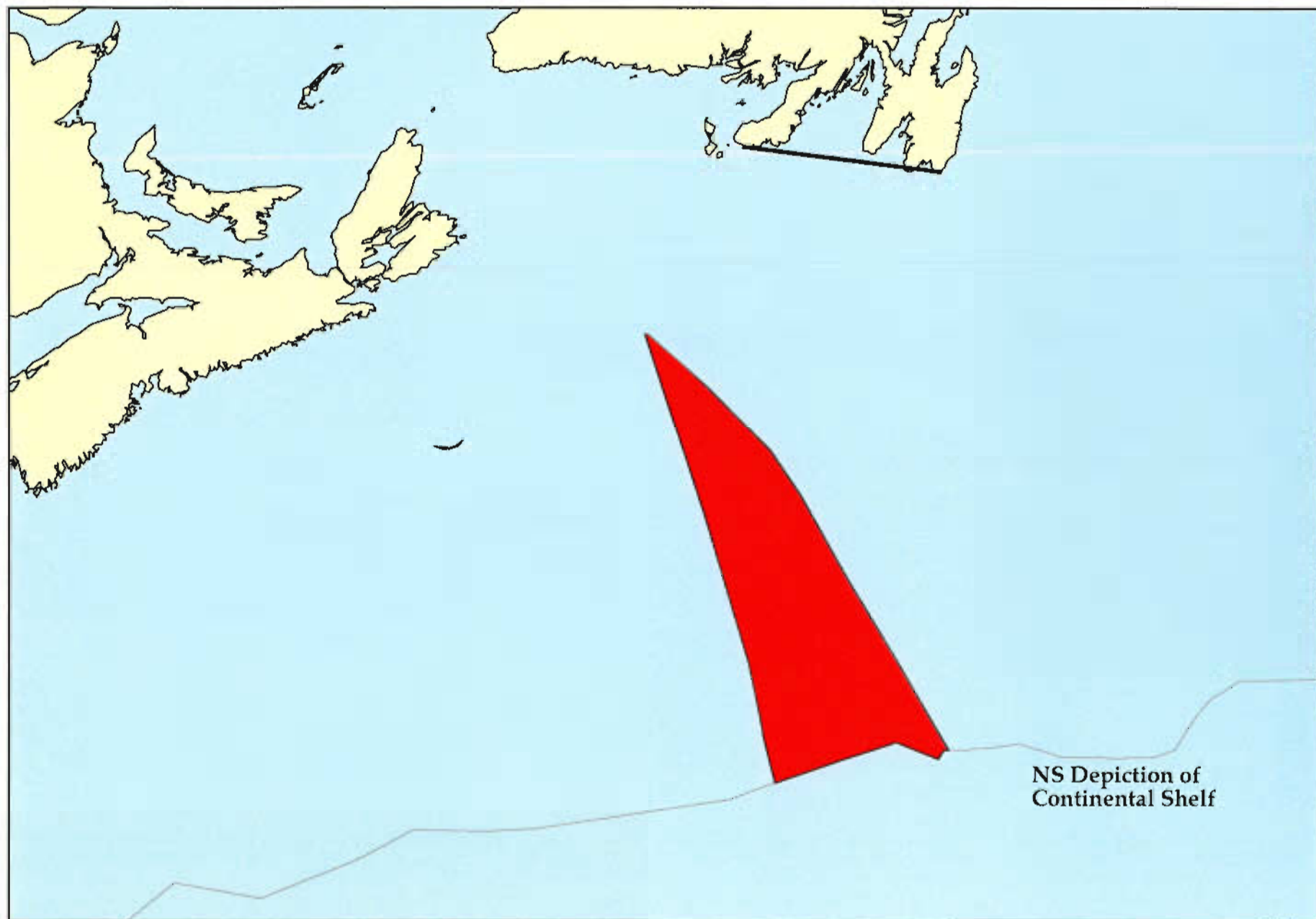
NS Line Completely Blocks the Coastal Projection of the South Coast of Newfoundland



N&L Line Shares the Cutoff Between the Parties



Total Area Attracted by Sable Island Using Equidistance



The Disproportionate Result Produced by the Nova Scotia Line

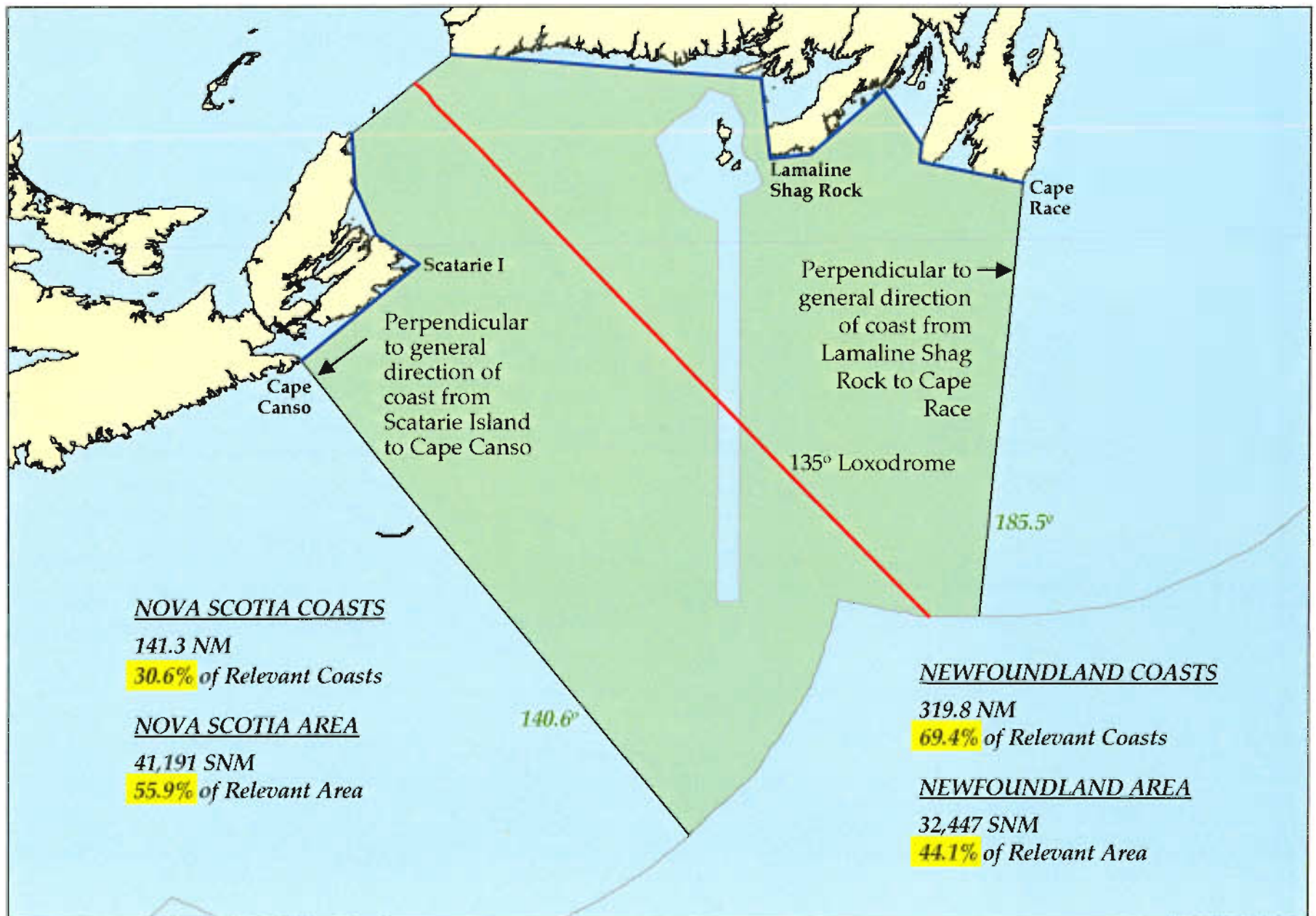


Figure 15, N&L CounterMemorial, Phase Two

What is the Conduct Basis of the Nova Scotia Line?

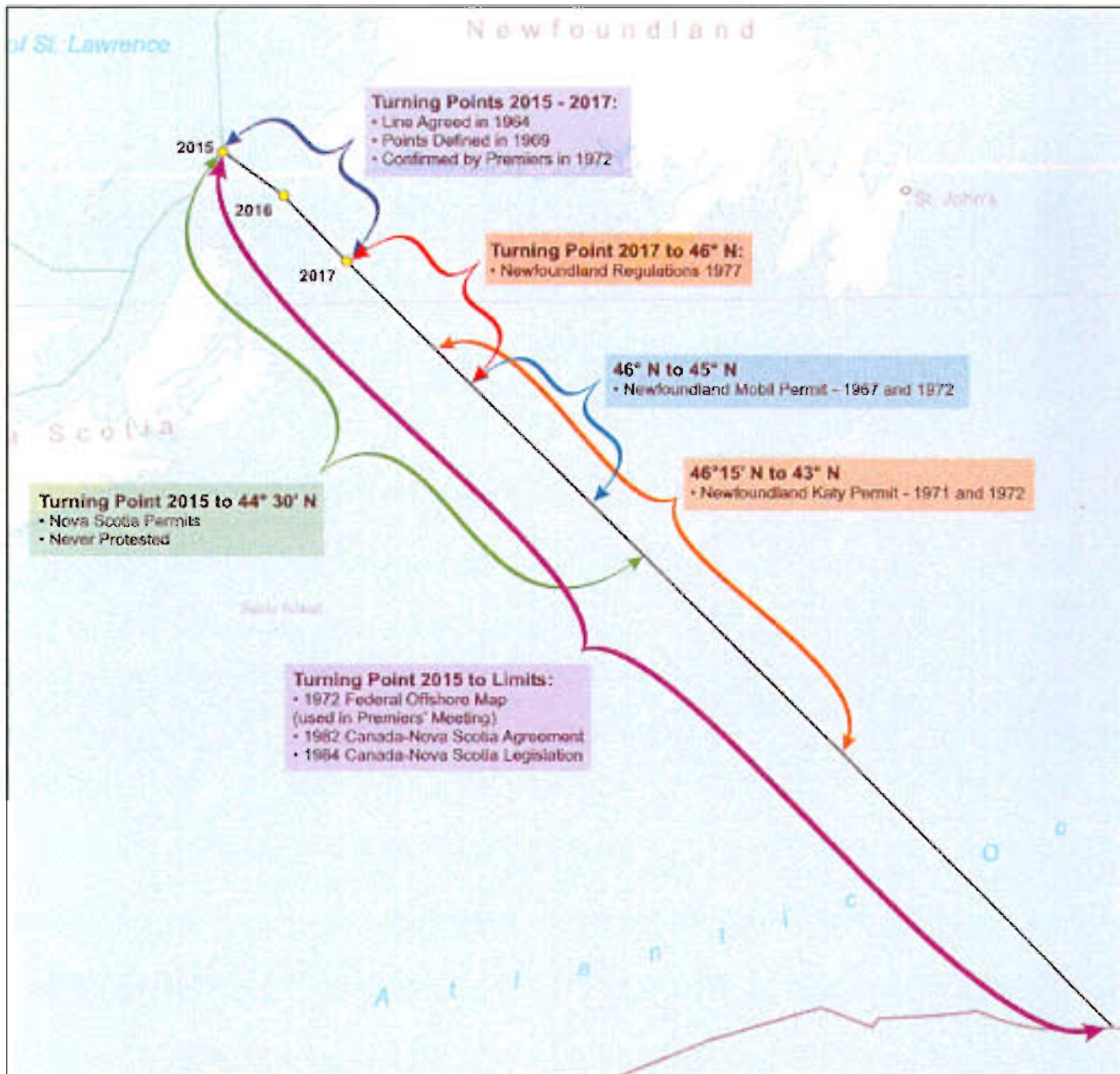
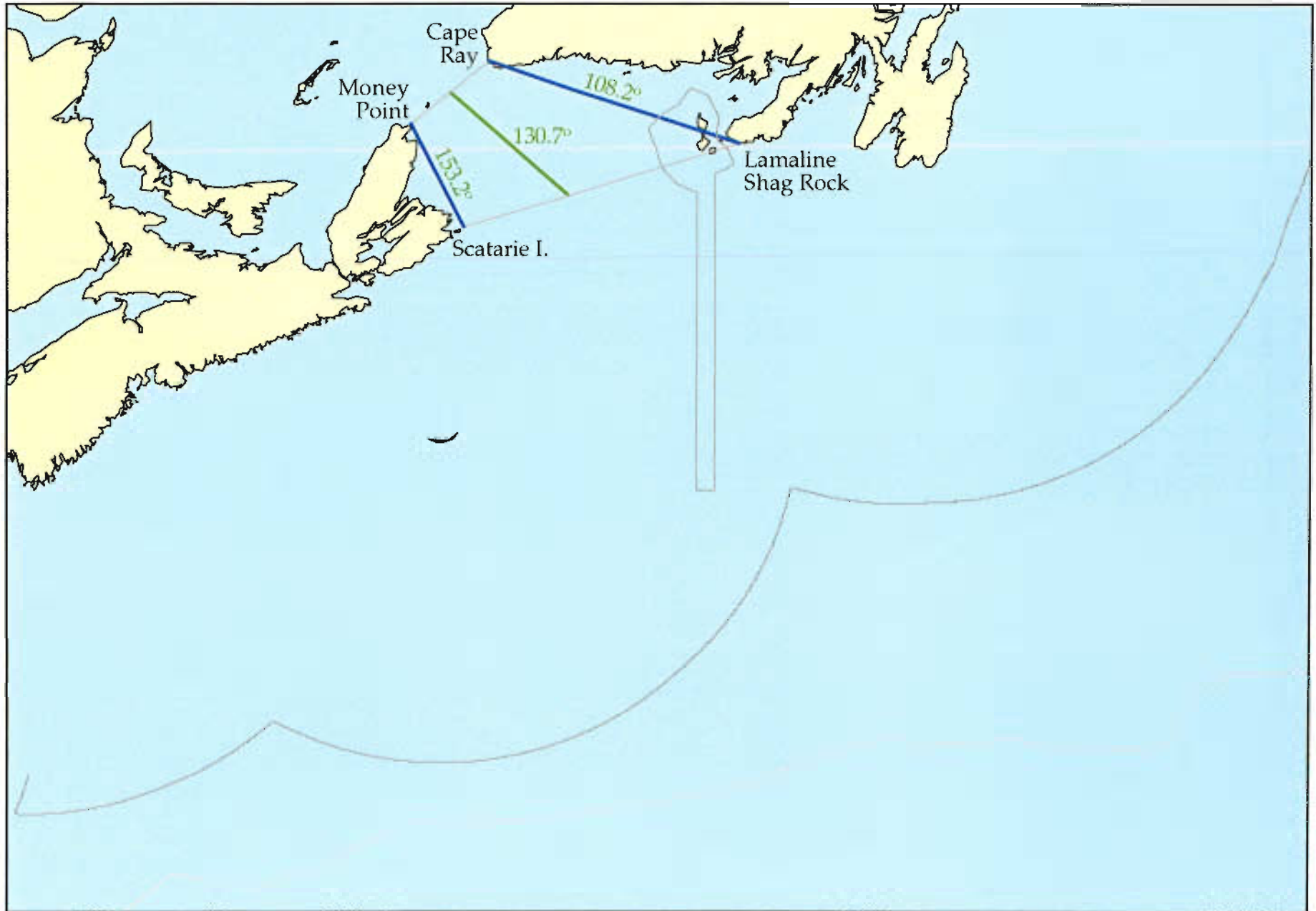


Figure 40, NS CounterMemorial, Phase Two

Oral Presentation, Phase Two, Figure: 140

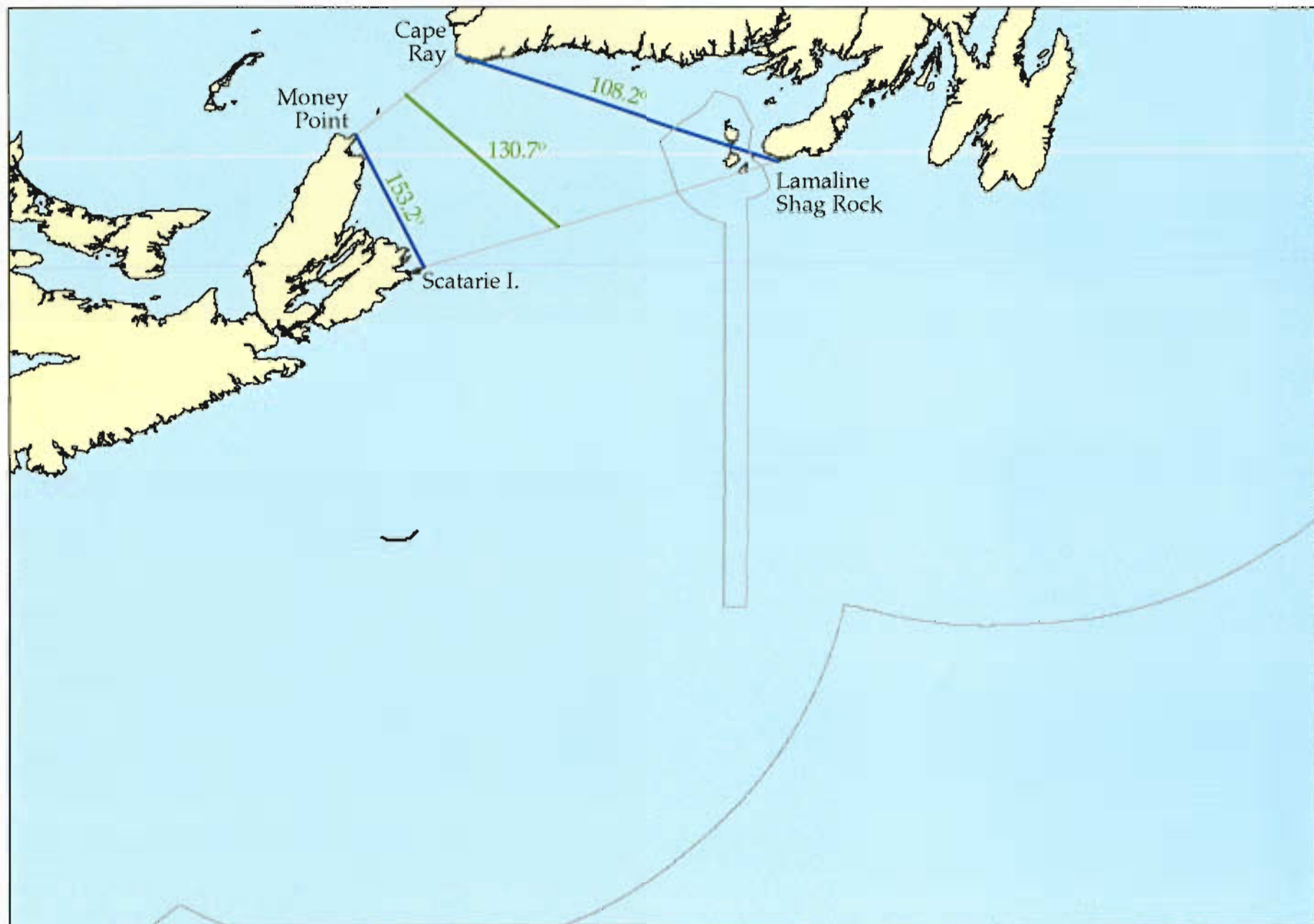
Scenario 1 - Macro-Geographic Approach - Inner Concavity



Scenario 1 - Macro-Geographic Approach - Outer Area



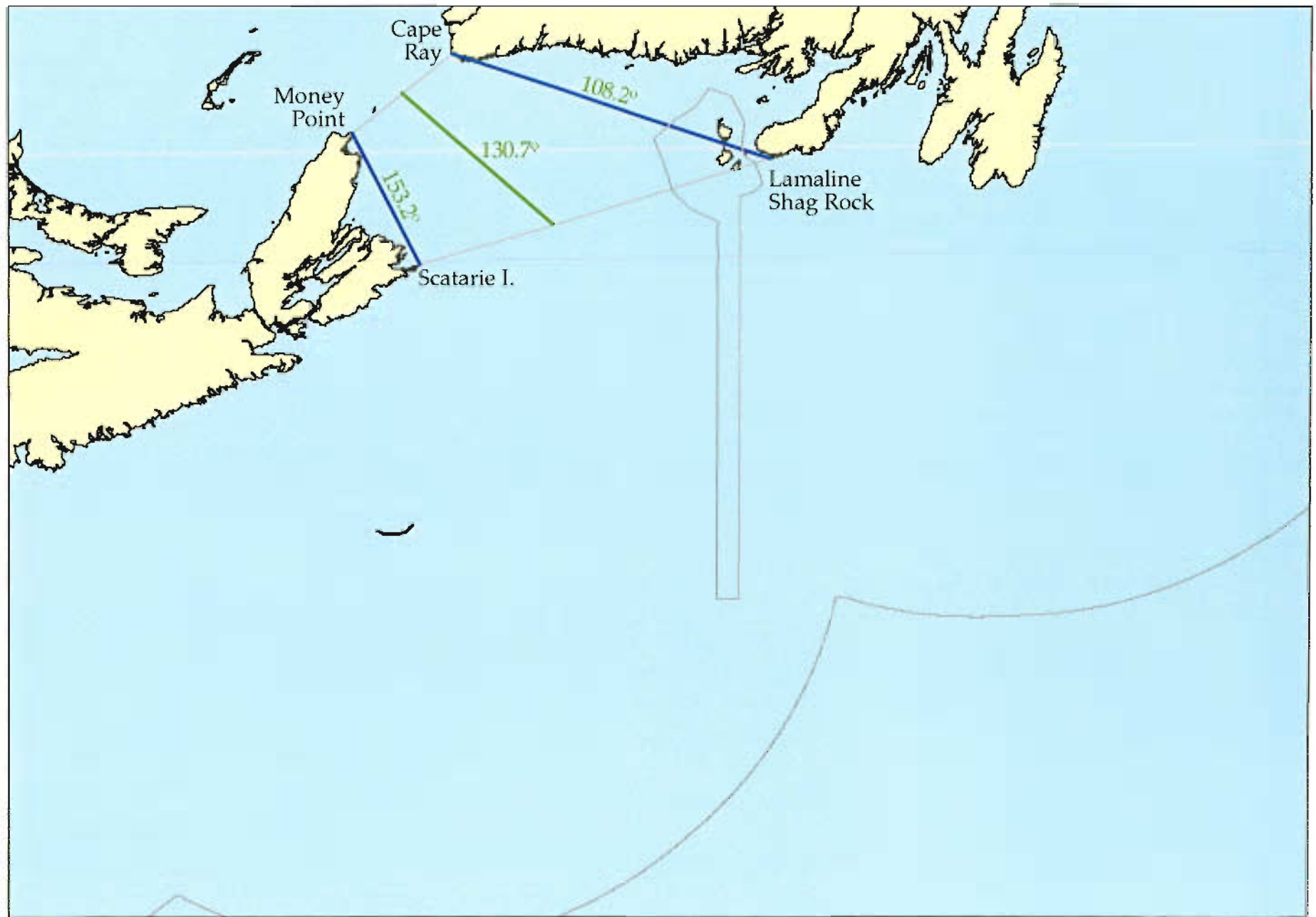
Scenario 2 - "Outer Wings" Approach - Inner Concavity



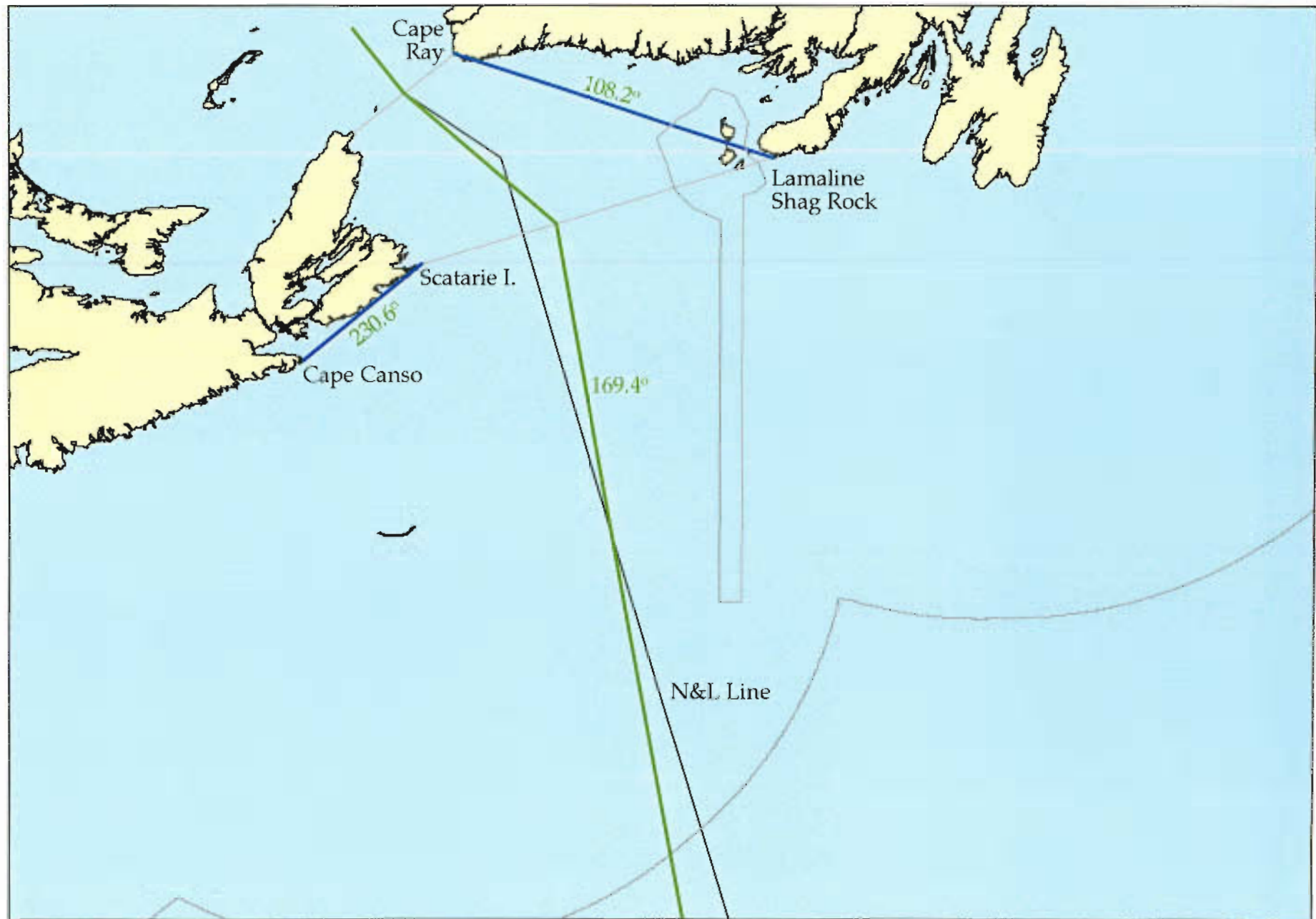
Scenario 2 - "Outer Wings" Approach - Outer Area



Scenario 3 - "Broken Wing" Approach - Inner Concavity

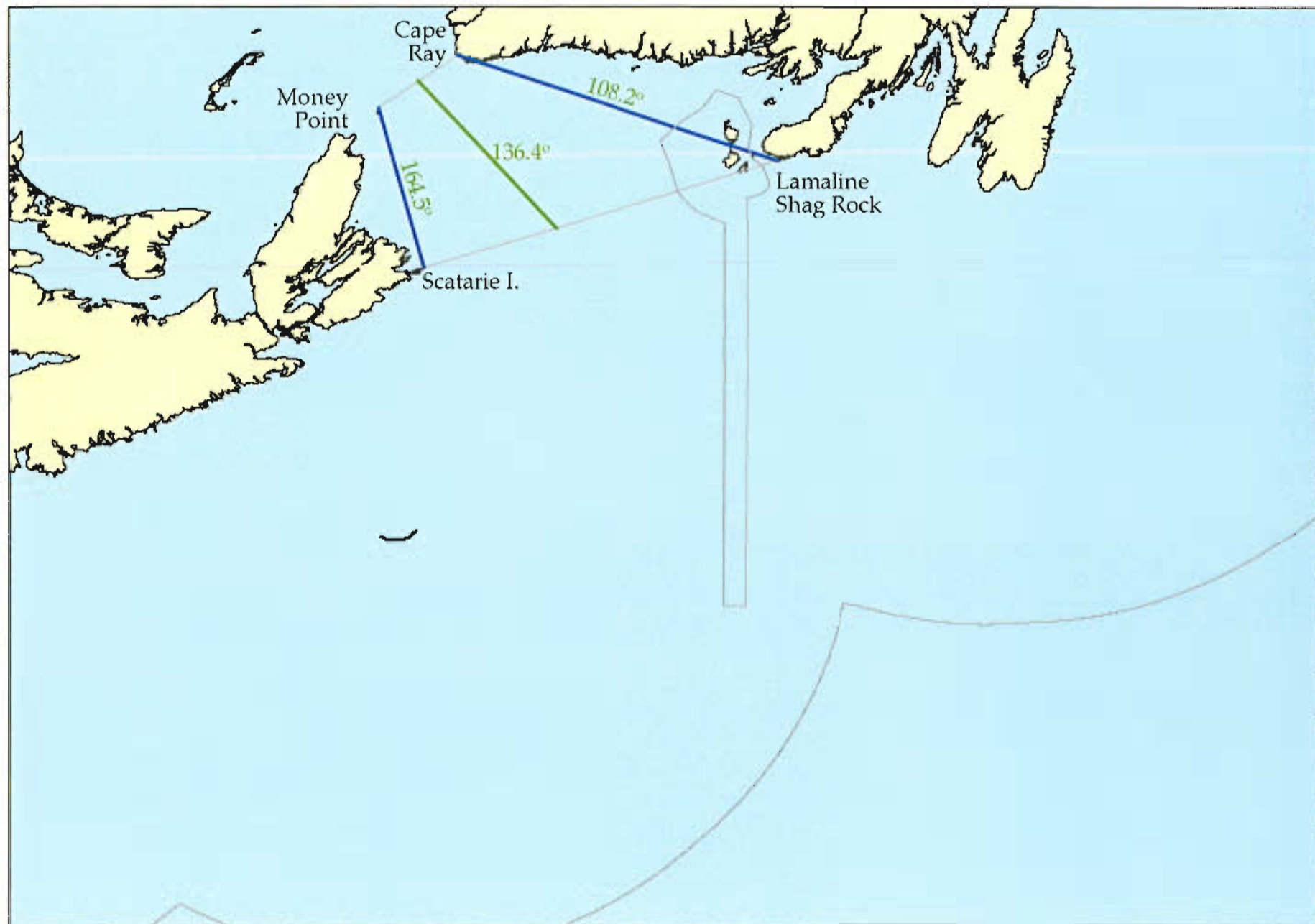


Scenario 3 - "Broken Wing" Approach - Inner Concavity



Oral Presentation, Phase Two, Figure: 146

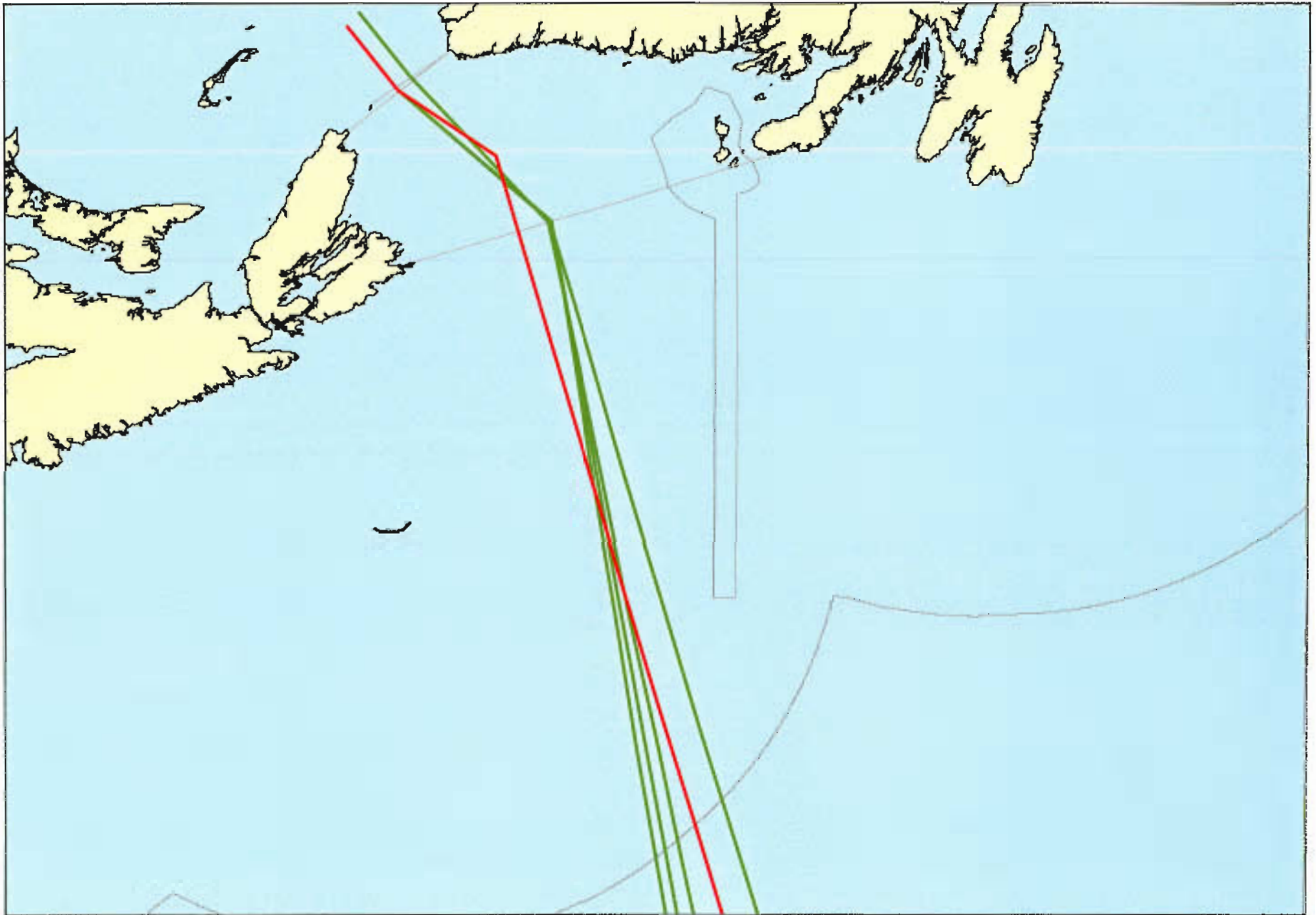
Scenario 4 - "St. Paul Cake and Ice Cream" Approach - Inner Concavity



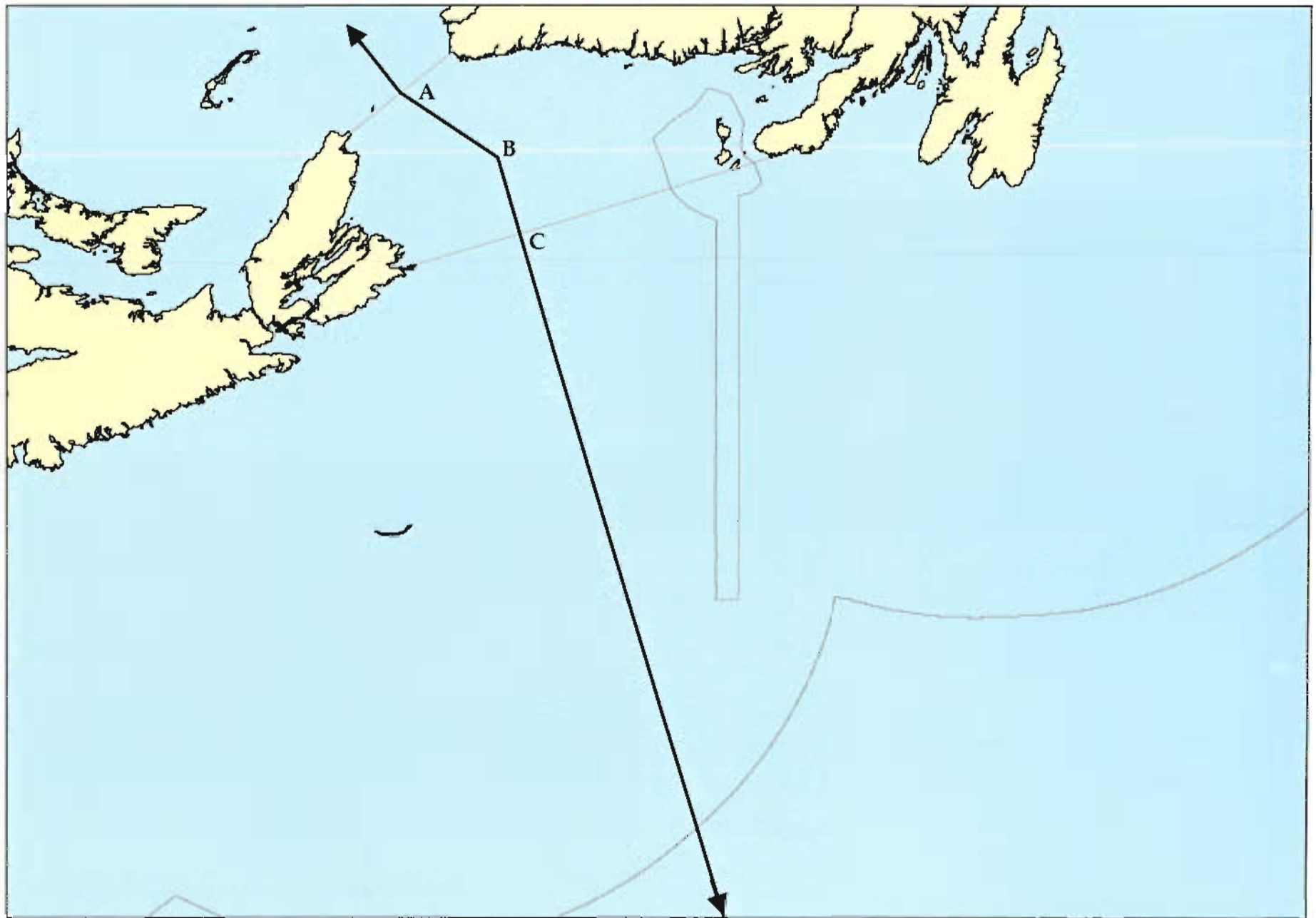
Scenario 4 - "St. Paul Cake and Ice Cream" Approach - Inner Concavity



All Roads Lead to Rome



The Newfoundland and Labrador Line



Key Issues

Basis of Title

Relevant Coasts

Relevant Circumstances and Equitable Principles & Criteria

Method of Delimitation

The Line and the Equity of the Result

Newfoundland and Labrador Position

Nova Scotia Position

- ✓ The basis of title is found within the body of **international law governing maritime delimitation.**
- ✓ Title derives from the right of a state to the maritime territory **extending from its coasts.**

- ✓ The basis of title is to be determined from outside law relating to maritime delimitation.
- ✓ It is derived from particular facts of the case. In this case, it is derived from the elements of the province under the records and the implementing legislation.

Key Issues

Basis of Title

Relevant Coasts

Relevant Circumstances and Equitable Principles & Criteria

Method of Delimitation

The Line and the Equity of the Result

Newfoundland and Labrador Position

Nova Scotia Position

*Defines the relevant coasts and the relevant area by looking at the coasts that **face into** the **area** to be **delimited** and that in some general sense can have an impact on the delimitation.*

Defines the relevant coasts and the relevant area with reference to the Article 76 definition of the continental shelf, a novel and unprecedented "line of sight" theory

Key Issues

Basis of Title

Relevant Coasts

**Relevant
Circumstances
and Equitable
Principles
& Criteria**

*Method of
Delimitation*

*The Line and
the Equity of
the Result*

Newfoundland
and Labrador
Position

Nova Scotia
Position

- ✓ Places primacy on **geography** as a relevant circumstance, but does not exclude other factors where relevant.
- ✓ In giving effect to the geography of the area, equitable principles such as the **avoidance of cut-off**, the **avoidance of giving weight to incidental features** and **proportionality** have important roles to play.

Conduct plays the cardinal role and geographical factors, either as relevant circumstances or equitable principles, are relegated to a secondary, and often insignificant role.

Key Issues

Basis of Title

Relevant Coasts

Relevant Circumstances and Equitable Principles & Criteria

Method of Delimitation

The Line and the Equity of the Result

Newfoundland and Labrador Position

Nova Scotia Position

*Has applied methods of delimitation that are appropriate in the light of the geographical characteristics - the **coasts** and the **coastal relationships** - of each of the areas to be delimited.*

Has a unidirectional line that has no method of ~~delimitation~~ in the conduct on which it is ~~based~~ based.

Key Issues

Basis of Title

Relevant Coasts

Relevant Circumstances and Equitable Principles & Criteria

Method of Delimitation

The Line and the Equity of the Result

Newfoundland and Labrador Position

Nova Scotia Position

*The Newfoundland and Labrador line is drawn in accordance with methods that **reflect the geography** of the area to be delimited and **meets** appropriate tests of the **equity** of the result.*

Nova Scotia's line is constructed on the basis of ~~coastal~~, is apparently ~~not~~ be equitable by reference to the ~~conduct~~ which is the ~~basis~~ of its ~~construction~~.

Conclusion

Basis of Title

Relevant Coasts

Relevant Circumstances and Equitable Principles & Criteria

Method of Delimitation

The Line and the Equity of the Result

