



FINAL SUBMISSIONS

74. The Kingdom of the Netherlands requests the International Tribunal for the Law of the Sea with respect to the dispute concerning the ‘Arctic Sunrise’,

to declare:

- a) that the Tribunal has jurisdiction over the request for provisional measures;
- b) the arbitral tribunal to which the dispute is being submitted has *prima facie* jurisdiction;
- c) the claim is supported by fact and law;

to order, by means of provisional measures, the Russian Federation:

- d) to immediately enable the ‘Arctic Sunrise’ to be resupplied, to leave its place of detention and the maritime areas under the jurisdiction of the Russian Federation and to exercise the freedom of navigation;
- e) to immediately release the crew members of the ‘Arctic Sunrise’, and allow them to leave the territory and maritime areas under the jurisdiction of the Russian Federation;
- f) to suspend all judicial and administrative proceedings, and refrain from initiating any further proceedings, in connection with the incidents leading to

‘ARCTIC SUNRISE’
ORAL STATEMENT BY THE KINGDOM OF THE NETHERLANDS

the dispute concerning the ‘Arctic Sunrise’, and refrain from taking or enforcing any judicial or administrative measures against the ‘Arctic Sunrise’, its crew members, its owners and its operators; and

- g) to ensure that no other action is taken which might aggravate or extend the dispute.

Hamburg, 6 November 2013

A handwritten signature in black ink, appearing to read 'L. Lijnzaad', written over a horizontal line.

Liesbeth Lijnzaad
Agent for the Kingdom of the Netherlands