

# MARITIME BOUNDARY DELIMITATION: GHANA v. COTE d'IVOIRE (ITLOS, 2017)

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- Focus: How ITLOS applied equidistance and relevant circumstances in maritime boundary delimitation.
- Why it matters: Demonstrates peaceful dispute resolution under UNCLOS Part XV.
- Angle: “Drawing the Line: How ITLOS Balanced Equity and Geography in West Africa”

## Drawing the Line: Ghana v. Côte d'Ivoire and the Art of Maritime Boundary Delimitation

Diplomacy and law must work together when maritime boundaries intersect with oil reserves. The 2017 judgment in *Ghana v. Côte d'Ivoire* (ITLOS Case No. 23) offers a masterclass in how international law can resolve complex boundary disputes without force.

### The Dispute

Ghana and Côte d'Ivoire share a coastline along the Atlantic Ocean. Both states operated under a tacit understanding of an equidistance-based maritime boundary for decades. But as offshore oil exploration intensified, Côte d'Ivoire challenged the boundary, claiming it had never been formally agreed.

In 2014, both states submitted the dispute to a Special Chamber of the International Tribunal for the Law of the Sea (ITLOS) under Article 15(2) of the Tribunal's Statute. (1)

Source (1):

Dispute concerning delimitation of the maritime boundary between Ghana and Côte d'Ivoire in the Atlantic Ocean (Ghana/Côte d'Ivoire)

<https://itlos.org/en/main/cases/list-of-cases/case-no-23/>

### The Legal Questions

The Special Chamber was asked to determine:

- Whether a customary boundary existed based on mutual conduct.
- Whether Ghana's oil activities violated Côte d'Ivoire's sovereign rights.

- How can the maritime boundary in the territorial sea, EEZ, and continental shelf be delimited (including beyond 200 NM)?

### **The Judgment (23 Sept 2017)**

The Tribunal ruled that:

- No binding customary boundary had been established.
- Ghana's oil activities did not violate Côte d'Ivoire's rights.
- The maritime boundary should follow an equidistance-based line, adjusted slightly for geographic concavity (2)

Source (2):

Dispute Concerning Delimitation of the Maritime Boundary between Ghana and Côte d'Ivoire in the Atlantic Ocean

Dispute Concerning Delimitation of the Maritime Boundary between Ghana and Côte d'Ivoire in the Atlantic Ocean (Ghana/Côte d'Ivoire), ITLOS Case No. 23

<https://jusmundi.com/en/document/decision/en-dispute-concerning-delimitation-of-the-maritime-boundary-between-ghana-and-cote-divoire-in-the-atlantic-ocean-ghana-cote-divoire-judgment-saturday-23rd-september-2017>

That reaffirmed the three-stage delimitation method:

- Draw a provisional equidistance line.
- Consider relevant circumstances.
- Apply a disproportionality test.

### **Why It Matters**

This case:

- Reinforced UNCLOS as the primary legal framework for maritime delimitation.
- Demonstrated how peaceful adjudication can resolve resource-linked disputes.
- Clarified the role of state conduct in shaping maritime claims.

## Conclusion

***Ghana v. Côte d'Ivoire*** is more than a boundary case; it is a blueprint for how international law can balance geography, equity, and energy interests. In a world of rising maritime tensions, it reminds us that lines on a map can be drawn with reason, not rivalry.

#UNCLOS #ITLOS #MaritimeBoundary #GhanaCotedIvoire #LawOfTheSea  
#EnergyLaw #LLMLOS #Geopolitics #BoundaryDelimitation #LLMLOS

