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**SINGAPORE'S DIPLOMATIC STRATEGY IN RESPONSE TO MALAYSIA
REGARDING THE PEDRA BRANCA DISPUTE, 1980-2008**

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ABSTRACT

The publication of Malaysia's new map in 1979 sparked a territorial dispute between the governments of Singapore and Malaysia over sovereignty concerning a maritime feature known as Pedra Branca. Since the onset of the dispute, both governments have employed various diplomatic strategies to reinforce their respective claims over the maritime feature. The increasing physical measures undertaken by both countries in the waters surrounding Pedra Branca created a tense situation with the potential to escalate the territorial dispute into a military confrontation. To manage these challenges, both governments utilized diplomatic notes as a channel for expressing their views and positions regarding the sovereignty dispute. This article examines Singapore's response towards Malaysia during the Pedra Branca dispute from 1980 to 1992. Since the beginning of the dispute, Singapore consistently submitted diplomatic notes to assert its claim to Pedra Branca, which it had administered through the Horsburgh Lighthouse since the 1850s. Employing a historical research methodology, this article analyses primary sources, including ICJ reports and diplomatic notes issued by the Ministries of Foreign Affairs and the High Commissions of both Malaysia and Singapore from 1980 to 2008. The findings reveal that Singapore implemented a combination of physical and diplomatic strategies to maintain its claim over Pedra Branca while managing tensions with Malaysia. This article contributes to the understanding of diplomacy and small-state strategy by demonstrating how Singapore utilized diplomatic notes as a sustained legal-diplomatic instrument to assert its position, manage escalation, and pursue a peaceful resolution of a long-standing territorial dispute without resorting to military force.

Keywords: Diplomatic history, Malaysia-Singapore bilateral relations, battle of notes *verbales*, inter-states disputes.

INTRODUCTION

Territorial conflict constitutes a central concern in contemporary maritime security studies, particularly in regions where overlapping claims over islands, rocks, and other maritime features intersect with strategic and economic interests (Abadi, 2015; Kadir, 2024; Ahamat et al., 2023; Akmalhisham et al., 2015). In Asia, coastal States such as India, Myanmar, the Philippines, and Malaysia have relied on the legal framework of the United Nations Convention on the Law of the Sea (UNCLOS) to assert sovereignty over these features, as such claims directly affect the extent of their maritime zones and associated rights (Manicom, 2016). Control over maritime features is therefore not merely symbolic, but also carries significant implications for territorial expansion through land reclamation, as well as for economic activities, including port development and maritime trade (Jasni et al., 2015).

The Pedra Branca dispute between Malaysia and Singapore illustrates how competing sovereignty claims over a small maritime feature can evolve into a broader maritime security concern. Referred to the International Court of Justice (ICJ), the Court awarded sovereignty over the feature, known as Batu Puteh in Malaysia, to Singapore, thereby allowing it to carry out reclamation work within a radius of 0.5 nautical miles. This outcome has been perceived as having potential implications for Malaysia's maritime security posture in the surrounding waters (Jumrah, 2021). In reaching its decision, the ICJ held that "several events of significance worked to shift title away from Malaysia and towards Singapore." Meanwhile, Middle Rocks was awarded to Malaysia, as Johor held the original title to this maritime feature (Colson & Vohrer, 2008). However, despite extensive research on the ICJ ruling in the Pedra Branca dispute and its impact on both countries (Hamid, 2011; Wan Dahalan, 2008), limited attention has been given to the diplomatic dimensions of the dispute between Singapore and Malaysia. Without the mutual agreement of both countries, the territorial dispute could not have been brought before the ICJ for adjudication.

The Pedra Branca conflict emerged as a particularly critical issue that generated diplomatic tensions between the Malaysian and Singaporean governments for several decades. The dispute was especially significant because of its direct implications for both countries' territorial control and administrative jurisdiction. Throughout the dispute, bilateral relations between Malaysia and Singapore remained tense and were largely shaped by each country's efforts to assert its respective claim over the maritime feature. Tensions escalated in 1979 when Malaysia published its "Map Showing the Territorial Waters and Continental Shelf Boundaries of Malaysia," which included Pedra Branca within its territorial waters. This unilateral action marked a pivotal moment in the dispute and created a diplomatic rift between the two countries. Malaysia formally declared the incorporation of Pedra Branca into its territorial waters through the publication of the new map in the Government Gazette on 21 December 1979, without prior consultation with Singapore. The initiative to delineate Malaysia's maritime boundaries had begun under the leadership of Tun Hussein Onn, Malaysia's third Prime Minister. However, publication of the map was delayed for two years, and it was ultimately issued by Minister Abdul Kadir Yusof in the Government Gazette in December 1979. This action provoked strong reactions from Singapore, which viewed the publication of the map as an attempt to undermine its sovereignty over Pedra Branca. Scholars such as Kadir (2009) and Ranjit (2009) argued that Malaysia's decision to issue the map prompted protests from Singapore, which maintained that Pedra Branca was under its jurisdiction.

Contemporary international relations, particularly in Asia, emphasize the peaceful settlement of disputes, often through international adjudication as an impartial third-party mechanism. The ICJ remains the only permanent global court that performs this function (Jin-Hyun, 2013; Uraz, 2025).

Within this framework of peaceful dispute settlement, the ‘battle of notes verbales’ constitutes a strategic diplomatic practice frequently employed by states involved in territorial disputes in the South China Sea. These diplomatic notes carry legal significance for states that are parties to the United Nations Convention on the Law of the Sea (UNCLOS), serving as instruments to assert claims over maritime zones and to challenge the sovereignty claims of other states (Agusman, 2025). In the Pedra Branca dispute between Singapore and Malaysia, the 2003 agreement between the two countries to refer the case to the ICJ represented the culmination of longstanding diplomatic tensions over sovereignty of the island (Cornelius, 2013). This was consistent with the provisions governing the ICJ, which only entertains disputes jointly submitted by states through a Special Agreement (ICJ, 2025). Accordingly, the proceedings were formalized under Article 7 of the Special Agreement, which provided for the continuation of the case before the ICJ, particularly through written pleadings and oral hearings (ICJ, 2003). Throughout the dispute, diplomatic notes constituted a crucial instrument in facilitating its peaceful resolution. They encapsulated the narratives advanced by both countries regarding historical claims and interpretations of international law in defending territorial sovereignty and safeguarding their diplomatic interests (Yoshimatsu, 2025). Kadir (2015) has demonstrated the dynamic nature of Malaysia–Singapore bilateral relations, as reflected in the exchange of diplomatic notes between the two states, including those related to the resolution of the Pedra Branca sovereignty dispute, which ultimately favored Singapore. Nevertheless, this outcome has been attributed to Singapore’s adoption of a ‘whole-of-government approach,’ encompassing coordinated efforts across state institutions, particularly within the context of bilateral relations (Jayakumar & Koh, 2009).

Following this, the role of diplomatic notes as instruments of territorial claims and contestation in the Pedra Branca dispute warrants further examination, particularly within the broader contemporary framework of the ‘battle of notes verbales.’ Examining diplomatic notes in the Pedra Branca case not only contributes to the discourse on the peaceful settlement of disputes in Asia but also highlights the diplomatic strategies employed by Singapore to maintain the status quo following the ICJ judgment in its favor (Jayakumar, 2011). From Singapore’s perspective, Malaysia’s publication of the 1979 New Map was unacceptable because the Department of Survey and Mapping Malaysia (JUPEM) had issued it unilaterally, without prior consultation with Singapore. Consequently, the publication not only triggered a sovereignty dispute over Pedra Branca but also extended tensions to the maritime areas surrounding Point 21 and Point 22 (Jayakumar & Koh, 2009). In addition, Singapore was cognizant of the potential risks inherent in Malaysia’s 1995 proposal to determine the rights and interests of the party that would not obtain sovereignty over Pedra Branca. It viewed Malaysia’s proposal, particularly the suggestion to grant traditional fishing rights in the waters surrounding Pedra Branca, as conferring a tactical advantage on Malaysia vis-à-vis Singapore (Jayakumar & Koh, 2009). Moreover, an analysis of Singapore’s use of diplomatic notes highlights the effectiveness of the ‘battle of notes verbales’ in its interactions with Malaysia, particularly in avoiding unfriendly actions during the resolution of the Pedra Branca dispute, thereby ultimately conferring a strategic advantage on Singapore (Dai, 2019; Agusman, 2025). Despite the central role of diplomatic notes in facilitating the peaceful resolution of the dispute, existing scholarship remains largely confined to analyses of the ICJ judgment and the formal legal proceedings before the Court (Jayakumar & Koh, 2009; Arkib Negara Malaysia, 2012; Omar et al., 2005; Beckman & Schofield, 2009; Mahbubani, 1978). This emphasis overlooks the strategic use of diplomatic notes as instruments of territorial claim-making and contestation, particularly within the broader framework of the ‘battle of notes verbales’ in contemporary Asian disputes.

Therefore, by focusing on Singapore’s diplomatic strategies vis-à-vis Malaysia, this article contributes to the broader discourse on international dispute resolution mechanisms from an Asian perspective. In the Asian context, inter-state disputes are often intertwined with contemporary international law,

historic rights, and the legacies of Western colonialism (Jin-Hyun et al., 2013; Ahamat et al., 2023). Within this context, the ICJ's judgment in the Pedra Branca dispute represents the first case in which the Court authoritatively pronounced on historical title, and the first instance in which such title was defeated other than by treaty. Accordingly, historical considerations formed an integral component of Singapore's diplomatic strategy in advancing its claim to sovereignty (Tan, 2013).

THE DISPUTE IN HISTORICAL CONTEXT

The 2008 International Court of Justice (ICJ) judgment on the Pedra Branca dispute underscores the significance of historical context in establishing the island's legal status prior to the 1840s. Before that period, the Court acknowledged that the Sultanate of Johor held the original title to Pedra Branca. However, subsequent developments, particularly the measures implemented by the British authorities in the mid-19th century, gradually demonstrated Singapore's effective exercise of authority and administration over the island, ultimately resulting in a shift in sovereignty (ICJ, 2008). This shift can be traced to the ratification of the Anglo-Dutch Treaty of 1824, which redefined territorial boundaries in the Malay Archipelago. While this treaty was intended to resolve disputes between Britain and the Netherlands, it also gave rise to territorial sovereignty conflicts involving Malay kingdoms that remained independent of European colonial rule (Harefa et. al., 2024). For instance, the Sultan of Johor asserted a claim over territories that had formerly been under the sovereignty of the Johor-Riau Kingdom. In 1886, he claimed sovereignty over the Pulau Tujuh islands, comprising Anambas, Natuna, and Jambelon, by submitting a claim to the Dutch government through the British Colonial Office in London. However, the British government rejected the claim on the grounds that it lacked *prima facie* validity, and recognized Dutch sovereignty over Pulau Tujuh (CO273/142, 1886a). The Dutch Resident in Riau also dismissed the claim, arguing that Pulau Tujuh was under the control of the Lingga-Riau Sultanate rather than the Johor Sultanate, which was under the protection of the Dutch East Indies. Furthermore, it was stated that the ruler of Lingga, Sultan Sulaiman Badrul Alam Shah, had agreed to accept Dutch occupation within the sovereign territories of the Lingga-Riau Sultanate (CO273/142, 1886b).

In this matter, the British Colonial Office referred to documents relating to the 'Treaties Convention between the Netherlands Government and the Native Princes in the Eastern Seas' as a point of reference. However, the justification advanced by the Sultan of Johor in support of his claim remains open to reconsideration by contemporary historians. He argued that the Anambas, Natuna, and Jambelon islands were not under the sovereignty of the Lingga Sultanate but rather formed part of the Johor-Riau Kingdom before the territorial boundaries were established under the Anglo-Dutch Treaty of 1824 (CO273/142, 1886c).

The historical continuity of Johor later served as the basis for Malaysia's claim over Pedra Branca during the ICJ proceedings in 2008. However, the Court found that several of Malaysia's arguments, based on historical sources were not conclusive. For instance, Malaysia was unable to substantiate its principal argument that Johor had permitted the British to construct the Horsburgh Lighthouse while retaining sovereignty over Pedra Branca (Colson & Vohrer, 2008). During the proceedings, Malaysia presented eight key historical documents, as listed below:

- i. Anglo-Dutch Treaty of 1824 and Crawford Treaty of 1824
- ii. Correspondence from Sultan Ali and Temenggong Daeng Ibrahim to the Governor of the Straits Settlements

- iii. Correspondence from the Dutch Governor in Melaka to the Dutch East Indies authorities relating to the Straits of Johor
- iv. Edward Presgrave (1828)
- v. Ord Award (1868), Report of Johor Boundary Commission (1898) and Johor Territorial Waters Agreement (1927)

Malaysia's legal team before the ICJ, comprising Abdul Kadir Mohamad, Noor Farida Ariffin, and international legal scholars such as Elihu Lauterpacht, James Crawford, Nicolaas Jan Schrijver, and Marcelo G. Kohen, relied on the eight documents listed above to counter Singapore's arguments concerning Batu Puteh during the oral hearings on 9 April 2007 (ICJ, 2008).

The Singaporean government argued that Pedra Branca was *terra nullius*, or uninhabited territory, asserting that when the British constructed Horsburgh Lighthouse on Pedra Branca in 1847, the island was not under the sovereignty of any state. In addition, Singapore had administered the Horsburgh Lighthouse for 150 years without facing objections from any state in Southeast Asia. To support its case, the Singapore government referred to several maps published by Malaysia in 1962, 1965, 1974, and 1975, all of which identified the Horsburgh Lighthouse on Pedra Branca with the label "Singapore" (Kadir, 2009). However, Malaysia's legal team argued that the Johor Sultanate had been the original sovereign of Pedra Branca since 1824. To support this position, the Malaysian government relied on two treaties: the Anglo-Dutch Treaty of 1824 and the Crawford Treaty of 1824. According to Nicolaas Jan Schrijver, both treaties recognized the Johor Sultanate as the original sovereign over all three disputed maritime features ("Tuntutan Malaysia ada," 2007). The treaties also resulted in the division of the Johor Sultanate's territories into two regions. The northern region, which included Riau-Lingga, came under Dutch control, while the southern region, comprising Singapore, mainland Johor, and Pahang, came under British control (Mohd Hafizal & Mohd Shazwan, 2022).

Nevertheless, the most important document in collection (ii)—the original letter from Governor Butterworth requesting permission to construct a lighthouse on Peak Rock or another suitable location within the territory of the Johor Sultanate—was not found. Malaysia was only able to produce the response letters from Sultan Ali and Temenggong Ibrahim, dated 1844 (Arkib Negara Malaysia, 2012). In these letters, the Sultan and Temenggong of Johor approved the construction of the lighthouse. This position was supported by two letters of authorization, dated 25 November 1844, sent by the Sultan of Johor to Governor Butterworth in Singapore (ICJ, 2008).

METHODOLOGY

The primary methodology employed in this article is grounded in historical research methods, which aim to reconstruct past events through the systematic examination and interpretation of written sources. These sources are classified into primary and secondary materials, both of which are essential for conducting rigorous historical analysis. Historical research involves evaluating, analyzing, and interpreting evidence derived from these sources to develop a comprehensive and accurate understanding of the historical events under investigation. A document-based approach, which is central to historical research, is particularly important in ensuring objective reconstructions, as it emphasizes the use of verifiable and authentic information. This method was selected for the present study because it focuses on examining documents that are less susceptible to manipulation, thereby ensuring that the findings are grounded in factual and reliable evidence. Moreover, this approach enables researchers to access precise and well-supported information, which is vital for producing an accurate and faithful reconstruction of historical events.

In this study, Singapore's response to Malaysia in the Pedra Branca dispute is examined through an in-depth analysis of primary sources, particularly the diplomatic notes exchanged between the Singaporean and Malaysian governments. These diplomatic notes, sourced from the Ministries of Foreign Affairs of Malaysia and Singapore, as well as the High Commissions of both countries, span the period from 1980 to 1992. As formal channels of communication between governments, they constitute key primary resources for understanding the protestations, concerns, and sovereignty-related issues raised by both parties throughout the dispute. Through a systematic analysis of these diplomatic notes, this article presents a nuanced understanding of Singapore's official position and responses to Malaysia's actions during the dispute. As the Malaysian government made relatively limited use of diplomatic notes to express its views on the Pedra Branca dispute, this study also draws upon Malaysia's official parliamentary records to examine the country's position on Singapore's actions. The use of ICJ reports and parliamentary records covering the period from 1980 to 2008 is essential for evaluating and understanding the Malaysian government's position and foreign policy approach towards Singapore during that period.

In addition to diplomatic correspondence, newspapers such as 'The Straits Times' and 'Berita Harian' were examined to provide valuable supplementary information for corroborating historical facts and contextualizing the events discussed. These newspapers were accessed online through the National Library of Singapore's official website, while physical copies were obtained from the National Archives of Malaysia. The analysis was further strengthened through consultation of secondary sources, including books, academic journals, and scholarly articles sourced from various academic institutions and libraries in Malaysia and abroad. The inclusion of these secondary sources ensured a well-rounded and comprehensive examination of the Pedra Branca dispute by reinforcing the primary findings and contributing to a deeper understanding of the conflict. This multi-faceted approach not only enriches the analysis but also enhances the credibility of the study by providing a more comprehensive and contextualized understanding of the Pedra Branca dispute between Singapore and Malaysia.

DIPLOMATIC STRATEGY BEHIND THE UNILATERAL ACTIONS ON PEDRA BRANCA

The ICJ judgment also considered issues relating to the publication of official maps by both Malaysia and Singapore, each depicting Pedra Branca as lying within their respective territorial boundaries. Within this context, the Court found that Singapore had not published any official maps showing Pedra Branca as part of its territory prior to 1995. Nevertheless, the maps published by Malaya and subsequently by Malaysia between 1962 and 1975 led the Court to conclude that "those maps tend to confirm that Malaysia considered that Pedra Branca/Pulau Batu Puteh fell under the sovereignty of Singapore" (ICJ, 2008). However, in 1979, the Malaysian Government's publication of a new map that included Pedra Branca prompted a strong reaction from Singapore, which viewed the act as a unilateral measure that directly threatened its sovereignty over the island (Leifer, 2000). Singapore interpreted the publication of the map as an attempt by Malaysia to undermine its territorial claim to Pedra Branca, thereby escalating diplomatic tensions between the two countries. Conversely, Malaysia regarded the delineation of new territorial waters and continental shelf boundaries as part of a routine cartographic exercise, consistent with similar initiatives undertaken by other Southeast Asian countries.

Through the publication of the 1979 Malaysian Map, Malaysia delineated new maritime boundaries and continental shelf limits in accordance with the United Nations Convention on the Law of the Sea (UNCLOS). As a State Party to UNCLOS, Malaysia closely followed developments in international

maritime law negotiated under the Convention. Among its key provisions was the right of states to claim and extend their maritime zones in accordance with international law. The 1958 Geneva Convention on the Territorial Sea and the Contiguous Zone granted states the right to claim territorial seas, while the 1958 Geneva Convention on the Continental Shelf enabled coastal states to assert claims over their continental shelves. These legal developments encouraged Malaysia to extend its maritime zones by asserting claims over maritime areas recognized under international law. Under UNCLOS, states are permitted to extend the breadth of their territorial seas to a maximum of 12 nautical miles. Within this legal framework, Malaysia sought to define its maritime boundaries through the publication of the 1979 New Map. Similar practices were adopted by most Southeast Asian countries, with Singapore and the Philippines constituting notable exceptions, as they maintained territorial sea limits of only three nautical miles (Polomka, 1978). To address concerns arising from the publication of the map, Malaysia's Ministry of Foreign Affairs clarified that its purpose was not to assert claims over new territories but rather to provide an official record of Malaysia's territorial waters (Ministry of Foreign Affairs Malaysia, 1979).

In response to what it regarded as an infringement of its sovereignty, Singapore issued a formal protest through a diplomatic note on 14 February 1980. During the Pedra Branca sovereignty dispute, Malaysia and Singapore advanced divergent arguments to substantiate their respective claims. Malaysia's position was grounded in historical evidence and supported by a range of historical documents. From Malaysia's perspective, Pedra Branca was one of the islands under the jurisdiction of the Johor Sultanate, based on the principle of time immemorial. Conversely, Singapore maintained that Pedra Branca was *terra nullius* (territory belonging to no one) which had been occupied by the British colonial authorities in the 1840s. Acting on Singapore's behalf, the British established sovereignty through the construction of the Horsburgh Lighthouse and the subsequent administration of its operations from the 1840s onwards. Singapore's first formal protest against Malaysia generated considerable debate among politicians in both countries concerning the ownership and sovereignty of Pedra Branca (Kadir, 2015).

Singapore claimed that Pedra Branca had been under its jurisdiction since the 1840s. The Republic emphasized that it had inherited sovereignty over the island from the British colonial authorities (MFA30/80, 1980). As the legal successor to British rule, Singapore regarded Pedra Branca as a territory over which Britain had long exercised sovereignty. A key symbol of this control was the construction and continued operation of the Horsburgh Lighthouse on Pedra Branca, which had assisted maritime navigation in the Singapore Strait since the 1850s (Nik Anuar, 2003). To defend its territorial claim, Singapore formally requested that Malaysia revise the boundary lines depicted in the 1979 New Map. However, Malaysia rejected Singapore's position despite the latter's submission of historical evidence regarding its role in managing the lighthouse. In a diplomatic note sent to Singapore on April 14 1980, Malaysia reaffirmed its position that the Sultanate of Johor was the rightful sovereign over Pedra Branca, basing its claim on the principle of 'time immemorial.' From Malaysia's perspective, Pedra Branca had always formed part of Johor, which was then a state within the Federation of Malaysia (EC87/80, 1980). Malaysia's refusal to acknowledge Singapore's claim prompted Singapore to adopt further strategic measures to consolidate its position over Pedra Branca. Singapore sought to assert its sovereignty through diplomatic engagement and the exercise of sovereign authority, or "a titre de souverain." Singapore consistently urged Malaysia to amend the 1979 map and reiterated these requests through diplomatic channels. In a diplomatic note dated 18 February 1989, Singapore expressed renewed concern over Malaysia's continued failure to revise the map as proposed in 1980 (MFA/D1/179/89, 1989).

Despite Singapore's persistent efforts, Malaysia did not revise the map, which remained an official document recognized by the Malaysian government for purposes of territorial administration and enforcement (Kasmin, 2012). In addition to diplomatic measures, Singapore undertook physical actions to solidify its control over Pedra Branca. In July 1989, the Port of Singapore Authority (PSA) announced plans to construct a radar tower known as the Vessel Traffic Information System (VTIS), designed to monitor maritime traffic in the Singapore Strait. The radar system was installed on several locations including Sultan Shoal, Raffles Lighthouse, St John's Island, Bedok, and Pedra Branca, with SGD 40 million allocated to the project. During the construction period, Singapore imposed restrictions on foreign vessels, including those belonging to Johor's fishermen, from entering the waters surrounding Pedra Branca (Port Marine Circular No. 8, 1989). These restrictions significantly affected traditional fishing activities in the region and generated controversy within the Malaysian government. The directive had a substantial impact on the freedom of Johor fishermen from Pengerang, Sungai Rengit, Kampung Melayu, Teluk Ramunia, and Punggol, limiting their ability to conduct fishing activities in the waters near Pedra Branca, which had long served as a traditional fishing ground (Hamzah, 1999).

Singapore's unilateral measures were significant in asserting its position as the administrator of Pedra Branca, including responsibility for the Horsburgh Lighthouse, which had been constructed by the British in the 1850s. However, these actions drew objections from several Malaysian politicians. From their perspective, Singapore's developments were inappropriate, given that both countries were engaged in bilateral discussions to determine sovereignty over Pedra Branca. Consequently, any unilateral construction on the island was viewed as premature and unwarranted until the dispute had been formally resolved. During a parliamentary session, Malaysia's Deputy Foreign Minister, Dr. Abdullah Fadzil Che Wan, expressed Malaysia's opposition to Singapore's actions by emphasizing that Singapore should not have proceeded with development activities on Pedra Branca while the territorial dispute remained unresolved (DR/29/10/1992). In response to what they perceived as Singapore's growing presence in the region, Malaysian parliamentarians urged the government to establish a physical presence on Pedra Branca as a symbolic assertion of Malaysia's sovereignty. Among the proposals was the construction of a military base on the island, which was viewed as a strategic measure to safeguard Malaysia's sovereignty and security over the disputed territory (DR/14/11/1991).

However, the Malaysian government ultimately decided against implementing this proposal, fearing that it could further strain bilateral relations. This decision reflected Malaysia's broader diplomatic commitment to preserving amicable relations with Singapore while addressing the sovereignty dispute over Pedra Branca. Instead, Malaysia lodged an official protest, expressing deep regret over Singapore's construction of the VTIS facility on Pedra Branca and objecting to the restriction imposed on Johor's fishermen operating in the area (EC 60/89, 1989). In response, Singapore clarified that it had notified all relevant parties regarding the VTIS project through a Marine Circular (SHC 139/89, 1989). Following the completion of the project, Johor fishermen were permitted to return to the waters surrounding Pedra Branca on 25 August 1989 ("PSA izin bot," 1989). Despite this development, Singapore continued to reinforce its administrative presence on Pedra Branca by deploying its Marine Police and Navy to conduct regular patrols in the surrounding waters (Port Marine Circular No. 12, 1989). In October 1991, the PSA announced plans to construct a helipad on Pedra Branca to facilitate the movement of personnel responsible for maintaining the Horsburgh Lighthouse ("Tapak darat helikopter," 1991). Singapore did not notify Malaysia of these plans in advance, prompting Malaysia to lodge another protest in November 1991 and request that Singapore halt the construction project. Despite Malaysia's objections, Singapore proceeded with the construction as planned (EC 46/91, 1991).

SINGAPORE'S BILATERAL NEGOTIATIONS

Although Singapore had undertaken unilateral infrastructure development on Pedra Branca, the Republic also pursued diplomatic avenues to resolve the dispute. Singapore's commitment to diplomacy was demonstrated when Prime Minister Lee Kuan Yew agreed that bilateral negotiations should be the primary mechanism for resolving the Pedra Branca dispute (Jayakumar & Koh, 2009). From the beginning of the dispute, both the Malaysian and Singaporean governments consistently prioritized diplomacy as the principal approach to managing their territorial disagreement. Bilateral negotiations between the two countries can be traced back to 1980, when Malaysia's third Prime Minister, Tun Hussein Onn, and Singapore's Prime Minister, Lee Kuan Yew, held discussions at the Istana in Singapore. Both leaders emphasized the importance of resolving the dispute peacefully through diplomatic negotiations, reaffirming their commitment to maintaining amicable relations based on mutual respect (DR10/06/1980). Following these discussions, Malaysia proposed that both countries refer to relevant historical documents to substantiate their respective claims over Pedra Branca (Ministry of Foreign Affairs, 1980). This initiative was officially endorsed by Dr. Mahathir Mohamad after he became Malaysia's fourth Prime Minister in December 1981 (SHC 109/89, 1989). However, despite the initial consensus, the exchange of documents between the two countries progressed slowly and raised concerns in Singapore, whose leaders were eager to secure greater recognition of its position regarding sovereignty over Pedra Branca. Upon recognizing that the exchange process was taking longer than expected, Singapore adopted a diplomatic approach by engaging directly with Malaysian leaders to expedite the process. This step was considered necessary because a formal agreement had already been reached, and its timely implementation was regarded as important for maintaining positive bilateral relations between the two countries.

By 1989, Singapore had initiated efforts to expedite the exchange of documents. During a meeting in Geneva on 16 June 1989, Singapore's Foreign Minister, Wong Kan Seng, emphasized to Malaysia's Foreign Minister, Abu Hassan Omar, the importance of receiving a timely response from Malaysia to facilitate the process. Wong further suggested that, if the exchange of documents failed to resolve the dispute, the matter should be referred to the International Court of Justice (ICJ) for adjudication (SHC 109/89, 1989). This proposal reflected Singapore's reliance on international law as a mechanism for dispute resolution. Singapore maintained that territorial disputes, including Pedra Branca, should first be addressed through diplomatic channels but, if necessary, referred to a neutral third party such as the ICJ to prevent further deterioration of bilateral relations (CR2007/20, Verbatim Record).

Despite Singapore's persistent efforts, the Malaysian government did not provide updates on the progress of the document exchange. At the Malaysia-Singapore Foreign Ministers' Meeting held in Kuala Lumpur on 17 July 1989, Singapore raised the issue again. Malaysia's Foreign Minister, Abu Hassan Omar, assured Singapore that discussions and the exchange of documents would proceed after the Commonwealth Heads of Government Meeting (SHC 64/90, 1990). However, these discussions did not materialize, and Malaysia did not proceed with the proposed exchange within the expected timeframe. On 11 September 1989, Singapore submitted another diplomatic note formally requesting that the document exchange be scheduled for November 1989 (SHC 139/89, 1989). In response, Malaysia dispatched Dato' Ahmad Kamil Jaafar, Deputy Secretary-General of the Ministry of Foreign Affairs, to Singapore in mid-August 1990 to discuss arrangements for the exchange. During his meetings with Singapore's Permanent Secretary for Foreign Affairs, Peter Chan, on 22 August 1990, and with Singapore's Foreign Minister on the following day, Ahmad Kamil assured Singapore that Malaysia was in the final stages of preparing the relevant documents (SHC 161/90). However, Ahmad Kamil's visit did not result in immediate progress, and Malaysia continued to delay providing updates

on the document exchange. This prompted Singapore to submit another diplomatic note on 22 December 1990 seeking clarification on the proposed timeline (SHC 161/90). Singapore expressed concern over the lack of progress and reiterated its commitment to resolving the dispute expeditiously. To facilitate the process, Singapore submitted a written memorandum on 15 February 1992, outlining its legal and historical arguments in support of its claim over Pedra Branca. Four months later, Malaysia submitted its own memorandum on 20 June 1992 (Haller Trost, 1993).

In addition to advocating for the exchange of documents, Singapore also proposed that the Pedra Branca dispute be referred to the ICJ if bilateral negotiations proved unsuccessful (SHC 104/91). However, as noted by Ming (2009), Malaysia was initially reluctant to accept this proposal. Throughout the late 1980s and early 1990s, Malaysia's Minister of Justice, Syed Hamid Albar, advocated resolving the dispute through bilateral negotiations, emphasizing that direct diplomatic engagement was more appropriate than involving a third party ("Albar: Isu boleh," 1992). Malaysia's official position, reiterated by Deputy Foreign Minister Dr Abdullah Fadzil Che Wan on 4 December 1991, was that the Pedra Branca dispute should be resolved bilaterally without recourse to international adjudication (DR/04/12/1991). However, Malaysia's position began to shift in 1994. On 17 September 1994, Malaysia formally informed Singapore's Ministry of Foreign Affairs that it was willing to refer the Pedra Branca dispute to the ICJ (EC 135/94). Explaining this change, Deputy Foreign Minister Dr Abdullah Fadzil Che Wan stated that referring the dispute to the ICJ was the most appropriate course of action to achieve a final and binding resolution (DR/26/10/1994). Despite the exchange of documents, both countries remained deadlocked with neither side willing to accept the other's claims. The situation became more complex when, during the negotiations, Singapore also asserted claims over two additional maritime features near Pedra Branca, namely Middle Rocks and South Ledge. These additional claims effectively diminished the prospects for a bilateral settlement (Kadir Mohamad, 2009). Consequently, both governments agreed that the ICJ, as a neutral and impartial institution, was the most appropriate forum to determine sovereignty over Pedra Branca. From Malaysia's perspective, referring the dispute to the ICJ offered the most appropriate means of determining which country possessed legitimate sovereignty over the contested territory (DR/10/11/1997, 1997).

SINGAPORE'S DIPLOMATIC RESPONSE TO PAS'S POLITICAL ACTIONS

The Singapore government faced considerable challenges when Malaysian opposition parties adopted an assertive stance in defending Malaysia's sovereignty over Batu Puteh. Nevertheless, both governments exercised caution in responding to the developments in Malaysia's domestic politics to avoid any escalation of the dispute into military conflict. This was particularly evident when Singapore perceived the actions of the Royal Malaysia Marine Police in the Pedra Branca area in 1989 as provocative and potentially dangerous. Even so, the Republic of Singapore Navy exercised restraint to avoid further escalation (Jayakumar & Koh, 2009). From 1991 onwards, the Pan-Malaysian Islamic Party (PAS), one of Malaysia's opposition parties, sought to elevate the issue from the level of bilateral negotiations to the national political arena. As part of its strategy, PAS used parliamentary debates to urge the federal government to adopt a more resolute approach to safeguarding Malaysia's sovereignty. For example, the Member of Parliament for Nilam Puri, Mohamad Sabu, criticized the government under Mahathir Mohamad for bearing significant responsibility for resolving territorial disputes with neighboring states (DR/05/12/1991, 1991). Similarly, the Member of Parliament for Marang, Abdul Hadi Awang called for a fair resolution of the Batu Puteh dispute without compromising national dignity, echoing the reminder of the Yang di-Pertuan Agong (DR/29/04/1992). By framing the Batu Puteh issue as a matter of national sovereignty, PAS sought to project itself as a defender of national

interests while strengthening its political position in challenging the long-standing dominance of UMNO and Barisan Nasional in Johor. In response to these domestic political developments in Malaysia, Singapore continued to employ diplomatic notes strategically to ease tensions between the two countries. This approach was reflected, for instance, in the meeting between Prime Minister Goh Chok Tong and Prime Minister Mahathir Mohamad during the Commonwealth Heads of Government Meeting in 1991, where both leaders agreed to compile documentation supporting their respective claims over Pedra Branca (Jayakumar & Koh, 2009).

However, PAS's approach to advancing the Batu Puteh sovereignty issue shifted significantly by 1992. The party adopted a more assertive strategy to reinforce its commitment to national sovereignty and to project itself as a consistent defender of Malaysia's territorial interests. This shift became evident when the party's Youth Chief, Mohamad Sabu, announced plans to land on Batu Puteh to hoist the Malaysian flag in 1992 ("PAS mahu kibar," 1992). The proposed symbolic act was intended to strengthen Malaysia's physical presence in the disputed waters and to counter Singapore's construction of the VTIS radar system and a helicopter landing pad on Batu Puteh. The announcement, however, prompted a firm response from Singapore. The Ministry of Foreign Affairs issued an official warning that any unauthorized landing would result in arrest and prosecution for illegal entry into Singapore (Ramthan, 1992). This warning was reinforced by legal measures, as Batu Puteh had been designated a restricted area under the Singapore Protected Places Order 1991 (S 525/91).

Despite the Singapore government's firm warnings, PAS members remained determined to proceed with the proposed action as a means of asserting Malaysia's sovereignty over Batu Puteh. On 23 May 1992, a group of 35 PAS members led by Mahfuz Omar, the Information Chief of PAS Youth, gathered at Sungai Rengit Jetty in Pengerang, near Kota Tinggi. The group assembled for approximately half an hour, displaying posters condemning the Singaporean government. Among the more provocative slogans were: "Singapore, America's Illegitimate Child," "Beware Singapore, the Islamic Bomb Awaits You," and "Batu Puteh Belongs to Malaysia" ("Rancangan ahli PAS," 1992). In response, Singapore continued to utilize diplomatic notes to express its concerns to Malaysia regarding the risks posed by potential provocations by Malaysian opposition parties in relation to Pedra Branca (Ming, 2009). The situation was defused when the Malaysian government, through the Johor police, intervened to prevent the plan from being carried out. Although the attempt ultimately failed, Mahfuz Omar announced that PAS would instead submit a memorandum to the Malaysian Foreign Minister outlining the party's position on the Batu Puteh issue (Ismail Kassim, 1992). These developments underscore the importance of the diplomatic strategies employed by both countries in containing bilateral tensions, particularly in preventing further deterioration in relations and reducing the risk of armed conflict. Consequently, during a subsequent meeting between Goh Chok Tong and Mahathir Mohamad at the 1992 ASEAN Summit, Singapore and Malaysia agreed to continue addressing the dispute through the exchange of documents grounded in legal principles. This process ultimately contributed to the two governments' decision to refer the dispute to the ICJ in 1994 (Ming, 2009).

At the domestic level, PAS's provocative plan drew criticism from the federal cabinet under the leadership of Mahathir Mohamad. The government regarded the action as unproductive in resolving the Batu Puteh sovereignty dispute and, instead, as a move that risked heightening diplomatic tensions between Malaysia and Singapore. Moreover, the plan was seen as potentially undermining the image of Mahathir's administration, which had consistently adhered to diplomatic principles. Since 1981, the Malaysian government had been committed to avoiding any military confrontation over Batu Puteh, recognising that such measures could strain bilateral relations. Instead, the federal government viewed bilateral negotiations as the most effective mechanism for resolving territorial disputes with Singapore

and other neighboring states (“KL tidak akan,” 1992). Accordingly, PAS’s unilateral plan to stage an illegal landing on Batu Puteh was met with disappointment and condemnation by cabinet ministers. Members of the federal cabinet rejected PAS’s actions and criticized the opposition party’s youth wing for its unilateral provocation. On 5 June 1992, Malaysia’s Foreign Minister, Abdullah Ahmad Badawi, warned that PAS’s actions could complicate efforts to resolve the dispute and further undermine diplomatic relations between Malaysia and Singapore (“Pedra Branca: Menlu,” 1992). He added that such an approach could even increase the risk of armed conflict should Singapore decide to retaliate, while characterizing PAS’s actions as politically motivated publicity stunts to garner electoral support (DR/15/12/1992, 1992). Prime Minister Mahathir Mohamad also issued a firm warning to PAS, urging the party to refrain from undertaking further provocative measures. According to Mahathir, such actions would neither strengthen Malaysia’s claim to sovereignty over Batu Puteh nor contribute to resolving the dispute with Singapore in a timely manner (“Mahathir beri amaran,” 1992).

Nevertheless, PAS Youth rejected claims that its proposed action was intended to garner electoral support. Instead, the party maintained that its primary objective was to uphold national dignity and defend Malaysia’s sovereignty over Batu Puteh (“Kibar bendera: PAS,” 1992). On 20 July 1992, The Member of Parliament for Nilam Puri, Mohamad Sabu asserted that PAS’s actions were a direct response to Singapore’s conduct in relation to the sovereignty dispute. According to him, Singaporean ministers had repeatedly made statements asserting the Republic’s sovereignty over Batu Puteh despite the ongoing bilateral negotiations. However, Malaysia’s Deputy Foreign Minister, Abdullah Fadzil, Che Wan, rejected PAS’s justification. He emphasized that Singapore had the right to express its views and position regarding the dispute, but that such statements did not constitute legal evidence of sovereignty over Batu Puteh. He further stressed that PAS’s proposed action was unacceptable to the federal government (DR/20/07/1992). This was because the question of sovereignty over Batu Puteh remained the subject of bilateral negotiations between the two governments through diplomatic channels. Accordingly, PAS—or any other actor—had no authority to take unilateral actions that could undermine Malaysia’s diplomatic efforts to resolve the dispute peacefully (DR/20/07/1992).

SINGAPORE’S ACTIONS OVER THE WATERS OF PEDRA BRANCA

Throughout the Pedra Branca dispute, the Singaporean government implemented a comprehensive range of strategies to assert and consolidate its claim to sovereignty over the contested maritime feature. As highlighted by Dai (2019), Singapore employed four key approaches: peaceful negotiations, extending its claims to Middle Rocks and South Ledge, pursuing gradual conflict resolution, and maintaining a robust legal defense. However, Dai’s study does not examine in detail the physical measures undertaken by Singapore to strengthen its control over Pedra Branca. Ting’s (2009) research addresses this aspect, noting that Singapore stationed military personnel and conducted regular patrols around the island to reinforce its physical presence. An analysis of the diplomatic exchanges between Malaysia and Singapore supports Ming’s findings, as Singapore’s actions from 1989 onwards demonstrate a clear intention to maintain its claim over Pedra Branca by exercising control over the surrounding waters. To reinforce its position, Singapore deployed the Republic of Singapore Navy (RSN) to conduct regular patrols and prevent Malaysian vessels from entering the disputed waters (Koh, 2012). From Singapore’s perspective, these actions reflected its exercise of sovereign authority over Pedra Branca (SHC 75/92, 1992).

Singapore’s decision to deploy its military forces in the waters surrounding Batu Puteh constituted an indirect strategy to reinforce its physical presence in the area. This measure was intended to strengthen

its claim to sovereignty over Batu Puteh through the principle of effective occupation as recognized in international law. Under this principle, a state seeking to establish sovereignty over a territory must satisfy key criteria, including the display of authority and the intention to occupy and control (*animus occupandi*) (Jennings, 1963). The military presence not only demonstrated Singapore's intention to assert sovereignty over Batu Puteh but also reflected its exercise of sovereign authority in practice through security control and the regulation of access to the area. These actions further supported Singapore's position that it had consistently exercised administrative and security functions on Batu Puteh, in line with its longstanding management of the Horsburgh Lighthouse and regulation of access to the island.

From 1989 onwards, Singapore intensified its control over the movement of foreign vessels, including Malaysian vessels, in the waters surrounding Pedra Branca. To reinforce its claim to sovereignty over Pedra Branca, Singapore consistently objected to Malaysia's activities in the surrounding waters. Singapore viewed any failure to assert control over the waters around Pedra Branca as weakening its sovereignty claim, which it maintained had been exercised since the 1840s through the British colonial administration. For example, in 1989, Singapore lodged a diplomatic protest against the Malaysian naval vessel PZ 5, alleging that it had entered Singapore's territorial waters and anchored approximately one nautical mile from Pedra Branca (SHC 109/89, 1989). Singapore regarded this as both a violation of its sovereignty and a provocative act that could heighten tensions in bilateral relations. Malaysia, however, rejected Singapore's protest and maintained its own claim by continuing navy patrol operations in the vicinity of Pedra Branca. From Malaysia's perspective, such patrols were legitimate exercises of sovereignty and were consistent with international practice. The patrols, together with the presence of Malaysian vessels and personnel, were justified by Malaysia's position that Pedra Branca belonged to Malaysia (EC60/89). This position had already been articulated in Malaysia's Diplomatic Note EC 87/80 which was submitted to Singapore on 14 April 1980. In that diplomatic note, Malaysia maintained that its actions did not constitute trespass into Singaporean waters. In response, Singapore issued another diplomatic note, arguing that Malaysia's claim over Pedra Branca lacked a valid legal basis under international law. Singapore also referred to maps published by Malaysia in 1962, 1965, and 1974, which it contended implicitly acknowledged Singapore's sovereignty over Pedra Branca (SHC 139/89). In addition, Singapore protested Malaysia's continuing physical activities in the area and urged the Malaysian government to cease such operations (SHC 141/89).

Singapore's deployment of its naval forces in the waters surrounding Pedra Branca formed part of its broader strategy to consolidate its control over an area also claimed by Malaysia. This assertion of control, however, had direct implications for Johor fishermen who had traditionally conducted fishing activities in the waters around Pedra Branca. In September 1991, Johor Bahru UMNO leader Shahrir Samad publicly claimed that Singaporean authorities had expelled Johor fishermen from the waters surrounding Pedra Branca ("Tiada halangan bagi," 1991). This incident prompted strong reactions from politicians in Johor, who maintained that Pedra Branca formed part of Malaysia's territorial waters. They expressed dissatisfaction with Singapore's alleged restrictions on Johor fishermen operating in the surrounding waters. From their perspective, Pedra Branca was part of Malaysia's territory, and therefore Singapore had no legitimate authority to prohibit or obstruct Johor fishermen from accessing those waters. However, the Port of Singapore Authority (PSA) denied these allegations and clarified that foreign fishermen, including those from Johor, were permitted to fish in the waters near Pedra Branca, except during the construction of the Vessel Traffic Information System (VTIS) radar tower in 1989.

In response to the ongoing dispute, Shahrir Samad urged the Malaysian government to assert its position on Pedra Branca (“Shahrir gesa KL,” 1991), arguing that Singapore’s actions reflected its claim to sovereignty over Pedra Branca and its control of the surrounding waters. To safeguard Johor fishermen engaged in fishing activities in the waters surrounding Pedra Branca, the Malaysian Maritime Enforcement Agency (MMEA) deployed a patrol vessel. On 21 and 22 April 1991, the Johor State Fisheries Department dispatched the vessel “KP Landok” to patrol the waters near Pedra Branca. However, the vessel was reportedly intercepted and ordered to leave by a Singaporean patrol boat, prompting official responses from both governments. Through a diplomatic note, Singapore explained that the Republic of Singapore Navy’s (RSN) actions were intended to protect when it regarded as Singapore’s territorial waters from unauthorized incursions and were not intended to provoke Malaysia (SHC 41/92). Singapore further justified the removal of KP Landok on the grounds that the vessel had entered its territorial waters without prior authorization.

Singapore’s decision to deploy its naval forces to conduct regular patrols and operational activities in the waters surrounding Pedra Branca prompted a reciprocal response from Malaysia. By 1992, Malaysia had adopted a similar approach by stationing its naval forces in the surrounding waters of Pedra Branca. This measure was intended to reinforce Malaysia’s claim to sovereignty over Pedra Branca, which it regarded as an integral part of its national territory. On 28 May 1992, Malaysia’s Marine Police detained two Singaporean fishing vessels, SMF 794 and SMF 1028, for allegedly entering Malaysian waters near Pedra Branca illegally. Seven Singaporean fishermen were detained overnight before being released on RM1,000 bail. Following their release, the fishermen alleged that they had been mistreated by Malaysian authorities, claiming that Malaysian officers had fired warning shots and slapped them during the operation (“Malaysian marine police,” 1992; “Marin M’sia tahan,” 1992). In response to these allegations, the Malaysian government initiated an investigation through the Johor Police. On 3 June 1992, Johor’s Chief of Criminal Investigations, AC Clive Howell, announced that all officers involved would be thoroughly investigated and that any misconduct would result in legal action (Chiang, 1992). Singapore also lodged a formal protest on 8 June 1992, condemning the alleged mistreatment of its fishermen (MFA/D1/422/92, 1992). Nevertheless, Singapore welcomed Malaysia’s decision to investigate the incident. Following the investigation, Malaysia’s Marine Police issued a statement maintaining that no physical violence had occurred during the raid (“Polis marin nafi,” 1992). A subsequent report confirmed that warning shots had indeed been fired, however, these were intended to signal the main Malaysian patrol boat, PX4, after one of the Singaporean fishing vessel’s engines had malfunctioned. DSP Chong, the officer in charge, fired five warning shots into the air to alert PX4 (“Johore Marine Police,” 1992).

THE ICJ JUDGMENT ON THE PEDRA BRANCA DISPUTE

The judgment delivered by the ICJ on 23 May 2008 marked the conclusion of the dispute over Pedra Branca, Middle Rocks, and South Ledge between Malaysia and Singapore. Based on the deliberations of a panel of 16 judges, the Court rendered separate decisions concerning sovereignty over the three maritime features. By a vote of twelve to four, the Court awarded sovereignty over Pedra Branca to Singapore (ICJ, 2008). The ruling was a disappointment to Malaysia’s legal team, which had argued that Pedra Branca belonged to the Sultanate of Johor. This position was initially acknowledged by the Court, which recognized that Johor, now part of Malaysia, was the original sovereign of Pedra Branca dating back to the sixteenth century. Nevertheless, the Court reached a different conclusion after considering Singapore’s consistent acts *à titre de souverain* over Pedra Branca, which had not been contested by Malaysia (Choong, 2009). Nevertheless, both states continued to employ diplomatic

measures to honor and comply with the ICJ's decision through the Malaysia–Singapore Joint Technical Committee (MSJTC) (Ministry of Foreign Affairs Singapore, 2008).

In assessing Singapore's acts *à titre de souverain*, the Court limited its consideration to actions undertaken before the critical date of the Pedra Branca dispute, namely 14 February 1980. Among the acts examined were Singapore's investigation of maritime accidents, regulation of access to Pedra Branca, and the raising of its national flag on the island (Choong, 2009). These actions demonstrated Singapore's intention to exercise effective administrative authority over Pedra Branca. The Court did not consider subsequent acts of sovereignty after the critical date, such as the deployment of military forces in the waters surrounding Pedra Branca or the construction of facilities, including a helicopter landing pad and the Vessel Traffic Information System (VTIS) radar. Nevertheless, the acts undertaken before the critical date carried significant weight in supporting Singapore's claim. The Court also considered Malaysia's failure to protest Singapore's activities as evidence of acquiescence, thereby strengthening Singapore's legal position (ICJ, 2008). On this basis, the Court concluded that sovereignty over Pedra Branca rightfully belong to Singapore.

Nevertheless, the ICJ's decision on sovereignty over Pedra Branca was not unanimous. Four judges dissented from the majority ruling in favor of Singapore: Judges Dugard, Simma, Abraham, and Parra-Aranguren. Judge Dugard, for instance, argued that the Court had failed to clarify how sovereignty over Pedra Branca had formally transferred from the Sultanate of Johor to Singapore (ICJ, 2008). The judgment merely stated that sovereignty had passed to Singapore without specifying the mechanism or date of transfer, an omission that diverged from the Court's usual practice in adjudicating territorial disputes. Judge Parra-Aranguren similarly questioned the sufficiency of Singapore's acts of sovereignty between 1953 and 1980, arguing that a period of 27 years was too short to extinguish Johor's sovereignty, which had extended over Pedra Branca for approximately 127 years (ICJ, 2008). Likewise, Judges Simma and Abraham expressed doubts regarding the weight of Singapore's evidence, maintaining that its acts of sovereignty were too limited, insufficiently significant, and lacking in consistency to displace Malaysia's historical claim to Pedra Branca (ICJ, 2008). With regard to Middle Rocks, the Court awarded sovereignty to Malaysia by a vote of fifteen judges (ICJ, 2008). This decision was based on the finding that Middle Rocks lies within Malaysia's territorial waters. However, Malaysia's success in securing sovereignty over Middle Rocks was not perceived domestically as significant (Arkib Negara Malaysia, 2012). This was because Pedra Branca, rather than Middle Rocks, constituted the central focus of the territorial dispute between Malaysia and Singapore since 1980. Consequently, the ruling in Malaysia's favor over Middle Rocks, which received limited public attention, did not generate the same sense of national achievement. As for South Ledge, the Court determined that sovereignty would depend on the delimitation of maritime boundaries between Malaysia and Singapore (ICJ, 2008). Accordingly, the status of South Ledge remained unresolved and left to be determined by both states through future negotiations on maritime delimitation.

CONCLUSION

Throughout the Pedra Branca dispute, Singapore consistently maintained a firm and resolute position in defending its claim and interests concerning the contested maritime feature. From the outset, Singapore responded strongly to Malaysia's publication of the 1979 New Malaysia Map, which included Pedra Branca within Malaysia's territorial waters. Singapore's claim over Pedra Branca was deeply rooted in its historical role as the administrator of the Horsburgh Lighthouse, which it had maintained since the 1850s. To strengthen its *de facto* control, Singapore employed a series of physical measures,

including the construction of infrastructure on Pedra Branca, the deployment of maritime authorities to patrol the surrounding waters, and the regulation of access by foreign vessels. These actions were intended to reinforce Singapore's claim over Pedra Branca while directly challenging Malaysia's competing claim.

However, Singapore also recognized that unilateral actions could potentially escalate tensions and risk confrontation with Malaysia. To mitigate this possibility, Singapore consistently relied on diplomatic channels, particularly through the exchange of formal diplomatic notes, to communicate its concerns and contest Malaysia's position. Through these exchanges, Singapore reiterated its claim, expressed objections to Malaysia's actions, and emphasized the importance of resolving the dispute through peaceful means. Recognizing diplomacy and international law as the most pragmatic avenues for settlement, Singapore proposed in 1989 that the dispute be referred to the International Court of Justice (ICJ). Although Malaysia was initially hesitant to accept this proposal, Singapore's continued advocacy for a legal resolution eventually contributed to Malaysia's decision in 1994 to agree to refer the dispute to the ICJ.

In conclusion, Singapore's strategy in the Pedra Branca dispute was characterized by a combination of physical measures to maintain its presence and diplomatic efforts to achieve a peaceful resolution. By balancing these approaches, Singapore was able to sustain its claim over Pedra Branca while avoiding military confrontation. The eventual decision by both countries to refer the dispute to the ICJ reflected their recognition that a legal settlement was necessary to bring finality to the long-standing territorial conflict. Singapore's persistence in pursuing diplomatic and legal avenues ultimately contributed to the peaceful resolution of the dispute through international adjudication.

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