

12 July 2024.

THE “ZHENG HE” CASE NO.33 (LUXEMBOURG V. MEXICO)

FINAL SUBMISSIONS OF THE UNITED MEXICAN STATES

For the reasons explained by Mexico in its Statement in Response and during the hearings, and pursuant to article 75(2) of the Rules of the International Tribunal of the Law of the Sea, the United Mexican States respectfully requests the Tribunal to reject Luxembourg’s request for provisional measures.

Notwithstanding the foregoing, Mexico considers that the rights of the crew are of the utmost importance and their well-being and integrity must be preserved even when internal procedures under Mexican law are pending. Equally, Mexico considers it important to safeguard the integrity of the vessel, thus allowing maintenance work on the Zheng He, as requested by the agency contracted by owners of the vessel.

In this regard, and considering that an order for provisional measures should safeguard the rights of both parties, and acknowledging that the Tribunal must recognize Mexico's right to exercise jurisdiction over events occurring in internal waters, Mexico wishes to voluntarily offer periodic reports reflecting the treatment provided to both the crew and the vessel, as well as their current status. Of course, these demonstrations of good faith should not, in any way, be construed as an admission of the claims of Luxembourg before this Tribunal.



Yours sincerely,
Minister Alfonso Ascencio Herrera
Deputy Chief of Mission of the
Embassy of Mexico to the Kingdom of the Netherlands
and Co-Agent of the United Mexican States