

## **MARITIME SECURITY IN SOUTHEAST ASIA - AN APPRAISAL**

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### **A. INTRODUCTION**

As opposed to the definition of military security which relates to the security of a state and its people, maritime security covers a wider range particularly after September 11 to include maritime terrorism, people smuggling, narcotics trafficking, smuggling of goods, piracy, transnational crime, as well as environmental aspects such as illegal fishing, timber smuggling, and the smuggling of wildlife.

Christian Bueger comments that “the ‘laundry list’ approach to defining maritime security has rightfully been criticized as insufficient since it does not prioritize issues, nor provide clues of how these issues are inter-linked, nor outlines how these threats can be addressed”.<sup>1</sup>

Nevertheless, all nations have a responsibility for maintaining “good governance at sea” be it nationally, regionally or internationally. Lutz Feldt, Dr. Peter Roell and Ralph Thiele observe that the term “maritime security” is a responsibility, which has no clear definitions; it is a governmental responsibility, has no universal legal or agreed definition due to its broad topic”.<sup>2</sup> Among the issues relating to maritime security are international and national peace and security; sovereignty, territorial integrity and political independence; security of sea lines of communications; security protection from crimes at sea; environmental issues and security of all seafarers and fishermen.

This paper provides an overview of maritime security in Southeast Asia and an appraisal of cooperative measures undertaken to combat armed robbery and piracy, incidents at sea, search and rescue, maritime domain awareness and information sharing.

### **B. MARITIME SECURITY ISSUES**

#### **I. PIRACY AND ARMED ROBBERY – CASE STUDY FOR STRAITS OF MALACCA**

The seas of the Southeast Asian region are critical and important sea lanes of communication (SLOC) since they border the Pacific and Indian Ocean and are major arteries of communication and international commerce. The seas which cover about 80% of the region dominate the economic lifelines of the surrounding countries. Today more than half of the world’s annual merchant tonnages traverse Southeast Asian waters.

Piracy and armed robbery threats in this strategic SLOC has attracted much attention from states dependent on these water for international trade and free movement of goods. The best example of

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<sup>1</sup> Bueger, Christian (2015), What is Maritime Security?, Cardiff University, retrieved from <http://bueger.info/wp-content/uploads/2014/12/Bueger-2014-What-is-Maritime-Security-final.pdf>

<sup>2</sup> Feldt, Lutz, Roell, Dr. Peter and D. Thiele, Ralph (2013), Maritime Security – Perspectives for a Comprehensive Approach, ISPSW Strategy Series: Focus on Defense and International Security, Issue No.22, April 2013, p.2 and 3.

the effectiveness of regional cooperation in addressing maritime security threats in Southeast Asia is the Malacca Strait cooperation. The Strait of Malacca (SOM) is quite unique in that it shares borders with Indonesia, Malaysia and Singapore and connects three major oceans - the South China Sea, Indian Ocean and the Pacific Ocean.

Piracy and armed robberies in the Straits back in 2006 had resulted in Lloyd's of London categorizing it as a "war risk zone" which among others resulted in higher insurance premiums for vessels using the straits.<sup>3</sup> The littoral states of Indonesia, Malaysia and Singapore have taken very proactive moves to address this by establishing in July 2004, the Malacca Straits Security Initiative (MSSI). The current effort by the Malaysia, Indonesia, Singapore and Thailand is Malacca Strait Sea Patrol (MSSP) consists of surface and air surveillance a year-round operation to ensure greater safety of navigation in SOM. This includes the famous Eyes in the Sky or EIS, air patrol by using Maritime Patrol Aircraft (MPA) in the straits.

This cooperation is supported by the improvement of operations through continuous discussions among the three littoral states has led to a significant decline in seaborne crime, particularly maritime piracy and armed robbery in SOM. MSSP is also significant as being the effective multilateral cooperation in Southeast Asia without an extra-regional partner.

Efforts at enhancing maritime security cooperation continues to grow with the littoral states responding positively to Thailand interest as neighboring states controlling the northern area of SOM in joining the patrols and the littoral states. In fact Indonesia and Thailand – Malaysia have already developed an informal cooperative network for coordinated patrols in SOM and there is the good opportunity to develop current trilateral cooperation into five-state network cooperation (Indonesia, Malaysia, Singapore, Thailand) in the future.

<b>Year</b>	<b>MECC</b>	<b>IMB</b>
2004	20 (8)	20
2005	8	8
2006	3	3
2007	4	5
	<b>MMEA</b>	<b>IMB</b>
2008	3	2
2009	1	2
2010	1	2
2011	9	1
2012	2	2
2013	0	1
2014	2	1

*Source: International Maritime Bureau and Malaysia Enforcement Coordinating Centre (MECC) and Malaysian Maritime Enforcement Agency (MMEA)<sup>4</sup>*

*Table 1: Incidents of piracy and armed robberies in Strait of Malacca*

This unique development of the multilateral Straits of Malacca patrols originated from an informal cooperation network of bilateral agreements without external leadership. This could be due to the aspiration of the littoral states (especially Malaysia and Indonesia) that refuse to allow foreign

<sup>3</sup> Yun Yun Teo, "Target Malacca Straits: Maritime Terrorism in Southeast Asia," *Studies in Conflict and Terrorism* 30 (2007): 547-48

<sup>4</sup> Adopted from "Profile of the Straits of Malacca: Malaysia's Perspective", H.M Ibrahim & Hairil Anuar Husin, MIMA, Kuala Lumpur, 2008.

interference that could potentially lead to an imbalance in the geopolitics of the straits and region and compromise their sovereign rights. Malaysia and Indonesia are consistent in opposition to the internationalization of security cooperation management in SOM since 1999 when Japan wanted to establish a regional coast guard force for joint patrolling of the SOM<sup>5</sup> and the United States proposed a Regional Maritime Security Initiative (RMSI) in 2004. The Cooperative Mechanism for the Straits of Malacca and Singapore was launched in 2007 in the context of encouraging user states and shippers to voluntarily assist the littoral states in their responsibility to enhance safety, security and environmental protection in the straits. As expected, Malaysia and Indonesia declined the security element in that initiative.

As a resource-poor nation, Japan depends heavily on the safe passage of ships through the SOM and the South China Sea (SCS) and this has made the safety and freedom of navigation her primary maritime interest. As a trading state, 99% of Japan's trade by value moves by sea.<sup>6</sup> At least 80% of her crude oil imports and 60% of her food sources are transported via Southeast Asian sea routes.

Japan began early efforts on combating piracy in Southeast Asia by organising the first ever Anti-piracy meeting in Tokyo in 2000 in line with ASEAN + Japan 1999 summit in Manila.<sup>7</sup> The introduction of the Japan International Cooperation Agency (JICA) to assist the cooperative capacity building programme for ASEAN together with the Japanese Coast Guard (JCG) demonstrated her concern for the importance of non-interference to sovereignty of the three littoral states.<sup>8</sup> JCG conducted the capacity building programme with Philippines Coast Guard (2002 – 2008), Malaysian Maritime Enforcement Agency (MMEA) in 2005 and Indonesia Coast Guard namely BAKORKAMLA (now called BAKAMLA) in 2008.

After the establishment of the Regional Cooperation Agreement on Combating Piracy and Armed Robbery against Ship in Asia (ReCAAP) in 2006, Japan channeled most of her antipiracy aid to the region through that mechanism. She also continued to provide assistance to the littoral states through technical assistance, information sharing, and capacity building including training exercises. Japan also allocated grants under the “Cooperation on Counter-Terrorism and Security Enhancement” comprising ¥1.92 billion to Indonesia for three patrol vessel in 2006; ¥609 million to upgrade maritime security communication systems in the Philippines; and ¥476 million to enhance Malaysia's maritime security.<sup>9</sup> A total of ¥5.57 billion was also funded for upgrading the vessel traffic system (VTS) to collect data on traffic patterns in the SOM.<sup>10</sup>

Despite of the overlapping claims in the Strait of Malacca, the littoral states such as Indonesia, Malaysia, Thailand and Singapore move together as a team in preserving the security, safety and freedom of navigation in the straits. This shows that territorial dispute management is not just about UNCLOS and legal instruments. They adopted security cooperation as a bigger agenda rather than the almost non-resolvable disputes that could trigger more crises. Security and economy should be the instruments to dominate territorial dispute and encourage comprehensive and collaborative actions aimed at achieving economic prosperity. The “sense of similarity among them” makes the crisis be overshadowed by the more important and crucial needs to preserve the safety and security of the SLOC in SOM. To conclude, strategic interests always override the operational crisis.

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<sup>5</sup> Maritime Security in Southeast Asia, *U.S., Japanese, Regional and Industry Strategies*, NBR Special Report #24 (Nov. 2010)

<sup>6</sup> Tsuneo Akaha, “Japan's Comprehensive Security Policy,” *Asian Survey* 31, no. 4 (April 1991): 328.

<sup>7</sup> Andrin Raj, “Japan Initiatives in Security Cooperation in the Straits of Malacca on Maritime Security and in Southeast Asia: Piracy and Maritime Terrorism” (Centre Stratad Asia Pacific Strategic Centre, 2009)

<sup>8</sup> Ibid

<sup>9</sup> Yoichiro Sato, “Southeast Asian Receptiveness to Japanese Maritime Security Cooperation” (Asia Center for Security Studies, 2007), <http://www.apcss>

<sup>10</sup> Ibid.

The important contribution of SOM as one of the global waterways triggered regional security cooperation that was later supported by extraregional parties that finally resulted in interregional cooperation. Perhaps such security cooperation that is able to ease tensions among claimant states can be applied to manage disputes in the South China Sea. ASEAN and China might explore opportunities to initiate security cooperation in the SCS rather than trigger a crisis that does not benefit any party.

## **II. SECOND PHASE OF BOAT PEOPLE: ISSUES OF ROHINGYAS FROM MYANMAR**

The issue of boat people has not gone off the radar screen as boatloads of Rohingyas landed in ASEAN countries over the last two weeks. Such a situation is not new to Malaysia which saw thousands of Vietnamese refugees illegally entering the country in 1975.

This is due to the internal issue in Myanmar where the Rohingyas, an ethnic minority from Rakhine region between the borders of Myanmar and Bangladesh, are not regarded as citizens of Myanmar despite living there for centuries. They are denied all rights as citizens in terms of freedom of movement to travel domestically, lack of education, limited employment opportunities, etc.<sup>11</sup> As a result, “many live in poverty, working illegally with no documentation, illiteracy, vulnerable to discrimination, poor healthcare, etc.”<sup>12</sup> The most detestable part is the repulsive form of forced labour, rape, executions and torture.<sup>13</sup> Being denied their rights as citizen has resulted in them not having proper national documentation which prevents them from travelling nationally and internationally.

Many of them have sought to escape by fleeing to countries such as Thailand, Malaysia and Indonesia using land and sea routes. This makes the situation worse being abroad outside of Myanmar due to their lack of legal status of being statelessness. The Rohingyas’ rely on the “assistance of smugglers which usually necessitates them making hazardous boat journeys to countries in Southeast Asia. Many Rohingyas’ who undertake the journey end up as victims of trafficking and are forced into bonded labour”.<sup>14</sup>

The situation of the illegal boat people of Rohingyas’ has become more out of control and in this regard, the United Nations Secretary General Ban Ki-moon urged the Southeast Asian region to first receive and provide necessary humanitarian life-saving assistance and to facilitate timely disembarkation and keep their borders and ports open.<sup>15</sup> It was also mentioned that a special meeting on Irregular Migration in the Indian Ocean will be held in Bangkok on 29 May 2015 with participants from Australia, Indonesia, Cambodia, Laos, Myanmar, Vietnam and Bangladesh. The purpose of the meeting is for these countries and international organisations to discuss and seek solutions to solve the problem constructively.

In the meantime, Malaysia and Indonesia have begun the process of providing temporary shelter, food, clothing, and medical aid to the Rohingya boat people. On 21 May 2015, Myanmar’s navy carried out its first rescue of Rohingyas’ boat people due to international pressure. The focus now is

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<sup>11</sup> Al-Imran, Hassan Faruk and Mian, Md. Nannu (2014). The Rohingya Refugees in Bangladesh: A Vulnerable Group in Law and Policy, *Journal of Studies in Social Sciences*, Vol. 8, No. 2, p. 233.

<sup>12</sup> The Human Rights of Stateless Rohingya in Thailand, The Equal Rights Trust in partnership with The Institute of Human Rights and Peace Studies, Mahidol University, 2014 at p. 3.

<sup>13</sup> Al-Imran, Hassan Faruk and Mian, Md. Nannu (2014). The Rohingya Refugees in Bangladesh: A Vulnerable Group in Law and Policy, *Journal of Studies in Social Sciences*, Vol. 8, No. 2, p. 234.

<sup>14</sup> The Human Rights of Stateless Rohingya in Thailand, The Equal Rights Trust in partnership with The Institute of Human Rights and Peace Studies, Mahidol University, 2014 at p. 5.

<sup>15</sup> STAR, World Section, UN Chief: They deserve human dignity, Tuesday, 12 May 2015, p. 22.

for regional cooperation among states to tackle the issue of irregular movement of Rohingyas while taking note of Myanmar's perspectives.

The European approach in relation to boat people is to tackle the issues from the root source. For example, under present EU arrangements, someone who arrives by boat in Italy but applies for asylum in Germany will be sent back to Italy to deal with the asylum claim.<sup>16</sup> However, last month, the Council of Aliens Law Litigation, a Belgian administrative court ruled in favour of two asylum seekers in which they claimed they should not be sent back to Italy because their applications would not be handled correctly there.<sup>17</sup>

### III. COORDINATION ON SEARCH AND RESCUE (SAR) OF MH 370

In the issue of search and rescue (SAR), undelimited border areas are of utmost importance. The search and rescue (SAR) mission for Malaysia Airlines flight MH 370 that went missing on 8th March 2014 is a good example of practical cooperation between states. The international rescue effort over the South China Sea demonstrated goodwill and cooperation with twenty six countries involved in the search at an "unprecedented level"<sup>18</sup>

From the South China Sea to the Andaman Sea to the Indian Ocean – ASEAN has continued to assist in every way possible, true to the spirit of regional cooperation and friendship without any hesitation in sharing of information, assets and expertise. The SAR shows commitment for greater cooperation between each member nation especially in the field of disaster management under the framework of the ASEAN Agreement on Disaster Management and Emergency Response. The incident stressed upon the importance of information and resource sharing as we strive to be in the utmost state of readiness in mitigating potential calamities and risks. ASEAN's unity will remain solid and is totally committed to assisting Malaysia in coordinating this massive SAR to locate MH 370.<sup>19</sup>

Joint Communiqué of the MH 370 Third Tripartite Ministerial Meeting on 16 April 2015 stated "in the event the aircraft is found and accessible, Ministers agreed to plans for recovery activities, including securing all the evidence necessary for the investigation in accordance with the requirements of Annex 13 to the Chicago Convention".<sup>20</sup> If the aircraft cannot be found within the current search area, Ministers agreed to the search of additional 60,000 000 square kilometres, thus covering the search area up to 120,000 square kilometres in which all high probability search areas would have been covered.<sup>21</sup>

Ministers remain committed to bring closure and some peace to the families and loved ones of

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<sup>16</sup> Neumann, Klaus (2015). Boat people and gunships in the Mediterranean, Media Centre, Swinburne University of Technology, Australia, 13 May 2015, retrieved from <http://www.swinburne.edu.au/media-centre/news/2015/05/boat-people-and-gunships-in-the-mediterranean.html>

<sup>17</sup> Neumann, Klaus (2015). Boat people and gunships in the Mediterranean, Media Centre, Swinburne University of Technology, Australia, 13 May 2015, retrieved from <http://www.swinburne.edu.au/media-centre/news/2015/05/boat-people-and-gunships-in-the-mediterranean.html>

<sup>18</sup> The STAR. 21 March 2014. Missing MH 370: Unprecedented level of cooperation. Retrieved from <http://www.thestar.com.my/News/Nation/2014/03/21/Unprecedented-level-of-cooperation>

<sup>19</sup> DCA Official Newsroom – The Official MH370 Newsroom. 21 March 2014. M370 Press Briefing by Hishamuddin Hussein, Minister of Defence and Acting Minister of Transport, 5 April 2014 Retrieved from <http://www.mh370.dc.gov.my/archive/>

<sup>20</sup> Joint Communiqué of the MH 370 Third Tripartite Ministerial Meeting, 16 April 2015. Retrieved from <http://www.mh370.gov.my/MH370%20Tripartite%20Communique%20April%202015.pdf>

<sup>21</sup> Joint Communiqué of the MH 370 Third Tripartite Ministerial Meeting, 16 April 2015. Retrieved from <http://www.mh370.gov.my/MH370%20Tripartite%20Communique%20April%202015.pdf>

those on board MH 370 and all the three countries stated their commitments and best efforts in search of the aircraft and will continue to updates on the latest developments of the search operations whenever new information is available.

Most importantly, the search and rescue for MH 370 demonstrated goodwill and international cooperation in maintaining the peace and good order of the sea in relation to maritime security.

#### **IV. MARITIME DOMAIN AWARENESS AND INFORMATION SHARING**

Maritime Domain Awareness (MDA) can be defined as “the effective understanding of anything associated with the global maritime domain that could impact the security, safety, economy or environment of the state”. It is “all area and things of, on, under, relating to, adjacent to, or bordering on a sea, ocean, or other navigable waterway, including all maritime-related activities, infrastructure, people, cargo, vessels and other conveyances.”<sup>22</sup>

MDA is about the importance of effective surveillance of the world’s waterways that require a global chain of information exchange. Prior to the realisation of the MDA, there were several elements (info-sharing, info-fusion and sense making) required to cue responsive intelligence and operational coordination. To connect the global information series, it is important to have regional maritime information-sharing hubs located at strategic choke points of maritime trade.

No single state is able to deal with a various maritime security threats alone and this indicates the clear need of information sharing initiatives. As Southeast Asian waters are one of the critical regions for maritime transportation where more than half of the world’s shipping trade traverses efforts to enhance MDA and information sharing are an important agenda among the littoral states.

Bilaterally, the more than a decade-old Malaysian Sea Surveillance System and Indonesia’s Integrated Maritime Surveillance System, and a comprehensive Vessel Traffic Information System (VTIS) for the SOM have enhanced maritime domain awareness.<sup>23</sup> For regional initiatives, Japan took the lead in establishing the Regional Cooperation Agreement on Combating Piracy and Armed Robbery against Ships in Asia (ReCAAP) in 2006 as a result from 2004 ReCAAP between ASEAN and Japan, China, the Republic of Korea, Sri Lanka and Bangladesh (ASEAN + 6). ReCAAP that operates in Singapore is a mechanism to facilitate communication and information exchange, provide statistical analyses on piracy and armed robbery incidents in Asia, facilitate capacity building to improve the capability of member countries in combating piracy and armed robbery in the region and cooperate with organisations and like-minded parties on joint exercises, information sharing, capacity building, or other forms of cooperation.

The end delivery of ReCAAP is the establishment of an Information Sharing Center (ISC) which has proven effective in coordinating responses to piracy reports and the ReCAAP agreement has been credited with reducing piracy in the Straits of Malacca. Although Malaysia and Indonesia have not signed and ratified the ReCAAP due to their stance in rejecting any internationalisation and third party military presence, both have signaled a willingness to cooperate with the ISC with no formal acceptance to that agreement.

Singapore later make progress toward better cooperation by developing the Information Fusion Centre (IFC) in April 2009 at Singapore’s Changi Command & Control Centre (CC2C) to ensure

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<sup>22</sup> Rear Adm. Jonathan W. White, *Advancing Maritime Domain Awareness (MDA) for the Fleet and the Nation*. Retrieved from <http://navylive.dodlive.mil/>

<sup>23</sup> The 5<sup>th</sup> IISS Asia Security Summit, 2-4 June 2006. *Chapter 5: Advancing Maritime Security Cooperation*. The Shangri-La Dialogue Report 2006, page 57-64

that actionable information can be delivered to regional partners for further collaboration or to cue timely operational responses.<sup>24</sup> The legal basis of the IFC are a series of Memoranda of Understanding (MoU) between Singapore and participating countries and it is not limited to piracy and armed robbery incidents and include a broader range of maritime domain issues including fisheries, marine environment and maritime terrorism. As of March 2015, 23 countries participated in IFC and 15 have their respective International Liaison Officers (ILOs) to serve as conduits to their respective countries' operation centres for facilitating the seamless sharing of information between their parent agencies and the IFC.<sup>25</sup> The unique approach of IFC enables the pooling of resources and expertise allowing for better shared MDA.

Despite of reluctance of Malaysia and Indonesia to officially recognise ReCAAP, they have sent their ILOs to IFC in support of the Singapore initiative (IFC) for enhancing information sharing and later the MDA among the states on maritime issues especially in the SOM and South China Sea.

As a 24/7 centre, the IFC is equipped with sense technology namely Open & Analysed Shipping Information System (OASIS) which contains vessel information and tracks their movements through satellite Automatic Identification System (AIS), Long Range Identification System (LRIT) and IMO data.<sup>26</sup> This system is an effective response or deterrence to any incident or seaborne crimes. When the IFC is first alerted, the Duty Officer will react by informing key stakeholders of the incident and distribute details to its information sharing portals, and the ILOs team would then analyse an incident from the collected data. Finally, the output will be transmitted to the relevant sharing partners to trigger operational responses where applicable. The IFC also organises quarterly Shared Awareness Meeting (SAM) which bring together the regional maritime security community to discuss current challenges including partners such as ReCAAP, IMB and shipping associations for better collaborative efforts.



Figure 2: Collaboration among IFC partners' ILOs

The capability of the IFC to utilise information sharing and create timely maritime awareness has proven to have tangible benefits among its partners. For example, in October 2009, a Thailand-flagged fishing vessel, *Thai Union 3*, was attacked in the Gulf of Aden. The IFC was able to source positional information from international partners in an expeditious manner, providing Thai authorities with the most up-to-date information to deal with the incident.

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<sup>24</sup> LTC Nicholas Lim, *The Information Fusion Centre (IFC) – A Case For Information Sharing To Enforce Security In The Maritime Domain*, Journal of the Singapore Armed Forces Supplement, April 2011.

<sup>25</sup> Ibid.

<sup>26</sup> Ibid.

The International Maritime Bureau Piracy Reporting Centre (IMB PRC) for the Asia Pacific region based in Kuala Lumpur is also part of MDA through information sharing. It serves as a single point of contact for shipmasters anywhere in the world whose vessels have been attacked or robbed and all information will be immediately relayed to local law enforcement agencies and broadcast to all vessels in the ocean region, providing vital intelligence and increasing awareness.<sup>27</sup>

The only different between ReCAAP, IFC and IMB are: ReCAAP is Japan's initiative based on a government-to-government consensus made up of ASEAN states but excluding Malaysia and Indonesia and Japan; the IFC is Singapore effort to encourage interregional information sharing with wider support beyond ASEAN and also on a government-to-government basis; and the IMB serves as industrial focal point.

The information sharing among the governments does not come easily with some challenges which might restrict such cooperation. The first challenge might be to reduce the trust gap between the states due to the sensitivity of some information relating to their security and strategic interests. This causes states to practice the concept of "a need to share" which makes it restricted rather than comprehensive. The IFC overcomes the challenge by confidence-building efforts through visits, information sharing exercises and maritime security workshops. It aims to transform the "need to share" approach to a "responsibility to share". The next challenge is to keep an effective interoperability between states that might be constrained by technology. The IFC addressed this by providing an internet-based platform through ReMIX system to link information sharing among 24 countries in the Western Pacific Naval Symposium (WPNS). It also utilises ACCESS 2 system, operated flexibly either by satellite or internet broadband network and commercial-off the-shelf (COTS) applications that are able to provide common situation pictures as well as a real-time secured communication linkage for partnership.

Maritime Domain Awareness strongly requires comprehensive and collaborative information sharing to be achieved. For Asia, ReCAAP, IMB and IFC are a part of the regional initiative to create a global information network on a regional to regional basis which has proven beneficial in securing the interests of littoral and coastal states.

### **C. CONCLUSION**

In reference to the wide ranging issues on maritime security, maritime security cooperation in Asia could be reviewed on an intraregional basis before being extended to the regional context. Regional (bilateral, trilateral and multilateral) and extraregional approaches taken to address maritime security issues in Asia should be adopted comprehensively. Nevertheless, efforts that do not take into account the centrality of the role of littoral states and respect for their sovereignty should be discarded. The most effective approach is by ensuring the centrality of littoral states that would foster the contribution of user states.

Although sovereignty sensitivities are significant factors to littoral states in regard to extraregional security cooperation, the structural, economic and normative changes in the Southeast Asia security complex are broadening, and operationalising maritime cooperation have assumed higher significance to the littoral states. At the same time, governments should look towards fostering existing networks and work for formal arrangements although informal cooperation can also be beneficial.

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<sup>27</sup> Retrieved from <https://icc-ccs.org/icc/imb>