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Gammeltoft, Peder

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From Dutch to disputed: How Skagerrak became the focus of a naming dispute between Denmark, Norway and Sweden

Peder GAMMELTOFT

In 1967, the Norwegian State, through its Name Consultants called for a joint inter-Nordic and international spelling of the water Skagerrak between Denmark, Norway and Sweden. The reason for this was that there was no fixed standard form of the name. In fact, there were three spelling conventions, one with -r- only, Skagerak (Norwegian) and Skagerack (Sweden), and one with -rr-, Skagerrak (Denmark). Implicit in the Norwegian request for a joint form, was the demand for accepting the authorized Norwegian, Skagerak, to be the joint inter-Nordic and international name form over the Swedish and Danish name forms Skagerack and Skagerrak. The call resulted in a prolonged and very polemic series of correspondences with several surprising turns and changes in attitude towards which spelling should be preferred. This is the story about how a geographical name came to named, disputed and finally settled for national and international use. It is also an article about what we may learn from earlier cases of this nature to solve current and future international naming disputes.

INTRODUCTION

In late 1967, the Norwegian State Name Consultants and the Norwegian Place-Name Archives called for a joint inter-Nordic and international spelling of the water Skagerrak between Denmark, Norway and Sweden. The reason for the call was that there was no fixed standard for the name. In fact, there were three spelling conventions, one with -r- only, Skagerak (Norwegian) and Skagerack (Sweden), and one with -rr-, Skagerrak (Denmark). Norway argued for their form, Skagerak, to be the joint inter-Nordic and international name form, whereas Sweden and Denmark used Skagerack and Skagerrak. This is the story about how a geographical name came to named, disputed and finally settled for national and international use.

* Professor, University of Copenhage, Denmark.
ONE SEA, MANY NAMES

As already touched upon in my earlier article in this forum on the naming of seas, Skagerrak is a geographical name of Dutch origin. However, the name Skagerrak is far from the only name of this water, historically speaking. There was an array of different name forms which differed in time and user groups. The oldest known reference to the stretch of water between Denmark, Norway and Sweden is Codanus Sinus by the Roman geographer Pomponius Mela. Whether that name includes all of what is now Skagerrak is uncertain, but it seems to include at least the southeastern parts of the sea, as it is termed ‘a mighty bay’, seemingly referring to the outer Baltic sea and coastal Eastern Denmark.

The first purely Scandinavian reference to Skagerrak – and probably also Kattegat – is from a Skaldic poem, in the heroic Viking-Age tradition, by the renowned Skald Þorleikr fagri in a poem presented to the Danish king Sven Estridsen in 1051. Here the sea is called Jótlandshaf, The Sea of Jutland:

\[ \text{Fengr varð Prænda þengils} \quad \text{All the loot of the Prændir lord} \]
\[ \quad \text{— þeir létu skip fleiri —} \quad \text{had to float on the} \]
\[ \quad \text{allr á éli sollnu} \quad \text{hail-swollen Jutland Sea} \]
\[ \quad \text{Jótlandshafí fljóta} \quad \text{they emptied more ships} \]

Shortly after in the 1070’s, the great German chronicler, Adam of Bremen terms the sea part of Mare Barbaricum ‘Barbarous Sea’ with the particular stretch of water being called [Mare] Nordmannos ‘Sea of the Norwegians’.

In the early days of mapping, the Dutch cartographers used the term Oceani Germanici pars or Nordzee ‘North Sea’, or Mare Balticum. In fact, it is not until well into the 17th century that the name t’Schager Rack occurs on maps. The first to term this sea Skagerrak were pioneered by Willem Blaeu in 1618 and Jan Janssonius in 1647 (see Figure 1). However, the name Skagerrak and the neighbouring Kattegat remained

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5 Geradus Mercator (1595). *Atlas sive cosmographicae meditationes de fabrica mvndi et fabricati figvra* (Duisburg), plate XX.
largely used exclusively in the international (Dutch inspired) sphere, not regionally as a name used by Danes, Norwegians or Swedes. It is not until the late 18\textsuperscript{th} century that we see these names used in a Scandinavian context. But from then on, these names are the generally accepted names of the waters north and east of Jutland, nationally as well as internationally.

As is clear from the above, the context of the name Skagerrak is entirely Dutch – it first occurs in the heyday of Dutch mapping and there are no previous or contemporary Danish, Swedish or Norwegian name forms of Skagerrak. From a research perspective, the Dutch origin of the name has been alluded to in a few publications at the turn of the 19\textsuperscript{th} century, such as Edvard Erslev’s book on Jutland\textsuperscript{7} and Johannes Steenstrup’s work on Danish place-names,\textsuperscript{8} but the first scientific research into the name only appeared around 1920 with van den Meulen in the Netherlands\textsuperscript{9} and Johannes Knudsen in Denmark.\textsuperscript{10}

The name itself, Skagerrak, is a formally secondary name, i.e. a geographical name which contains another geographical name as its specific element. In this case, it is the name of Skagen (locally pronounced Skagi), the northern most point and city of Jutland,

\begin{figure}
\centering
\includegraphics[width=\textwidth]{figure1.png}
\caption{Section of Jan Janssonius’ map Toitus Iutiæ (1647) showing the Latin and Dutch name forms of Skagerrak.}
\end{figure}

\begin{itemize}
\item \textsuperscript{7} Edvard Erslev (1886). \textit{Jylland, studier og skildringer til Danmarks geografi} (Copenhagen), p. 295.
\item \textsuperscript{9} R. van den Meulen (1919). Over den Nederlandschen oorsprong der aardrijkskundige namen Skagerrak (Skagerak) en Kattegat. \textit{Tijdschrift voor nederlandse taal- en letterkunde}. Jaargang 38, (Leiden), pp. 113-132.
\item \textsuperscript{10} Johannes Knudsen (1920). Hollandsk indflydelse paa navngivningen i farvandene omkring Danmark. \textit{Historisk Tidsskrift} vol. 9.1, (Copenhagen), pp. 398-420.
\end{itemize}
albeit declined with a Dutch -ar declension. The generic, or second element is the Dutch noun *rak* ‘straight (line)’ as its second element. The meaning of the name is thus something like “The way straight past Skagen”.

**THE DISPUTE – SKAGERRAK OR SKAGERAK**

In the 20th century, Skagerrak had a number of differing forms: Skagerrak (authorized by Denmark and used on international maps) *Skagerack* (Sweden), whereas Norway authorized the form Skagerak in 1959.

In late November 1967, The Norwegian Geographical Survey announced that “the name Skagerak will be published with one ‘r’ on the international maps we publish ourselves. This form has been determined by the State Name Consultants; we have also notified the Danish Geodetic Institute.” This message was subsequently forwarded to the Royal Swedish Place-Name Commission 8. December 1967, who notified the Danish Place-Name Commission. Helge Lindberg, 5. January 1968.

From the Royal Swedish Place-Name Commission to the Danish Place-Name Commission:

*The Place-name Commission has, from the Swedish Ordnance Survey received (in xeroopy) a letter concerning a change of the spelling of ”Skagerack” on the international world map at a scale 1: 1.000.000. It would be appreciated if Denmark, Norway and Sweden could agree on a joint spelling. [...]*

*Regarding the second element, perhaps -rak could become the one of the three of us accepted spelling. What sets us apart is the Danish spelling of -r in the first element, supposedly an adjective in -r formed of Skagen (Hald, Vore Stednavne (1965), p. 245).*

*Could we possibly agree on a spelling Skagerak?*

*How do you spell ”Kattegatt” officially in Denmark?*

*The Place-name Commission is concurrently contacting the Norwegian Place-Name Archives in Oslo.*

*The Commission is looking forward to a response with thanks. As the Swedish Ordnance Survey has announced that this name question is very urgent, we ask that the Commission respond before 16. January.* [my translation]¹¹

With the short response time given, the Danish Place-Name Commission wrote to question the commission members on the question whether to accept the Norwegian request or not. Professor Anders Bjerrum of the Danish Place-Name Commission forwarded an outline answer to the Royal Swedish Place-Name Commission to all the members of the Danish Place-Name Commission on 9. January 1968:

*To the members of the Place-Name Commission*

*The Royal Swedish Place-Name Commission in Uppsala has sent the Institute for Name Resarch a question about spelling of Skagerrak and Kattegat for use by the Swedish Ordnance Survey (3 photocopies enclosed).*

¹¹ Royal Swedish Place-Name Commission Journal No.: 69/67.
The Place-Name Commission has adopted the, for Denmark authorized, form Skagerrak, which is also used by the Swedish Navigation Pilot and Swedish Aviation. However, for the sake of Nordic Cooperation the institute is willing to accept a change to Skagerak.

Please inform the institute your viewpoint to the enclosed draft response. [my translation]

Anders Bjerrum received replies from all the members of the commission and although the majority agreed to the text, there was a also a number of persons which only would agree, if the suggested form Skagerak was philologically correct – the fact that the form Skagerrak was already in use was also given as an argument against accepting the Norwegian demands. However, within a week, Anders Bjerrum, on behalf of the Danish Place-Name Commission, replied the Royal Swedish Place-Name Commission on 12. January 1968:


The Norwegian Place-Name Archive did not respond to the Royal Swedish Place-Name Commission within the given date of 16. January – the reply was sent on 28. January – too, late for the commission’s reply to the Swedish Ordnance Survey:

In reference to the Swedish Ordnance Survey’s query No. A 601 from December 8, 1967 regarding a suggested change in spelling of "Skagerack" on the international world map in the scale 1: 1 million, the Place-Name Commission wishes to give the following statement.

The Commission has requested written statement from the Danish Place-Name Commission (Institute for Name Research) in Copenhagen and the Norwegian Place-Name Archives in Oslo. Replies were received from the Danish Place-Name Commission (see attached copy), but not from Norwegian Place-Name Archives. The commission had requested a response prior to 16. January.

The Commission has no objection, neither to the name form Skagerrak, the Danish official spelling, nor to Skagerak, which seems to be the official Norwegian spelling. However, the name form Skagerrak appears to be the most preferable one. As

1 2 Danish Place-Name Commission Journal No.: 2/68.
emphasized in the letter from the Danish Place-Name Commission, the form is based on the forms of the 1600-century, and is used by almost all seafaring nations and is also found on the Swedish charts. It may be added that even Petter Gedda, Chartbook Öfwer Oster Zion, in 1695, spells the name Skager-rack (and Skager reef), i.e. with two ‘r’s.

Commission requests to receive the decision in the case. [my translation]

The Norwegian Place-Name Archive’s response was sent on the 28. January, and thus received late. It was, however, circulated and reconfirmed the previous Norwegian viewpoint:

The name Skagerak on the world map 1: 1 million.
We have long been aware of the, unfortunate, different spellings of the name Skagerak in our three Nordic countries and are pleased that this question has been raised.

1. We are fully aware that the Danish spelling with -rr- goes back to older ‘unfortunate’ spellings of the name. To a time when authors or cartographers did not take much care in name form spellings and the like.
2. These older names forms can still not lie about the fact that the spelling with -rr- is not in accordance with the origin. The first element in the name goes to the name of Skagen in Jutland and a spelling in -rr- is thus rather misleading.
3. The official spelling in our country has since long been SKAGERAK, which is also in accordance with the origin. In all our maps, ICAO and the world map included, the forms SKAGERAK is used, with the exception of Chart no. 302, whose name form is Skagerrak. In the correction list of the map, the name is written with -r-.

We cannot advice to use another form than Skagerak and it would be very much desired if all the Nordic countries would adopt this name form which also suits the origin best. [my translation]

The Royal Swedish Place-Name Commission asked the Danish Place-Name Commission to present their viewpoints on the Norwegian reply and that the case referred in order to have more thorough considerations. 1 3

The Danish Place-Name Commission discussed the matter on its ordinary commission meeting on 2. May 1968:

3. Discussion of the issue Skagerrak : Skagerak.
Professor Bjerrum pointed out that the letter of the Head of the Norwegian Place-Name Archive, Per Hovda, (Annex 2 c) was highly misleading. Firstly, the most likely etymology of the name was, that it was given by Dutch or Germans to the place-name Skagi. Secondly, the name first appears on Dutch maps and figure only quite late (c.1800) on the Danish maps.

1 3 Royal Swedish Place-Name Commission, 5. February 1968.
Professor Aksel E. Jørgensen agreed that there could hardly be any doubt about the accuracy of the, by Professor Bjerrum listed, etymology, and that in Danish the old spelling was with -rr-.

Professor Aksel E. Christensen stressed that internationally, there was a strong tradition of spelling with -rr-, which was the only one used.

The commission decided to retain the spelling Skagerrak. [my translation]

Since the initial contact from the Royal Swedish Place-Name Commission in the matter, The Danish Place-Name Commission had changed its viewpoint from being in favour of a spelling in -rr- at the same time as being able to accept a spelling with one -r- in order to secure and maintain the Nordic cooperation, to definitely favouring the by Denmark already authorized spelling: Skagerrak.

This decision was forwarded to the Royal Swedish Place-Name Commission on 14. May 1968

To the Royal Swedish Place-Name Commission.

In a letter dated 12. January 1968, I informed you that some of the Place-Name Commission members had given convincing reasons against a change of spelling of Skagerrak to Skagerak, namely that the name is undoubtedly of Dutch origin, and the name of the form with double r is used in official publications such as charts and pilot guides published by almost all seafaring nations. At the same time, I suggested that the decision should be suspended so that the Place-Name Commission would have time for proper consideration.

Such consideration took place during a meeting of the commission on May 2. 1968. The Commission did not agree with the reasoning given from the Norwegian side for a spelling with a single -r-, but decided unanimously to maintain the spelling with double -rr-, both for etymological considerations and in adherence to international tradition. [my translation]

With the reply from the Danish Place-Name Commission received, the Royal Swedish Place-Name Commission forwarded a letter giving the Norwegian State Name Consultants notice of the Danish position in the matter on 21. May 1968. The Commission also noted that the Swedish Ordnance Survey requested a joint spelling of name in Denmark, Norway and Sweden. There was seemingly never a reply to this request from Norway, and on 11. October 1968 the Royal Swedish Place-Name Commission resubmitted its query with the request from the Swedish Ordnance Survey that the three countries should agree on a joint spelling. The letter was this time augmented by the additional information that the form Skagerrak was preferred Norwegian seafaring circles and the additional request by the Royal Swedish Place-Name Commission to specify what the Norwegian State Name Consultants meant with “the spelling ”Skagerrak” is not consistent with the origin, while the spelling Skagerak

14 Minutes of the 92. Plenary Meeting in the Danish Place-Name Commission, 2. May 1968, agenda item 3.
15 Danish Place-Name Commission Journal No.: 56/68.
16 Correspondence, Danish Place-Name Commission Journal No. 56/68.
17 Correspondence, Danish Place-Name Commission Journal No. 16/69 and Journal No. 59/69.
most consistently is”. The Norwegian State Name Consultants replied on 27. November:

*The name SKAGERAK*

We refer to our previous information about the spelling of the name Skagerrak, where we mentioned that the official spelling in our country is SKAGERAK.

The reason for this is: The old Norwegian skjalds uses the name Jótlandshaf about both Kattegat and Skagerrak (see e.g. Saga Haralds Hardráða, Codex Frisianus, Christiania. 1871, pp. 213, 214). Old Danish sources uses among others ‘Noreghaf” as a joint name for these two sea passages. In Saxo Grammaticus we otherwise find “Noricum fretum” (The Norwegian Strait) used as a name for the same.

In old Dutch maps from the 17th century, new names crop up for these sea tracts. In Atlas major, page Regni Norvegia v/ F de Witt gives the name Schagerack and also F. Doncker, Pascaarte van de Noord Zee (1694) has the name form Schagerack. This name is at the time used of both waters. It is not until the 18th century that the name Kattegat (among others in the form Cattegath) is to be found in charts. A more fixed application of these two names is not until the 19th century.

There is thus no doubt that the current name use originates from old Dutch charts and maps. […]

The first element in Skagerak is related to the name of the northern point of Jutland, Skagen, Old Norse skagi m. used about a protruding headland, ness, and the last element is Dutch rak which was also used in the meaning ‘straight water’, cf. Damrak in Amsterdam.

When it comes to the spelling it is worth noting that the the name in the oldest maps and charts is written with both -r- and -rr-. Here it is the spelling with -r-: Skagerak, which is historically correct. Whether a singular or plural form is the basis of the compound, it would yield Skage- (from Old Norse *Skaga-*) in both Danish and Norwegian. From the rather diverting spellings in old maps, the spelling with -rr- became the most widely used name form by foreign nations, even if this form lacks historical precedence in the Nordic languages. Norwegian does not have the nominative plural of the composition form of the first element, cf. a possible * Holmar-sund, which could yield a possible Skager-rak.

Norwegian charts use the Skagerak, which is also in accordance with the Norwegian pronunciation of the name.

*The name form Skagerak is in accordance with Norwegian (and Nordic) name formation and we cannot advise to change this form [Skagerak] against a form, Skagerrak – which is not.* [my translation]

This letter is later in the year, in December 1968, followed by a letter from the Norwegian Ministry for Church and Education endorsing the letter from the State Name Consultants. 19 By now a certain amount of fatigue seems evident in the case, the

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18 The Norwegian Ministry for Church and Education, Cultural Section, Journal No. 07736.
19 The Norwegian Ministry for Church and Education, Cultural Section, Journal No. 07736-Ku-68, part of correspondence, Danish Place-Name Commission, Journal No. 16/69.
correspondences between the Danish and Swedish commissions peter out and it is not until 31. March 1969 that the Danish Place-Name Commission replies a request from the Royal Swedish Place-Name Commission to reconsider its stand in relation to the letters from the Norwegian State Name Consultants and its governmental department. And the reply is rather short and formal:

In reply to the Royal Swedish Place-Name Commission’s letter of 20/1 1969 notifying us the Norwegian Ministry of the Church and Education’s viewpoint on the spelling of Skagerrak: Skagerak. The case has been discussed at the Place-Name Commission’s plenary meeting on 21/3 this year.

The Commission decided to maintain its previous viewpoint that the correct spelling of the name should be Skagerrak, not least from the wish to retain the continuity from old maps. [my translation]

THE RESOLVE – SKAGERRAK!

By now the case was in a deadlock – the Norwegian name authorities demanded the form Skagerak to be the joint form, the Danish name authorities wanted to retain their form, Skagerrak. The Royal Swedish Place-Name Commission was not fixed on any particular form either Skagerak or Skagerrak was acceptable for them. However, with no resolution to the question in sight, particularly with the strong Norwegian and Danish views in mind, the Royal Swedish Place-Name Commission did not foresee a resolve if they went along with either side, as the minority side would not be likely to accept the majority decision. The commission’s move was, however, very shrewd. They simply conferred the matter back to the Swedish Ordnance Survey – the original organization requesting a resolve on the matter – and its sister organizations in Denmark and Norway to resolve the question in between them:

Re.: The proposed change of the spelling of “Skagerack” on international world maps, scale 1: 1,000,000 (Swedish Ordnance Survey’s original request No. A 601, 8. December 1967)

We have, in the above cases, carried out an extensive and prolonged correspondence with the Danish Place-Name Commission (Institute for Name Research) in Copenhagen and the (Norwegian) State Name Consultants, through the Norwegian Place-Name Archive in Oslo, a correspondence which the commission has continuously kept the Ordnance Survey informed about.

The Place-Name Commission maintains its opinion on 25. January 1968 that it does not have anything against accepting the name form of Skagerrak, the by the Danish Place-Name Commission authorized form, or Skagerak, the form authorized by the Norwegian State Name Consultants and the Ministry of the Church and Education in Norway. However, the commission does regard the form Skagerrak to be the preferred form, partly because, as stated in the letters by the Danish Place-Name Commission, it originates from 17th century name forms, and partly because it is used by almost all seafaring nations and even on the Swedish sea charts. Worthy of note

20 Danish Place-Name Commission Journal No. 16/69.
is also that Petter Gedda, in his Chartbook öfwer Östersiön, 1695, spells the name Skagerack (and Skager reef), i.e. with -rr.

As far as the commission can see, the final treatment of this case should be undertaken by the Swedish Ordnance Survey conferring with corresponding institutions in Denmark and Norway, and in this way attempts to reach an agreement in this name question.

The commission requests to be informed about the decision the matter. [my translation] ² ¹

The Swedish Ordnance Survey took the matter to its Danish and Norwegian sister institutions. From the Royal Swedish Place-Name Commission they had a mandate which was something like 55-60% in favour of a spelling in -rr-, i.e. Skagerrak from the three Nordic geographical names authorities, because of Sweden’s undecided opinion albeit slightly favoring of the form authorized by Denmark. The subsequent negotiations ended with the three Nordic mapping authorities accepting the name form Skagerrak.

Two years after the case had left the domain of the geographical name commissions, the Norwegian Ministry of the Church and Education endorsed the form Skagerrak on the 12. October 1972, according to a “Nordic agreement” on the name form. ² ²

A MODEL TO FOLLOW?

The Nordic agreement on a common name form for the international water of Skagerrak has been hailed as a model for solving name conflicts – the three countries discuss pros and cons of either name form, Skagerak or Skagerrak, and reached an agreement in unison. The reality, however, is somewhat different, though. After having gone through the rather lengthy correspondences, 47 in total in the Danish Place-Name Commission’s archive alone, a rather different picture emerges. The three geographical names authorities could not agree on a joint name form – in spite of initial acceptance of the considerations of Nordic cooperation. As the case evolved, the initial goodwill of the wish for a resolve turned into strong views in favour of either name form.

Part of the reason seems to lie in the very insisting position of Norway in favour of its own authorized form, and the insistence that the name was of Scandinavian origin. This particularly seems to have annoyed the Danish Place-Name Commission, who countered with insisting on their own form, Skagerrak on the basis of it being of, correctly, Dutch origin. Sweden was prepared to completely skip their own form, Skagerack at the outset but could not agree internally, it seems, on neither the Norwegian nor the Danish suggestion. The end result was a split decision that had to be solved externally by the three countries’ national mapping agencies. As such, the Skagerrak-case stands as a somewhat messy case.

What can be learnt from this ‘one-letter-war’, then? I think there are several points to be

² ¹ Royal Swedish Place-Name Commission, Journal No. 69/67, part of correspondence, Danish Place-Name Commission, Journal No. 59/69.

made here. The first one is how to approach a naming situation of international character. The Skagerrak case shows very well how even uncomplicated cases can become politically and nationally infested and thus not become resolved as quickly as the magnitude of the case (or lack of the same) furthers. If anything, this case shows that the matter must be approached with a large amount of humility. The 180° turn of the Danish Place-Name Commission in the matter can only be seen as a direct reaction to the rather arrogant stance of the Norwegian State Name Consultants. Not only did they not reply in time, they were also somewhat liberal with the truth, in as much as the etymology of the name is concerned. Provocative arguments were met by counter arguments, and did in the end result in an agreement which went directly against the Norwegian demands. And this can only be ascribed to Norway’s own acting in the matter.

Secondly, the process of the case is vital. As is visible in particularly the first correspondences, the case was very compressed and was tried resolved within a very short time span. Again the Danish Place-Name Commission objected to this – although the commission actually did its requirements within the stated timeframe. The decision was postponed because of these objections, resulting in a better investigation of the naming situation. With the extended time frame, the origin of the name, its manifestations from the very earliest to current usage nationally and internationally was thoroughly examined. This established without a doubt the Dutch origin of the name, as well as determining which of the name forms, Skagerrak or Skagerak, had the highest frequency in international use.

Even so, this was not enough to come to an agreement among the three Scandinavian geographical names authorities, Norway remained adamant that Skagerak should be the form, Denmark demanded Skagerrak because of the origin of the name and international usage of this name form, and Sweden was undecided. The resolve to this was to engage the national mapping agencies of Denmark, Norway and Sweden to find a solution. Although this seems like an unusual way to let third-party organizations work out a solution, this was a very shrewd move by the Royal Swedish Place-Name Commission. Since the conflict arose from the wish to have a uniform Scandinavian spelling on the individual national mapping agencies’ 1:1,000,000 scale maps, they were the ones with both the greatest interests in the matter and with the greatest knowledge of international usage. As such, the resolve from the national mapping agencies was not surprising. At the outset, there was a slim majority in favour of the form Skagerrak from the deliberations of the geographical names authorities of Denmark, Norway and Sweden, and with international maps favouring this name form also, this was the natural outcome of the case. Whether this was anticipated by the Royal Swedish Place-Name Commission or not, is impossible to see out of the correspondences, albeit not entirely inconceivable.

However, the most noteworthy point to make with this case is the fact that the name form, once determined as being Skagerrak, has never since been challenged by any of the three countries. This illustrates the most important issue when it comes to determining a joint name form in a naming dispute – make sure that the agreed name is sustainable. Granted, in the case of Skagerrak versus Skagerak, the dispute is merely one of spelling and not of different name forms, but in order to reach a permanent and acceptable name; it has to be neutral and non-offensive and to all involved parties. In the above case, the dispute was over spelling and thus the name could, effectively, be retained – albeit in a different form.
for two of the countries. Where the case concerns different name forms, it is worth considering if any of the name forms of the dispute are suitable, or if a third way – a new, third name would be more acceptable?

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