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Forging the new Black Sea Security Architecture in the flames of the war

April, 2024

This non-paper is the second in line created by the Security Track of the Crimea Platform Expert Network for the Black Sea Security Conference as an expert vision and set of recommendations for state players

<https://encp.org.ua/en/>

A decade ago, Russia illegally attempted to annex Crimea and to subjugate Ukraine and destroy the European security architecture by using force to change borders. A weak response from Euro-Atlantic states and futile, unrealistic diplomatic solution only encouraged the Kremlin's aggressive behaviour and paved the way for the full-scale invasion eight years later. It also encouraged Russia's wider plans to undermine the democratic, rules and values-based order, which entails significant consequences beyond the Black Sea Region for Europe, the Middle East, Africa and elsewhere.

Russia's assets in the Black Sea have not only been used for the full-scale invasion: landing its assault forces, ferrying supplies and striking mainland Ukraine. Last year, Russia launched 332 missiles of various types and more than 1,250 drones from Crimea and its Black Sea Fleet's platforms. These have been targeting Ukraine's civilian energy and transport infrastructure, port and agriculture infrastructure (Russia has attacked civilian infrastructure 60 times more often than military sites) as well as civilian cargo vessels, all while obstructing Freedom of Navigation (FON) throughout the Black Sea, thereby jeopardizing global food security. When Russia has enjoyed unimpeded seaborne manuevre, including from illegally occupied Ukrainian ports (in Crimea, Donetsk and Zaporizhzhia regions), it has mined Sea Lines of Communications (SLOC), spoofed GPS, routinely switched off automatic identification systems (AIS) on cargo ships involved in its illegal activities, in the process endangering and impeding civil navigation.

Since the full-scale invasion began, 18 cargo ships from three countries have been struck, resulting in at least two being sunk. Seven cargo ships were blown up by sea mines, including five in 2023. So far, the international **Task Force to Combat Sea Mines in the Black Sea has destroyed up to a hundred of**

Russia's illegally-placed mines. Russia has also been using civilian cargo vessels for military purposes, including delivery of weapons and ammunition for its war of aggression against Ukraine via the Straits of the Bosphorus and Dardanelles.

Russia is shipping via the Black Sea a significant amount of its oil, petroleum products and food supplies, including stolen Ukrainian grain and oilseeds (up to 4.2 million tons in 2022 and 2.5 million tons of grain from Crimea alone in 2023, while the overall amount is difficult to calculate), mainly to Syria, Iran and other allied countries. Russia exported 47.5 million tons of crude oil from its Black Sea ports between December 5, 2022, when the EU imposed its oil embargo, and December 31, 2023. Over one fifth has been exported to EU ports and transshipment terminals off EU countries' coasts. In January 2024 alone, there were **36 violations of the EU embargo on seaborne imports of Russian oil and petroleum products**. The lion's share of violations (26) related to petroleum product transshipment along the Laconian Gulf off the coast of Greece. There were also eight direct deliveries of oil and products from Russian ports to EU countries. Despite losing \$110 billion in export revenue due to the restrictive measures and sanctions following the invasion, Russia still managed to generate \$99.3 billion in revenue in 2023 to further finance its war in Ukraine.

Türkiye showed leadership and, along with the UN, negotiated the Black Sea Grain Initiative (BSGI) with Ukraine and Russia in good faith, which unblocked some export capabilities for Ukraine. However, Russia later decided to breach the «grain deal», once again proving that its political assurances could not be relied upon despite its legal obligations. It happened even though Moscow had succeeded in de facto exempting vast swaths of the Black Sea from the Law of the Sea, distorting the Freedom of Navigation (FON) principles, and acquiring additional leverage over Ukraine, such as the ability to create artificial obstacles for Ukrainian exports). Moscow believes that it is an influential player in the Black Sea region and can ignore agreements.

It was the **Ukrainian Armed Forces which put an end to Russia's blockade, securing Ukraine's SLOC and restoring FON in the northwest of the Black Sea**. This has allowed Ukraine to export its commodities in greater quantities,

bringing relief to other countries in need of its products, especially food products. After Ukraine expelled the Russian Black Sea Fleet from the vicinity of its shores and waters in the northwest, it successfully exported 33.8 million tons of cargo, with 23.1 million tons comprising food supplies. Nevertheless, the total export of grain and leguminous crops (via railway, road, sea, and river bulk carriers) decreased by 1.09 year-on-year to 34.8 million tons. Ukraine's missile and drone strikes on Russia's military assets in the temporary occupied Crimea and innovative approach to naval warfare have significantly degraded Russia's warfighting capabilities and its ability to restrict FON in the Black Sea. By destroying and rendering inoperative a significant number of Russian surface warships and a submarine, Ukraine has reduced the number of missiles hitting Ukrainian cities. It also means fewer Russian platforms to threaten other European cities in future.

Yet **Russia is determined to further deteriorate the security environment in Europe.** The Black Sea Region will play a crucial role in its plans. While NATO nations enhance defence and deterrence capabilities in the Baltics, the Black Sea Region is falling behind. Neglecting the Black Sea proved to be wrong and allowed the illegal annexation of Crimea and its subsequent heavy militarisation. The Kremlin may likely try to test Western resolve in the Black Sea, where there is less readiness than in the Baltic.

Crimea was a key starting point for the Russian aggression. **Crimea remains the centre of gravity of the war and its liberation will curtail Russia's warfighting efforts** and could trigger the collapse of the Putin regime, which is a necessary first step towards a democratic transition in Russia, as well as a comprehensive, just and lasting peace and robust security architecture for Europe. The twofold priorities are to enable Ukraine with military means to further destroy the Russian Black Sea Fleet and other assets in Crimea, and consequently liberate the Ukrainian peninsula, thereby denying Russia the ability to employ Crimea's resources for its war of aggression. A failure to do this will pose a direct threat to the peace, security, stability and prosperity of Europe for decades to come. Under no circumstances will Ukraine agree to Crimea remaining under Russian illegal occupation, for such a «compromise» would mean a permanent existential threat to the Ukrainian state. **It is high time for**

Ukraine's partners to step up their assistance to Ukraine to liberate Crimea by military means, preferably by making Crimea untenable for Russia and impossible to hold. The results of this war will significantly impact the post-war security architecture in the Black Sea Region and Europe as a whole. As is the case with the Baltic Sea, transforming the Black Sea into another «NATO lake» will dramatically enhance the alliance's security, and food security for many non-alliance countries.

This document consists of a short list of practical tasks and complements the ideas the Crimea Platform Expert Network laid out in last year's non-paper «Vision for a Peaceful, Secure and Prosperous Black Sea Region», which remains highly relevant today.

Security domain

Ukraine's partners should increase security assistance and cooperate more actively to strengthen Ukraine's deep strike, anti-ship, and anti-submarine warfare capabilities, as well as the development and use of highly effective unmanned naval assets.

The Black Sea Task Force to Combat Sea Mines (MCM Black Sea) should gain a permanent character. Although Ukraine highly appreciates Türkiye, Romania and Bulgaria's contributions to the security and safety of civil navigation, the MCM Black Sea should go beyond information sharing with Ukraine and include the deployment of the assets of the Ukrainian Navy and the coordination of their actions.

The US, UK and Türkiye should consider deploying their **air policing assets in support of the MCM Black Sea operation and as a part of the Freedom of Navigation Operation.** This would contribute to the security and safety of civilian shipping by deterring Russian mining activities with its manned and unmanned platforms.

The US and the EU should accelerate the resolution of their outstanding issues with Türkiye that would increase the latter's defense capabilities and

strengthen cohesion among allies and partners, thus contributing to long-term security in the Black Sea region.

Ukraine, Romania and the UK should devise a possible swap scheme that would allow the Ukrainian Navy immediately to receive a Romanian minesweeper and, in return, Romania would receive one intended for Ukraine. This would rapidly boost Ukraine's anti-mine capabilities while honouring the Montreux Convention. It would be expedient to discuss other options of cooperation and the more active involvement of Ukrainian Navy personnel.

The Black Sea littoral states and partners from beyond should work out a **plan to boost the coastal defence capabilities of the Black Sea nations**: from NATO members (Romania and Bulgaria) to NATO partners (Ukraine, Moldova and Georgia). Such actions should be aimed at establishing and/or strengthening the Sea Control and Sea Denial capabilities of the most vulnerable littoral states so that they are able to secure their ports and SLOCs, and deny Russia the ability to seize their sovereign territory, including their Exclusive Economic Zones, as well as denying Russia's ability to target those territories and deployed assets. Among other capabilities, this approach could include air and missile defence systems, anti-drone and EW systems, sea mines and anti-ship missile systems, and anti-submarine systems. Following Türkiye's application of the Montreux Convention under the current circumstances, Ukraine's partners may provide Ukraine with up to 30m-long boats (via railways and rivers), as well as launch joint production in Ukraine and one of the neighbouring countries of Fast Inshore Attack Crafts (FIAC) under the existing bilateral agreement with the United Kingdom.

As Türkiye and Greece have joined **the European Sky Shield initiative**, **Ukraine's partners should also consider Ukraine's involvement**. Partners would benefit from Ukraine's strategic location, significant air and missile defence capabilities, and highly capable and experienced military personnel.

Depriving Russia of resources for its war effort

The **EU should ban all shipments from Russian Black Sea ports and deliveries by Russian tankers directly, or via transshipments** by Russia's so-called «shadow fleet,» to any ports of the European Union.

Third countries should cease their involvement in Russia's actions to circumvent the oil embargo by preventing transshipments of Russian oil and petroleum products in their waters. The countries of the Black Sea region should also prevent Russia circumventing the EU oil embargo and sanctions by preventing its oil tankers entry into their ports before sailing to European ports.

The receiving cargo ships sailing from the ports of the illegally occupied territories of Ukraine should stop, as well as receiving and processing Ukrainian commodities stolen by Russia. The countries of the Black Sea region have to put an end to any transshipments meant to mask Russia's activities aimed at circumventing the embargo, sanctions and restrictions. At the same time, countries of the region, the EU and other partners should work out a mechanism that would compensate economic losses related to full compliance with the embargo and export control measures imposed on Russia.

Ukraine should put forward a Black Sea Oil Initiative (BSOI) to control Russian compliance with the oil price cap, oil embargo, and provisions of international law that prohibit the use of civilian vessels for military purposes. The NAVTEX warnings (NAVigational TELeX) would define the operational areas, while a joint BSOI group, which may include representatives of the UN, Türkiye, Ukraine and other international stakeholders, would coordinate with Russia issuing permits for the passage of tankers, bulkers and other cargo vessels to and from Russian Black Sea ports. The BSOI naval units would inspect the vessels at sea and guide or/and escort them for safe passage. Otherwise, it would be the sole responsibility of Russia for any incidents and dangers civilian vessels may face.

Ukraine and its Black Sea NATO partners should consider **establishing a fusion**

situation awareness centre to improve their ability to evaluate the security landscape. Such a centre would enable the involved parties to counteract Russia's attempts to evade restrictive measures, sanctions, and other breaches of international law, particularly concerning maritime activities.

Whether integrated into a fusion situation awareness centre or operated independently, involving Ukraine, Romania, and Bulgaria, along with support from other Black Sea nations and members of the International Maritime Organization (IMO) and the International Civil Aviation Organization (ICAO), there is a pressing need to **create a collaborative monitoring facility and a mechanism** for swiftly responding to any illegal, reckless and malign actions by Russia that could jeopardize FON and place civilian navigation in the Black Sea at risk, including GPS spoofing and similar tactics.

Russia's military defeat in Ukraine and the liberation of Crimea is the only scenario that would open the way to restoring a comprehensive, just and lasting peace on the continent and strengthen European security. The Black Sea Region should be a much greater priority to NATO, the EU and the US. It should be considered an integral part of a wider strategy of deterring Russia in the knowledge that it represents a key square on the geostrategic chess game the Kremlin is playing against the democratic, rules and values-based order.

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Note about the Crimea Platform Expert Network

The Expert Network of the Crimea Platform is a community of individual experts, Ukrainian, foreign and international non-governmental organisations, initiatives, associations, think tanks and scientific institutions whose activities contribute to achieving the main goal of the International Crimea Platform – liberation and reintegration of Crimea. The expert network operates in line with the parliamentary and governmental dimensions of the Crimea Platform, while keeping its independence as a non-governmental community. The Expert Network members function without any vertical administrative and financial subordination to any state authority of Ukraine or another country.



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