

NATO Pirates in the Baltic Sea? Lawfare in Russian Deterrence Strategy

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Abstract

Russia has repeatedly accused European states of ‘piracy’ for detaining vessels from its ‘shadow fleet’ suspected of grey zone activities in the Baltic Sea. These accusations are legally unfounded. However, the persistence of this narrative in both official statements and public discussion in Russia warrants closer scrutiny. This article argues against dismissing Moscow’s invocation of piracy as mere propaganda. These claims should be understood as lawfare – the strategic misuse of legal concepts to advance political objectives. This article examines how such lawfare complements Russia’s coercive signalling strategy and explores its broader strategic implications. Moscow’s piracy narrative reveals how hijacking the authority of international law has become integral to the Russian practice of deterrence.

Introduction

Amid the protracted invasion of Ukraine, Moscow’s so-called ‘shadow fleet’ operating in the Baltic Sea has emerged as an urgent concern for Europe. The shadow fleet serves as the primary mechanism through which Russia circumvents the EU/G7+ price cap on Russian oil and petroleum products. It has also become a lifeline sustaining Russia’s war economy: apart from securing the revenues from global energy markets, these vessels import some sanctioned commodities necessary for the Russian arms industry. Upon a closer look, the shadow fleet seems to fulfil dual-use functions in Russian grey zone activities against NATO at sea, notably in damaging critical infrastructure, surveillance, and drone operations (Stavridis, 2025). This article

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contributes to our understanding of how the phenomenon of the shadow fleet impacts NATO-Russia deterrence dynamics.

In several instances between 2023 and 2025, the EU and NATO member states resorted to coercive measures against the shadow fleet vessels, including seizure, boarding, and inspection (see *Table 1*). In response, Russian authorities brought up accusations of piracy. Although these claims lack any conceivable legal merit, they should not be simply dismissed as propaganda. This article argues that this piracy narrative amounts to lawfare – the misuse of law in pursuit of strategic aims (Dunlap, 2017). Actors resort to lawfare to exert influence on their opponents through various international legal regimes and foras in both war- and peacetime. Lawfare applies across various fields of legal practice in interstate as well as asymmetric armed conflicts, grey-zone confrontation, and in more formalised settings, such as treaty-making, litigation, dispute settlement procedures, as well as institutional and legislative procedures within international organisations (Bartman, 2010; Kittrie, 2016; McKeown, 2017; Dos Reis and Grzybowski, 2024; McLaughlin, 2024; Goldenziel, Blockberger and Granholm, 2024). The defining feature is that actors resorting to lawfare act in bad faith and leverage legal arguments to advance their strategic agenda, presenting it as legitimate rather than to seek justice (Kennedy, 2012; Munoz, Andres and Bachmann, 2016). By equating public law enforcement with criminal activity, Russia in fact denies the sovereign authority of the coastal states participating in interdictions and claims the universal jurisdiction granted to all states in the repression of piracy (see Shearer, 2010). This invocation functions as a form of strategic signalling: lawfare allows Moscow to convey a threat to use armed force against European vessels implicitly and maintain strategic ambiguity regarding if and under which conditions Russia might intervene should interdiction of the shadow fleet vessels continue.

This article proceeds as follows: first, it briefly introduces what are the security concerns related to the shadow fleet; second, it looks into the scope of the Russian piracy claims, and argues why these present lawfare; third, it highlights what significance lawfare holds for coercive signalling; and finally, it concludes with observations on the role of lawfare in Russian deterrence strategy.

The Shadow Fleet Operations in the Baltic Sea

The deceptive shipping practice known as shadow fleet is not novel, however the Russian shadow fleet operations have set a new precedent for global maritime shipping in its scale and coordination (Rodriguez-Diaz, Alcaide, Endrina, 2025). It represents Russia's deliberate adaptation efforts in response to the comprehensive sanction's regime imposed by EU/G7+ states. The three main components of this regime are: (1) the EU's ban on all Russian-flagged vessels or those vessels which were re-flagged from the Russian Flag as from February 24, 2022; (2) the EU's embargo on importing seaborne crude oil from Russia and on most petroleum products; and (3) the EU/G7+ states' agreement introducing a price cap on the trade of these commodities to cut Russia's global revenues. These measures are intended to preclude vessels transporting Russian crude oil and petroleum products at prices above the cap of 60USD/barrel from obtaining insurances, brokering, and technical assistance – services dominated by companies under the jurisdiction of EU/G7+ states (Parlov and Sverdrup, 2024). This design, albeit contradictory, should mitigate adverse effects on global energy market by keeping Russian crude oil exports in, while considerably reducing Russia's revenues (Wolf-ram, 2024).

Within months after the abovementioned measures entered into force in early 2023, Moscow has re-oriented its exports to countries that have not aligned with the sanction regimes, notably China and India (Hilgenstock, Hrybanovskii, Kravtsev, 2024). To enable the continuation of shipments, major Russian oil trade companies have developed a sophisticated network of intermediaries. This design allows the Russian operators to obscure the ownership structure, financial and insurance liability. Typical evasion practices include the vessel registration under the flags of convenience, the frequent change of flag registries, or resort of fraudulent ones (Caprile and Leclerc, 2024). The Russian shadow fleet comprises hundreds of tankers and cargo vessels, many exceeding and standard insurance age, and do not comply with safety and environmental standards (International Maritime Organisation (IMO), 2023).

The shadow fleet's transports generate billions of dollars in annual revenue that directly fund Moscow's military operations in Ukraine (Braw, 2024). Although the most recent US sanctions against the two main companies engaged in the shadow shipping, Rosneft and Lukoil, enhance the political pressure on buyers, the long-term effects on Russian economy

depend on the readiness of the US government to push for extensive enforcement (Vakulenko, 2025). Meanwhile, the US, the UK, the EU, and Ukraine continue to target individual vessels with sanctions, albeit these measures are similarly far from comprehensive (Golovchenko, 2025). For instance, as of October 2025 the number of vessels listed by the EU is a total of 557 (European Commission, 2025). However, the shadow fleet's size in 2025 may range from 300 up to 1800 vessels depending on classification criteria; the highest estimates suggest that the total number has tripled compared to the fleet's early-2022 size (McKinney and Domballe, 2024; Parlov and Sverdrup, 2024).

In the congested Baltic Sea, where at least 40 to 60 percent of Russian oil and petroleum products shipping goes through, the shadow fleet poses grave risks of collision accidents and environmental disaster (Hilgenstock, Hrybanovskii, Kravtsev, 2024; Jack, Gambarini, Guillot, 2025a). Yet its activity has given rise to far more imminent security concerns. Between 2023 and 2025, at least 11 vessels associated with the shadow fleet were implicated in grey zone activities in the Baltic Sea (see Table 1). Although investigations remain pending, authorities in the affected coastal states and independent experts contend that the circumstances and nature of the incidents point to deliberate action (see Edwards and Seidenstein, 2025).

The convergence of multiple factors renders shadow fleet vessels optimal instruments for grey zone activity – coercive actions employed by states and non-state actors to achieve strategic objectives by exploiting legal ambiguities below the threshold of war (see Larsson, 2024). These vessels routinely disable their transponders or spoof AIS signals to obscure shipping routes and loiter while awaiting ship-to-ship cargo transfers at high seas. Tankers and cargo ships are essentially multimodal platforms and offer substantial space to carry drones, signals intelligence, reconnaissance and surveillance equipment, and other tools for grey zone activity (see Hammes and Harris, 2025). Moreover, undersea infrastructure (especially sea cables) is by its design vulnerable to damage, both from natural causes and accidental human interference. This vulnerability provides plausible deniability for intentional sabotage, with the crews of suspect vessels typically claiming accidental anchor loss or dragging. Indeed, some reported Baltic incidents appear consistent with accidental causes (see Table 1).

The current security environment should be factored in too. The Nordic and Baltic states have been avid supporters of Ukraine and a stronger NATO posture in Europe (Mälksoo, 2024). Russia perceived the strengthening

of NATO's Northern Flank with sensitivity (Litovkin, 2022; TASS, 2022; TASS, 2023). Russia's forward-leaning posture in the region, combined with its acute dependence on the Baltic Sea for illicit oil transports makes the Baltic theatre significant to the Russian contest against NATO (see Banka and Bussmann, 2023). It offers Moscow an ideal setting for calibrated risk-taking – testing the Alliance's resolve and cohesion while staying below the Article 5 threshold.

Grey Zone Activity of the Shadow Fleet: Legal Challenges and Signalling Rationale

Although plausible deniability poses challenges for legal attribution of grey zone activities, there is broad consensus that the shadow fleet is an enterprise coordinated by the Russian state (see NATO, 2023; Caprile and Leclerc, 2024; Edwards and Seidenstein, 2025; Jack, Mackenzie, Clark, 2025b). In line with this assumption, the listed incidents (*Table 1*) emerge as systemic, targeted, and overt actions. The established pattern points at a coercive signalling rationale: these are demonstrative actions short of the use of force that are intended to affect adversary behaviour, in this case, that of NATO member states (see Opro in Croxton, 2025).

In response, NATO has launched the 'Baltic Sentry' initiative to enhance its naval presence and strengthen the protection of critical infrastructure in the Baltic Sea (NATO, 2025). The EU and Nordic-Baltic 8++ states, meanwhile, are intensifying their efforts to counter the shadow fleet together with their G7 partners (EEAS, 2025). In several instances, the affected states have interdicted the vessels suspected of grey zone operations in the Baltic Sea (*Table 1*). Without discussing the legal merits of each case in detail, a few legal aspects should be noted.

The Law of the Sea provides for strong protection of freedom of navigation. Coastal states' competences decrease, generally speaking, as distance from their coasts increases. The scope of coastal state enforcement rights over foreign vessels is further restricted by the Regime of Straits and the Regime Innocent Passage through territorial waters (see Wolfrum, 2009). On the high seas, the principle of Flag State jurisdiction is paramount, which entails that, as a general rule, enforcement actions can only be undertaken with the consent of the respective flag state (Lampo, 2022).

According to the dominant legal interpretation, Article 113 of UNCLOS, which regulates the breaking or injury of submarine cables or pipelines, does not provide for universal jurisdiction. The legal framework applicable to the cases of cargo vessels acting as drone launch or intelligence platforms appears even thinner. However, law does not categorically deny coastal states the right to take enforcement actions against suspected ships. This is allowed, for instance, when a foreign vessel threatens the environment in a coastal states' Exclusive Economic Zone (EEZ) (Ringbom, 2025).

Moreover, considering that shadow fleet vessels often have fraudulent documentation, states may rely on the Right of Visit to verify the flag under Article 110(2) UNCLOS, although matters of enforcement as well as any investigative measures remain with the flag state as a general rule (see Norris, 2025). There are some other legal grounds which grant coastal states power to interdict navigation of a suspect foreign vessel outside their territorial sea, but these remain subject to diverging legal interpretations and may not rely on settled state practice (Parlov and Sverdrup, 2024, pp. 256–59; Lott, 2025).

While exploiting legal loopholes, Moscow leverages the grey zone activities, as well as respective Western responses, to send coercive signals that threaten escalation, delegitimise Western action, and thus seek to constrain future countermeasures. With these notes in mind, this article proceeds to a discussion of the scope and context of Russia's piracy claims. By framing this narrative as lawfare, the analysis further explicates the rationale of the Kremlin's coercive signalling (see McKeown 2017, p. 118; Munoz, Andres and Bachmann, 2016).

Table 1. *The shadow fleet alleged involvement in grey zone activities in the baltic sea*

Date	Vessel ¹	Flag ²	Type of Incident	Site	State Involvement	Responses
October 8, 2023	NewNew Polar Bear (IMO: 9313204)	China (Hong Kong)	Anchor Drugging	Finnish EEZ Baltic-connector Gas Pipeline and 2 Telecom Cables	Finland, Estonia, China	The vessel left the site where the incident took place and continued its journey from the Baltic Sea to the Russian port of Arkhangelsk. The joint investigation by Finnish and Estonian authorities is pending (Staalesen, 2023). China has acknowledged the vessel's responsibility for damaging the pipeline and cables; however, it attributed the incident to accidental causes stemming from adverse weather conditions (ERR, 2024).
November 17–18, 2024	Yi Peng 3 (IMO: 9224984)	China	Anchor Drugging	Swedish territorial sea (TS) BCS East-West Inter-link Cable (Lithuania-Sweden) + C-Lion1 Cable (Finland-Germany)	Germany, Sweden, Finland, Denmark, China	The bulk carrier Yi Peng 3 was tracked by Swedish and German authorities sailing over two cut telecom cables near the islands of Gotland and Öland (Bryant, 2024). The vessel had departed the Russian port of Ust-Luga on November 15, 2024. The Danish Navy monitored the vessel anchored in the Kattegat Strait for nearly five weeks, suspecting it of deliberately dragging its anchor to cut the undersea cables (Radio Free Europe/Radio Liberty, 2024). After month-long negotiations with Chinese authorities, who denied the vessel's involvement, Swedish, Danish, German, and Finnish officials were allowed to board and inspect the Yi Peng 3 as part of a Chinese-led investigation (DW, 2024). However, the Swedish prosecutor leading the European investigation was not allowed aboard. The Swedish investigation later confirmed that the Yi Peng 3 had severed the cables with its anchor. However, no conclusive evidence of deliberate intent was established. Another investigation remains pending (Jones, 2025).

¹ For the list of EU sanction- designated vessels, see Annex XLII of Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine (Council of the European Union, 2014).

² Flag state registration as at the time of incident.

Date	Vessel ¹	Flag ²	Type of Incident	Site	State Involvement	Responses
December 25, 2024	Eagle S (IMO: 9329760)	Cook Islands (Suspected Russian Shadow Fleet)	Anchor Drugging	Finnish EEZ Estlink 2 Power Cable (Finland-Estonia) + 4 Data Cables	Finland	The Finnish Border Guard escorted the Eagle S into Finnish territorial waters. Police and coast guard representatives, supported by the Finnish border guard unit and armed forces, seized and boarded the vessel on suspicion of deliberate anchor dragging that caused cable damage. This incident marked the first seizure of a suspect vessel in enforcement of coastal state sovereign jurisdiction without securing the flag state's consent (Yle, 2024). In August 2025, the captain and two members of the vessel's crew were charged but pleaded not guilty and disputed Finland's jurisdiction. On October 3, 2025, the Helsinki District Court dismissed the case, citing lack of jurisdiction since the damage took place in an EEZ and not in a territorial sea. The case can be appealed to a higher court. The flag state, Cook Islands, did not take any action against the vessel (Osler, 2025).
January 10, 2025	Eventin (IMO: 9308065)	Eventin (IMO: 9308065) Panama	Vessel Adrift/ Risk of Oil Spill	German EEZ	Germany	The loaded tanker lost power and navigation control and was adrift off the German coast near Rügen Island (DW, 2025). To prevent an oil spill, the German authorities seized the tanker, towed it safely to shore, and ordered the vessel and its cargo confiscated (Connor, 2025). Court proceedings remain pending.

Date	Vessel ¹	Flag ²	Type of Incident	Site	State Involvement	Responses
January 26, 2025	Venzhen (IMO: 9937270)	Malta	Anchor Drugging	Swedish EEZ Latvia State Radio and Television Centre's Telecom Cable	Sweden, Latvia, Norway	Several vessels were identified at the site of the incident. Swedish authorities seized the cargo vessel Venzhen and boarded it to conduct an investigation into suspected sabotage of the cable (LSM, 2025a). Norway seized another cargo vessel at the request of the Latvian authorities. The vessel was crewed by Russian nationals but registered and operated under the Norwegian flag. The Norwegian Coast Guard boarded the vessel to investigate but promptly released it after finding no evidence linking it to the cable damage (Reuters, 2025). A few months later, Sweden closed the case. The vessel had several technical defects that led to the anchor being inadequately secured, causing it to break loose due to adverse weather conditions. Swedish authorities found no evidence of deliberate sabotage. The Latvian investigation remains pending (LSM, 2025b).
	Silver Dania (IMO: 8808604)	Norway				
April 11–28, 2025	Kiwala (IMO: 9332810)	Djibouti	Flagless Navigation	Estonian TS	Estonia	The sanctioned tanker Kiwala, en route to the Russian port of Ust-Luga, passed through Estonia's exclusive economic zone. Estonian authorities directed the vessel into territorial waters for boarding and inspection on grounds of flagless navigation. The vessel claimed to be registered in Djibouti and was released on April 28 after technical deficiencies were corrected (ERR, 2025c).

Date	Vessel ¹	Flag ²	Type of Incident	Site	State Involvement	Responses
April 23–30, 2025	<i>HAV Dolphin</i> (IMO: 9073854)	Antigua and Barbuda	Unidentified Drones	German EEZ	Germany, Netherlands	<p>The cargo vessel <i>HAV Dolphin</i> spent eight days anchored northwest of Kiel, close to German Navy's facilities based in Eckernförde. This was not a usual anchorage point (The Insider, 2025b). Unidentified drones were reported in the area while the <i>HAV Dolphin</i> held its position. German police authorities inspected and boarded the vessel twice. The officers found no drones on the ship but determined that all seven crew members were Russian nationals. German authorities notified their Dutch counterparts of their suspicions. On May 15, the vessel was searched again by police upon arrival in Rotterdam, again without results. The measures taken by both countries revealed nothing that would implicate the ship in espionage or sabotage (Tagesschau / ARD, 2025).</p>

Date	Vessel ¹	Flag ²	Type of Incident	Site	State Involvement	Responses
May 13, 2025	Jaguar (IMO: 9293002)	Gabon and Guinea Bissau	Flagless Navigation	Estonian EEZ	Estonia	<p>The Jaguar tanker raised suspicions because of its flagless status. According to the Ministry of Defence, the Estonian Navy attempted to contact the vessel, and, after receiving no response, proceeded to escort it out of Estonian waters. The vessel had reached the vicinity of the previously damaged EstLink cable, and authorities sought to prevent any threat to Estonia's underwater infrastructure (ERR, 2025b). There had been plans to board the Jaguar, but the operation was called off midway (ERR, 2025a). While the EML Raju patrol boat, supported by an Estonian A139 helicopter and an M-28 Skytruck aircraft, was escorting the tanker, a Russian Air Force Su-35 fighter jet entered Estonian airspace without permission. The jet remained in Estonian airspace for less than a minute, but this prompted the Baltic Air Policing mission to launch a Portuguese Air Force F-16 fighter from Åmari Air Base to conduct a reconnaissance flight alongside other Estonian aircraft (Meade, 2025a). This marked the first instance of Russia deploying its military to protect a shadow fleet vessel. The precedent demonstrated that Russia was prepared to use force and risk a serious incident to keep navigation routes open for the so-called shadow fleet, regardless of the flag or ownership details of the vessel (Meade, 2025b).</p>

Date	Vessel ¹	Flag ²	Type of Incident	Site	State Involvement	Responses
May 17/28, 2025	Lauga (IMO: 9111060)	Russia	Unidentified Drones	German TS/EEZ, Belgian Port of Zeebrugge	Germany, Belgium	A German naval patrol vessel, BP 81 Potsdam, started following the Lauga near Borkum Island in the North Sea after noticing a swarm of drones around the Russian cargo ship (Tagesschau / ARD, 2025). The two vessels and the drones moved in procession for roughly three hours, but the aircraft disappeared before German officials could determine their model type or confirm that the Lauga had launched them. When the ship arrived at the Belgian port of Zeebrugge on May 28, local customs authorities inspected the vessel at Germany's request. However, the inspection found no evidence of drones, and questioning of the 11 crew members, all Russian nationals, yielded no leads (Meduza, 2025).
August 26, 2025	Scanlark (IMO: 8505915)	St. Vincent Grenadines	Unidentified Drones	Kiel Canal (Internal Waters of Germany)		On September 7, German police special forces searched the cargo vessel 'Scanlark' on the Kiel Canal. The vessel had docked in the Bay of Kiel on August 20, where over the following days, several warships passed by, including German Warship A511, the tender NATO Warship A516, and the Swedish warships HMS Helsingborg (K32) and HMS Härnösand (K33). On August 26, a drone was allegedly launched from the vessel and flown over a warship to take photographs. Investigations are currently underway against five crew members, all Russian nationals (NDR, 2025a). They are suspected of espionage for sabotage purposes. According to NDR information, the police operation also discovered equipment and antennas that would not normally be found on a cargo ship (NDR, 2025b).

Date	Vessel ¹	Flag ²	Type of Incident	Site	State Involvement	Responses
September 30, 2025	Boracay (IMO: 9332810)	Benin	Flagless Navigation/ Unidentified Drones	French EEZ	France	<p>The French Navy seized the Boracay on grounds of fraudulent documentation. They boarded and inspected the tanker to investigate what authorities described as an unspecified 'suspected violation' (Meade, 2025c). The vessel may be linked to unidentified drone incursions reported between September 22 and 28, 2025, over Danish and Norwegian civilian airports and military installations (Seibt, 2025). The captain, a Chinese national, and the first mate were detained and interviewed before the vessel was released to continue its voyage on October 3 (France24, 2025). The Boracay had previously been arrested in Estonia in April while sailing under one of its many former identities, Kiwala. The tanker was flying the flag of Djibouti at the time, but Djiboutian authorities denied the vessel was registered with them (Meade, 2025c).</p>

'Pirates' of the Baltic Sea: Lawfare and Signalling in Russian Deterrence Strategy

As European enforcement efforts against the shadow fleet intensified, Russia responded with demonstrative naval escorts for some vessels (The Insider, 2025a; Meade, 2025d). At the same time, several high-ranking state officials started equating the seizure of shadow fleet vessels to piracy. In February 2025, Nikolai Patrushev, head of the Maritime Collegium and close ally of President Vladimir Putin, characterised Finland's seizure of the Chinese-flagged Eagle S tanker as a 'piratical seizure' (*piratskii zakhvat*) (TASS, 2025). Since then, the pattern of Russian piracy accusations has become systematic.

In May 2025, Russia's UN Representative Vasily Nebenzya referred to European states countering the shadow fleet 'pirates of the Baltic Sea' during a UN Security Council meeting (Nebenzya, 2025). Russian officials, including Russia's ambassador to Denmark, repeated these accusations, and these also were echoed within Russian expert and academic circles (RIA Novosti, 2025; Smotrim.ru, 2025; Russia Today, 2025; Popov, 2025). These claims misrepresent both the context and the legal matters of the shadow fleet vessels seizure and investigation of the incidents. The consistency and coherency of Moscow's narrative suggest it is not a mere diplomatic protest or propaganda (see EUvsDisinfo, 2025).

After the French authorities seized a sanctioned vessel 'Boracay' on October 1, 2025, President Putin addressed the issue during the annual Valdai Club meeting. He claimed that 'the tanker was seized in neutral waters without any grounds' and further stated: 'As for the seizure of some ships. Well, what's good about it? This is piracy. What is done with pirates? They are destroyed. But the level of risk of collisions will, of course, seriously increase' (President of the Russian Federation, 2025).

In strategic terms, this statement exemplifies what deterrence theory describes as a signal: the verbal and non-verbal communications through which actors convey threats and commitments, display resolve, and project credibility (see Jervis, 2017). Signalling is essential to deterrence practice. When Putin personally articulates consequences, he ties these commitment to his state's reputation for action: it is an authoritative policy position that Moscow may feel compelled to uphold (Schelling, 2020, p. 124). Backing down would undermine future deterrent threats.

What is important here, is that by utilising legal language to frame a signal, the piracy narrative turns into lawfare (see Dunlap, 2008). It reveals

how Moscow misuses law in pursuit of its strategic aims – to deter European states and other actors from taking further coercive measures against the shadow fleet. In the final section of this article, I take a brief look at the legal merit of Russia's claims before analysing what this narrative implies if considered in strategic terms as coercive signalling.

Russia's Piracy Claims: The Strategic Logic of Lawfare

Piracy is a relatively well-defined category in international public law, although some doubts and disagreements regarding its scope of definition and applicability persist (ILC, 2019). According to Art. 101 UNCLOS the term applies to 'any illegal acts of violence or detention, or any act of depredation' which occur on the high seas (or any other place beyond jurisdiction of any state) and involve at least two vessels, the piratical act being launched from one against the other (Shearer, 2010). An act of piracy must be 'committed for private ends'. This is the most substantial criterion to qualify an action as piracy.

Art. 102 UNCLOS elaborates the 'private ends' requirements, stipulating that violence committed by a warship or other state vessels and aircraft qualifies as piracy only if the respective crew mutinies. Such vessel thus ceases to act on flag state duty and hence loses its sovereign immunity. The threshold for this qualification is high – a mere disobedience to orders falls short of mutiny unless intended by the persons in dominant control of the vessel to be used for the purpose of piracy (Shearer, 2010). Thus, the scope of piracy explicitly excludes a coercive action conducted or authorised by a state actor, regardless of the legality of such actions in view of other applicable international legal frameworks (see Proelss et al., 2017, p. 745). These norms may entail the question of state responsibility in peacetime or the laws of naval warfare, respectively (Proelss et al., 2017, pp. 720, 745–46).

However, another aspect of the legal concept of piracy seems to be central to the Russian narrative. The Art. 100 UNCLOS sets the duty for all states to cooperate in matters of repression of piracy. The logical corollary of this provision is that it outlines an exception to the ordinarily exclusive jurisdiction of the flag state of the Art. 92(1), and affords each state enforcement rights against vessels and aircraft suspect of being involved in piracy (Proelss et al., 2017, pp. 734–35). This provision is one of the few recognised cases of universal jurisdiction in international law (Shearer,

2010). By invoking piracy, Russia thus seeks to justify a potential resort to armed violence against NATO states as the exercise of these exceptional enforcement powers.

Russian piracy accusations against European states thus lack any conceivable legal merit. They should be understood as an act of lawfare which appropriates legal concept of piracy for purposes of coercive signalling. Lawfare allows Moscow to signal potential escalation, but in implicit terms, so that it maintains strategic ambiguity which an explicit threat of use of force would eliminate. As mentioned above, although international law of the sea reserves certain rights for coastal states to interdict foreign vessels beyond the territorial sea, this field of law lacks coherent established state practice and contains many grey areas. While NATO's naval and coast guard personnel understand the legal basis for their actions, operating in an environment where Russia threatens "collisions" adds to the planning complexity and risk.

In discussions on the shadow fleet, the EU and NATO member states have so far presented varying legal interpretations and differ in their threat perceptions and risk tolerances regarding what they as plausible legal grounds and operational extent of the enforcement operations against the shadow fleet. The Russian piracy narrative thus seeks to leverage these divisions.

The piracy accusations also perform a symbolic function: they invert the legal status of the actors involved. This signalling move seeks to accomplish two objectives simultaneously: it delegitimises Western actions while providing an allegedly legal cover for Russian responses. Consider another statement Putin made in his Valdai address: 'Our opponents, let's call them that for caution, always call on us to comply with international law. We, for our part, call on them to comply with international law. There is nothing in international law that says one can engage in banditry, piracy, and seize other people's ships without any grounds for doing so, and this can lead to grave consequences' (President of the Russian Federation, 2025).

If European forces are "pirates", then any Russian action against them can be framed not as aggression but as lawful counter-piracy enforcement that any state may undertake under universal jurisdiction. Indeed, Putin alleges a possibility for a third-party intervention to sustain the shadow fleet operations: '...but if we act in the manner I spoke about in today's address, if the multipolar world fights for the interests of each and finds instruments for coordinating positions, I think it will not come to that' (President of

the Russian Federation, 2025). The audience for this signal extends beyond Europe to include states dependent on shadow fleet operations – particularly major importers of discounted Russian oil like China and India.

The rationale of such signalling is twofold: it tacitly conveys that Moscow is considering the possibility of using armed force against the European state vessels while simultaneously preserving strategic ambiguity about when and how Russia might intervene should the interdiction of the shadow fleet vessels continue. For Russian deterrence strategy, lawfare provides a legitimising narrative structure anchored to the authority of international law. Any escalation on Russia's part would be presented as proportionate counter-piracy measures rather than use of force. When considered against broader patterns of Russian posturing – encompassing overt military activity as well as alleged grey zone interventions such as GPS jamming, drone surveillance, and sabotage of undersea infrastructure in the Baltic Sea – this signal demonstrates that Russia possesses not merely the capability to escalate, but also a legal rationale that could complicate Western responses and divide international opinion.

Conclusions

Russian officials have accused EU and NATO members of piracy for interdicting shadow fleet vessels with striking frequency since mid-2024. This represents more than defensive rhetoric or propaganda. The Kremlin has converted its vulnerability into a coercive leverage by expanding its deterrence strategy into the legal domain. When analysed as lawfare, these accusations reveal a signalling rationale: the piracy framing, though legally invalid, enables Russia to threaten escalation while maintaining strategic ambiguity. By describing the EU and NATO states as pirates – and thus criminals – Moscow symbolically delegitimises Western sanctions enforcement and sovereign authority. Moreover, by exploiting the persistent legal uncertainty concerning enforcement measures on the high seas, Moscow buys time for the shadow fleet to continue sustaining Russia's war economy.

For European security, the implications are significant. The shadow fleet will remain a critical vulnerability for Russia and thus a focal point of confrontation. The appropriate response requires recognising Russia's lawfare strategy for what it is while refusing to be constrained by it. Western capitals must understand that in contemporary conflict, legal narratives

are battlefields no less significant than the seas themselves. Countering Moscow's lawfare in international legal fora matters for the demonstration of resolve and unity within the EU and NATO's and achieving credible deterrence against Russia in as much as sanctions enforcement and kinetic measures in countering the illicit operation of the shadow fleet globally.

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