

# STRATEGIC NOTE



## **Guarding Contested Sea Lanes: Comparing Western Maritime Security Responses in the Black and Red Seas**

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## Executive summary

Since 2022, Western and European states have faced similar maritime threats in two places (drifting mines and GPS jamming in the Black Sea, and missile, drone and cable attacks in the Red Sea) however, handled them through completely different legal routes. This brief compares the two responses in terms of their mandates, how quickly they developed, how they were coordinated, how far they reached, and what we can actually say about their results. In the Black Sea, NATO cannot easily establish a collective operational presence because the Montreux Convention significantly restricts warship transit and tonnage, as implemented in particular by Turkey, though this falls short of an outright prohibition on NATO involvement. The Red Sea is different. There, three separate legal channels developed alongside one another: a US-led coalition, an EU mission and UK-US strikes. They still do not operate under a single command structure, although informal coordination and information-sharing occur between the three. How fast each side responded seems to be influenced on how visible and violent a threat looked, not how dangerous it actually was, and neither region can really prove that its response stopped anything, since each one measures success a different way. The brief makes four recommendations. The EU should prioritise funding, operationalising and integrating the Black Sea Maritime Security Hub — a concept already developed by Romania and Bulgaria with EU support — rather than building a new mechanism from scratch. NATO should work within Montreux's limits instead of around them. The Black Sea countries should position key equipment in advance instead of acquiring it only after an incident, while the three Red Sea commands should agree on a shared system for reporting results. All these changes are meant to close a coordination gap that will otherwise come back the next time this happens somewhere else.



# Introduction

Ukraine's war and the Houthi attacks on shipping have shown the same weak spot in two different places: Western and European maritime security isn't really one system. It's a bunch of separate responses put together as problems came up. This brief asks: how do the response setups built in the Black Sea and the Red Sea differ in their mandates, speed, coordination and ability to protect commercial shipping, and what does that difference tell us about the gaps in European maritime security?

To answer that, the brief looks at five things: what happened in the Black Sea and how states responded; what happened in the Red Sea from late 2023 onward and how that was met; how the legal basis and speed of the two responses compare; what that gap says about coordination between national governments - the EU, NATO and ad hoc coalitions; and, finally, where there's enough evidence, whether either response actually deterred anything or just reacted to what already happened. Each case is analysed using the same criteria: the threat, the actors involved, the response, the timing, the coordination mechanism and the observable effects.

## Background

UNCLOS is where all of this starts. Under the 1982 convention, a coastal state controls the water up to 12 miles from its shore, but foreign ships can still pass through that strip as long as they're not doing anything that threatens the coastal state's security. That's what "innocent passage" means.<sup>1</sup> Past the 12-mile line, on the high seas, any ship from any country can go where it wants — no state owns that water.<sup>2</sup> Both the Black Sea and the Red Sea sit under this same baseline law. The problem is that UNCLOS was written back in 1982, long before anyone thought about drifting sea mines, jammed GPS signals or missiles fired at cargo ships. It just doesn't cover any of that.

The Black Sea has one extra rule the Red Sea doesn't have to deal with: the Montreux Convention from 1936. It limits how much warship tonnage non-Black-Sea states can send through the Straits, and how much they can keep in the Black Sea at once — capped at 21 days per ship.<sup>3</sup> This is a major reason NATO cannot easily establish a collective operational presence in the Black Sea — the treaty, and in particular its implementation by Turkey, significantly restricts naval transit and tonnage for non-Black-Sea states, though this restriction falls short of a blanket legal prohibition on NATO involvement as such. So, Romania, Bulgaria and Turkey are left to handle mine clearance and jamming mostly on their own, because there's no straightforward legal route for NATO to get involved as an organization at scale.

The EU works under different rules entirely. Articles 42(4) and 43(2) of the Treaty on European Union give the Council the power to launch missions like this and that's the exact legal basis used to stand up ASPIDES in the Red Sea.<sup>4</sup> NATO's stance on hybrid threats, meanwhile, comes from the 2021 Brussels Summit, where members agreed that a hybrid or cumulative cyber campaign could, in theory, be enough to trigger Article 5, the mutual-defense clause. But that decision gets made case by case, and NATO has never actually done it.<sup>5</sup>

None of these legal frameworks were built to work together. UNCLOS deals mainly with ships and maritime zones, while Montreux governs access through one particular strait. EU treaty

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<sup>1</sup>UNCLOS Art. 19

<sup>2</sup>UNCLOS Art. 87(1)

<sup>3</sup>Convention regarding the Régime of the Straits, Montreux 1936, Arts. 14, 18

<sup>4</sup>Council Decision (CFSP) 2024/632

<sup>5</sup>Brussels Summit Communiqué, 14 June 2021



law provides the basis for EU missions, and NATO's position on hybrid threats leaves considerable room for case-by-case decisions. That's basically what the term “grey zone” or “hybrid threat” is meant to describe — actions designed to stay just under whatever line would force a real legal or military response and usually hard to pin on one country.<sup>6</sup> Not everything in this brief fits that idea cleanly, though. A Soviet-era mine drifting loose feels more like old wreckage from a war than a deliberate grey-zone move, while the GPS jamming and the Houthi missile campaign match the concept a lot better. For this comparison, ‘grey zone’ is therefore treated as a spectrum rather than a strict category.

## Case Studies in the Black Sea

### 1. Sea mine incidents (Romania, Bulgaria, 2022–2023)

Ever since Russia invaded Ukraine, old Soviet sea mines have been drifting loose in the western Black Sea and causing real problems. Ukraine is widely reported to have originally placed these mines to protect the waters near Odesa, although this attribution rests on public reporting rather than independently verified evidence. But ocean currents pulled some of them away, and they ended up floating into Romanian, Bulgarian and Turkish waters.<sup>7</sup>

These weren't near misses – three vessels were actually struck, along with one further mine detonation near shore that did not hit a vessel. A Romanian Navy minesweeper got hit on 8 September 2022.<sup>8</sup> A mine detonated near the breakwater at the Romanian beach town of Costinești on 14 August 2023 – this incident did not involve a vessel being struck.<sup>9</sup> Then two more ships were hit later that year – a Panama-flagged ship on 28 December 2023 and a Turkish cargo ship on 5 October 2023.<sup>10</sup> Beyond the actual hits, these mines have just been a constant danger for shipping, fishing boats, tourists and people living along the coast in three different countries.

Ukraine is widely reported to have laid the mines as a defensive move, and this attribution is not seriously contested, what remains disputed is why so many broke free. Ukraine and Western countries think Russian naval activity is partly to blame. Russia says the opposite – that Ukraine didn't secure the minefield properly, breaking the 1907 Hague Convention.<sup>11</sup> Either way, it was left to Romania, Bulgaria and Turkey to actually clean up the mess. NATO wasn't really involved directly – only indirectly, because these are NATO member countries.

The response took a while to get going. Each country started patrolling on its own back in March 2022. But Romania didn't actually get proper minesweeping ships until September 2023 – two secondhand ones from the UK, HMS Blyth and HMS Pembroke. That's almost a full year after Romania's own ship had already been damaged.<sup>12</sup> Bulgaria was ahead of the game here – it had already bought two used Dutch minesweepers back in 2020, before the war even started.

The big turning point came on 11 January 2024. That's when Romania, Bulgaria and Turkey signed an agreement in Istanbul to form a new group called MCM Black Sea – short for the Mine Countermeasures Black Sea Naval Group. That's almost two years (22 months) after the first mine exploded in Turkish waters, back on 26 March 2022.

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<sup>6</sup>Peter Dobias, Kyle Christensen, “The ‘Grey Zone’ and Hybrid Activities”, *The Quarterly Journal*, Vol. 21, no.2, pp.-41-54, 2022

<sup>7</sup>RadioFreeEurope/RadioLiberty, ‘The Battle To Clear The Black Sea Of Mines,’ Tony Wesolowsky, Georgi A. Angelov (14 January 2024)

<sup>8</sup>Naval News, ‘Romanian minesweeper hits Sea Mine in the Black Sea’, by Tayfun Ozberk (11 September 2022)

<sup>9</sup>The Maritime Executive, ‘Romania Reports Mine Explosion as Efforts Seek to Expand Ukrainian Exports’ (15 August 2023)

<sup>10</sup>GCaptain ‘Turkish Cargo Ship Hits Mine in Black Sea’ Copyright Thomson Reuters 2023.

<sup>11</sup>RadioFreeEurope/RadioLiberty, ‘The Battle To Clear The Black Sea Of Mines,’ Tony Wesolowsky, Georgi A. Angelov (14 January 2024)

<sup>12</sup>RadioFreeEurope/RadioLiberty, ‘The Battle to Clear the Black Sea of Mines,’ Tony Wesolowsky, Georgi A. Angelov (14 January 2024)



Why did it take so long? It wasn't just slow paperwork – there's an actual legal reason. A 1936 agreement called the Montreux Convention limits how many warships from outside the Black Sea region can pass through the Turkish Straits, and how big those ships can be.<sup>13</sup> That significantly limits NATO's ability to lead a joint response here, even though it does not amount to an absolute bar on NATO involvement. That's exactly why the three countries kept their agreement separate from NATO's official command.

By September 2022, patrols from Romania, Bulgaria, Turkey and Ukraine had destroyed at least 28 mines in the western Black Sea. Turkey got three, Romania two, Bulgaria one and Ukraine cleared most of the rest. So far, no one has died, but the danger has still pushed up insurance costs for ships stopping at Black Sea ports.<sup>14</sup>

## **2. GPS jamming and spoofing messing with ships and planes**

There's a second, quieter threat too – Russia has been messing with satellite navigation signals using electronic-warfare equipment based on the ground and in Crimea. This has knocked out or faked GPS signals across the Black Sea, the airspace Romania controls, the Danube Delta and the waters near Crimea. For planes, this means pilots can't fully trust their navigation systems. For ships, it creates what's called “ghost” AIS tracks – basically, the ship's system says it's in one place, but in reality, it's somewhere else entirely.

Romania's aviation authorities and coast guard have mostly been the ones dealing with this. They've put out official warnings (called NOTAMs) and interference alerts, and pushed airlines to switch to backup navigation methods, like inertial systems or ground-based radio beacons, whenever GPS signals get disrupted.<sup>15</sup> But it took until August 2024 for a real technical response to show up: a Romanian company called InSpace Engineering launched a high-altitude balloon from Constanta specifically to measure how bad the interference actually was.<sup>16</sup> The EU's aviation safety agency (EASA) and Eurocontrol have also put out safety warnings about it. Still, overall, the response has mostly been each country handling things on its own – nothing like the more organized, joint efforts NATO has used in other situations, like its Baltic Sentry patrols that protect underwater cables and pipelines.

There's a big-time gap here too. People first started reporting this interference regularly back in 2022, but Romania didn't start seriously monitoring it until August 2024 – roughly two years later. By 2025, the satellite company Spire Global was calling Romanian airspace one of the worst GPS-interference zones in all of Europe, with location errors sometimes off by hundreds of kilometers, and pilots reporting they'd lost GPS guidance entirely during landing approaches.<sup>17</sup> So far, no crashes or collisions have been directly blamed on this interference, but experts say the safety risk keeps growing.

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<sup>13</sup>Convention regarding the Régime of the Straits, Montreux (20 July 1936)

<sup>14</sup>The Maritime Executive, 'Romania Reports Mine Explosion as Efforts Seek to Expand Ukrainian Exports' (15 August 2023)

<sup>15</sup>Spire Global, 'GNSS interference Report: Russia — Part 4 of 4: Black Sea and Romanian airspace' (24 September 2025)

<sup>16</sup>Flightradar24, 'GPS Jamming: the benign, the bad, and the scary' (9 January 2025)

<sup>17</sup>Spire Global, 'GNSS interference Report: Russia — Part 4 of 4: Black Sea and Romanian airspace' (24 September 2025)



### 3. Fake GPS signals throwing off ships across the wider Black Sea area

There's another problem related to jamming, but different from it – deliberate GPS spoofing. This is when someone sends out fake satellite signals that trick a ship's navigation system into showing the wrong location. Sometimes it even makes the ship appear to be sitting on dry land or parked at an airport. The first documented incidents of this kind in the Black Sea date to at least 2017 near Crimea<sup>18</sup>, and it later spread to the Eastern Mediterranean, where it caused one truly bizarre incident: in April 2024, 117 ships all got spoofed at once, and their systems showed them sitting at Beirut's airport.<sup>19</sup> Russia is suspected of being behind it, though spoofing is hard to trace back to anyone for certain, which makes it tough to pin down definitively.

So far, it's mostly been shipping companies, not governments, dealing with this. They've started using tools designed to resist GPS interference, like RockFLEET Assured's system, which combines several sensors to track a ship's real position.<sup>20</sup> Meanwhile, groups like the NATO Shipping Centre and UKMTO have sent out warnings to sailors. But there's no actual law or treaty forcing anyone to act – it's completely up to each shipping company whether they want to spend money on protection. It took roughly seven years, from the first documented reports near Crimea in 2017 to the huge Beirut incident in April 2024, before the problem became big enough that the industry started responding. By 2024 and 2025, the same spoofing tricks seen in the Black Sea had clearly spread to the Eastern Mediterranean and the Red Sea too, pushing up war-risk insurance costs — even though no actual collision has been blamed on Black Sea spoofing yet.

## Case Studies in the Red Sea

### 1. Operation Prosperity Guardian

Starting in October 2023, Houthi forces began repeatedly attacking commercial ships with drones and missiles as they passed through the Bab-el-Mandeb Strait and the southern Red Sea. By mid-December 2023, there had been more than 100 attacks, hitting ten merchant ships connected to over thirty-five different countries.<sup>21</sup> This was a much bigger, more visible problem than anything happening in the Black Sea.

This time, the US reacted fast. On 18-19 December 2023, Defense Secretary Lloyd Austin announced a new multinational task force called Operation Prosperity Guardian. It brought together the US, UK, Bahrain, Canada, France, Italy, the Netherlands, Norway, the Seychelles and Spain, with Greece and other countries joining later.<sup>22</sup> Instead of building something entirely new, they used an existing military group — Task Force 153, part of the Combined Maritime Forces, to run joint patrols and share intelligence, giving what the Pentagon called “umbrella protection” to merchant ships.<sup>23</sup>

The gap between when the attacks really picked up (late October 2023) and when the coalition was officially announced (18 December 2023) was only about two months – way faster than

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<sup>18</sup>GPS World, 'Spoofing in the Black Sea: What really happened?', by Michael Jones (11 October 2017) — added per correction: earliest documented Black Sea spoofing reports date to 2017, not 2021.

<sup>19</sup>GPSPATRON, 'Maritime GNSS Interference Worldwide: A Cumulative Analysis 2025' (24 October 2025)

<sup>20</sup>Ground Control, 'Tackling Maritime GPS Spoofing and Jamming Threats with RockFLEET Assured' (August 5, 2026)

<sup>21</sup>USNI News, 'Operation Prosperity Guardian Set to Protect Ships in the Red Sea, Carrier Ike in Gulf of Aden' (USNI News, 18 December 2023)

<sup>22</sup>Air and Space Forces Magazine, 'US, Allies Take On Over 100 Attacks by Houthis with New 'Operation Prosperity Guardian'', Chris Gordon (19 December 2023)

<sup>23</sup>NPR, 'Pentagon announces new international maritime protection force for the Red Sea', The Associated Press (19 December 2023)



the Black Sea's response times, which took anywhere from one to two years. Even so, some operational details were still being figured out in Pentagon briefings as late as 21 December 2023.<sup>24</sup>

The coordination was deliberately loose – this wasn't a formal NATO or UN operation, just a “coalition of the willing.” Countries participated however they wanted: some ran patrols, others just shared intelligence.<sup>25</sup> Even without a joint command, participating states did exchange intelligence and coordinate patrol areas informally through the existing Combined Maritime Forces structure. A few countries, including France, Italy and Spain, chose not to fully join in, they kept control of their own ships instead. Despite the operation launching, Houthi attacks kept happening, which eventually led the US and UK to start directly striking back on 11 January 2024.

## 2. EUNAVFOR ASPIDES

The same Houthi attacks also raised a separate worry for the EU: relying on a US-led coalition for something that directly affected European trade. So, the EU launched its own response – Operation ASPIDES – following a more official, though slightly slower, process than Prosperity Guardian. The EU Council approved a Crisis Management Concept on 29 January 2024, then formally set up the operation on 8 February 2024 and officially launched it on 19 February 2024.<sup>26</sup> It's run out of Larissa, Greece, led by Rear Admiral Vasileios Gryparis and was built specifically as a defensive-only mission, with its own command structure and rules kept separate from Prosperity Guardian.<sup>27</sup>

Looking at the whole timeline – from when Houthi attacks escalated in October 2023 to when the EU Council approved the plan in late January 2024 – that's about four months. Then it took another three weeks to launch, so about four and a half months total from the crisis starting to troops being deployed. This operation falls under EU defense rules (specifically Articles 42(4) and 43(2) of the EU Treaty), and it was run separately from the US-led coalition so the EU could keep what officials call “strategic autonomy”, while still informally coordinating with the US coalition and other partners – the three Red Sea commands share situational updates even though none of them sits under a joint command structure.<sup>28</sup>

According to its own reports, ASPIDES protected more than 370 ships in its first year (as of February 2025).<sup>29</sup> The EU Council has extended its mandate twice – first through February 2026 with about €17 million in funding, then through February 2027 with about €15 million.<sup>30</sup> True to its defensive mission, it has never carried out any offensive strikes.

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<sup>24</sup>GlobalSecurity, 'Ryder Gives More Detail on How Operation Prosperity Guardian Will Work — News Briefing with Major General Pat Ryder', Jim Garamone, DOD News (21 December 2023)

<sup>25</sup>Defense News, 'US unveils international force to defend Red Sea: Here's what we know' (19 December 2023)

<sup>26</sup>Council of the European Union, 'Security and freedom of navigation in the Red Sea: Council launches EUNAVFOR ASPIDES' (Press Release, 19 February 2024)

<sup>27</sup>Council of the European Union, 'Security and freedom of navigation in the Red Sea: Council launches EUNAVFOR ASPIDES' (Press Release, 19 February 2024)

<sup>28</sup>Council Decision (CFSP) 2024/632 of 19 February 2024

<sup>29</sup>The Maritime Executive, 'EU Extends Aspides Freedom of Navigation Mission in the Red Sea to 2026' (17 February 2025)

<sup>30</sup>Council of the European Union, 'Red Sea: Council prolongs the mandate of Operation Aspides' (Press Release, 14 February 2025)



### 3. UK-US strikes against Houthi targets

Even though both Prosperity Guardian and ASPIDES were purely defensive, Houthi attacks kept happening – including one big, complicated attack in early January 2024 that had to be stopped by three US destroyers, US fighter jets and a British warship.<sup>31</sup> That was the tipping point. Instead of just trying to deter more attacks, the US and UK decided to strike back. On 11–12 January 2024, they carried out their first joint strikes together, hitting more than sixty targets in sixteen different locations.<sup>32</sup> More strikes followed on 22 January, 3 February and then on and off through the rest of 2024. Australia, Bahrain, Canada and the Netherlands offered political and logistical support early on, and later Denmark, Germany, New Zealand and South Korea also spoke in support. Once Trump took office, the US launched a bigger, more solo campaign in 2025, and the UK publicly joined in on a strike that year.

The first UK-US strikes came only three to four weeks after the launch of Operation Prosperity Guardian on 18 December 2023. The strikes themselves sat outside any formal joint command – they were coordinated bilaterally between the US and UK, separately from both Prosperity Guardian and ASPIDES, since neither of those mandates allows offensive action – though ad hoc political and logistical coordination with coalition partners continued alongside them. The strikes did damage some Houthi missile storage sites, radar systems and drone factories, but the attacks on shipping didn't stop. Houthi leaders promised to retaliate, and the whole situation raised fears that the conflict could spread further, possibly pulling in Iran.

#### Comparative Findings

(Table 1: Black Sea vs. Red Sea — comparison across five criteria)

| Comparison criterion                 | Black Sea                                                                                                                                                                                                                                                                                                                                                                           | Red Sea                                                                                                                                                                                                                                                                        |
|--------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Legal institutional mandate</b> / | No EU or NATO operational mandate.<br>National mine-clearance authority only, plus an ad hoc trilateral MoU (Romania-Bulgaria-Turkey) kept deliberately outside NATO structures.<br>Montreux Convention (1936) restricts transit/tonnage of non-Black-Sea-state warships through the Turkish Straits, significantly limiting, though not formally excluding NATO as an institution. | Three distinct, parallel legal bases:<br>- US-led coalition operating through the existing Combined Maritime Forces Task Force 153.<br>- EU mission (ASPIDES) under CSDP, Articles 42(4)/43(2) TEU.<br>- UK-US strikes: ad hoc bilateral, no treaty basis.                     |
| <b>Speed response</b> of             | Slow: ±22 months from first confirmed drifting-mine detonation (Mar 2022) to the trilateral MCM MoU (Jan 2024).<br>±12 months from Romania's minesweeper being damaged to its replacement purchase.<br>±24 months before Romania began systematic GPS-jamming measurement (Aug 2024).                                                                                               | Fast by comparison: ±2 months from sustained Houthi attacks to the Prosperity Guardian announcement (Dec 2023).<br>±4.5 months from crisis onset to ASPIDES full deployment (Feb 2024).<br>±3–4 weeks from Prosperity Guardian's launch to the first UK-US strikes (Jan 2024). |

<sup>31</sup>CNN, 'US and UK carry out additional strikes against Houthi targets in Yemen' (22 January 2024)

<sup>32</sup>NBC News, 'US and Britain launch strikes against Houthi rebel targets in Yemen', by Courtney Kube and Tim Stelloh (12 January 2024)



| Comparison criterion                              | Black Sea                                                                                                                                                                              | Red Sea                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Coordination mechanism</b>                     | Fragmented and ad hoc: a trilateral MoU for mines; unilateral national advisories for jamming; industry self-help for spoofing. No single body owns the problem across incident types. | Fragmented institutionally rather than informally: three separate command structures (US/CMF, EU/ASPIDES, UK-US strikes) operating in the same theatre without a joint command, by design. Informal coordination and information exchange nonetheless occur between the three commands. |
| <b>Geographic coverage and continuity</b>         | Narrow, littoral-state-bound; each state patrols its own waters. No sustained multinational naval presence.                                                                            | Broader coverage with renewed mandates (ASPIDES extended twice, through Feb 2027). Continuous multinational naval presence since late 2023.                                                                                                                                             |
| <b>Observable effect / evidence of deterrence</b> | ±28 mines destroyed by September 2022; no fatalities reported. GPS jamming and spoofing explicitly described as still rising through 2025 - no deterrence claimed.                     | Concrete protection metrics (370+ vessels escorted by ASPIDES in year one). Houthi attacks continued despite three overlapping responses; no coalition claims a deterrent effect.                                                                                                       |

The Black Sea lacks a single overarching EU or NATO operational mandate. The only formal setup is a three-way agreement between Romania, Bulgaria and Turkey and even this was built on purpose to stay outside NATO's command structure.<sup>33</sup> This isn't just a political choice – it's strongly shaped by the 1936 Montreux Convention, which limits the size and passage rights of warships from non-Black-Sea countries through the Turkish Straits. That rule significantly restricts NATO's ability to operate there as an institution, no matter what individual member states might want, though it stops short of an outright, formal exclusion – much of its practical force comes from how Türkiye implements it.<sup>34</sup>

The Red Sea is the opposite. It runs on three separate legal frameworks, all working at once: the US-led coalition operating through the already-existing Combined Maritime Forces Task Force 153, the EU's ASPIDES mission based on Articles 42(4) and 43(2) of the Treaty on European Union, and the informal, treaty-free bilateral deal behind the UK-US strikes.<sup>35</sup>

The two seas also differ sharply in how fast anyone reacted. In the Black Sea, the mine-clearance agreement took about twenty-two months to come together after the first confirmed mine explosion. Romania needed about twelve months to replace its minesweeper after its own ship was damaged.<sup>36</sup> Its effort to monitor GPS jamming took even longer – roughly twenty-four months after the interference was first reported.<sup>37</sup>

The Red Sea response was much quicker. Prosperity Guardian was announced just two months after the Houthi attacks became sustained. ASPIDES was fully up and running within

<sup>33</sup>RadioFreeEurope/RadioLiberty, 'The Battle to Clear the Black Sea of Mines', Tony Wesolowsky, Georgi A. Angelov (14 January 2024)

<sup>34</sup>Tactics Institute For Security and Counter Terrorism, 'Addressing the Menace of Russian Sea Mines in the Black Sea' (7 February 2024) — note: Montreux and its implementation by Türkiye restrict, but do not formally prohibit, NATO involvement.

<sup>35</sup>EUR-lex, 'Treaty on European Union' (26 October 2012)

<sup>37</sup>Spire Global, 'GNSS interference Report: Russia — Part 4 of 4: Black Sea and Romanian airspace' (24 September 2025)



four and a half months of the crisis starting. And the move to offensive UK-US strikes came only three to four weeks after Prosperity Guardian launched.<sup>38</sup>

The difference is not only about speed. The two theatres are also coordinated in very different ways. In the Black Sea, coordination is fragmented informally – a trilateral MoU covers mines, unilateral national advisories cover jamming, and industry self-help covers spoofing, with no single body owning the problem across incident types.<sup>39</sup> In the Red Sea, fragmentation is institutional rather than informal: three separate command structures (US/CMF, EU/ASPIDES, UK-US) operate in the same theatre without a joint command, by design rather than by default – though this does not mean the three operate in isolation from one another; they exchange information and coordinate informally even without a shared command.<sup>40</sup>

Geographically, the Black Sea response remains narrow. Each state largely patrols its own waters, and there is no sustained multinational naval presence. The Red Sea response has broader coverage and has been renewed twice, with ASPIDES's mandate extended through February 2027.<sup>41</sup>

Finally, the clearest difference comes when looking at what each operation actually counts as a result. The Black Sea counts roughly twenty-eight mines destroyed by September 2022, with no fatalities reported, while GPS jamming and spoofing are explicitly described as still worsening through 2025 – no deterrent effect is claimed.<sup>42</sup> The Red Sea reports concrete protection numbers, such as ASPIDES's 370-plus vessels escorted in its first year, but Houthi attacks continued despite three overlapping responses, and no coalition claims to have deterred anything either.<sup>43</sup>

The comparison points out four broader findings. First, fragmentation has different causes in each theatre. In the Black Sea, the Montreux Convention limits the possibility of a NATO-led operational response, while in the Red Sea, separate national and institutional mandates have led to parallel command structures. The difference in response time is also striking. Response speed seems to be influenced by how visibly “kinetic” a threat appears than on how serious it actually is. Overt missile and drone attacks produced a coalition in about two months, while ambiguous and difficult-to-attribute grey-zone threats on NATO's own eastern flank took twelve to twenty-four months to produce any organized response.

There is also an institutional asymmetry that is difficult to explain. The EU has an operational role in the theatre farther from its own territory, but none in the theatre closer to it. That asymmetry is difficult to explain on the basis of proximity or interest alone. The last issue is how “success” is measured. The two theatres use very different measures: mines neutralized in the Black Sea, vessels escorted in the Red Sea. Neither measure tells us whether deterrence has actually been achieved, and there is no shared framework for judging whether either response is working.

Taken together, these cases suggest that European maritime security still depends on legal workarounds and national initiative rather than a coherent, transferable model. That matters beyond these two theatres. If a comparable threat appeared somewhere else, Europe would again have to work out how to respond while the crisis was already underway.

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<sup>38</sup>CBS News, 'Houthi vow to keep attacking ships in Red Sea after US, UK strikes target their weapons in Yemen' (12 January 2024)

<sup>39</sup>GPSPATRON, 'Maritime GNSS Interference Worldwide: A Cumulative Analysis 2025' (24 October 2025)

<sup>40</sup>Defense News, 'US unveils international force to defend Red Sea: Here's what we know' (19 December 2023)

<sup>41</sup>Council of the European Union, 'Red Sea: Council extends the mandate of Operation Aspides to safeguard freedom of navigation' (Press Release, 23 February 2026)

<sup>42</sup>CNN, 'GPS jamming is emerging as an increasingly prevalent-and troubling-weapon of war' (6 March 2026)

<sup>43</sup>The Maritime Executive, 'EU Extends Aspides Freedom of Navigation Mission in the Red Sea to 2026' (17 February 2025)



## Recommendations

For the EU: Rather than building a new mechanism from scratch, the Council should prioritise funding, operationalising and integrating the Black Sea Maritime Security Hub – a concept already developed jointly by Romania and Bulgaria with EU support – into a standing capability to monitor hybrid threats and give advice, focused specifically on the Black Sea. It would work like ASPIDES does in the Red Sea, not necessarily the same size, but the same basic function. Right now, the EU has an actual operational presence thousands of kilometers away in the Red Sea, but only an advisory role in the Black Sea, which is right on its doorstep. That's hard to justify given how close the Black Sea is and how much is at stake there. Building on the existing Hub concept, rather than starting a parallel structure, wouldn't need a new treaty and would make use of work Romania and Bulgaria have already put in. It could use the same CSDP tools that were used to launch ASPIDES, just adjusted for an advisory role instead of an escort role, since Montreux significantly limits NATO's ability to maintain an operational presence there.

For NATO: Instead of treating Montreux as a wall it can't get past, NATO should formally share intelligence and provide logistics support to the existing Romania-Bulgaria-Turkey Mine Countermeasures Group. This would fix the current mandate gap without changing the treaty at all – NATO doesn't need warships in the Black Sea to offer satellite intelligence, funding or technical know-how to the countries already doing this work. There's already precedent for NATO backing member-led efforts in other areas without deploying operationally itself.

For Romania, Bulgaria and Turkey: procurement should happen before an incident, not after one. In both the mine case and the jamming case, the pattern is the same: a country only buys or builds the capability after an incident has already caused damage, which is why responses have taken twelve to twenty-four months. Funding and positioning mine-clearance ships and GPS-jamming monitoring equipment ahead of time, instead of after something happens, would cut this response time down and reduce how long shipping and coastal communities stay at risk.

For the three Red Sea commands (Prosperity Guardian, ASPIDES, and the UK-US strike coalition): These three structures should agree on a shared way to report incidents and measure effectiveness. Right now, each one uses its own metrics, so there's no way to compare how well they're working or draw lessons that could help the Black Sea. This would not require the three commands to merge, and there is no indication that they want to do that. The point would simply be to give them a common way of reporting results.

## Limitations

Three things limit this brief. There isn't much data on whether these responses actually worked. Both sides report numbers – mines cleared, ships escorted, but nobody publishes what would have happened without these responses. The mine-clearance numbers from Romania and Bulgaria, and the escort numbers from ASPIDES, all come from the countries or coalitions that did the work, not from an outside source. For that reason, this brief treats those numbers as evidence of activity, not proof of deterrence.

Classified information isn't available. NATO and EU internal assessments, and whatever is behind the Brussels Summit's language on hybrid threats and Article 5, are not public. When this brief describes NATO's or the EU's position, it's relying on public statements and Council decisions, which may not show the full internal debate.



There is almost no economic data. Neither the Black Sea nor the Red Sea has reliable public numbers on ships being rerouted, insurance costs rising or trade dropping. Without that information, this brief can compare mandates, speed and coordination in detail, but can't say which response was worth the cost.

## Conclusion

The comparison shows that European maritime security is not organised around a single response model. In the Black Sea, legal constraints and the absence of a common operational mandate have pushed responsibility towards neighbouring states and ad hoc cooperation. In the Red Sea, stronger institutional capacity has enabled a faster and broader response, but the coexistence of separate commands has still limited coordination. The key problem, therefore, is not simply whether Europe can respond to maritime threats, but whether it can respond consistently when threats differ in visibility, attribution and legal character.

The evidence also suggests that speed and activity should not be confused with effectiveness. The Black Sea response produced concrete mine-clearance activity, while the Red Sea response escorted hundreds of vessels, yet neither case provides sufficient evidence to demonstrate deterrence. This makes the absence of a common framework for measuring effectiveness more important than the raw number of operations conducted.

The practical lesson is that Europe needs a response architecture that can adapt to different legal and operational environments instead of being rebuilt after every crisis. A standing advisory role for the EU, stronger NATO support to existing Black Sea capabilities, advance procurement and positioning of critical equipment, and common reporting standards in the Red Sea would not create a single European command. They would, however, make existing responses faster, more comparable and easier to adapt when the next maritime security crisis emerges.



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