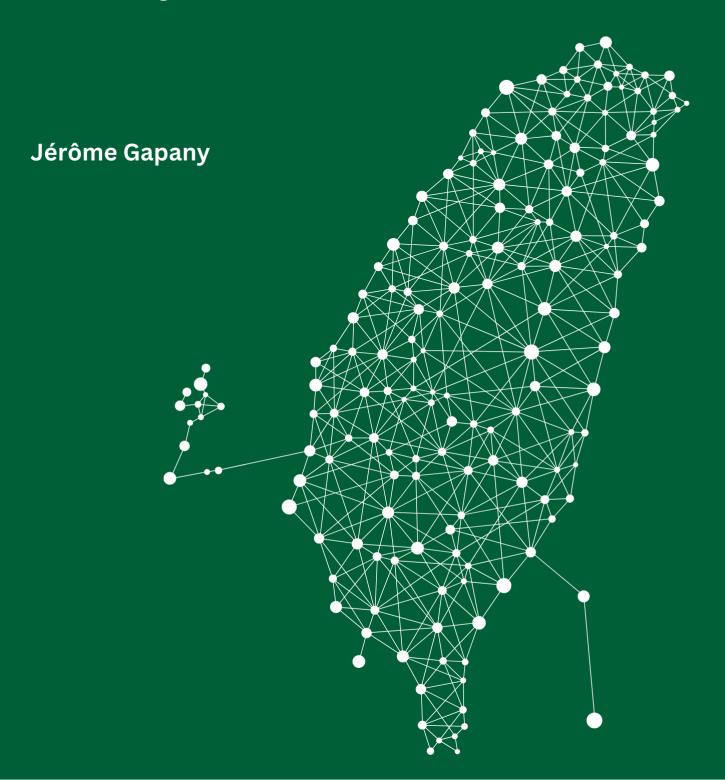


Moving Beyond the Grey Zone: Evidence-Based Policy for Maritime Security in the Taiwan Strait (Part I)



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Executive Summary

This two-part policy paper examines how evolving patterns of maritime activity in and around the Taiwan Strait create escalation risks, and how Taiwan authorities can respond with clearer concepts and more systematic evidence. Part I suggests that the increasingly elastic use of "grey zone" as a catch-all label makes it harder to distinguish between different types of pressure at sea, their indicators and appropriate responses. As an alternative working lens, the paper uses "maritime coercion", which is the sustained use of non-war maritime activities to influence another actor's choices through pressure or disruption, while remaining short of open conflict. Viewed this way, the Strait appears as a setting of cumulative risk rather than isolated crises. Large-scale exercises, the expanded influence of Chinese Coast Guard authorities, the growing role of militia-type actors and recurrent disturbances affecting subsea cables and other infrastructure all add friction, uncertainty and room for misreading intent. Managing this environment requires the ability to tell routine activity from meaningful change in posture, to connect observable patterns to proportionate, non-escalatory responses, and to communicate facts credibly to domestic and external audiences. Part II, therefore, advances a practical, evidence-led agenda centred on a "Taiwan Maritime Transparency Hub" (TMTH) that would draw together incident data from defence, coastguard and infrastructure operators under common templates and validation rules. It also outlines how a clearer domestic evidence base could feed into status-neutral channels, both regionally and internationally. In combination, the following policy recommendations are intended to make well-documented incidents, rather than contested narratives, the organising principle for how Taiwan tracks maritime risks, calibrates its responses and contributes to wider regional resilience:

- Adopt a domain-specific taxonomy of maritime coercion with measurable indicators and proportionate counter-responses. Define practical categories with observable indicators and thresholds, and link each to pre-agreed operational responses.
- Standardise information-sharing and create a single, interoperable reporting platform, or "Taiwan Maritime Transparency Hub" (TMTH). Fold existing platforms into one interoperable system with common templates, data standards and a single public-facing dashboard.
- 3. Establish an expert advisory board to embed scientific peer review in incident analysis. Require rigorous, routine documentation of incidents; publish methods and datasets where security allows, backed up by a solid domestic and international peer review process to ensure greater visibility and credibility.
- 4. Expand and tighten Track-2 and -1.5 cooperation so that Taiwan contributes evidence and expertise within existing international frameworks. Contribute standardised incident data and join technical working groups with trusted, international and regional bodies to build shared knowledge on, without politicisation of maritime security.
- 5. Support and promote UNIDIR's call to create a new UN body focusing on maritime security. Participate in the United Nations Institute for Disarmament Research (UNIDIR)'s efforts to tackle the lack of a comprehensive institutional framework addressing maritime security challenges.

Part I – Introduction

Recent patterns of activity in and around the Taiwan Strait have heightened the difficulty of distinguishing routine state behaviour from calibrated pressure operating below the threshold of armed conflict. The concept of the "grey zone" has become a common shorthand for these dynamics. Yet, its elastic usage limits its policy utility and obscures meaningful distinctions between different forms of coercion and their corresponding response options.

This document constitutes Part I of a two-part policy paper. Its purpose is to refine the analytical vocabulary available to policymakers by identifying the limits of the grey zone framework and advancing a domain-specific taxonomy of maritime coercion. By drawing on established theories of coercion and empirical developments in the Strait, it offers a more precise conceptual structure from which proportionate, non-escalatory policy responses can be derived. Part II, to be released shortly, will build on this foundation by outlining the institutional reforms and international pathways needed to translate this taxonomy into an evidence-led deterrence architecture.

1. Beyond the "Grey Zone": Clarifying Concepts to Sharpen Policymaking

Few terms in contemporary strategic and security studies have spread as quickly – and as loosely – as "grey zone". It now abundantly appears in academic debates, policy papers, and news headlines, usually to describe assertive posturing by China falling just short of open conflict. The concept, however, has value only insofar as it highlights a growing number of activities calibrated to remain below the thresholds that would otherwise trigger military retaliation. Yet the elasticity of its definition also constitutes its main pitfall. The following sections review the scholarly debate on the "grey zone" and replace it with a more precise vocabulary of maritime coercion, at and below sea. Drawing on strategic risk analysis and the ends—ways—means framework, we link observable behaviours to non-escalatory tools, allowing governments to align specific problems with appropriate policy instruments.

a. Critiques of the Grey Zone

In his 2015 work titled *Mastering the Gray Zone*, Michael Mazarr defines grey zone strategies as coercive, incremental campaigns designed to alter facts on the ground while avoiding triggering kinetic military response. Mazarr stresses that such tools – economic pressure, political subversion, information manipulation, proxy forces, legal manoeuvres – are not new but are being orchestrated with greater sophistication in a competitive era below open war¹. Hal Brands similarly characterises grey zone activity as "coercive and aggressive in nature" but calibrated to stay "below the threshold of conventional military conflict" and argues that the phenomenon poses paradoxes for deterrence and escalation management². In practice, the grey zone is generally associated with specific theatres and toolsets: Russia's tactics around Ukraine before 2022, Chinese coercion in the East and South China Seas, and cross-domain blends of cyber, information operations, lawfare, and economic leverage. In the East Asian context, grey zone activities are typically shaped by the local geostrategic environment, which is predominantly maritime. They are conducted not only by military and law enforcement forces but also by a mix of paramilitary, militia and civilian contingents, and reinforced by state-backed legal–administrative measures³.

Critics of the grey zone concept⁴, however, argue that the term's breadth drains it of explanatory power: indeed, if any sub-threshold competition is "grey", the category then ceases to discriminate among mechanisms, causes and effects, as well as policy remedies. Another critique is that "grey zone" repackages old wine in new bottles. Theories of coercion, subversion and political warfare, for example, have a longstanding scholarly tradition: from Schelling's classic distinction between deterrence and compellence,⁵ to George and Simons' extensive work on coercive diplomacy,⁶ or practices of "political warfare" codified during the

Cold War era, which all led to major policy repositioning or calibration. Calling these dynamics "new" can distract from existing theory with well-tested insights about credibility, signalling, and risk manipulation. A number of analysts caution that 'catch-all usage' leads to ineffective responses that lack prioritisation, indicators, or threshold definition. On Russia, for example, Kofman and Rojansky (2015) have warned against reifying a mythical "doctrine" (often attributed to Gerasimov) and urged analysis grounded in specific force development and political objectives rather than empty buzzwords⁷. Today, major Euro-Atlantic institutions have already shifted from alarmism to concrete policy reform: NATO and the EU, for example, initiated new policy discussions on how to build up resilience against "hybrid threats"⁸, even as specialists continue to wrestle with the definitional sprawl between "hybrid", "grey zone", and "political warfare"— indicating that they are at least determined to tackle these challenges⁹.

b. Maritime Coercion as Preferred Taxonomy

Throughout this paper, we settle on the overarching term maritime coercion, rather than relying on either grey zone or hybrid approaches as our primary frame. The distinction between these approaches is not merely semantic: it has direct implications for how analysts characterise behaviour and design operational responses.

Grey zone activity is usually defined in terms of competitive environment: it refers to coercive strategies that remain below the threshold of open armed conflict, often unfolding incrementally over time and calibrated to avoid triggering conventional military retaliation. It is therefore a broad, environment- or strategy-focused label for sub-threshold competition across domains. By contrast, hybrid activity is defined in terms of the means employed: it denotes the deliberate combination of different instruments of power - military and nonmilitary, conventional and unconventional – such as cyber operations, disinformation, economic pressure and limited kinetic force, in order to create complex dilemmas for the target state. Hybrid campaigns can occur both below and above the threshold of armed conflict and are not confined to the maritime domain. Maritime coercion, in turn, is narrower than either of these concepts. It designates the sustained use of non-war maritime activities to influence or constrain the behaviour of another actor through pressure, intimidation or disruption, without crossing the threshold of open armed conflict. It focuses specifically on coercive actions at and below sea and on their cumulative effects. This framing allows analysts to connect observed behaviour – by naval, coastguard, militia or ostensibly civilian actors – to established principles of naval strategy, international law (such as UNCLOS)¹⁰, and measurable operational outcomes.

The choice between these frameworks thus depends on the analytical purpose. When assessing broad competitive strategies that blend multiple domains and instruments, grey zone and hybrid lenses remain useful. When the primary interest is in sea-based contests over

territory, access or influence, however, maritime coercion is more appropriate because it is conceptually tighter, empirically grounded in the maritime domain, and directly relevant to existing legal and strategic doctrines. It also differs from classical deterrence in that it seeks to compel or dissuade through cumulative friction rather than explicit threats of large-scale force; from piracy or criminal violence in that it is politically directed and state-enabled; and from legitimate law enforcement by its manipulative use of legal ambiguity, administrative instruments or quasi-civilian proxies to achieve strategic effect. As strategic competition at sea intensifies, particularly in the Indo-Pacific, such precision in conceptual framing becomes critical for designing proportionate and credible policy responses.

2. From Taxonomy to Strategy: Aligning Concepts with Countermeasures

With the limits of the 'grey zone' label in view, this section outlines the main patterns of activity commonly regarded as threats or sources of instability in the Taiwan Strait. It focuses on forms of coercion above and below sea, using a civil—military lens that emphasises the actors involved, the assets or infrastructures targeted, and the mechanisms through which their behaviour contributes to cumulative strategic risk.

a. PLA Coercive Signalling

Over the past few years, we have witnessed an increase in the frequency, complexity and geographic spread of Chinese drills around Taiwan. These military activities are best read as coercive signalling — especially given their growing emphasis on blockade rehearsal and encirclement manoeuvres — or, in Schellingian terms of "compellence", as a "strategy of using the threat [of force] to change the status quo"¹¹.

Following the August 2022 exercise cycle after then U.S. Speaker Nancy Pelosi's visit to Taipei, observers began to discern a pattern of large, multidomain manoeuvres characterised by encirclement and maritime interdiction behaviour that remained just short of actual blockade or strike ¹². Subsequent iterations have reinforced this trajectory. The Joint Sword-2024A exercise, launched immediately after President Lai's inauguration, framed two days of drills as "punishment" and showcased coordinated pressure around the island ¹³. Joint Sword–2024B, conducted without prior notice later that year, brought together a record number of aircraft with an unprecedented presence of navy and coastguard vessels near Taiwan's contiguous zone, explicitly blending military and constabulary instruments ¹⁴. The 2025 iteration of the Strait Thunder exercise added live-fire rocket drills in the East China Sea and carrier-based capabilities, signalling further maturation of joint strike and sea-control practice all around the island ¹⁵. Taken together, these exercise cycles amount to less isolated demonstrations of force than to a sustained campaign. Indeed, their cumulative operational and psychological effects

- from normalising exceptional patterns of PLA presence to rehearsing de facto forms of exclusion - fit squarely within the definition of maritime coercion set out above.

b. Constabulary and Civilian Coercion at Sea

Where large-scale exercises represent a classic form of coercive signalling, day-to-day pressure exerted through constabulary and civilian actors has steadily materialised in the Strait. China's 2021 Coast Guard Law codified unusually expansive authorities, including the use of force "in waters under the jurisdiction of China," and has been widely read by regional analysts as a legal-administrative basis for an assertive coastguard presence in disputed or sensitive areas. ¹⁶ In practice, this legal backdrop is enacted through boarding, inspection, escort and expulsion behaviours that exploit ambiguity in contiguous and restricted waters. These behaviours typically combine elements of maritime coercion (using law and constabulary presence to impose costs and signal claims).

A series of events in the vicinity of Kinmen and Matsu islands in early 2024 illustrates these dynamics¹⁷. On 19 February, six Chinese coastguard officers boarded a Taiwanese tourist boat with 34 people aboard to inspect documentation, remaining on board for roughly thirty minutes before departing; the following day, Taiwan reported that it had driven away a China Coast Guard vessel entering waters near its frontline islands and publicly criticised the prior boarding as panic-inducing¹⁸. Other civilian auxiliaries – notably the People's Armed Forces Maritime Militia (PAFMM) - operate in the seam between law enforcement and military support. Consistent research conducted notably by the U.S. Naval War College's China Maritime Studies Institute (CMSI) documents the PAFMM as a reserve force linked to PLA command chains via local military districts, using civilian fishing vessels for presence and screening, obstruction and harassment, and domain awareness tasks under CCG or PLA overwatch 19. A 2023 CMSI survey of Fujian and Guangdong units notably showed the structured training, compensation schemes and political commissars' oversight, thus shedding light on the militia's hybrid character. Provincial-level regulations, such as Fujian's "Measures for Guaranteeing Militia Rights and Interests", further codify benefits, training incentives and normalised readiness for units likely to be central in any cross-Strait contingency²⁰.

A careful analysis of these developments would refine Taiwan's incident mapping by bringing more nuance to the distinction between organised coercion and incidental fishing activity. Taken together, the CCG's expanded legal authorities, on-scene boarding and escort practices, and the normalisation of PAFMM activity suggest a greater influence of state-enabled pressure in the Taiwan Strait. Managing this pattern requires more refined, transparent rules of interaction by hull type and personnel, and systematic evidence collection procedures for potential legal or diplomatic follow-up²¹. Over time, such routines can feed into a broader incident mapping effort, allowing Taiwan and its partners to better distinguish routine friction from significant shifts in posture and to calibrate responses accordingly. Taiwan's recent move

to subject certain direct voyage permits to interagency national security review illustrates how such practices can be embedded in existing regulatory processes without relying solely on naval, more escalatory countermeasures²².

c. The Growing Importance of Subsea Coercion: Critical Infrastructure under Threat

In recent years, another phenomenon has been raising concerns and much scrutiny over regional security. The subsea environment around Taiwan has moved from background risk to a visible arena of pressure. Cable disruptions have become a recurrent feature, especially on links connecting Taiwan to its offshore islands. In 2023, two cables linking the Matsu archipelago to Taiwan's main island were severed in close succession, cutting connectivity for residents and forcing temporary workarounds. Taiwan's National Communications Commission attributed the damage to passing Chinese vessels but stopped short of attributing intent²³. Since then, further incidents have occurred in similar circumstances. In January 2025, authorities reported new disconnections in the region and activated backup routes while investigations proceeded²⁴. In late February, Taiwanese coastguards detained a Togo-flagged freighter after a Penghu cable was found disconnected; prosecutors later filed Taiwan's first criminal case alleging intentional cable damage against the captain of the Chinese crewed vessel, before a court subsequently imposed a custodial sentence²⁵.

For the most part, however, damages to undersea infrastructure result from non-malign incidents, such as adverse weather, accidental anchor drags or normal wear, which makes it particularly hard to elucidate the cause of disruption. As a result, verification, maintenance and repair processes remain slow and complex, partly because international freighters, trawlers and other industrial actors can credibly claim plausible deniability. Nevertheless, incident reports have increased over the past decade, raising concerns about the resilience of cables and the scope for intentional interference²⁶. Taiwanese authorities have alternated between technical explanations and legal action²⁷, demonstrating once again the need to base judgments on rigorously documented signals that can be verified and compared over time. In other words, there is an urgent need for a coherent evidentiary standard that can be mobilised for future policy responses.

NATO and the European Union have begun to integrate these issues into their hybrid defence playbooks²⁸, in order to enhance the security of undersea cables and pipelines, as well as to monitor potential threats in this domain. In 2024, NATO launched a "Maritime Centre for the Security of Critical Undersea Infrastructure" within its Maritime Command (MARCOM) in Northwood, UK, to tighten surveillance, incident sharing and engagement with actors from the undersea infrastructure sectors²⁹. The European Union's Critical Entities Resilience (CER) Directive and its 2025 Action Plan on Cable Security similarly emphasise risk-mapping, redundancy and repair capacity, and cross-border coordination with operators³⁰. Taiwan should adopt a similar stance and replicate efforts to prioritise coordination between

operators, regulators and the coast guard, to reinforce security of, and sovereignty over its undersea infrastructure (including processes of maintenance and repair of critical infrastructure).

The following table (see Annex 1) summarises the main categories of coercive behaviour observable around Taiwan – at and below sea – and associates each with proportionate, non-escalatory forms of response. By linking observable actions (ways), their instruments (means) and intended outcomes (ends), this taxonomy – inspired by the literature in strategic studies – offers a pragmatic and policy-usable vocabulary for understanding coercion short of war. These categories and indicators also serve as the reference frame for incident data and patterns that a future Taiwanese "maritime transparency hub" would collect, code and publish (see Part II of this policy paper).

Part I – Conclusion

Clarifying the conceptual vocabulary surrounding sub-threshold competition — above and undersea — strengthens detection, prioritisation and decision-making. By replacing the breadth of the grey zone label with a more rigorous taxonomy of maritime coercion, Taiwan gains a clearer foundation for assessing PLA military signalling, constabulary encounters and pressures on critical infrastructure. The indicators and categories outlined here provide a starting point for proportionate, non-escalatory responses and for distinguishing routine friction from deliberate coercion.

This concludes Part I of a two-part policy study. Part II, to be published shortly, will examine how these conceptual distinctions can be embedded in Taiwan's institutional practices – through a unified maritime transparency hub, rigorous incident documentation, and statusneutral regional and international cooperation mechanisms – in order to strengthen evidence-led deterrence and reduce escalation risk in the Taiwan Strait. While this first part has concentrated on conceptual clarification and taxonomy-building, the overall implications for practice will be developed in a joint conclusion presented in Part II of this policy paper.

Annex 1 – Maritime Coercion around Taiwan: Indicators, Response Ladders and Requirements

	Category/assets	Typical coercive pattern	Key indicators	Non-escalatory response ladder	Primary operator (support)	Data and capability requirements
SURFACE	Military (PLA Navy / Air Force)	Recurrent presence patrols, close interceptions, multi-axis drills and encirclement patterns	Platform count/type, distance to coast and key routes, duration/density, deviation from baselines	R0: internal monitoring R1: calibrated presence R2: factual transparency R3: measured protest	MND (CGA, MOTC, MOFA)	Integrated radar/AIS tracking, SOPs, secure sharing channels
	Paramilitary (CCG, militia)	Inspections, close approaches, blocking, water cannon, swarming	Frequency of boardings, manoeuvre severity, distance to Taiwan, multi-vessel coordination, composition of forces, hull type and equipment	R0: on-scene recording R1: safety actions R2: incident notification R3: legal/diplomatic follow-up	CGA (MPB, MOFA, regulators)	Templates for CGA, legal authority, liaison procedures, and de-escalation training
	State-linked civilian	Research/fishing/construction obstruction, AIS manipulation, presence near infrastructure	AIS gaps; loitering; anchor drops; flag state and personnel origin; visible coordination with military/coastguard	R0: risk assessment R1: safety/regulatory signalling R2: conditional access R3: pattern disclosure	MPB, regulators (CGA, operators)	AIS/ownership data, regulatory framework, insurer/class-society ties, publication protocols
SUBSEA	Military	Covert mapping/monitoring; presence near cables or chokepoints; SIGINT activity	Cable fault anomalies; acoustic/magnetic signatures; survey/UUV patterns	R0: internal alert R1: rerouting/redundancy R2: quiet documentation R3: private signalling	MND/security community (operators, NCC, MOTC)	Fault logs, underwater awareness, secure infosharing, contingency plans
	Paramilitary/survey vessels	Surveys overlapping corridors, delayed repairs, and shadowing repair ships	Survey frequency, overlap with systems failures, repair delays, and CCG presence	R0: pre-planning R1: repair corridor activation R2: documentation R3: factual protest	Operators, regulators (CGA, MOFA, ICPC liaison)	Legal basis for corridors, ICPC contacts, documentation assets, and reporting templates
	State-linked civilian	Anchor drags, trawl damage, construction conflicts, illegal/illicit dredging activities	Clustering of faults, non- compliance with protection zones, repeat offenders	R0: baseline mapping R1: outreach/zoning R2: enforcement/economic levers R3: targeted publicity	Regulators, operators (CGA, local authorities)	Cable route mapping, liability rules, industry cooperation, insurance/licensing data

¹ Mazarr, M. (2015). *Mastering the Gray Zone: Understanding a Changing Era of Conflict*. U.S. Army War College Press, Carlisle Barracks <u>URL</u>.

² Brands, H. (2016). "Paradoxes of the Gray Zone." *Foreign Policy Research Institute*, February 2016. URL

³ Green, M., Hicks, K., Cooper, Z., Schaus, J., Douglas, J. (2017). *Countering Coercion in Maritime Asia: The Theory and Practice of Gray Zone Deterrence*. CSIS, pp. 21-50. Washington DC. URL

⁴ Elkus, A. (2015). "50 Shades of Gray: Why the Gray Wars Concept Lacks Strategic Sense", *War on the Rocks*, 15 October. <u>URL</u>; Stoker, Donald, and Whiteside, Craig (2020). "Blurred Lines: Gray-Zone Conflict and Hybrid War – Two Failures of American Strategic Thinking". *Naval War College Review*, no. 4. <u>URL</u>.

⁵ Schelling, T. (1966). *Arms and Influence*. Yale University Press, New Haven.

⁶ George, A. L., Simons, W. R. (Eds.) (1994). The limits of coercive diplomacy. 2nd ed. Boulder, CO: Westview.

⁷ Kofman, M., and Rojansky, M. (2015). "A Closer Look at Russia's 'Hybrid War.'" *Kennan Cable*, No. 7, Wilson Center, Washington DC. <u>URL</u>

⁸ See NATO and EU official documents on "Hybrid Warfare", <u>URL</u>: See NATO and EU official documents on "Hybrid Warfare" <u>URL</u>

⁹ Insisa, Aurelio (2023). Hybrid after All: The 'Grey Zone', the 'Hybrid Warfare' Debate, and the PLA's Science of Military Strategy, in Defence Strategic Communications, Vol. 12, pp. 165-186. DOI 10.30966/2018.RIGA.12.8

¹⁰ Namely, the United Convention on the Law of the Sea. For a timely critique and call for updating the UNCLOS, see: Bueger, C., Edmunds, T., & Stockbruegger, J. (2025). UNCLOS under Fire: Recalibrating Maritime Security Governance. *International and Comparative Law Quarterly*, 74(S1), 85–102. doi:10.1017/S0020589325101218. URL

¹¹ Ohnishi, K. (2019). Briefing Memo – Compellence and Coercive Diplomacy: Concepts and Characteristics, p.2, NIDS. <u>URL</u>

¹² See "Critical Questions - Speaker Pelosi's Taiwan Visit: Implications for the Indo-Pacific", by Jude Blanchette, Charles Edel, Christopher B. Johnstone, Scott Kennedy, Victor Cha, Ellen Kim, and Gregory B. Poling (CSIS, 15 August 2022) <u>URL</u>; also: Shattuck, Thomas (2023). "One Year Later: How Has China's Military Pressure on Taiwan Changed Since Nancy Pelosi's Visit?, Global Taiwan Institute, 20 September <u>URL</u>; Ogasawara, Y. (2022). "What did Nancy Pelosi's visit do for Taiwan?", Institute of Geoeconomics, Tokyo <u>URL</u>; Klare, M.T. (2022). "China Reacts Aggressively to Pelosi's Taiwan Visit", *Arms Control Today*, September 2022. <u>URL</u>

¹³ Reuters (2024). "China launches 'punishment' war games around Taiwan" *Reuters*, 23 May 2024. URL

¹⁴ Reuters (2024). "Taiwan says China uses record number of aircraft in war games" *Reuters*, 16 October 2024 <u>URL</u>; Ma, C.-K., and Tang, T. K. (2025). "Joint Sword-2024B: Quarantining Key Ports and Seizing Comprehensive Superiority", Jamestown Foundation, Vol. 24, Issue 21 <u>URL</u>; See also: "Analyzing China's Escalation After Taiwan President William Lai's National Day Speech", China Power, CSIS, <u>URL</u>; Green, E., and Nouwens, M. (2024). "China's Joint-Sword B exercise: a calculated follow-on" *IISS*, London <u>URL</u>; Sugiura, Y. (2025). "Analysis of "Joint Sword 2024B" – Focusing on Changes & Continuity from "Joint Sword 2024A"" *Sasakawa Peace Foundation*, SPF China Observer No. 58 <u>URL</u>; Dotson, J. (2024). "The PLA's Joint Sword 2024B Exercise: Continuing Political Warfare and Creeping Territorial Encroachment", *Global Taiwan Brief*, Vol. 9, Issue 20. <u>URL</u>

¹⁵ Mahadzir, D. (2025). "Chinese Military Wraps Intimidation Drills Off Taiwan" *USNI News*, 2 April 2025 <u>URL</u>; Reuters (2025). "China concludes two-day war games around Taiwan after live fire drills" 2 April 2025 <u>URL</u>; Yang, T.-Y., and Tang, T. K. (2025). "Strait Thunder-2025A' Drill Implies Future Increase in PLA Pressure on Taiwan", China Brief Vol. 25 Issue 7, Jamestown Foundation, pp. 13–21. <u>URL</u>

¹⁶ CSIS (2021). "Force Majeure: China's Coast Guard Law in Context". Asia Maritime Transparency Initiative, CSIS, Washington DC, 30 March 2021. URL

¹⁷ Thibault, H. (2024). "In Kinmen's disputed waters, the Chinese coast guard tests Taiwan's limits", *Le Monde*, 22 May 2024. <u>URL</u>

¹⁸ Reuters (2024). "Taiwan drives away Chinese coast guard boat as frontline island tensions rise", 20 February 2024 <u>URL</u>; Davidson, Helen (2024). "China coast guard boards Taiwan tourist boat in escalation of tensions" *The Guardian*, 20 February 2024. <u>URL</u>

¹⁹ Kennedy, C.M., and Erickson, A. S. (2017). "China's Third Sea Force, The People's Armed Forces Maritime Militia: Tethered to the PLA", CMSI China Maritime Reports No. 1, U.S. Naval War College, <u>URL</u>; Martinson, R.D. (2025). China's Fishermen Spies: Intelligence Specialists in the Maritime Militia". China Maritime Report No. 46, U.S. Naval War College, Newport. <u>URL</u>

²⁰ Martinson, R. (2025). "Fujian Unveils Incentives for Militia Training for a Cross-Strait Campaign", in China Brief, Vol. 25 Issue 5, Jamestown Foundation, March 15, 2025. URL

²¹A good example of systematic time-series dataset that help visualising patterns of maritime behaviours (e.g., practices of Maritime Assertiveness) can be found here: Chubb, A. (2024). *The East China Sea Dispute: China's and Japan's Assertiveness from Mao to Xi"*, Asia Society, 14 November. <u>URL</u>

²² NorthStandard (2025). "Newly implemented requirements for vessels between China and Taiwan", 2 September 2025 <u>URL</u>; GAC (2025). "Additional checks on Chinese, Hong Kong & Macau flagged vessels", 28 March 2025. URL

- ²⁵ Lee, Yimou (2025). "Taiwan detains China-linked cargo ship after undersea cable disconnected", Reuters, 25 February 2025. <u>URL</u>; Associated Press, "Taiwan is investigating a Chinese-crewed ship believed to have severed an undersea cable," 25 February 2025. <u>URL</u>
- ²⁶ Reuters (2025). "China says Taiwan politicising cable damage issue, after ship's captain jailed", 13 June <u>URL</u>; "Taiwan jails Chinese ship captain for damaging undersea cables," Reuters, 12 June 2025. <u>URL</u>
- ²⁷ Lee, Yimou; Blanchard, Ben (2025), "Taiwan activates back-up communication for Matsu Islands after undersea cables malfunctioned," *Reuters*, 22 January 2025. <u>URL</u>
- ²⁸ Zekulic, Vlasta (2019). "Assuring Allies by Effectively Countering Hybrid Threats Challenges and Opportunities", System Analysis and Studies Panel, NATO Science and Technology Organization, Brussels. <u>URL</u>
- ²⁹ Giannopoulos, G., Smith, H., Theocharidou, M. (2021). *The Landscape of Hybrid Threats: A Conceptual Model"*. Science for Policy report, Joint Research Centre (JRC), European Commission's science and knowledge service and European Centre of Excellence for Countering Hybrid Threats (Hybrid CoE), Luxembourg <u>URL</u>; See also: "NATO holds first meeting of Critical Undersea Infrastructure Network", NATO, 24 May 2024 <u>URL</u>
- ³⁰ Jungwirth, R., Smith, H., Willkomm, E., Savolainen, J., Alonso Villota, M., Lebrun, M., Aho, A. and Giannopoulos, G. (2023). "Hybrid Threats: A Comprehensive Resilience Ecosystem", Publications Office of the European Union, Luxembourg, doi:10.2760/37899. URL; see also "Directive (EU) 2022/2557 of the European Parliament and of the Council of 14 December 2022 on the resilience of critical entities". URL

²³ Associated Press, "Taiwan suspects Chinese ships cut islands' internet cables," 18 April 2023. URL

²⁴ Lee, Yimou, Blanchard, Ben (2025). "Taiwan activates back-up communication for Matsu Islands after undersea cables malfunctioned," Reuters, 22 January 2025. <u>URL</u>

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