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ΑΡΘΡΟ

Crippling Jurisdiction: A Matter of International Law in an Unpredictable International Reality.

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Abstract. The modern international landscape is facing a multifaceted crisis. The recent wave of revisionism in international relations has raised the question of whether international law, as it currently stands, can respond to it. This paper examines one specific manifestation of said crisis. The phenomenon which the paper terms *"crippling jurisdiction"* is a situation in which a state retains legal title over its territory, though it cannot exercise the sum of its powers within that territory in an efficient and sovereign manner. Despite the legal title remaining intact, the practical capacity to govern is degraded through means that fall short of an unambiguous armed attack, leaving affected states with formal authority, yet limited recourse. Drawing on recent state practice, including the Russian occupation of Ukrainian territory, the sabotage of undersea cables in the Baltic Sea and Turkey's *"Mavi Vatan"* initiative, this paper argues that the existing normative framework, built around thresholds calibrated to armed attack and formal occupation, is structurally unable to address this gap between legal title and practical capacity.

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Introduction

Recent developments in international relations showcase a pattern of states undermining the authority of international law without directly violating it. The Russian occupation of Ukrainian territory (namely Crimea and Donbas),[2] the sabotage of undersea cables in the Baltic Sea,[3] the implementation of the *"Mavi Vatan"* (Blue Homeland) initiative by Turkey,[4] share a common pattern.

A State legally retains full jurisdiction over its territory and population, while being practically unable to exercise the sum of that jurisdiction in an efficient manner. This is what leads to the phenomenon of *"crippling jurisdiction".*

The *dictum* of the International Court of Justice (ICJ) in the *Corfu Channel* case highlighted the link between territorial sovereignty and a state's freedom to conduct its internal affairs without foreign intervention. Specifically, the Court held that *respect for territorial sovereignty is an essential foundation of international relations* and that *intervention cannot find a place in international law.*[5] Historically, the fundamental concept of state sovereignty, as initially stipulated in the Peace of Westphalia, consolidated political authority within a distinct territory that excluded external actors from domestic authority structures.[6]

The paper now advances two significant assumptions. First, jurisdiction is a corollary of territorial sovereignty, because the territory, in which domestic authori-

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[2] Tetiana Trach et al., "Russian Offensive Campaign Assessment," Institute for the Study of War, July 20, 2026, https://understandingwar.org/research/russia-ukraine/russian-offensive-campaign-assessment-july-20-2026/ accessed July 20, 2026.
[3] Pablo Juarranz, "Undersea Cable Sabotages: Russia's and China's Hybrid Warfare Strategy," Global Affairs, University of Navarra, https://www.unav.edu/web/global-affairs/undersea-cable-sabotages-russia-s-and-china-s-hybrid-warfare-strategy accessed July 20, 2026.
[4] Lucas Martin, "Mavi Vatan: The Turkish Blue Homeland Doctrine," Global Affairs, University of Navarra, https://en.unav.edu/web/global-affairs/detalle/-/blogs/-mavi-vatam-la-doctrina-turca-de-la-patria-azul-3 accessed July 20, 2026.
[5] *Corfu Channel* (United Kingdom v. Albania), Merits, 1949 I.C.J. Rep. 4.
[6] Christopher Rudolph, "Sovereignty and Territorial Borders in a Global Age," *International Studies Review* 7 (2005): 1.

ties exercise their powers, becomes the "seat" of jurisdiction.[7] Second, jurisdiction is an attribute inherent to sovereignty. This entails the exclusive and absolute power of a state to manage its affairs within its sphere of sovereignty, without being subject to external influence.[8] Put simply, jurisdiction derives from sovereignty and has the same spatial extent.

These two assumptions matter, because they are the reason why *"crippling jurisdiction"* arises as a coherent legal problem. If jurisdiction were merely a separable competence that a state could lose without any implication for its sovereignty, its erosion would be unremarkable. It is precisely because jurisdiction and sovereignty are closely intertwined that a state is able to retain full sovereign title, while losing the practical capacity that the title is supposed to guarantee. This is the exact divergence that the paper examines.

The paper proceeds in four parts. Section I defines jurisdiction in international law. Section II builds on that definition to propose and justify the concept of *"crippling jurisdiction".* Section III examines the existing normative framework, mainly focusing on the prohibition of the use of force, the rule of non-intervention, the law of occupation and the law of the sea, and evaluates whether it can address this phenomenon. Section IV tests this analysis against three recent instances of state practice. The paper argues that no existing regime is designed to address the divergence between legal title and practical capacity, because each regulates conduct defined by other thresholds and, thus, treats that divergence as a side effect, rather than as the harm at issue.

Defining Jurisdiction

What is Jurisdiction in International Law?

In the context of international law, the term "jurisdiction" has no singular meaning. It is, indeed, *"a word of many, too many, meanings"*.[9] Historically, *'jurisdiction'*

[7] Emmerich de Vattel, *Le Droit des Gens* (1758; repr., Indianapolis: Liberty Fund, 2008), 121.
[8] Hannis Taylor, *A Treatise on International Public Law* (Chicago: Callaghan & Co., 1901), 26.
[9] *United Phosphorus Ltd v. Angus Chemical Co.*, 322 F.3d 942, 948 (7th Cir. 2003).

meant 'to speak the law,' referring to a magistrate's power to settle disputes. Today, the term is largely equated with competence.[10]

In the Westphalian international order of equally sovereign states, jurisdiction serves as a tool, through which states delineate their sovereignty and their relationship with persons, activities or legal interests. Jurisdiction becomes a matter of international law, when a State seeks to protect and promote its national interests abroad and, therefore, adopts laws that govern matters that are not solely of domestic concern.[11]

Broadly speaking, jurisdiction means the power of the state under international law to regulate or otherwise impact upon people, property and circumstances and reflects the basic principles of state sovereignty, equality of states and non-interference in domestic affairs.[12] There are three types of state jurisdiction: legislative, executive and judicial.[13] A distinction can be drawn between prescriptive jurisdiction, which is mainly connected with the authority of a state to legislate, and enforcement jurisdiction, which entails the ability of a state to practically enforce its laws internally (or even externally).[14]

Limits of Jurisdiction in International Law

The Permanent Court of International Justice (PCIJ), the predecessor of the ICJ,[15] defined the extent of the jurisdictional powers of a state. In the historic *SS Lotus* case, the PCIJ ruled that international law does not gen-

[10] Patrick Capps, Malcolm Evans, and Stratos Konstadinidis, "Introduction," in *Asserting Jurisdiction: International and European Legal Perspectives*, ed. Patrick Capps, Malcolm Evans, and Stratos Konstadinidis (Oxford: Hart Publishing, 2003).
[11] Anthony J. Colangelo, "Spatial Legality," *Northwestern University Law Review* 107 (2012): 69.
[12] Malcolm N. Shaw, *International Law*, 9th ed. (Cambridge: Cambridge University Press, 2021), 1522.
[13] Ibid.
[14] FA Mann, "The Doctrine of Jurisdiction in International Law," *Recueil des Cours* 111 (1964): 1, 2. Hazel Fox, "Enforcement Jurisdiction, Foreign State Property and Diplomatic Immunity," *International and Comparative Law Quarterly* 34 (1985): 115.
[15] Statute of the International Court of Justice (adopted June 26, 1945, entered into force October 24, 1945), 33 U.N.T.S. 993, arts. 36(5), 37.

erally prohibit States from extending their jurisdiction extraterritorially, however it limits it only by specific prohibitive rules.[16]

From the standpoint of the European Convention on Human Rights (ECHR), "jurisdiction" in Article 1 of the Convention must be understood to mean that a State's jurisdictional competence is primarily territorial.[17] In the *Banković and Others v. Belgium and Others* case, the European Court on Human Rights (ECtHR) affirmed that jurisdiction is presumed to be exercised throughout the State's territory, while exceptions for extraterritorial exercise require special justification.[18]

In *Banković*, the ECtHR seems to suggest that jurisdiction is absolute and only limited by certain prohibitions set by international law.[19] In addition, the ECtHR held that *all that can be required of a State is that it should not overstep the limits which international law places upon its jurisdiction; within these limits, its title to exercise jurisdiction rests in its sovereignty.*[20]

Defining "Crippling Jurisdiction"

Having outlined the concept of jurisdiction in international law, it is appropriate to proceed to the question: "What is crippling jurisdiction?" There is, admittedly, no explicit legal term "crippling jurisdiction" — if there were, there would be no need for the present research.

The *De Facto* Constraint: Isn't "Effective Control over Territory" Enough?

The decision of the European Court of Human Rights (ECtHR) in *Ilaşcu and Others v. Moldova and Russia* is instructive here.[21] The ECtHR judged that where a State is prevented from exercising its authority over the whole of its territory by a constraining *de facto* situation,

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[16] *SS Lotus* (France v. Turkey) (1927), P.C.I.J. Series A No. 10, 18–19.
[17] Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights, as amended), art. 1.
[18] *Banković and Others v. Belgium and Others*, dec. [GC], App. No. 52207/99, ECHR 2001-XII, para. 57.
[19] Alex Mills, "Rethinking Jurisdiction in International Law," *British Yearbook of International Law* 84 (2014): 187, 190.
[20] *Lotus*, 18–19.
[21] *Ilaşcu and Others v. Moldova and Russia*, 2004-VII Eur. Ct. H.R. 1.

it does not thereby cease to have jurisdiction.[22] Therefore, despite the absence of effective control over a specific part of its territory, a State is still under a positive obligation to take diplomatic, economic, judicial or other measures that it is in its power to take and are in accordance with international law.[23]

As to what constitutes a *de facto* constraint, the ECtHR has described it as one that might result from military occupation by the armed forces of another State effectively controlling the territory concerned, acts of war or rebellion, or the acts of a foreign State supporting the installation of a separatist State within the territory of the State concerned.[24]

In international legal scholarship, the factual constraint on state authority has traditionally been framed as *"effective control over territory".* Under International Human Rights Law, jurisdiction departs from the strict authority of general international law.[25] Jurisdiction is centered on actual power, authority or control exerted over an area or population.[26] Drawing from the *dictum* of the ECtHR in the *Al-Skeini and Others v. the United Kingdom* case, *a Contracting State exercises effective control of an area outside its national territory*, even if it is *a consequence of unlawful military action.*[27] The spatial model presumes that a state exercises jurisdiction whenever it establishes overall *de facto* domination over a territory, whether directly through occupying forces or indirectly through a subordinate proxy administration.[28]

However, this reliance on *"effective control"* exposes a critical normative gap when confronted with contemporary gray-zone coercion. A "grey zone" is a geo-

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[22] *Ibid.,* para. 333.
[23] *Ibid.,* paras. 330–331.
[24] *Ibid.,* para. 312. *Loizidou v. Turkey*, Merits, App. No. 15318/89, ECHR 1996-VI. *Cyprus v. Turkey* [GC], App. No. 25781/94, ECHR 2001-IV.
[25] Antal Berkes, *International Human Rights Law Beyond State Territorial Control* (Cambridge: Cambridge University Press, 2021), 19.
[26] Ibid.
[27] *Al-Skeini and Others v. United Kingdom*, App. No. 55721/07 (ECtHR [GC], July 7, 2011), paras. 138–140.
[28] Marko Milanovic, *Extraterritorial Application of Human Rights Treaties: Law, Principles, and Policy* (Oxford: Oxford University Press, 2011), 140. Olivier De Schutter, "Globalization and Jurisdiction: Lessons from the European Convention on Human Rights," *Baltic Yearbook of International Law* 6 (2006): 185, 213–216.

graphic area where the sovereign territorial state is unable to exercise its effective control due to armed conflict, foreign military occupation, or the presence of a *de facto* proxy regime.[29] Scholars, however, treat *"grey zones"* as an *a posteriori* condition resulting from an already completed loss of control or formal occupation.[30]

By contrast, there is a gap concerning coercion that intentionally operates below the threshold of effective control and degrades a State's practical capacity, without ever establishing a formal occupation or proxy regime on the ground.[31] It is precisely this unaddressed divergence the concept of "crippling jurisdiction" is designed to name: a situation where a State's practical capacity is systematically degraded without triggering the traditional thresholds of effective control or occupation.

The Gap Between Legal Title & Practical Capacity

In international relations, which serve as the field of international law, the phenomenon of crippling jurisdiction is met as a gap between *"international legal sovereignty"* and "*domestic sovereignty"*.[32] While all sovereign, recognized States enjoy legal sovereignty (and, thus, have the right to exercise jurisdiction in their respective territory), there are instances a State that is legally entitled to do so does not hold a monopoly over the ability of the state to legislate and enforce policies and adjudicate any disputes related to them.[33] This lack of capacity of the central state to implement and enforce rules and decisions has been defined as limited statehood.[34]

[29] Antal Berkes, "'Grey Zones': The Protection of Human Rights in Areas out of the Effective Control of the State" (PhD diss., Université Paris 1 Panthéon-Sorbonne / Eötvös Loránd University, 2015), 13.
[30] Kjetil Mujezinović Larsen, "Territorial Non-application of the European Convention on Human Rights," *Nordic Journal of International Law* 78 (2009): 73, 83.
[31] Berkes, "'Grey Zones'," 43–44.
[32] Stephen D. Krasner and Thomas Risse, "External Actors, State-Building, and Service Provision in Areas of Limited Statehood," *Governance* 27 (2014): 545.
[33] *Ibid.*
[34] Krasner and Risse, "External Actors," 545.

This *slippage*[35] is usually countered in cases of grey-zones and unrecognized states. For example, Russia's actions, from 2014 to the invasion of 2022 and beyond, illustrate how a gradual ambiguity of interests resulting in a full-scale war can "cripple" the jurisdictional powers of the State, in this case Ukraine.[36]

The Deviation from International Law

International jurisprudence has recognized such situations, mainly for the purposes of attributing internationally wrongful acts. In the *Ukraine and the Netherlands v. Russia* case, the ECtHR ruled that areas in eastern Ukraine controlled by separatist organizations were, from 11 May 2014 up to at least 26 January 2022, under the jurisdiction of the Russian Federation.[37] This constitutes a legal finding that jurisdiction in practice can be attributed to an outside state even when legal title remains with the territorial state.[38]

This does not grant grey-zones legal recognition or validity: the ECtHR found Russian jurisdiction in these areas solely in order to attribute wrongful acts to Russia.[39]

External Acts & Hybrid Warfare

An important element of *"crippling jurisdiction"* is that external acts can *"cripple"* the exercise jurisdiction over state functions without removing legal title.[40] The phenomenon of crippling jurisdiction is also connected to hybrid warfare. Hybrid warfare is generally understood to describe a situation where a state actor uses a diverse

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[35] Kristen E. Boon, "Are Control Tests Fit for the Future? The Slippage Problem in Attribution Doctrines," *Melbourne Journal of International Law* 15 (2014): 1, 3.
[36] Bohdan Kormych, Tetyana Malyarenko, and Cindy Wittke, "Rescaling the Legal Dimensions of Grey Zones: Evidence from Ukraine," *Global Policy* 14 (2023): 516, 516–530.
[37] *Ukraine and the Netherlands v. Russia*, App. Nos. 8019/16, 43800/14 and 28525/20 (ECtHR, January 25, 2023), para. 695.
[38] Tetyana Malyarenko, "New Wild Fields: How the Russian War Leads to the Demodernization of Ukraine's Occupied Territories," *Nationalities Papers* 52 (2024): 497, 500.
[39] *Ukraine and the Netherlands v. Russia*, para. 695.
[40] Michael N. Schmitt, "'Virtual' Disenfranchisement: Cyber Election Meddling in the Grey Zones of International Law," *Chicago Journal of International Law* 19 (2018): 30, 45.

range of military and non-military measures in pursuit of an overarching strategic objective.[41] The threshold of explicit use of force or intervention do not cover *"hybrid warfare"*, since the method seeks to exploit any legal vacuums, by deliberately creating grey zones.[42]

The significance of hybrid warfare for defining *"crippling jurisdiction"* is grounded on that international law already regulates incidents, where external interference reaches a certain level of gravity, through the prohibition on the use of force,[43] and, where sustained, the law of occupation.[44] The phenomenon this paper identifies as *"crippling jurisdiction"* exists precisely because it is calibrated to remain below that threshold. Thus, were a "means" element not included in the proposed definition, the concept would simply collapse into the law of armed conflict and occupation.

Proposing a Definition

From the foregoing analysis, the phenomenon's core is when a State, though legally entitled to full jurisdiction, is practically deprived of the capacity to legislate, enforce, or adjudicate within its territory, wholly or in significant part

What differentiates the term is the existence of a *de facto* situation, which external actors impose through methods that do not satisfy the criteria of an unambiguous armed attack. Furthermore, already mentioned examples of international jurisprudence unveil that crippling jurisdiction is an illegal situation, under international law. This paper argues that its wrongfulness is evidenced precisely by the fact the ECtHR recognized *Russian jurisdiction* in Donbas exclusively aiming to attribute responsibility for wrongful acts to the Russian Federation.[45]

The paper defines *"crippling jurisdiction"* as a circumstance deviating from international law, belonging to the broader *genus* of jurisdictional divergence, in which a

[41] Aurel Sari, "Legal Aspects of Hybrid Warfare," Lawfare, October 2, 2015, https://www.lawfaremedia.org/article/legal-aspects-hybrid-warfare accessed 8 August 2026.
[42] Ibid.
[43] See below.
[44] See below.
[45] *Ukraine and the Netherlands v. Russia*, para. 695.

State that retains full legal title to exercise jurisdiction throughout its territory is deprived, wholly or in a significant part, of the practical capacity to legislate, enforce, and/or adjudicate within that territory, as a result of a *de facto* situation imposed by an external actor through means that fall short of an unambiguous armed attack.

The Normative Framework and its Effectiveness

No single international legal instrument addresses crippling jurisdiction. Instead, the analysis must examine frameworks governing its component parts.

Article 2(4) of the UN Charter: Prohibition of the Use of Force

Article 2, paragraph 4 of the Charter of the United Nations (UN Charter) prohibits the use of force.[46] That rule serves as a cornerstone of the international legal order and it is also an obligation stemming from international customary law.[47] That rule dictates that *every State has the duty to refrain from the threat or use of force to violate the existing international boundaries of another State or as a means of solving international disputes*.

In the landmark *Nicaragua case*, the ICJ defined armed attack as *the most grave form of use of force*, distinct *from other less grave forms*.[48] This indicates that Article 2(4) refers to a broader spectrum of unlawful force.[49]

UN General Assembly Resolution 3314 (XXIX) identifies the use of armed force as a core element of the definition of aggression, when it is directed *"against the sovereignty, territorial integrity or political independence*

[46] Charter of the United Nations (adopted June 26, 1945, entered into force October 24, 1945), 1 U.N.T.S. XVI, art. 2(4).
[47] *Military and Paramilitary Activities in and against Nicaragua* (Nicaragua v. United States of America), Merits, 1986 I.C.J. Rep. 14, paras. 202, 205.
[48] *Nicaragua*, para. 191.
[49] Tom Ruys, *'Armed Attack' and Article 51 of the UN Charter: Evolutions in Customary Law and Practice* (Cambridge University Press 2010) 22-25.

of another State", listing acts as invasion, occupation and bombardment.[50]

The Rule of Non-Intervention

Moreover, international jurisprudence has established the rule of non-intervention.[51] It is listed among 'the principles of international law embodied in the Charter' in the preambles to the 1969 and 1986 Vienna Conventions on the Law of Treaties.[52] The non-intervention principle featured prominently in resolutions of the UN General Assembly from the mid-1960s to the 1980s. This is reflected in Resolutions 2131 (XX), 2625 (XXV) and 36/103.[53]

The content of "intervention" is vague.[54] However, what is clear is that any such practice must concern *"matters in which each State is permitted, by the principle of State sovereignty, to decide freely".*[55] Furthermore, the interference must be forcible to a degree that it deprives the state of control over the matter in question.[56] UN General Assembly Resolution 2625 (XXV) declares that no State may use economic, political, or other measures to coerce another State into subordinating its sovereign rights to secure any advantages.[57]

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[50] UN General Assembly, Resolution 3314 (XXIX), "Definition of Aggression" (December 14, 1974), arts. 1, 3.
[51] *Corfu Channel*; *Nicaragua*.
[52] Vienna Convention on the Law of Treaties (adopted May 23, 1969, entered into force January 27, 1980), 1155 U.N.T.S. 331, preamble. Vienna Convention on the Law of Treaties between States and International Organizations or between International Organizations (adopted March 21, 1986, not yet in force), 25 I.L.M. 543, preamble.
[53] UN General Assembly, Resolution 2131 (XX), "Declaration on the Inadmissibility of Intervention in the Domestic Affairs of States and the Protection of Their Independence and Sovereignty" (December 21, 1965). UN General Assembly, Resolution 2625 (XXV), "Declaration on Principles of International Law concerning Friendly Relations and Co-operation among States" (October 24, 1970). UN General Assembly, Resolution 36/103, "Declaration on the Inadmissibility of Intervention and Interference in the Internal Affairs of States" (December 9, 1981).
[54] Gerhard Hafner, "Sub-group on Intervention by Invitation," Preliminary Report, July 26, 2007, *Yearbook of the Institute of International Law*, Santiago Session (2007): 226, 236.
[55] Maziar Jamnejad and Michael Wood, "The Principle of Non-Intervention," *Leiden Journal of International Law* 22 (2009): 345, 347.
[56] Robert Y. Jennings and Arthur D. Watts, eds., *Oppenheim's International Law*, 9th ed. (London: Longman, 1992), 428.
[57] UNGA Res. 2625 (XXV).

The Law of Occupation

Where crippling jurisdiction takes the form of territorial occupation, the law of belligerent (the Hague Regulations of 1907[58] and the Fourth Geneva Convention of 1949[59]) supplies a comparatively well-developed normative response.

Under Article 42, a territory is occupied when it is placed under the *effective control* and actual authority of a hostile state.[60] It obliges an occupying power to respect, as far as possible, the laws in force in the occupied territory, prohibits the occupant from annexing the territory or altering its legal status, and preserves the ousted sovereign's underlying title. This body of law is precisely calibrated to the jurisdiction-as-title/jurisdiction-as-practice distinction identified in Section II: it is built on the premise that effective control and lawful sovereignty can diverge, and it protects the latter while regulating the former.

The Law of the Sea - UNCLOS

Some illustrations of *"crippling jurisdiction"* relate to the law of the sea. The United Nations Convention on the Law of the Sea (UNCLOS) is the main instrument.[61] Within the Exclusive Economic Zone (EEZ), UNCLOS preserves for all states the high-seas freedom to lay and maintain submarine cables, subject only to the coastal state's right to take reasonable measures for exploring the continental shelf and exploiting its natural resources, and to the general obligation of *"due regard"* to the rights and duties of the coastal state.[62]

Moreover, Article 113 requires every state party to adopt laws criminalizing the willful or negligent breaking or injury of a submarine cable beneath the high seas or the EEZ by a ship flying its flag or a person subject to its

[58] Convention (IV) Respecting the Laws and Customs of War on Land and Its Annex (adopted October 18, 1907, entered into force January 26, 1910), 205 C.T.S. 277, annex reg. 42–56 (Hague Regulations).
[59] Geneva Convention Relative to the Protection of Civilian Persons in Time of War (adopted August 12, 1949, entered into force October 21, 1950), 75 U.N.T.S. 287 (Fourth Geneva Convention).
[60] Hague Regulations, art. 42.
[61] United Nations Convention on the Law of the Sea (adopted December 10, 1982, entered into force November 16, 1994), 1833 U.N.T.S. 3 (UNCLOS).
[62] UNCLOS, arts. 58(1), 79(2), 87(1)(c).

jurisdiction, extending liability even to conduct merely *calculated or likely to result* in such damage.[63]

UNCLOS also confers on every coastal State the right to a territorial sea of up to 12 nautical miles and an EEZ extending up to 200 nautical miles from its baselines.[64]

Admittedly, international jurisprudence has addressed fragments of this jurisdictional erosion. In the *Case Concerning Alleged Violations of Sovereign Rights and Maritime Spaces in the Caribbean Sea*, ICJ ruled that foreign state vessels actively obstructing a coastal state's resource exploration violate the coastal state's sovereign rights, triggering the law of state responsibility.[65]

Evaluation of Effectiveness against Crippling Jurisdiction

Each of the four regimes surveyed above addresses conduct affecting a state's control over its territory. However, none is designed to tackle the specific divergence between title and capacity that defines crippling jurisdiction.

Article 2(4) is connected to conduct reaching the threshold of an armed attack, *the most grave use of force*.[66] By definition, crippling jurisdiction operates below that threshold. Therefore, the prohibition structurally cannot reach it.

The rule of non-intervention requires coercion forcible enough to deprive a state of control over a matter in which it is otherwise free to decide. By contrast, crippling jurisdiction leaves legal title and formally recognized control intact. What the state is deprived of is the practical capacity to exercise that control. The principle of non-intervention is not built to deal with this distinction.

Concerning the law of occupation, it comes closest dealing adequately with the phenomenon, since it is ex-

[63] UNCLOS, art. 113.
[64] UNCLOS, arts. 3, 24, 57.
[65] *Alleged Violations of Sovereign Rights and Maritime Spaces in the Caribbean Sea* (Nicaragua v. Colombia) (Judgment) [2022] ICJ Rep 268, paras. 120-123.
[66] Nikolai Wessendorf. *The Charter of the United Nations: A Commentary*. (Vol. I. 3rd ed. Oxford: Oxford University Press, 2012).

pressly built on the premise that effective control and lawful sovereignty can diverge. It applies, though, only once a formal finding of *effective control and actual authority* over territory is established. Grey-zone interference resists exactly this kind of formal characterization, because no single actor exercises the sustained territorial control the law of occupation requires.

Finally, UNCLOS grants coastal states rights over their territorial sea and EEZ, and even obligates states to criminalize damage to submarine cables. However, it creates no enforcement jurisdiction over foreign vessels beyond the flag state's own jurisdiction. A coastal state can hold the legal entitlement and still have no lawful mechanism to act against the state exploiting the gap.

Taken together, each regime is either triggered by a threshold that crippling jurisdiction is defined to fall below, or grants a legal entitlement without a corresponding enforcement mechanism against the actor exploiting the gap. What can be deduced is that no existing rule is designed to regulate the gap between title and capacity itself, because each treats that divergence, where it arises, as a side effect of conduct it regulates for unrelated reasons. It is not perceived as the root problem to be addressed *per se*. This is the gap *"crippling jurisdiction"* is intended to name.

In Casu: Relevant State Practice

The theoretical analysis above has defined what crippling jurisdiction is and demonstrated the inadequacy of the current normative framework. At this point, the paper will present three recent and significant instances of state practice, chosen because each illustrates the phenomenon differently.

Russian Occupation of Ukrainian Territory

Since 2014, and on a vastly larger scale since February 2022, the Russian Federation has occupied and puported to annex significant portions of Ukrainian territory, including Crimea and parts of the Donetsk, Luhansk, Zaporizhzhia, and Kherson regions.[67]

[67] UN General Assembly, Resolution 68/262, UN Doc. A/RES/68/262, "Territorial Integrity of Ukraine" (March 27, 2014). UN General As-

The author, though, finds it appropriate to isolate the period between 11 May 2014 and 23 February 2022 for the purposes of the present analysis. This is because the subsequent full-scale invasion arguably satisfies the criteria of an unambiguous armed attack under Article 3(a) of Resolution 3314,[68] and therefore falls outside the definitional scope of crippling jurisdiction as proposed above.

Within this narrower window, as the ECtHR confirmed in *Ukraine and the Netherlands v. Russia*, Ukraine retained undisputed legal title over the Donetsk and Luhansk regions, while being deprived of the practical capacity to legislate, enforce, or adjudicate within areas under separatist administration, because Russia exercised effective control over the separatist-held areas from 11 May 2014, on the basis of its military presence and the decisive degree of influence it derived from military, political and economic support for the self-proclaimed *"Donetsk People's Republic"* ("DPR") and *"Luhansk People's Republic"* ("LPR").[69]

Notably, the ECtHR reached the opposite conclusion in the *Georgia v. Russia (II)* case with respect to periods of active hostilities, where the intensity of combat was found to preclude a finding of effective control altogether.[70]

The paper submits that this distinction lends further support to confining the Ukrainian case study to the pre-2022 period, since it demonstrates that the case law treats "war" and *"crippling jurisdiction"* as analytically distinct categories.

Sabotage of the Undersea Cables in the Baltic Sea

A structurally different, and newer, illustration is furnished by a series of incidents in the Baltic Sea. Since October 2023, several submarine telecommunications ca-

sembly, Resolution ES-11/4, "Territorial Integrity of Ukraine: Defending the Principles of the Charter of the United Nations" (October 12, 2022).

[68] UNGA Res. 3314 (XXIX), art. 3(a).

[69] *Ukraine and the Netherlands v. Russia*, para. 695.

[70] *Georgia v. Russia (II)*, App. No. 38263/08 (ECtHR, GC, January 21, 2021), para. 144.

bles, an underwater power cable and a gas pipeline connecting Baltic and Nordic States have been severed or damaged, apparently by vessels deliberately dragging their anchors along the seabed for extended distances.[71]

In this case, the coastal states retain undisturbed legal title over their exclusive economic zones and continental shelves under UNCLOS, and yet the author submits that they are structurally unable to translate that title into practical enforcement capacity. Article 113 of UNCLOS obliges states to criminalize the willful or negligent breaking of a submarine cable, but, as commentators have observed, this provision does not establish universal jurisdiction: enforcement is confined to the coastal state where the damage occurs to its own cable, or to the flag state of the vessel responsible, and even the latter bears no clear obligation actually to prosecute.[72] More fundamentally, UNCLOS contains no express authorization for a coastal state to interdict or board a foreign vessel on the high seas, or even within its own EEZ, on suspicion of cable sabotage.[73]

This weakness is compounded by the fact that these actions fall just short of an armed attack: "shadow fleet" tankers drag their anchors in ways designed to look accidental, a problem NATO commanders have publicly admitted is difficult to resolve.[74] Unlike the Ukrainian case study, however, this instance currently lacks any judicial finding equivalent to the ECtHR's attribution of jurisdiction in Donbas, NATO's Baltic Sea allies have, notably, stopped short of formal attribution even while launching a dedicated deterrence mission.[75]

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[71] International Law Association, "Report of the Committee on the Law of the Sea" (2024).
[72] Alexander Lott, "The Baltic Sea Cable-Cuts and Ship Interdiction: The C-Lionl Incident," Lieber Institute, West Point, November 26, 2024 https://lieber.westpoint.edu/baltic-sea-cable-cuts-ship-interdiction-c-lionl-incident/ accessed August 8, 2026.
[73] Henrik Ringbom, "New Threats—Old Rules: Law of the Sea Issues Raised by Suspected Attacks on Submarine Infrastructure in the Baltic Sea", *Ocean Development & International Law* (2025).
[74] CNN, "Ships, Sea Drones and AI: How NATO Is Hardening Its Defense of Critical Baltic Undersea Cables," January 27, 2025, https://edition.cnn.com/2025/01/27/europe/nato-defense-baltic-undersea-cables-intl-cmd accessed August 8, 2026
[75] CBC News, "NATO's Baltic Sea Allies Band Together to Deter Suspected Sabotage of Undersea Cables," January 18, 2025, https://www.cbc.ca/news/world/baltic-sea-security-cables-1.7434895 accessed August 8, 2026

"Blue Homeland" *(Mavi Vatan)*

In the law of the sea, the implementation of the "Blue Homeland" initiative offers a different illustration of crippling jurisdiction.

"Blue Homeland"(*Mavi Vatan*) is a Turkish naval doctrine, originated by Admiral Cem Gürdeniz in 2006 and later formalized by Admiral Cihat Yaycı, that claims for Turkey an expansive EEZ of roughly 462,000 km² across the Black Sea, Aegean, and Eastern Mediterranean.[76]

Unlike the other two cases, "Blue Homeland" rests on Turkey's rejection of the legal basis of UNCLOS itself.[77] The dispute is centered on whether Greece and Cyprus are entitled to exercise jurisdiction in the coastal zone and their sovereign rights in their respective EEZ.[78] Entitlement is unilateral, it determines whether a state possesses rights in a certain maritime zone and it is a prerequisite for the bilateral act of delimitation.[79]

Sovereign rights, however refer to the exclusive and functional entitlements a coastal State holds over its EEZ and continental shelf.[80] Although they differ from sovereignty, they are exclusive and carry jurisdiction to legislate and enforce within their scope.[81]

International jurisprudence, though, seems to resolve the entitlement dispute. In the *Case Concerning Territorial and Maritime Delimitation between Nicaragua and Colombia*, the ICJ confirmed that *the most important provisions of the UNCLOS*, including *Articles 74 and 83*

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[76] Aurélien Denizeau, *Mavi Vatan, the "Blue Homeland": The Origins, Influences and Limits of an Ambitious Doctrine for Turkey* (Études de l'Ifri, April 2021), 7–10.
[77] Third United Nations Conference on the Law of the Sea, "Official Records of the 182nd Plenary Meeting" (December 6–10, 1982), UN Doc. A/CONF.62/SR.182.
[78] UN General Assembly, "Letter Dated 16 February 2026 from the Permanent Representative of Turkey to the United Nations Addressed to the Secretary-General" (February 16, 2026), UN Doc. A/80/642.
[79] Nuno Marques Antunes and Vasco Becker-Weinberg, "Entitlement to Maritime Zones and Their Delimitation: In the Doldrums of Uncertainty and Unpredictability," in *Consistency and Predictability in the Case Law on Maritime Delimitation*, ed. Alex G. Oude Elferink and others (Cambridge: Cambridge University Press, 2018), 45.
[80] UNCLOS art.56(1), 77(1).
[81] Robin Churchill, Vaughan Lowe and Amy Sander, *The Law of the Sea* (4th edn, Manchester University Press 2022) 160–164.

on the delimitation of the exclusive economic zone and the continental shelf, and Article 121, on the legal régime of islands.[82] Turkey has no legal right to object neither Greece's nor Cyprus's rights.[83]

Answering the entitlement question alone does not allow the characterization of the *Mavi Vatan* policy as an example of crippling jurisdiction. An important element of the definition is that a state is deprived of the practical capacity to exercise jurisdiction in its sovereign territory.[84] In this case, Greece and Cyprus refuse to act.[85] This is due to the related *casus belli* set by Turkey.[86] This threat might be covered by Article 2(4), however it does not satisfy the Article 51 armed attack criterion, thus leaving no effective remedy.[87] The incapacity of Greece and Cyprus is grounded not on their unwillingness to exercise their lawful rights, but rather on a genuine attempt to avoid escalation.

This hostile stance was expressed when, in 2020, Turkey deployed the seismic survey vessel *Oruc Reis*, escorted by naval forces, into waters claimed by Cyprus, directly obstructing Cypriot and Greek capacity to license and conduct offshore exploration in areas over which they claim sovereign rights.[88] This motion constitutes an example of hybrid warfare, since it create a grey-zone and exercises coercion, while being below the threshold of an armed attack.[89]

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[82] *Territorial and Maritime Dispute* (Nicaragua v. Colombia), Judgment, 2012 I.C.J. Rep. 624, para. 139.
[83] Efthymios Papastavridis, "The Greek-Turkish Maritime Disputes: An International Law Perspective," ELIAMEP Policy Paper 36 (2020): 6, https://www.eliamep.gr/wp-content/uploads/2020/07/Policy-paper-36-Papastavridis-final-10.07.pdf accessed 26 September 2026.
[84] Türkiye MFA, "Background Note on Aegean Disputes."
[85] Papastavridis, "The Greek-Turkish Maritime Disputes," 1.
[86] Idil Muge Karatas, "How to Draw the Lines in the Aegean: A Multifaceted Conflict Turning into Casus Belli between Greece and Turkey," *Ocean & Coastal Law Journal* 27 (2022): 105, 108–109.
[87] *Nicaragua*; Ruys, "Armed Attack", 22-25.
[88] Andrew Norris and Alexander Norris, "Turkey's 'Mavi Vatan' Strategy and Rising Insecurity in the Eastern Mediterranean," Center for International Maritime Security, https://cimsec.org/turkeys-mavi-vatan-strategy-and-rising-insecurity-in-the-eastern-mediterranean/ accessed August 8, 2026.
[89] Dionysios Tsirigotis, "Juris Nullification and Counter-Lawfare in the Eastern Mediterranean: Strategic Uses of International Law in a Contested Maritime Order," *Journal of Balkan and Near Eastern Studies* 26, no. 6 (2026): 1, 22–23. Sari, "Legal Aspects of Hybrid Warfare."

Despite their evident factual differences between them, all three cases share the constitutive elements of crippling jurisdiction: divergence between title and capacity, de facto situation, acts falling below the threshold of an unambiguous armed attack.

Conclusion

This paper set out to answer a simple question: how does international law stand against the threat of crippling jurisdiction in both the normative and practical field? The answer, as shown, is that it stands not firm. Not yet.

Its core elements are a State's legal title over its territory, practical incapacity to exercise jurisdiction, external interference falling short of an armed attack, and a *de facto* constrain

The current normative framework, though it possesses relevant tools, does not directly address this phenomenon. It does not even use this term. The prohibition of the use of force, the law of occupation, the law of the sea and the rules on non-intervention each regulate a fragment of the problem, not its core.

The three case studies illustrate this gap. Regardless of their substantial differences, the Ukrainian, Baltic Sea and Blue Homeland each demonstrate a gap between title and capacity.

As a first step, the paper proposes that the international community define and adopt such a term. Consistent with its mandate,[90] the International Law Commission should undertake a targeted study on crippling jurisdiction. This could result in a robust set of articles or even a treaty.

In this manner, the paper concludes with the hope that this phenomenon be regulated, resulting in a more predictable international reality.

[90] Statute of the International Law Commission, art. 1 (adopted by UN General Assembly Resolution 174(II), November 21, 1947) (ILC Statute).

List of Sources

Treaties and Conventions

- Charter of the United Nations. Adopted June 26, 1945. Entered into force October 24, 1945. 1 U.N.T.S. XVI.

- Convention (IV) Respecting the Laws and Customs of War on Land and Its Annex. Adopted October 18, 1907. Entered into force January 26, 1910. 205 C.T.S. 277.

- Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights, as amended).

- Geneva Convention Relative to the Protection of Civilian Persons in Time of War. Adopted August 12, 1949. Entered into force October 21, 1950. 75 U.N.T.S. 287.

- Statute of the International Court of Justice. Adopted June 26, 1945. Entered into force October 24, 1945. 33 U.N.T.S. 993.

- United Nations Convention on the Law of the Sea. Adopted December 10, 1982. Entered into force November 16, 1994. 1833 U.N.T.S. 3.

- Vienna Convention on the Law of Treaties between States and International Organizations or between International Organizations. Adopted March 21, 1986. Not yet in force. 25 I.L.M. 543.

- Vienna Convention on the Law of Treaties. Adopted May 23, 1969. Entered into force January 27, 1980. 1155 U.N.T.S. 331.

Case Law

- *Al-Skeini and Others v. United Kingdom*. App. No. 55721/07. ECtHR [GC], July 7, 2011.
- *Alleged Violations of Sovereign Rights and Maritime Spaces in the Caribbean Sea* (Nicaragua v. Colombia), Judgment, I.C.J. Reports 2022.
-
- *Banković and Others v. Belgium and Others*. Dec. [GC]. App. No. 52207/99, ECHR 2001-XII.

- *Corfu Channel* (United Kingdom v. Albania). Merits. 1949 I.C.J. Rep. 4.

- *Cyprus v. Turkey* [GC]. App. No. 25781/94, ECHR 2001-IV.

- *Georgia v. Russia (II)*. App. No. 38263/08. ECtHR, GC, January 21, 2021.

- *Ilaşcu and Others v. Moldova and Russia*. 2004-VII Eur. Ct. H.R. 1.

- *Loizidou v. Turkey*. Merits. App. No. 15318/89, ECHR 1996-VI.

- *Military and Paramilitary Activities in and against Nicaragua* (Nicaragua v. United States of America). Merits. 1986 I.C.J. Rep. 14.

- *SS Lotus* (France v. Turkey). 1927. P.C.I.J. Series A No. 10.

- *Territorial and Maritime Dispute* (Nicaragua v. Colombia). Judgment. 2012 I.C.J. Rep. 624.

- *Ukraine and the Netherlands v. Russia*. App. Nos. 8019/16, 43800/14 and 28525/20. ECtHR, January 25, 2023.

- *United Phosphorus Ltd v. Angus Chemical Co.* 322 F.3d 942 (7th Cir. 2003).

United Nations Documents

- Statute of the International Law Commission. Adopted by UN General Assembly Resolution 174(II), November 21, 1947.

- Third United Nations Conference on the Law of the Sea. "Official Records of the 182nd Plenary Meeting." December 6–10, 1982. UN Doc. A/CONF.62/SR.182.

- United Nations General Assembly. "Letter Dated 16 February 2026 from the Permanent Representative of Turkey to the United Nations Addressed to the Secretary-General." February 16, 2026. UN Doc. A/80/642.

- United Nations General Assembly. Resolution 2131 (XX). "Declaration on the Inadmissibility of Intervention in the Domestic Affairs of States and the Protection of Their Independence and Sovereignty." December 21, 1965.

- United Nations General Assembly. Resolution 2625 (XXV). "Declaration on Principles of International Law concerning Friendly Relations and Co-operation among States." October 24, 1970.

- United Nations General Assembly. Resolution 3314 (XXIX). "Definition of Aggression." December 14, 1974.

- United Nations General Assembly. Resolution 36/103. "Declaration on the Inadmissibility of Intervention and Interference in the Internal Affairs of States." December 9, 1981.

- United Nations General Assembly. Resolution 68/262. UN Doc. A/RES/68/262. "Territorial Integrity of Ukraine." March 27, 2014.

- United Nations General Assembly. Resolution ES-11/4. "Territorial Integrity of Ukraine: Defending the Principles of the Charter of the United Nations." October 12, 2022.

Books

- Berkes, Antal. *International Human Rights Law Beyond State Territorial Control*. Cambridge: Cambridge University Press, 2021.

- Churchill, Robin, Vaughan Lowe, and Amy Sander. The Law of the Sea. 4th ed. Manchester: Manchester University Press, 2022.

- De Vattel, Emmerich. *Le Droit des Gens*. 1758. Reprint, Indianapolis: Liberty Fund, 2008.

- Jennings, Robert Y., and Arthur D. Watts, eds. *Oppenheim's International Law*. 9th ed. London: Longman, 1992.

- Milanovic, Marko. *Extraterritorial Application of Human Rights Treaties: Law, Principles, and Policy*. Oxford: Oxford University Press, 2011.

- Ruys, Tom. 'Armed Attack' and Article 51 of the UN Charter: Evolutions in Customary Law and Practice. Cambridge: Cambridge University Press, 2010.

- Shaw, Malcolm N. *International Law*. 9th ed. Cambridge: Cambridge University Press, 2021.

- Taylor, Hannis. *A Treatise on International Public Law*. Chicago: Callaghan & Co., 1901.

- Wessendorf, Nikolai. *The Charter of the United Nations: A Commentary.* Vol. 1. 3rd ed. Oxford: Oxford University Press, 2012.

Book Chapters

- Antunes, Nuno Marques, and Vasco Becker-Weinberg. "Entitlement to Maritime Zones and Their Delimitation: In the Doldrums of Uncertainty and Unpredictability." In *Consistency and Predictability in the Case Law on Maritime Delimitation*, edited by Alex G. Oude Elferink and others. Cambridge: Cambridge University Press, 2018.

- Capps, Patrick, Malcolm Evans, and Stratos Konstadinidis. "Introduction." In *Asserting Jurisdiction: International and European Legal Perspectives*, edited by Patrick Capps, Malcolm Evans, and Stratos Konstadinidis. Oxford: Hart Publishing, 2003.

Journal Articles

- Boon, Kristen E. "Are Control Tests Fit for the Future? The Slippage Problem in Attribution Doctrines." *Melbourne Journal of International Law* 15 (2014).

- Colangelo, Anthony J. "Spatial Legality." *Northwestern University Law Review* 107 (2012).

- De Schutter, Olivier. "Globalization and Jurisdiction: Lessons from the European Convention on Human Rights." *Baltic Yearbook of International Law* 6 (2006): 185–247.

- Fox, Hazel. "Enforcement Jurisdiction, Foreign State Property and Diplomatic Immunity." *International and Comparative Law Quarterly* 34 (1985).

- Hafner, Gerhard. "Sub-group on Intervention by Invitation." Preliminary Report, July 26, 2007. *Yearbook of the Institute of International Law*, Santiago Session (2007).

- Jamnejad, Maziar, and Michael Wood. "The Principle of Non-Intervention." *Leiden Journal of International Law* 22 (2009).

- Karatas, Idil Muge. "How to Draw the Lines in the Aegean: A Multifaceted Conflict Turning into Casus Belli between Greece and Turkey." *Ocean & Coastal Law Journal* 27 (2022).

- Kormych, Bohdan, Tetyana Malyarenko, and Cindy Wittke. "Rescaling the Legal Dimensions of Grey Zones: Evidence from Ukraine." *Global Policy* 14 (2023).

- Krasner, Stephen D., and Thomas Risse. "External Actors, State-Building, and Service Provision in Areas of Limited Statehood." *Governance* 27 (2014).

- Larsen, Kjetil Mujezinović. "Territorial Non-application of the European Convention on Human Rights." *Nordic Journal of International Law* 78 (2009).

- Malyarenko, Tetyana. "New Wild Fields: How the Russian War Leads to the Demodernization of Ukraine's Occupied Territories." *Nationalities Papers* 52 (2024).

- Mann, FA. "The Doctrine of Jurisdiction in International Law." *Recueil des Cours* 111 (1964).

- Mills, Alex. "Rethinking Jurisdiction in International Law." *British Yearbook of International Law* 84 (2014).

- Plescia, Joseph. "Conflict of Laws in the Roman Empire." *Labeo* 38 (1992).

- Ringbom, Henrik. "New Threats—Old Rules: Law of the Sea Issues Raised by Suspected Attacks on

Submarine Infrastructure in the Baltic Sea." *Ocean Development & International Law* (2025).

- Rudolph, Christopher. "Sovereignty and Territorial Borders in a Global Age." *International Studies Review* 7 (2005).

- Schmitt, Michael N. "'Virtual' Disenfranchisement: Cyber Election Meddling in the Grey Zones of International Law." *Chicago Journal of International Law* 19 (2018).

- Tsirigotis, Dionysios. "Juris Nullification and Counter-Lawfare in the Eastern Mediterranean: Strategic Uses of International Law in a Contested Maritime Order." *Journal of Balkan and Near Eastern Studies* 26, no. 6 (2026).

Theses

- Berkes, Antal. "'Grey Zones': The Protection of Human Rights in Areas out of the Effective Control of the State." PhD diss., Université Paris 1 Panthéon-Sorbonne / Eötvös Loránd University, 2015.

Reports and Policy Papers

- Denizeau, Aurélien. *Mavi Vatan, the "Blue Homeland": The Origins, Influences and Limits of an Ambitious Doctrine for Turkey*. Études de l'Ifri, April 2021.

- International Law Association. "Report of the Committee on the Law of the Sea." 2024.

- Papastavridis, Efthymios. "The Greek-Turkish Maritime Disputes: An International Law Perspective." ELIAMEP Policy Paper 36 (2020). https://www.eliamep.gr/wp-content/uploads/2020/07/Policy-paper-36-Papastavridis-final-10.07.pdf.

Websites and News Sources

- CBC News. "NATO's Baltic Sea Allies Band Together to Deter Suspected Sabotage of Undersea Cables." January 18, 2025. https://www.cbc.ca/news/world/baltic-sea-security-cables-1.7434895.

- CNN. "Ships, Sea Drones and AI: How NATO Is Hardening Its Defense of Critical Baltic Undersea Cables." January 27, 2025. https://edition.cnn.com/2025/01/27/europe/nato-defense-baltic-undersea-cables-intl-cmd.

- Juarranz, Pablo. "Undersea Cable Sabotages: Russia's and China's Hybrid Warfare Strategy." Global Affairs, University of Navarra. https://www.unav.edu/web/global-affairs/undersea-cable-sabotages-russia-s-and-china-s-hybrid-warfare-strategy.

- Lott, Alexander. "The Baltic Sea Cable-Cuts and Ship Interdiction: The C-Lionl Incident." Lieber Institute, West Point, November 26, 2024. https://lieber.westpoint.edu/baltic-sea-cable-cuts-ship-interdiction-c-lionl-incident/

- Martin, Lucas. "Mavi Vatan: The Turkish Blue Homeland Doctrine." Global Affairs, University of Navarra. https://en.unav.edu/web/global-affairs/detalle/-/blogs/-mavi-vatam-la-doctrina-turca-de-la-patria-azul-3.

- Norris, Andrew, and Alexander Norris. "Turkey's 'Mavi Vatan' Strategy and Rising Insecurity in the Eastern Mediterranean." Center for International Maritime Security. https://cimsec.org/turkeys-mavi-vatan-strategy-and-rising-insecurity-in-the-eastern-mediterranean/.

- Republic of Türkiye Ministry of Foreign Affairs. "Background Note on Aegean Disputes." Accessed September 26, 2026. https://www.mfa.gov.tr/background-note-on-aegean-disputes.en.mfa.

- Sari, Aurel. "Legal Aspects of Hybrid Warfare." Lawfare, October 2, 2015. https://www.lawfaremedia.org/article/legal-aspects-hybrid-warfare.

- Trach, Tetiana, et al. "Russian Offensive Campaign Assessment." Institute for the Study of War, July 20, 2026. https://understandingwar.org/research/russia-ukraine/russian-offensive-campaign-assessment-july-20-2026/.