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UK Arms Diplomacy and International Law on the Black Sea

**Leveraging Türkiye's Treaty Obligation to Deny UK Minehunters
Access to the Straits**

By LJ Howard

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UK Arms Diplomacy and International Law on the Black Sea

Leveraging Türkiye's Treaty Obligation to Deny UK Minehunters Access to the Straits

[L J Howard](#), PhD., LL.M.¹

Executive summary

Ukraine's grain shipments are at risk from Russia's mining shipping routes in the Black Sea. Following the July 2023 failure of the multilateral Black Sea Grain Initiative, Ukraine and Romania designated a safe lane through their adjacent 12 NM Territorial Seas. UNCLOS (1982) provides for littoral states' jurisdiction in these waters including protection of ships conducting innocent passage. Russian mines drift into this new lane and loiter. The UK offered decommissioned minehunters to Ukraine and Romania to mitigate the risk. The Montreux Convention (1936) provides for Türkiye to exercise jurisdiction over the Dardanelles and Bosphorus Strait and deny inbound access of belligerents' warships thereto during hostilities. While seen to frustrate the UK's effort in arms diplomacy, Türkiye's denial leveraged disproportionately broader diplomatic success.

1. Introduction

This note overviews the protection of Ukraine grain shipments in the Black Sea from Russian mines and its outcomes. The issue comprises agricultural economics, armed hostilities, provision of minehunters, designation of shipping lanes, military and diplomatic practice, and international law.

In **Part 1**, 'Context and back story,' Section 2 reviews the deployment of mines in the Black Sea. **Section 3** assesses initiatives in mine countermeasures to afford protection against mines, including the UK's offer of decommissioned shallow-draft coastal minesweepers, NATO's position on the matter, and the ad hoc measure undertaken by regional states. **Section 4** overviews Türkiye's current policy and legal position on the matter. **Section 5** offers interim conclusions.

Part 2, 'International law and diplomatic practice' (forthcoming in a future paper) assesses the law of treaties, treaty laws, conflict of treaties, reflagging ships and how international law retards and advances international peace and security. It then reviews advantages and difficulties in arms diplomacy. Final conclusions follow.

Part 1: Context and backstory

2. Deployment of mines

Of the world's exports in 2019, Ukraine provided 42 percent of sunflower oil, 16 percent of corn, 10 percent of barley and 9 percent of wheat.¹ As a % of GDP, Ukraine's exports fell from 52.6% in 2014 to 35.5% in 2019, the years Russia annexed Crimea and invaded Ukraine, respectively.² The largest market of grain exports is China.³

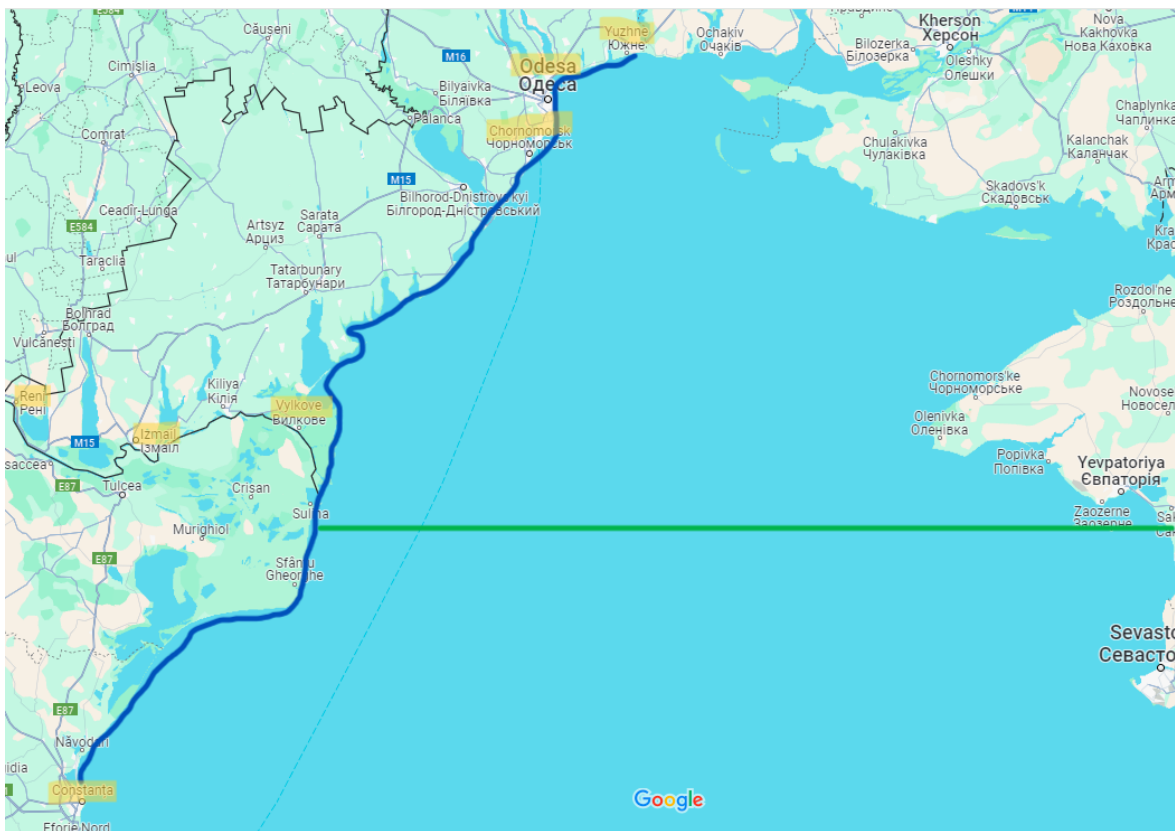
Within this context of agriculture commerce, a timeline of hostilities and related events follows. **20 February 2014**, Russia invades and annexes Crimea. **24 February 2022**, Russia invades Ukraine. **25**

¹ President, Royal Alberta United Services Institute

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February 2022, "Russia's Department of Navigation and Oceanography issues a navigational warning...[N]avigation was prohibited in the northwest portion of the Black Sea north of 45° 21' 'due to counterterrorist operations carried out by the Russian Navy' and that ships... 'in this area will be regarded as terrorist threats'" (**Annex A**).⁴ This blockades Ukraine's six ports: three each on the northwest Black Sea and Danube River (**Map 1**).

Ukraine's Black Sea ports of Odessa, Chornomorsk and Yuzhny/Pivdennyi and its Danube ports of Izmajl, Reni and Ust-Danube lie north of 45° 21' (**Map 1**). Romania's port of Constanza lies south of 45° 21'. The Danube River demarcates the border between the two states. Both are littoral states. Romania is a Member State of NATO, whereas Ukraine is not a Member State.



Map 1: Black Sea Grain ports, 45° 21' latitude, 12 Nautical Mile Territorial Seas approx. ©Google Maps, edited by LJH.

03 March 2022, *M/V Helt* strikes a mine twenty miles S of Odessa and sinks.⁵ Owned by Prima Shipping Group (Finland) but Panamanian-flagged, it is Panamanian sovereign territory.⁶

22 July 2022, Russia, Türkiye, Ukraine and the United Nations agree to the *Black Sea Grain Initiative*, creating a corridor for shipping Ukraine's grain safely to the Mediterranean Sea (**Map 2**). More than one thousand ships depart Ukraine from the three northern ports during the initiative.⁷ The corridor extends from a marshalling area East-Southeast of Odessa 320 nautical miles (NM) to the Bosphorus Strait and south through the Dardanelles to the Mediterranean. It is effective **26 August 2022** under

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control of a Joint Coordination Centre. Military ships, aircraft and unmanned aerial vehicle must remain beyond outside a radius of 10 NM of vessels transiting the corridor.⁸



The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.
 Creation date: 23 Aug 2022. Prepared by: OCHA. Schematic only.

Map 2: UN-sponsored Grain Corridor from Odessa to the Bosphorus Strait at Istanbul. © BIMCO 17 July 2023, Russia revokes the Initiative and guarantee of safe navigation.⁹

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03 March 2022, The *M/V Helt* sinks after striking a mine (Twitter) © The Maritime Executive.



28 December 2023, Panamanian-flagged bulk carrier *M/V VYSSOS* heading to a Danube port to load grain hits a Russian mine.¹⁰ © DPSU.gov.ua.

18 July 2023, Ukraine advises the International Maritime Organization (IMO), a Specialized Agency of the United Nations responsible for the safety and security of shipping,¹¹ that Ukraine will create an alternate safe sea lane for its grain shipments in the Black Sea.¹²

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23 July 2023, Ukraine and Romania together designate a new safe lane lying inside the 12 Nautical Mile Territorial Seas under jurisdiction of the two adjacent littoral states (**Map 1** blue marking). Ukraine remains contractually obligated to deliver grain to international markets and argues shipments can continue safely within the 12 NM lane without Russia's guarantee of safe passage.

At time of writing, Ukraine's grain moves from its three northern ports **(i)** by ships flying flags of convenience to its Danube ports; **(ii)** then via ship-to-barge southward to the port of Constanza, Romania; **(iii)** then either by barge-to-ship to the Mediterranean or barge-to-rail and overland. More efficient ship-to-ship protocols¹³ are pending during infrastructure improvements at Constanza.¹⁴ Ships remain at risk from Russian mines drifting into and loitering in the 12 NM lane.

3. Initiatives in mine countermeasures

3.1 UK

Respectively commissioned 25 September 1999 and 20 July 2002 and refitted in 2012/2017 and 2016 at Babcock's Rosyth (Scotland) dockyard, two of the Royal Navy's Sandown-class minehunters, *HMS Grimsby* Hull M108 and *HMS Shoreham* Hull M112 are decommissioned **October 2022**. In anticipation of their sale to Ukraine, each is subsequently renamed *Chernihiv* and *Cherkasy* in, and in **early 2023** were being used as platforms to train Ukrainian sailors.¹⁵ Reportedly, in **June 2023** following refit, the two minehunters had departed for Ukraine.¹⁶

11 December 2023, the UK government offers to 'provide the services of the two ships' to the government of Ukraine for deployment in the Black Sea to assist in securing safe passage of grain exports inside the new 12 NM lane tracking the western littoral of the Black Sea (**Map 1**). The offer is part of a multinational effort including Norway; the 'Joint Maritime Capability for Ukraine' includes the two ex-Royal Navy Sandown-class minehunters, amphibious armored vehicles and coastal raiding boats. Norway's contribution includes personnel, equipment and training.¹⁷



HMS Grimsby © Royal Navy



HMS Shoreham © Royal Navy

August 2021, two other Sandown-class minehunters, *HMS Blyth* and *HMS Ramsey*, are decommissioned. Originally intended for sale to Ukraine, they are sold to Romania in **September 2023**.¹⁸

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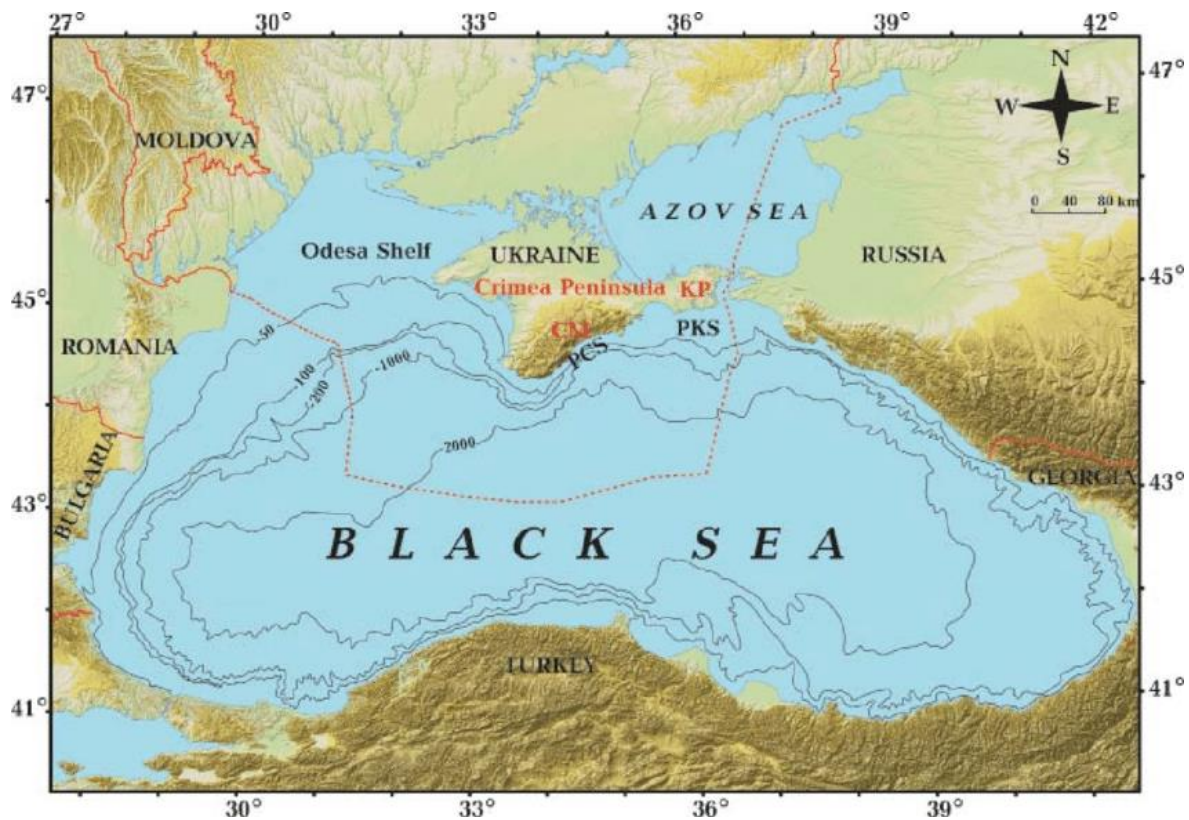
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Sandown-class minehunters were designed to *clear mines along coastlines* to permit safe passage of larger ships.¹⁹ Their draft is only 2.1 m while 52.5 m long and 10.5 m wide. They were intended “...to search for and destroy sea mines with the help of remote-controlled PAP-104 devices. [They carry] a shield-covered 30-mm machine gun. To reduce magnetism, ...hulls are made of reinforced fiberglass. Mechanisms are isolated from the body with the help of shock absorbers...”²⁰ Hence, they are suited to patrolling shallow waters of the two states’ 12 NM Territorial Seas.

Decommissioning older minehunters redirects investable resources to newer platforms in autonomous mine warfare, Mine Countermeasures (MCM) and Military Data Gathering (MDG). They yield improved combat-zone effect at lower cost,²¹ but are still vulnerable. The UK is focusing on autonomous systems, while Belgium, Italy, Netherlands and Norway retain crewed platforms.²²

Map 3 shows the Territorial Seas of Ukraine and Romania lie on the Odessa Shelf of the Black Sea, whose maximum depth is fifty feet. Such is suitable for shallow draft minehunters.



Map 3: Bathymetry Overview of Black Sea²³

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3.2 NATO

NATO's groupings and taskings of naval assets change as threats evolve. Its current Standing Naval Force (SNF) comprises two Standing NATO Maritime Groups (SNMG 1 and 2) and two Standing NATO Mine Countermeasures Groups (SNMCMG) 1 and 2.

In the latter, Group 1's minehunters include e.g. Poland's refitted logistics ship²⁴ *ORP Kontradmiral Xawery Czernicki* with its original draft of 4.3 m.²⁵ Group 2's ships include, e.g., the Italian built-to-purpose *Lerici*-class ships such as Italy's *Sapri* with a draft of 2.9 m vice the *Sandown's* 2.1 m.



ORP Kontradmiral Xawery Czernicki © Global Security



M-5551 Sapri © Black Sea Visits

A NATO Black Sea strategy appears absent. In **2021**, the U.S. navy spends roughly 180 days there, with the guided-missile destroyer, *USS Arleigh Burke*, exiting **15 December 2021**. In **June 2021**, the *HMS Defender* reportedly comes under fire from Russian aircraft and shore patrols when conducting freedom of navigation patrols 2 NM from the Crimean Peninsula, with the Royal Navy leaving the Black Sea **summer 2021**. In **2021**, other (non-littoral) NATO allies deploy thirty-one ships.²⁶ On **02 January 2022**, one month before Russia's invasion of Ukraine, the French missile frigate *FS Auvergne* becomes the last ship of a Member State of NATO to leave the Black Sea.²⁷

February 2022, the nearest NATO naval vessel lies in the Mediterranean.

No major NATO naval ally has patrolled its waters since [**January 2022**], ... Meanwhile, 16 [Russian ships including [guided missile frigates ships and amphibious land craft for armoured vehicles] sailed into the Black Sea [before the outbreak of armed conflict 22 February 2022], according to [Turkishnavy.net](https://turkishnavy.net) that tracks the movements of foreign warships and to Russia's defense ministry. [The latter noted the transit of its warships] were part of a pre-planned movement of military resources.²⁸

February 2022, Russia has eighteen capital warships in the Black Sea.²⁹ NATO Member States are obligated under the North Atlantic Treaty³⁰ to protect only its Member States.

[Member States disagree] ... whether to challenge Russia's navy in the area, resulting in a lack of a coherent ... Black Sea NATO strategy...[Further] ... Turkey [is reluctant] to agree to maritime patrols to avoid provoking Moscow. ... Other factors are budget constraints and the existence of other priorities among some major NATO allies NATO's naval

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response to Russia also [impacts] the West's ability to assert its interests elsewhere, [e.g.,] the South China Sea [over which] Beijing claims sovereignty.³¹



FS *Auvergne* © Ukrainian Navy

3.3 Bulgaria, Romania and Türkiye ad hoc arrangement

The UK's intended sale and re-employment of up to four noted ships as 'recommissioned' minehunters **during 2022 and 2023 (Section 3.1)** appears to have been overtaken by certain events in **late 2023 and early 2024**.

December 2023, Bulgaria, Romania and Türkiye enter negotiation to form a mine hunting task force in the Black Sea.³² Notably, the initiative, while comprising states that are also Member States of NATO, is not in NATO's orbit.³³

10 January 2024, while perhaps not yet fully informed of Türkiye's position on the matter of NATO's involvement in the task force, Romania's Minister of National Defence notes "NATO-member littoral states, as well as NATO Standing Maritime Groups and non-littoral Allies, will be able to participate in the MCM Black Sea activities in order to enhance cooperation in support of Black Sea security and to increase interoperability."³⁴

Subsequently, **11 January 2024**, the three parties conclude the *Memorandum of Understanding on the establishment of the Task Force to Counter Sea Mines in the Black Sea – Mine Countermeasures Black Sea (MCM Black Sea)*. Türkiye is leading the initiative designed firstly "to defuse [Russian] mines drifting into specific areas of the Black Sea ...and [secondly] to exclude other NATO members from the security effort, including the US and UK, to avoid escalating tensions in the region."³⁵

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3.4 Türkiye's position in policy and law concerning access to the Straits

11 January 2024, the Turkish presidency notes Türkiye has been implementing the longstanding Montreux Convention (1936) and

maintains its unwavering determination and principled stance throughout this war to prevent the escalation of tension in the Black Sea. Our pertinent allies have been duly apprised that the mine-hunting ships donated to Ukraine by the United Kingdom will not be allowed to pass through the Turkish Straits to the Black Sea as long as the war continues.³⁶

The convention applies equally to denying Russian warships inbound access to the Straits. In **January 2022**, before the 24 February 2022 land invasion, Türkiye's foreign ministry clarifies "ships ...registered to bases in the Black Sea will still be allowed to return to their ports, including warships of NATO Member States Bulgaria and Romania. [Otherwise], warships [will be] blocked from accessing the Bosphorus and Dardanelles, whether coming from countries 'bordering the Black Sea or not'."³⁷

Türkiye's currently denying wo of the UK's decommissioned minehunters access to the Straits satisfies the obligations under the Montreux Convention (1936) yet increases risk to grain carriers. Further, it initially appears to frustrate initiatives of the UK in arms diplomacy. To this end, some parties argue Russia is engaging in a disinformation campaign by advancing that Türkiye's denial is a declaration of war.³⁸ Arguably, such a belligerent declaration would fracture western support for Ukraine and aggravate relations among Member States of NATO.

At time of writing, the status of five decommissioned Minehunters are as follows:

1. *HMS Grimsby* and *HMS Shoreham* have been transferred to Ukraine under the UK / Ukraine Memorandum of Understanding underlying the Ukrainian Naval Capabilities Enhancement Programme (UNCEP).

Babcock International Group [was] chosen to lead in the delivery of the scope of the broad ranging... UNCEP, [which] includes the enhancement of capabilities on existing naval platforms, the delivery of new platforms, including fast attack missile craft, a modern frigate capability, shipborne armaments and the training of naval personnel. It also involves working together to regenerate Ukrainian shipyards by developing, implementing and completing a Shipyard Regeneration Plan³⁹

with the agreement being signed **23 June 2021** on *HMS Defender* (notably, see §3.2 above). Both minehunters are currently under maintenance and support contracts with Babcock International in naval dockyards in Rosyth, Scotland, last reported as sited there **22 September 2022**⁴⁰ and **23 August 2023**,⁴¹ respectively.

2. *HMS Ramsey* was last reported as sited in Portsmouth, English Channel, **11 August 2023**.⁴² Its status otherwise is not yet confirmed.
3. *HMS Byth* and *HMS Pembroke* were sold to Romania by the UK's Defence Equipment Sales Authority (DESA) **September 2023** and were to undergo refurbishment by Babcock.⁴³

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4. Notably, *HMS Blyth* departed Rosyth **15 November 2023** and arrived Constanza **19 December 2023**,⁴⁴ having entered the Black Sea via the Dardanelles and Bosphorus Strait.



Minehunter M270 *Sublieutenant Ion Ghiculescu*, formerly *HMS Blyth*, arrives Constanța, Romania

© Yusuf Çetiner.

The entry into the Black Sea of *Sublieutenant Ion Ghiculescu*, formerly *HMS Blyth*, through the Dardanelles and Bosphorus Straits in mid December 2023 appears to have occurred before Türkiye's more recent public promulgations in mid **January 2024** concerning Türkiye's policy and legal obligation restricting entrance of warships into the Black Sea. It is possible that the ship, being purchased from the UK in **September 2023**, was then classified as a Romanian warship returning to its home base in Constanza, Romania as permitted under the Montreux Convention (1936).

The *HMS Pembroke* is to be decommissioned **early 2024**, with the UK offering individual operator and maintainer training via Navy International Defence Training (IDT), and collective training via Fleet Operational Sea Training (FOST).⁴⁵ Presumably, once it is reflagged, renamed and reregistered, its status as Romanian sovereign territory may afford it access to Constanza, as was the case with *HMS Blyth*.

In addition to the aforementioned five Sandown class minehunters, four other Sandown-class minehunters have been sold, totalling nine of the fifteen in the fleet: *HMS Sandown*, *HMS Inverness* and *HMS Bridport* to Estonia, *HMS Berkeley* to Greece. Of the more versatile Hunt-class 'mine countermeasures' ships, *HMS Quorn*, *HMS Dulverton* and *HMS Cottesmore* have been sold to

Lithuania, and *HMS Bicester to Greece*.⁴⁶ All three purchasers are Member States of NATO, the first two of whom are under greater threat from Russia and are littoral states of the Baltic Sea.



A Russian Sea mine being examined by Ukraine military personnel; shown for scale.⁴⁷ © Ukraine Operational Command South.

5. Analysis and conclusion

5.1 Analysis of intended disposition of HMS Grimsby and HMS Shoreham

- 1. Counterparty** What does not appear to explain the preclusion of *HMS Grimsby's* and *HMS Shoreham's* entering the Black Sea is the standing of the counterparty. No NATO policy precludes a Member State from selling or otherwise providing arms to a non-Member State of NATO, viz., arms diplomacy of inter alia Canada, Germany Netherlands, Poland and the US in providing arms and munitions to Ukraine. Further, Turkey, a Member State of NATO, purchased the S-400 missile air defense system in 2019 from Russia, a non-Member State of NATO.
- 2. Transaction** The UK consummated an outright sale of *HMS Blyth* to Romania. The vessel subsequently entered the Black Sea. Presumably, the same outcome will apply to *HMS Pembroke*. On the other hand, the language surrounding the disposal of *HMS Grimsby* and *HMS Shoreham* does not use the word 'sale' but instead uses more opaque language such as 'provision of services' and 'transferred.' Further, there appeared to be little or no protest from the UK upon learning of Türkiye's denial of access. While both latter two ships have been renamed and presumably reflagged (or will be reflagged), there appears to exist a different conditionality accounting for Türkiye's denial of access to the Straits. Language of the

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transaction may explain it in part. Otherwise, what is preventing the UK from selling outright these two ships to Ukraine which, following reflagging and reregistration, could assert their home base is Odessa in the Black Sea and hence gain access thereto?

- 3. Party to hostilities** The 1936 Convention Regarding the Regime of the Straits (The Montreux Convention (1936), Montreux) ⁴⁸ Section II art 19 provides "Vessels of war belonging to belligerent Powers shall not, however, pass through the Straits except in cases arising out of the application of Article 25 of the present Convention..." Art 25 provides "Nothing in the present Convention shall prejudice the rights and obligations of Turkey, or of any of the other High Contracting Parties members of the League of Nations, arising out of the Covenant of the League of Nations."

Ukraine, an 'injured' or 'victim' vice 'aggressor state,' may still be considered a 'belligerent Power' under Montreux. As such, an 'ordinary meaning interpretation' of Montreux, as is recommended under the secondary rules of the Vienna Convention on the Law of Treaties (1969) (VCLT)⁴⁹art 31(1), with its emphasis on a more literal reading of the treaty, would initially explain Türkiye's denial of access to the Straits. However, a more thorough legal analysis of the matter (forthcoming in Part 2 of this note) may rebut Türkiye's interpretation.

Türkiye did not consider Romania, a Black Sea power, a belligerent Power, given *HMS Blyth's* inbound access to the Straits. Other littoral states on the Black Sea are Bulgaria and Georgia. Bulgaria, a Member State of NATO, is not (yet) a party to the UK's sale or transfer of warships.

Comparatively, a sale by the UK to Georgia, an aspirant member state of NATO, would pose issues in diplomacy. The sovereign state of Georgia includes enclaves of ethnic Russians in the nominal republics of South Ossetia and Abkhazia. This situation is not unlike Russian enclaves of **(i)** Transnistria situated in Moldova; **(ii)** Nagorno Karabakh (now dissolved) situated in Azerbaijan. In contrast, Kaliningrad, situated between Poland and Lithuania, is an *exclave*.

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Map 4: Russian enclaves surrounding the Black Sea © Warsaw Institute

5.2 Leveraging the denial of access to the Straits

Türkiye's denial of inbound access to the Straits by the *HMS Grimsby* and *HMS Shoreham* may initially appear to be a policy-driven decision to adopt an unduly narrow interrelation of international law that frustrates the UK's efforts to advance arms diplomacy that is productive and popular with domestic constituencies of western sovereigns, many being Member States of NATO. However, several matters deserve note.

1. The UK, together with Bulgaria, France, Greece, India, Japan, Romania, Turkey, USSR and Yugoslavia concluded the Montreux Convention 09 July 1936.⁵⁰ Hence, the UK knew or ought to have known of Türkiye's obligations under the treaty and its manner of interpretation under the VCLT (1969). The UK could not and should not have been surprised at the initial outcome, thereby permitting the inference that its proposed sale was only the first step in a larger manoeuvre in arms diplomacy.

Further, if the UK had intended the two minehunters to render 'battlefield effect' in assisting Ukraine in its Black Sea grain shipments, the UK might have renegotiated the arrangement with Ukraine and sold *HMS Grimsby* and *HMS Shoreham* to Romania instead of Ukraine. It is deployment of the asset rather than its ownership that is of consequence. Moreover, Romania's owning the two ships instead of Ukraine would decrease the likelihood of their being attacked by Russia, who may wish to avoid armed conflict with a Member State of NATO.

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Türkiye's denial of access is not newsworthy, but merits thought in broader diplomatic context.

2. Following Türkiye's pronouncements per **§3.3** (ad hoc task force) and **§3.4** (denial of access), Türkiye announced **24 January 2024** that its parliament ratified Sweden's accession into NATO after withholding ratification since Sweden's application **18 May 2022**. Ratification was pending approval from the US Congress for the sale of 40 Lockheed Martin F-16s and equipment to modernise seventy-nine of its existing F-16 fleet.⁵¹
3. Arguably, ratification of this new Member State of NATO is the political quid pro quo for the long-sought aircraft and arguably settles certain issues in backchannels.
 - a. The US Congress approved the sale to Türkiye in response to its heightened concern over increasing security threats to the Baltic region from Russia, and in exchange, enabled NATO's membership in that region to expand, subject now only to Hungary's ratification. Notably, as Hungary previously stated it would not be the last state to ratify Sweden's accession, it would appear its ratification should be forthcoming shortly. Hence, the western flank of Europe would be fully populated with Member States of NATO.
 - b. The ratification and sale further affirm Türkiye's political standing as a regional power reinforced with a more formidable air force with which to effect inter alia NATO policy and future coalition operations.
 - c. The US' concurrent sale to Greece of 40 F-35 Lightning II Joint Strike Fighters and related equipment⁵² (an asset denied to Turkey following its purchase of the Russian S-400 missile air defense system) further strengthens the southern flank of NATO relative to Russia and access to the Black Sea for naval and amphibious assets. Further, the transaction includes frigates, C-130 transport aircraft, armoured and soft skinned vehicles.⁵³



General Dynamics F-16 © Reuters



Lockheed Martin F-35 © US Naval Institute

5.3 Conclusion

Given

1. the UK's 'knew or ought to have known about Montreux (1936),' its moderate language surrounding the sale and its lack of protest upon its offer being rebuffed;

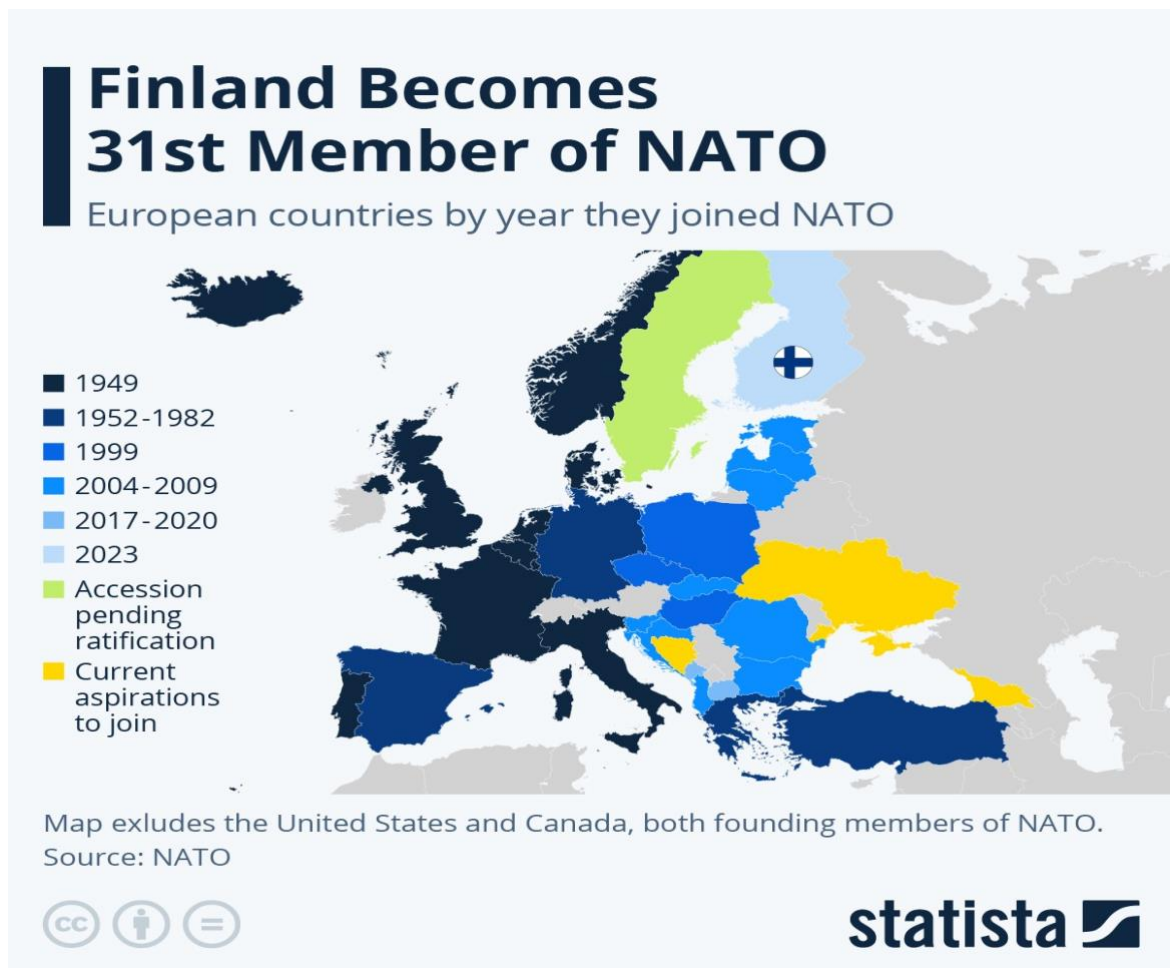
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2. the sequence and proximity of dates of pronouncements of proposed sale, formation of the ad hoc task force, denial of access, and ratification of Sweden's accession;
3. the size of the ultimate dividend of great security on NATO's western and southern flanks,

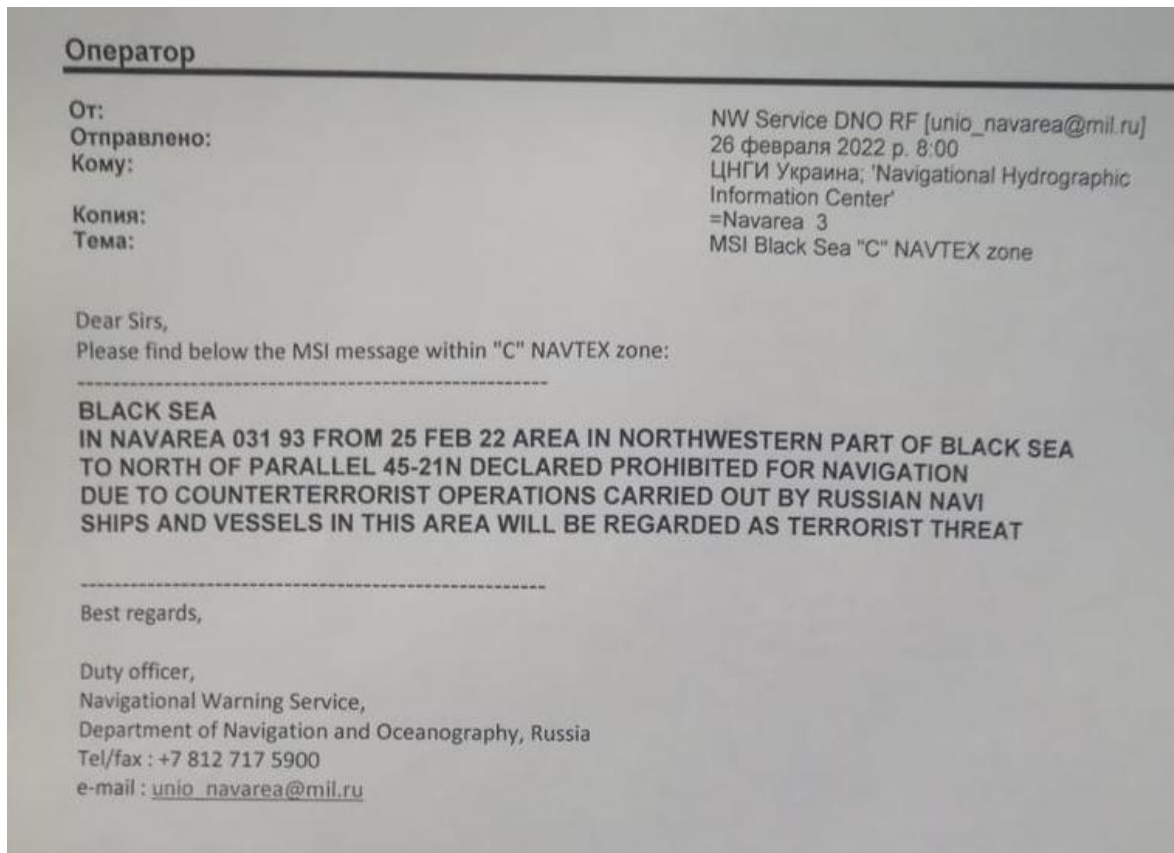
it is not unreasonable to conclude the UK's attempted sale of the *HMS Grimsby* and *HMS Shoreham* to Ukraine and their subsequent denial of access to the Straits by Türkiye, a fellow Member State of NATO, was intentionally orchestrated to be perceived as an aggravation between NATO allies that would be quickly overtaken by planned events of disproportionately greater and contrasting favourable gravity, namely the more robust bracketing of Russia by Member States of NATO on west and south flanks .



Map 5: Member States of NATO and aspirant members relative to Russia © NATO.

Annex A

Navigational Warning, Russia's Department of Navigation and Oceanography 25 February 2022



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Endnotes

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- ¹ [Russian blockade of Ukraine's ports puts global food supply at risk](#) (France 24 12 May 2022).
 - ² [Share of exports in the gross domestic product \(GDP\) of Ukraine from 2011 to 2022](#) (Statista October 2023).
 - ³ [Volume of agricultural exports from Ukraine secured by the Black Sea Grain Initiative from August 1, 2022, to July 17, 2023, by country](#) (Statista July 2023).
 - ⁴ Raul (Pete) Pedrozo, [Russia-Ukraine War at Sea: Naval Blockades, Visit and Search, and Targeting War Sustaining Objects](#), Articles of War (Lieber Institute West Point 25 August 2023), citing [gCaptain publication of the navigation warning](#).
 - ⁵ [Estonian Cargo Ship Sinks After Possible Mine Strike Near Odesa](#) (The Maritime Executive 03 March 2022).
 - ⁶ [HELT, IMO 8402589](#), Baltic Shipping Com (undated).
 - ⁷ [Infographic - Ukrainian grain exports explained](#) (European Council undated).
 - ⁸ [New shipping route under the Black Sea Grain Initiative](#) (Safety4Sea 29 August 2022).
 - ⁹ Jonathan Saul, [Ukraine setting up temporary shipping route after Russia exit - official letter](#) (Reuters 19 July 2023).
 - ¹⁰ RFE/RL's Ukrainian Service, [Panama-Flagged Ship Hits Russian Mine In Black Sea, Injuring Two](#) (Radio Free Europe 28 December 2023).
 - ¹¹ See generally [International Maritime Organization](#).
 - ¹² Jonathan Saul, [Ukraine setting up temporary shipping route after Russia exit - official letter](#) (Reuters 19 July 2023).
 - ¹³ [Ukraine Asks Romanian Port to Allow Ship-to-ship Grain Transfers](#) (Marine Link 04 January 2024).
 - ¹⁴ [Romania upgrades Black Sea port infrastructure to bring in more Ukrainian grain](#) (Reuters 08 September 2023).
 - ¹⁵ George Allison, [Two Ukrainian warships train together off Scottish coast](#) (UK Defence Journal 22 January 2023).
 - ¹⁶ [Minesweepers "Chernihiv" and "Cherkasy" have already left the port of Scotland](#) (Ukrainian Shipping Magazine 16 June 2023).
 - ¹⁷ Danica Kirka, [UK sends 2 minehunters to Ukraine as Britain and Norway seek to bolster Kyiv's navy in the Black Sea](#) (AP News 11 December 2023).
 - ¹⁸ [Two Retired Royal Navy Minehunters Sold to Romania](#) (Naval News 29 September 2023).
 - ¹⁹ Royal Navy, [Equipment / Ships Sandown Class](#) (undated).
 - ²⁰ [Minesweepers "Chernihiv" and "Cherkasy" have already left the port of Scotland](#) (Ukrainian Shipping Magazine 16 June 2023).
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UK Arms Diplomacy and International Law on the Black Sea

Leveraging Türkiye's Treaty Obligation to Deny UK Minehunters Access to the Straits

By LJ Howard

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