

Sanctions based on imaginary wrongdoings

2025-10-26: Ole K. Fostad, skyggekrigen.no

When the EU sanctioned the Russian shipping company Murman SeaFood, it was not obvious that Norway would follow suit. It could jeopardize the cooperation with Russia in managing the Northeast Atlantic cod and other fish species. The sanctions were also almost exclusively based on alleged wrongdoings by the trawler Melkart-5 carried out in Norway. The Norwegian police investigated the damage to the fiber cable to Svalbard and found no wrongdoing. Nevertheless, this was used as basis for the sanctioning. What was going on?



Melkart-5. Photo: Andrey Roman, Murman SeaFood

The sanctioning of Murman SeaFood was based on the premise that one of the company's vessels, the "Melkart-5", had been in the vicinity of an ongoing military NATO exercise, had regularly been close to Norwegian critical infrastructure and military sites, navigated in a highly unusual manner in close proximity to an underwater cable in the Norwegian part of the North Sea and crossed the cable a number of times just before the cable was seriously damaged. The crew also violated shore leave regulations and were caught secretly inspecting a bridge critical to

military logistics, and the Russian maritime doctrine from 2022 allowed civilian vessels to be used by Russian military forces in peacetime. All this according to the EU regulation.¹

This seems disturbing, but also a bit strange. One strange thing is that no underwater cable has been damaged in the Norwegian part of the North Sea. However, Melkart-5 is known to have been nearby when the fiber cable to Svalbard failed. And this happened in the Greenland Sea on the west coast of Svalbard. The North Sea is very far from Svalbard.

How could the EU Commission make such a mistake?

I contacted the Deputy Director of Murman SeaFood, Andrey Roman, to ask if he had information that could shed some light on the case. He told me that they had asked the European Commission to provide them with documentation showing the basis for the sanctions. They received this, but to their astonishment, it was only excerpts from articles written by journalists. He also asked me a question about an issue in the material that he did not understand: Is the naval base Haakonsværn located close to Forsøl just east of Hammerfest?

This was astonishing and it gave me the opportunity to investigate the basis for the sanctions just by looking at what has been published. I was particularly interested in how the Norwegian Ministry of Foreign Affairs had acted because the Norwegian police investigated the damage to the fiber cable to Svalbard and found that nothing wrong had been done. And in Kirkenes the crew from Melkart-5 was fined. Did that really qualify for sanctions? What kind of information did the Ministry and the Cabinet have access to allowing them to overrule their own prosecutorial authority by imposing sanctions based on these events?²

The review here shows that the basis the EU and the Norwegian government have used to justify the sanctions is based on a flawed foundation. Let's start the walk-through:

The Svalbard fiber cable damage

“It's a pattern of movement that looks completely illogical for a trawler. Now you could say that there must have been an insane amount of fish there, but with over 130 passages in a fairly limited area, so... Now, I'm not a fisherman, but to me it doesn't look like regular trawling activity,” shipping agent and local politician for the Liberal Party, Terje Aunevik said in “The Shadow War”.³

Katarzyna Zysk, a professor at the Norwegian Defense Collage,⁴ told Bloomberg that the tracks after Melkart-5 was “extremely unlikely and unconventional” behavior and that “the probability that this was intentional damage is very high”.⁵

The international legal framework governing submarine cables is the 1884 Convention for the Protection of Submarine Telegraph Cables⁶ and the 1982 United Nations Convention on the Law of the Sea (UNCLOS).⁷ The UN Convention on the Law of the Sea is based on the 1884 Cable Convention and is considered the current legal regime for submarine cables. This view is reinforced by the fact that the 1884 Cable Convention has been ratified by 47 countries, while the UNCLOS has been ratified by 170.

The UNCLOS defines “pollution of the marine environment” as “... obstruction of maritime

activities, including fishing and other legitimate uses of the sea”.⁸ To prevent and reduce pollution, states shall use the most appropriate means at their disposal according to article 194.⁹

In the early 1980s, British Telecom identified that they could achieve good protection against damage to submarine cables from trawling and acceptable protection against anchor damage by burying the cable 60 cm below the seabed.¹⁰ As a consequence, in 1986, they created a new plough design for burying cables on the seabed. This led to the standard practice of burying all fiber cables in waters shallower than 1000 m to protect them from damage from fishing activity, and to ensure that fishing activity was not impeded.¹¹¹²

The International Cable Protection Committee (ICPC) provides guidelines for how submarine cables should be laid. After the location of the route and where the cable is to be buried is determined, the seabed is surveyed and mapped in detail. Accurate sea depth is measured with multibeam echo sounders and the seabed along the route is imaged with side-scan sonar. Where the cable is to be buried, the conditions under the seabed are mapped with high-resolution seismic profiling equipment and bottom samples are taken. After the cable is laid, the burial is inspected by an underwater robot (ROV). The underwater robot can also bury the cable using a high-pressure water-jet if necessary.¹³

The Svalbard fiber was buried 2 meters below the seabed from Longyearbyen and out Isfjorden and Isfjordrenna and down to a depth of 1600 meters in the continental slope.¹⁴ This ensured that it was very unlikely to be exposed to damage from fishing activity. The burial also made continued fishing in the area unproblematic.

I asked a captain on a trawler how he assessed the tracks left by Melkart-5 in Isfjordrenna. He said that the tracks were completely normal. When a trawler finds fish, the extent of the fish population is shown on the echo sounder, and the vessel trawls back and forth over the fish. Sometimes the fish stand still in the same place. And it is completely normal to trawl over fiber cables, no one cares about it.

The UN report “Undersea Cables and the Ocean” from 2009 states the same:¹⁵ “Many modern cables are buried more than 60 cm into the sediment from shore down to water depths of up to 1,500 m, so contact with normal fishing gear is highly unlikely. Even with cables lying on the bottom, trawl contact with the seabed may be light enough for the gear to pass over the cable with no discernible contact. Firmer contact may occur if a heavy trawl door, ground gear or even mid-water equipment lands on, or scrapes across, a cable lying on rocks or other hard bottom. During such contact, the armour may provide enough protection to avoid damage.”

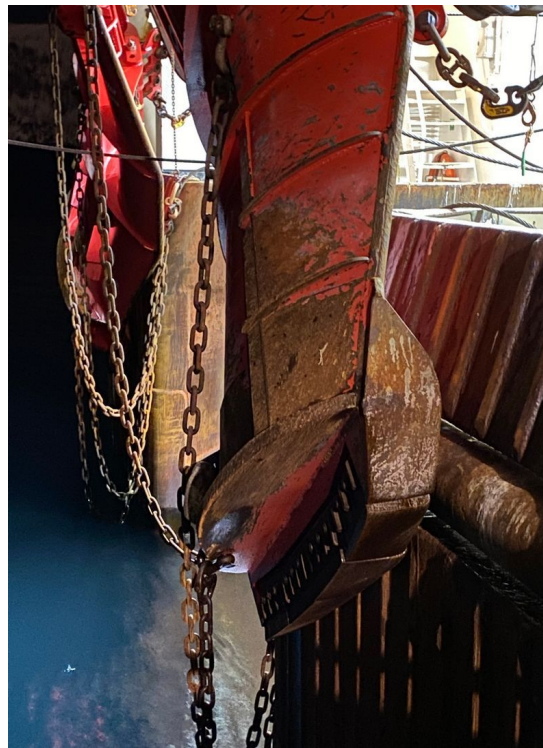
“If a piece of fishing gear or anchor actually hooks or snags a cable, the likelihood of damage is far greater. Cable damage by bending, crushing and stretching can occur long before the cable breaks. This is one reason why cable companies discourage mariners from using anchors, grapnels or other equipment to drag for lost or unmarked gear near cables. In many areas, normal fishing gear may present almost no risk, but as soon as a grapnel is deployed to retrieve lost gear, the risk becomes extreme.”

Northeast Arctic cod have grazing area on the western side of Svalbard.¹⁶ During the Institute of Marine Research’s expedition with the R/V Helmer Hansen in 2017, the echo sounder survey

showed a significant amount of cod in the outlet of the Isfjordrenna where Melkart-5 crossed the cable.¹⁷ So it is not unlikely that there actually were an “insane amount of fish” there.

From the images shown by NRK in the “Shadow War”-series, we can see that Melkart-5 used semi-pelagic trawl doors.¹⁸ Andrey Roman at Murman SeaFood confirmed this. The trawl captain I spoke with said that unlike traditional bottom trawl doors that rely on friction against the bottom, semi-pelagic doors use hydrodynamic forces to keep the trawl open. This means, among other things, that they do not need to be adjusted during changing seabed conditions, and that they have a significantly smaller footprint. For example, the seabed is looser during a full moon, which creates problems when using traditional bottom trawl doors. Semi-pelagic doors handle this without needing adjustment of the equipment. The doors normally do not go deeper than 10 - 20 cm into the sediment.

A semi-pelagic trawl door is unsuitable for burrowing. 2 meters below the seabed is out of reach. The door would also have been severely deformed if, against the odds, it by accident had managed to plow that deep, according to a trawl door manufacturer I spoke with. In the pictures of the Melkart-5 trawl doors that NRK showed in “The Shadow War” series, there were no such damage. Space Norway, the owner of the cable, inspected the seabed in Isfjordrenna with an underwater robot (ROV) and found grooves on the seabed that could have been made by a trawl. However, they stated that the grooves did not reach the depth where the cable was buried.¹⁹



Picture of the trawl doors of Melkart-5 in Båtsfjord in January 2022. They show no signs of being deformed. Photo: The Norwegian Police.

After the fiber connection was severed on January 7, the Norwegian Coast Guard asked the vessels fishing near the cable to leave the area. Melkart-5 sailed to Båtsfjord on January 13 and landed mainly cod. The captain and the navigator were questioned by the Norwegian police, but the investigation found no evidence of any wrongdoing either by Melkart-5 or anyone else.²⁰

There is no information in the case suggesting that the trawling across the cable caused the damage. Also, the information known in advance does not give reason to believe that it would be possible, making damage by intention a very far-fetched conclusion. If the trawling did contribute to the damage to the cable, it would have been because the cable was not buried as expected. That however, is the responsibility of the cable owner.

Repair of fiber optic cables on the seabed starts with the cable repair ship pulling a grapnel, a dredge-like hook with a sharp blade, across the cable, cutting it.²¹ During the Cod War between Iceland and Great Britain, the Icelandic Coast Guard used a similar method to cut the trawl wire on British trawlers.²² If someone intends to cut submarine cables, this is a simple, well-known and well-tested method that works excellently.

It is an absurd conception that intelligence officers sitting in an office somewhere in Russia should come up with the idea of destabilizing the West by pulling a semi-pelagic trawl door across a fiber cable buried 2 meters below the seabed in the Isfjorden channel from a trawler with the AIS transmitter switched on. It is also completely unreasonable to claim that this could have been planned sabotage and destabilization activity, as the EU and the Norwegian government are doing with the sanctions. It is tantamount to claiming that you were planning to sabotage a water pipeline buried 2 meters below the lawn by operating a rotary tiller. It is just not possible.

Based on the UNCLOS regulations, the recommended practices from the International Cable Protection Committee (ICPC), the UN report on submarine cables and the ocean, the Institute of Marine Research's expedition with the R/V Helmer Hansen which showed significant amount of cod in the Isfjordrenna, the assessment of the captain on a trawler, and the absurdity of the sabotage accusation, I would say that Aunevik and Professor Zysk are wrong. There was nothing "illogical" or "extremely unlikely and unconventional" about the behavior of Melkart-5 in this case.

Professor Katarzyna Zysk told Bloomberg that when she combined the extremely unlikely and unconventional behavior of Melkart-5 with "our knowledge about Russia using civilian trawlers for intelligence operations", "the probability that this was intentional damage is very high."

"Kyst og Fjord" has shown that NRK manipulated the presentation in the "Shadow War" TV-series where NRK erroneously claimed that they had shown that 50 civilian Russian vessels could have been engaged in espionage.²³ We found normal explanations for all the AIS tracks that NRK claimed were inexplicable and which they therefore believed gave reason to suspect espionage. The Norwegian domestic intelligence service (PST) claimed that the police had found an old military radio aboard two trawlers in Kirkenes that could both send and receive military messages. They claimed that this reinforced the suspicion of espionage from civilian vessels. It was easy to show that the radio was an ordinary radio receiver made for the Soviet fishing fleet. NRK and PST's accusations of possible espionage from civilian vessels were baseless.

As a consequence, Professor Zysk does not have evidence supporting the claims she made to Bloomberg about Melkart-5.

“Less than 10% of cable failures appear in the media out of the 500 per year. It is not uncommon to find that such coverage is biased with propaganda mixed with vague information, turning a simple fishing trawler incident into a massive conspiracy, followed by geopolitical recriminations, inconclusive investigative reports, or even misleading information for an untrained eye in the submarine cable industry”, Andrés Fígoli, former director and member of the International Cable Protection Committee, ICPC, wrote late last year.²⁴ That is an apt description of the portrayal of the damage to the Svalbard fiber.

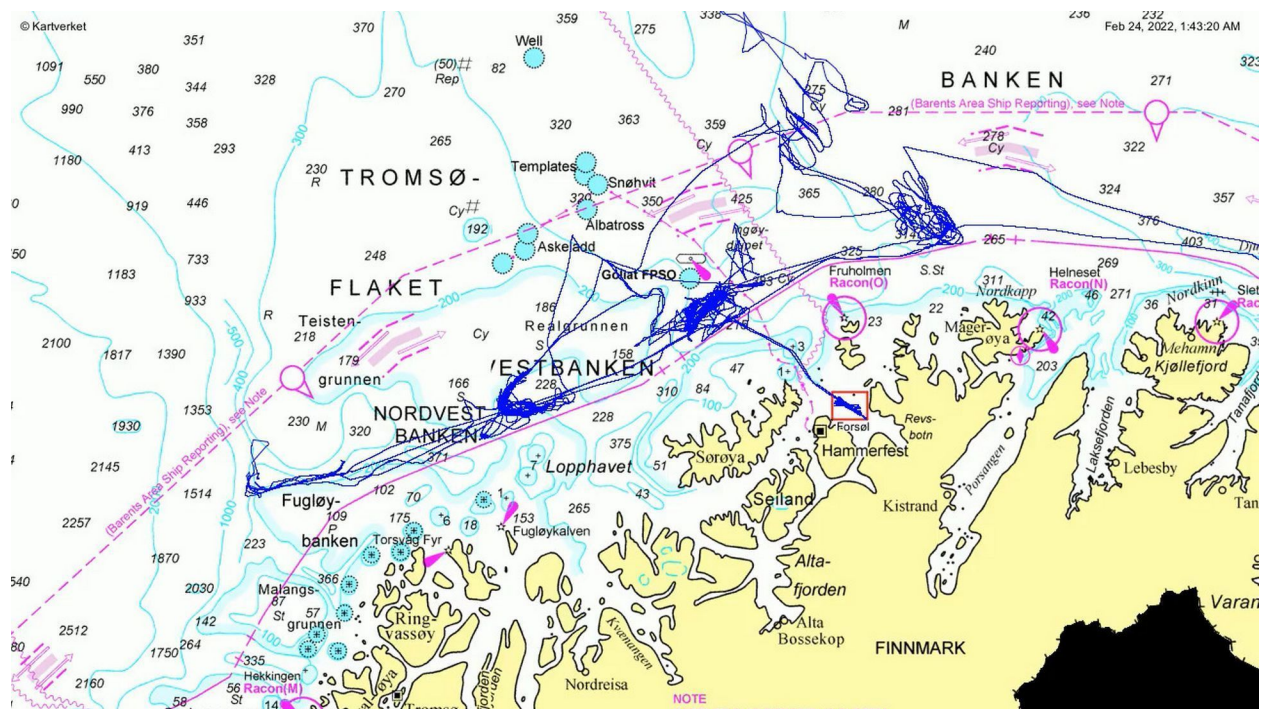
Critical infrastructure, military sites, and NATO exercise

The EU claimed that Melkart-5 repeatedly had shown atypical behavior inconsistent with commercial fishing activity. This included presence near an ongoing NATO military exercise and regular presence near Norwegian critical infrastructure and military sites.

The only article that has claimed that Melkart-5 was close to a NATO exercise is from NRK: “One Russian fishing trawler has crossed two important submarine cables more than 140 times”.²⁵ Here, NRK wrote that “on March 12th they appeared north of Tromsø, at Fugløybanken. A couple of days later Norway’s major winter exercise, Cold Response, starts.”²⁶

The article contains a list of “tracks of the fishing trawler” that NRK give the impression are suspicious. The offenses that NRK seems to believe the vessel has committed are in addition to its “appearance” on Fugløybanken, that in the period from January 16 to February 21; it crossed the pipeline and the fiber cable to the Goliat and Snøhvit fields and the fiber cable to Johan Castberg several times, that it sailed several times south and west of the Goliat field, that the AIS tracks disappeared for long periods of time, and that between January 23 and 25 it sailed back and forth in the fjord outside Forsøl, east of Hammerfest. The list ends with the incident in Kirkenes where the crew of the trawler was fined for violating the shore leave regulations. The article covers everything the EU has stated as the reasons for the sanctions against Murman SeaFood. Actually, it looks as if the sanctions may have been based on this article.

Melkart-5 crossed the fiber and gas pipeline to Snøhvit 8 times, and the fiber to Johan Castberg 4 times. Only two of the passages were at a speed consistent with trawling, the rest were at speeds above 8 knots, that is, without the trawl deployed.²⁷



AIS tracks from Melkart-5 from 16 January to 21 February 2022. Snøhvit and Goliat are located in the middle of rich fishing grounds. In only two of the 12 passages of pipes and cables that NRK insinuated were suspicious the vessel kept a speed consistent with trawling. Using a kind of associative wordplay, the EU connected the circling of Melkart-5 outside Forsøl to the Haakonvern submarine base in Bergen. AIS data is missing for a handful of periods of 30 - 50 minutes. The trawler was not close to any oil- or gas installations when the data loss happened. A lot of other vessels in the area were also experiencing similar data loss.

The Norwegian Meteorological Institute issued a series of storm warnings valid for Sunday 23 and Monday 24 January 2022. In the coastal and fjord areas of Finnmark, very strong wind with violent storm in the gusts and large amounts of precipitation were expected.²⁸ In several locations along the coast, the institute warned of heavy icing on boats and ships. The icing could cause small boats to sink, and for larger vessels there was a risk that rescue equipment and radio communication equipment would be damaged.²⁹

Melkart-5 sought shelter in the fjord outside Forsøl east of Hamerfest during this storm.

Before foreign vessels are allowed to enter Norwegian territorial waters, they have to obtain a permission from the Norwegian Armed Forces Operational Headquarters (FOH). FOH assigns a defined area where the vessel is allowed to shelter. This enables FOH to control where the ship approaches the coast, a control they lose if the vessel has to declare an emergency due to the bad weather. In the assigned area, the vessel either sails slowly back and forth, or deploys its anchor until the weather improves, while periodically reporting to the FOH.³⁰

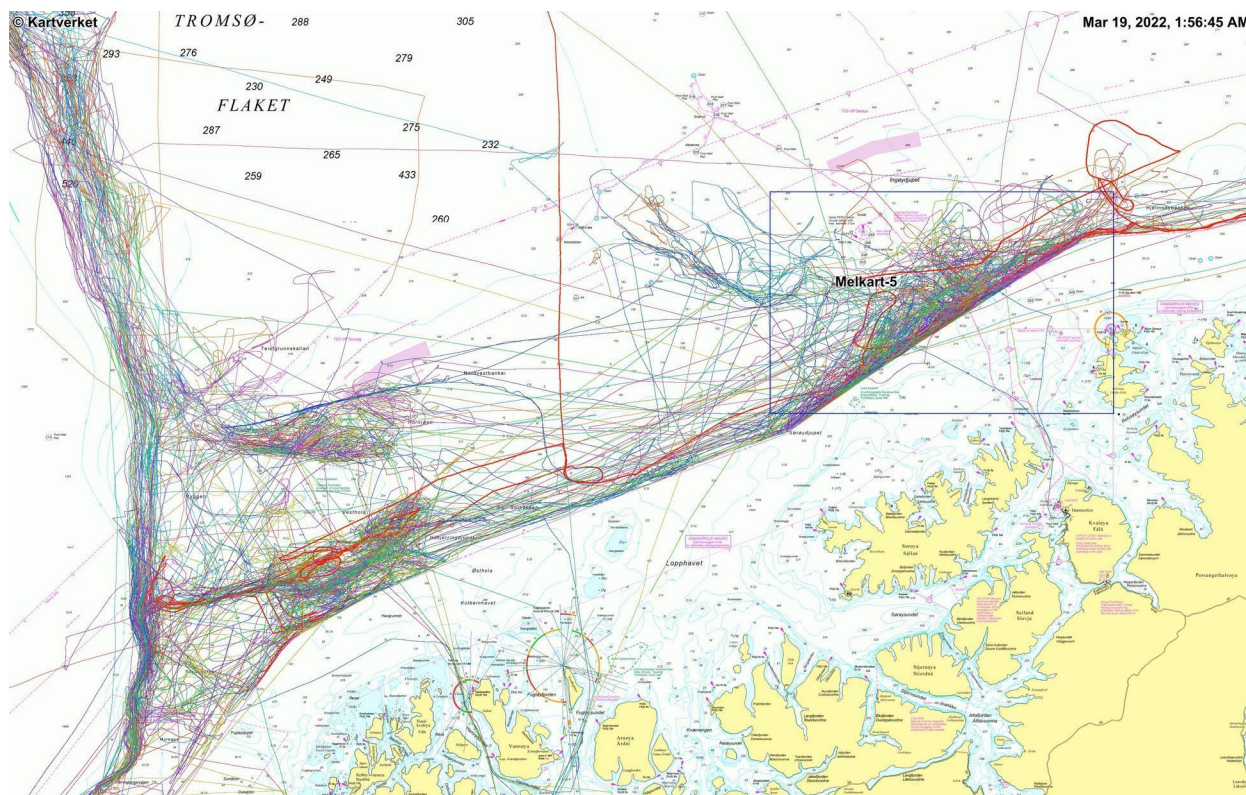
In 2021, NCC was selected as the contractor for the “Hammerfest Clean Harbour” project. They were to dredge the fairway and outside the fishing dock at Forsøl.³¹³² Just before Christmas in 2024, the Norwegian and German defense ministers laid down the foundation stone for a new

submarine maintenance facility at Haakonssvern outside Bergen.³³ The contract to build the facility was awarded to NCC. NCC announced in a press release that the experience from Hammerfest and Forsøl would be useful during the construction of the submarine base.³⁴

From this, the EU concluded that the circling of Melkart-5 off Forsøl during the storm in January 2022 was inconsistent with commercial fishing activity. The trawler showed an abnormal interest in a Norwegian military facility, the naval base at Haakonssvern outside Bergen. Not even the decision to build the submarine maintenance facility was taken when the trawler circled off Forsøl. And, it is located 1,500 kilometers away as the crow flies. But, the EU sees a sinister connection: Melkart-5 and Forsøl, Forsøl and NCC, NCC and Haakonssvern, Haakonssvern and military base.

According to the Institute of Marine Research, the spawning migration of the Northeast Arctic cod starts in the Barents Sea and proceeds along the coast of Finnmark and down south to the spawning areas in Ofoten and Vesterålen. This happens in March-April - every year.³⁵ Melkart-5 is fishing for cod and haddock according to the shipping company. Could this be related to the trawler “appearing” on Fugløybanken in mid-March?

To find out why NRK thought the tracks from Melkart-5 on Fugløybanken were suspicious, I looked at them during the week from March 12 to 19. I also looked for other traffic in the area to see how the tracks from Melkart-5 differed from the other trawlers and by that indicating undue interest in the NATO-exercise.

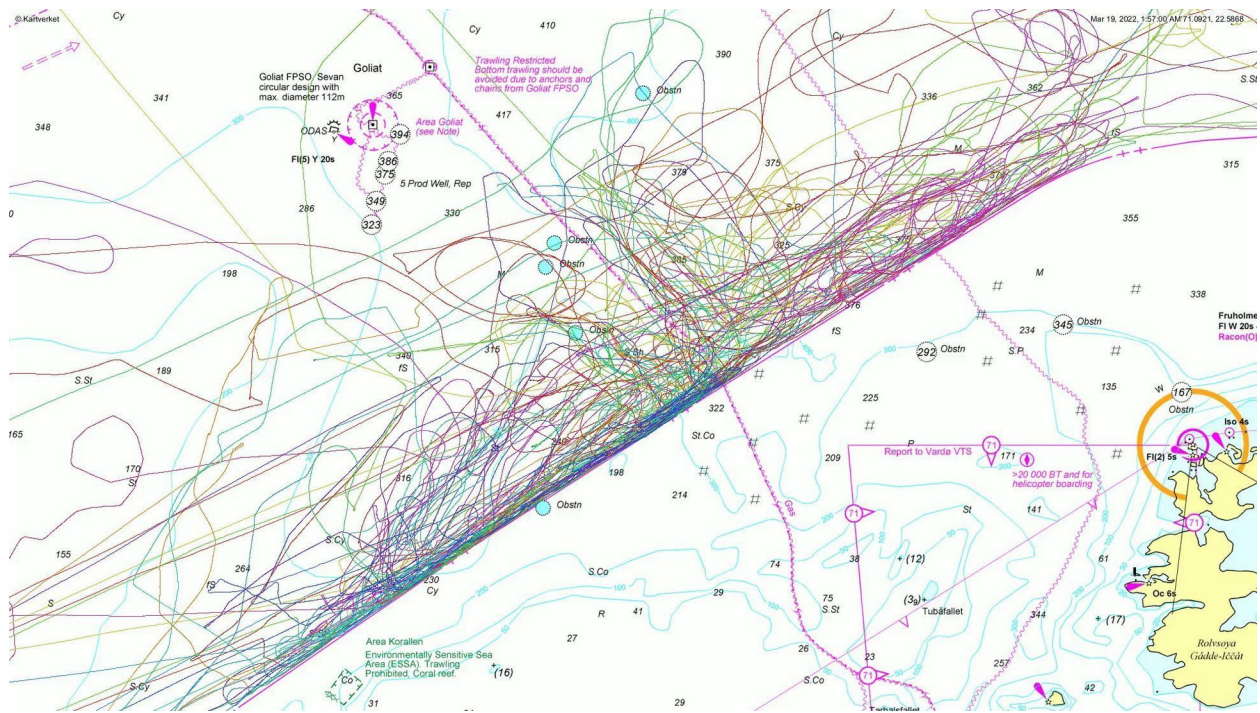


AIS tracks from Melkart-5 along with around 70 other trawlers during the week from 12th to 19th March. It is difficult to see what criteria NRK used to justify that Melkart-5 was showing undue interest in the Cold Response exercise beginning on 14th March. It looks like the suspicion is based on nothing more than the journalists' bias.

As we can see, Melkart-5 was not alone on Fugløybanken. In the video above you can see the AIS tracks from around 70 trawlers, about 40 Russian, the rest are Norwegian and Icelandic. There were also trawlers from other nationalities in the area that are not shown. The tracks from Melkart-5 are located in the same areas as the tracks from other trawlers, strongly suggesting that it was doing exactly what it was designed for - fishing. Interpreting this as something sinister based on the AIS-tracks is imagination.

The critical infrastructure that the EU, with the help of NRK, believes that it is suspicious that Melkart-5 has been in the proximity of, are oil and gas installations such as Snøhvit and Goliat, which are located in the middle of rich fishing grounds. It is not surprising then that there are trawlers there. Melkart-5 was not alone.

The tracks also show that many of the trawlers sailed back and forth over the same spot, just like Melkart-5 did in the Isfjordrenna west of Svalbard. A great many trawlers do this over the gas pipeline to the Snøhvit field and over the fiber cable to Johan Castberg. This is not a problem because the pipes and cables are buried so that they are not damaged by the fishing activity, and at the same time they do not hinder the fisheries, just as the UNCLOS require.



12 trawlers from the figure above in the same period, 12 - 19 March. Note that both the pipeline and the cables are crossed numerous times by the trawlers. If we take a look at the red text on the map next to Goliat we see that it says “Trawling Restricted. Bottom trawling should be avoided due to anchors and chains from Goliat FPSO”. The areas around Goliat with restrictions are circular, one with a diameter of 2 nm and one of half a nautical mile. Otherwise, there are no restrictions on trawling in the area above the gas pipeline and fiber to Goliat and Snøhvit or above the fiber to Johan Castberg.

Shore leave with sabotage?

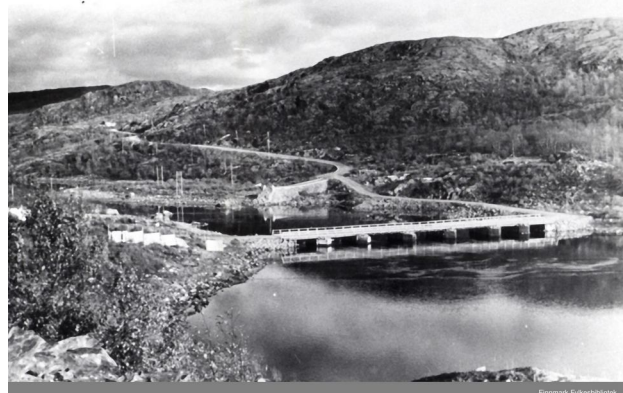
“The Barents Observer” reported in August 2022 that the crew of the “Melkart-5” launched a small boat and headed into the Langfjord from Kirkenes towards Strømmen Bridge. According to the article, the Chief of Police in Finnmark confirmed that the crew of the trawler were fined for violating the shore leave regulation by driving a small boat to Strømmen bridge.

The journalist also wrote that in order to stop invading forces, the Norwegian defense forces were tasked with blowing up this bridge during the Cold War. He continued that, unlike Russian cars driving along the main road from the border crossing with Russia at Storskog, fishing vessels were not inspected by the customs authorities in Kirkenes. The vessels could therefore bring explosives, mines and other harmful equipment to the Strømmen bridge or they could use these weapons against the garrison in Sør-Varanger located on the nearby hill.³⁶

Norwegian forces were supposed to blow up the bridge to delay invading Soviet forces during the Cold War, but now the Russians are going to do the job of the Norwegian defense forces and delay their own advance.³⁷ There is reason to doubt that analysis.



Strømmen Bridge was blown up by German forces as they retreated from Petsamo during “Operation Northern Lights” in 1944. Photo: Unknown photographer/Norsk vegmuseum, Statens vegvesen



Soviet forces built a makeshift bridge over the Langstrøm as they advanced in 1944. Photo: Finnmark Fylkesbibliotek, license: CC BY-NC

The bridge is located 15 minutes by car, 3 hours walk from the border with Russia.³⁸ In 1944, German forces blew the bridge up when they retreated³⁹ and the advancing Soviet troops built a makeshift bridge.⁴⁰⁴¹

The article states that the crew of Melkart-5 sailed the small boat to Strømmen bridge on July 17. The AIS tracks from the trawler show that the vessel did not arrive in Kirkenes until the following day, July 18. The same day a RIB, a boat similar to the small boat from Melkart-5,⁴² sailed slowly under Strømmen bridge before continuing on to Kirkenes.⁴³ The RIB and the small boat from Melkart-5 could be mixed-up by an observer.

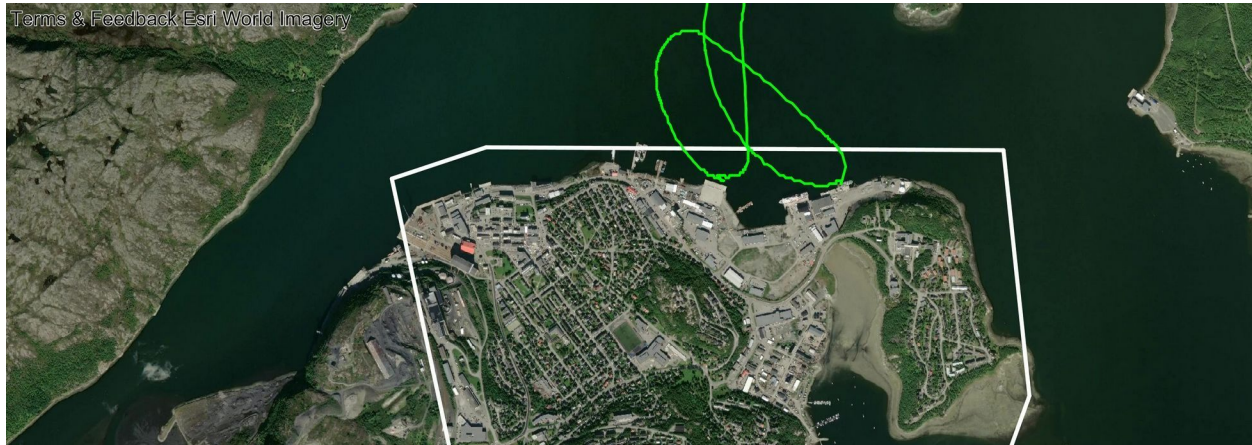
The crew from Melkart-5 were not apprehended by the police at Strømmen bridge. The police payed their visit to the vessel bringing the fine the next day, 19 July, the day before the trawler left Kirkenes. The Chief of Police must have based the claim that the crew sailed to the bridge on information from a third party. This gives reason to suspect that the information from the Chief of Police may have been incorrect.

I have asked the police in Kirkenes for access to both the fine and the basis for the fine.⁴⁴ In particular, I have asked to be informed of the time when the boat from Melkart-5 was observed at the bridge and whether there are any photos or video recordings that show this. That will make it possible to determine if this is a case of mixing-up boats, and whether image evidence shows that the Russian crew examined the bridge in a way consistent with sabotage planning.

Under the bridge there is a tidal current with an opportunity for salmon fishing. Russians are known to enjoy going out into the countryside to barbecue and fish in their spare time. So, there is a possibility that they could just be fishing - if they were at the bridge at all.

I reached out to the captain of Melkart-5 to get his side of the story. He explained that they tested the engine of the small work boat after repair. When the police officer showed up on the vessel, he wrote a 5 000 Norwegian kroner (490 Euro) fine to him for violation of the shore leave regulation. “That’s when he gave me a map showing the boundaries where Russian sailors could

be. So, if, while test running the boat's engine after repairs, it moved a few meters away from the trawler towards the fjord, that would be considered as a violation. I agreed with that. There was no mention of entering a restricted area, and no mention of any bridge either. It seems the journalist made that up later."



Kirkenes harbor: The green line is the AIS-track from Melkart-5 in July 2022. The white line is the demarcation of the shore leave area towards the sea shown in the document the police gave the captain of Melkart-5 when he was fined. The police station in Kirkenes is a four story building located at the seafront overlooking the harbor. However, it is not possible to see the Strømmen bridge from the building.

The police have not responded to the information access requests as they are obliged to.⁴⁵ The request was sent to the appeals body, the State Attorney's Office in Troms and Finnmark, after the prescribed reminders.⁴⁶ They are not responding neither.

The shore leave paragraph in the Immigration Regulations, § 4-19, states that the crew is allowed to stay in the port where the vessel is docked and in adjacent municipalities. And the Chief of Police can determine geographical limitations to this right. The regulations also have a separate section that lists which violations of the regulations that are subject to punishment. The shore leave paragraph is not mentioned.⁴⁷

Back in 2014, the Chief of Police in Eastern Finnmark police district prepared a document showing the limitations of the shore leave area. The document has text in both Norwegian and Russian, and a map showing the extent of the area where the crew is permitted to move around. In the text, the Chief of Police refers to the aforementioned shore leave paragraph and states that it may result in fines and deportation if the crew is found outside the area.⁴⁸

In November 2022, after the fine was issued, the Norwegian Police Directorate sent a letter to all the police districts encouraging them to consider tightening the shore leave regulations.⁴⁹ The Directorate commented the existing shore leave regulation like this: "The first paragraph, third sentence, gives the Chief of Police (as border control authority) the authority to determine "geographical limitations" of the shore leave area. The provision does not provide further rules for the decision, but must be understood according to its content as an authority for local regulations."

According to the Public Administration Act, a regulation must state that it is a regulation.⁵⁰ The document the Chief of Police in Finnmark has been using to enforce the shore leave regulation since 2014 does not state this. There are also formal requirements for dissemination and consultation that apparently have been skipped too. The document does not fulfill the criteria needed to be a valid Norwegian regulation.

In May 2023, almost a year after the fine was issued to the captain of Melkart-5, the “Regulation on the right of seafarers to shore leave, Sør-Varanger municipality, Troms and Finnmark” came into force.⁵¹ It was the first local regulation regulating shore leave in the municipality. The police in Kirkenes had then enforced restrictions in the shore leave rights for almost 10 years without any legal authority.

The crew of Melkart-5 did nothing wrong when they perhaps sailed a small boat to Strømmen bridge. It was the police in Kirkenes that violated the law when they fined them without a warrant for an offense that is not punishable. It would probably be a good thing if the Chief of Police ensures that the fine is reimbursed.

The Russian maritime doctrine

“There has been a significant increase in greyzone tactics by civilian ships. This is now official policy in Russia,” Professor Bueger of the University of Copenhagen⁵² said in an interview with the magazine “Follow The Money.”⁵³ He continued: “It is described in black and white in the new maritime doctrine drawn up in 2022. Civilian ships, such as fishing boats, container ships and oil tankers, must cooperate in military missions.”

“You just need to read the Russian maritime doctrine from July last year. It says that the Russian government can use all existing ships, no matter ownership or civilian or military status,” Ståle Ulriksen at the Naval Academy⁵⁴ claimed on “Dagsnytt 18”.⁵⁵ The EU and Norway⁵⁶ used the doctrine as part of the justification for imposing sanctions on Russian fishing vessels.⁵⁷ They believe it allows civilian vessels to be used by the armed forces in peacetime.

But, does the doctrine really state this?⁵⁸

I have followed Ulriksen’s instructions and tried to find what Professor Bueger claims is stated in black and white, to no avail.

The analysis published in Kyst og Fjord shows that the claim that the doctrine facilitates the use of civilian vessels for “gray zone activity” and espionage in peacetime does not hold scrutiny. An observed or perceived increase in such activity cannot be inferred from what is written. And neither can the claim that civilian vessels and crews can be used by the armed forces at any time in peacetime.⁵⁹

I forwarded the debate article to both the researcher at the Norwegian Naval Academy, Ståle Ulriksen, and to Professor Bueger hoping that as academics they were able to support the view they have advocated. Neither of them has responded.

The role of the press

The EU based the sanctions on articles written by journalists. But where did the information come from? Who wrote the articles?

The Norwegian Institute of International Affairs (NUPI) commented, referring to the NRK article “The Cable Mysteries”,⁶⁰ that Norwegian media were quick to see the communication loss in the fiber cable in light of the political tension between Russia and NATO, and to give in to theories claiming the damage was done intentionally.⁶¹ The analysis above shows that the NRK article “One Russian fishing trawler has crossed two important submarine cables more than 140 times”, can be added to that category.

Speculations implying that the damage was done intentionally by the Russians was also prominent in the TV series “The Shadow War” produced by the Norwegian public broadcaster, NRK, in cooperation with the other Nordic broadcasters. In “The Shadow War” and the accompanying article “The spy ships”, NRK claimed that they had uncovered possible espionage from 50 civilian Russian vessels. In addition, they reported that the Norwegian domestic security service (PST) claimed that the discovery of military radios onboard two trawlers by the police in Kirkenes reinforced the suspicion of espionage from civilian vessels.⁶² And, the editor of “The Barents Observer” speculated wildly about explosives and sabotage in connection with the shore leave fine issued to the crew of Melkart-5.

The information from NRK and “The Barents Observer” was sensational and was widely reported in the international press. Many international articles referred to what was described as the thorough coverage of the espionage activities of civilian Russian vessels by the Nordic public broadcasters.⁶³

The journalists in NRK made little or no effort to find alternative explanations to the preferred one, that the damage had been done intentionally by the Russians. If they had looked for alternatives, they would quickly have discovered that Melkart-5 was trawling along with dozens of other trawlers on Fugløybanken when the NATO exercise Cold Response started, that the vessel did not have the trawl deployed during most of the cable crossings along the Finnmark coast, and that trawling across buried fiber cables is quite common, etc.⁶⁴

The grooves that NRK showed images of on the seabed off Svalbard in “The Shadow War” were nowhere near the depth at which the fiber was buried, according to the cable owner, Space Norway.⁶⁵ And in the article “The Cable Mysteries”, NRK stated that the cable was buried two meters below the bottom of the sea. The conclusion the journalist drew when the tracks were shown was an attempt to portray the findings as suspicious. She said: “The cable breaks have shown us that Russian fishing trawlers may have a role that is about more than fisheries ... where the laws are inadequate.”⁶⁶

It is incredible that she not even mentioned that the information she presented on screen made it very unlikely that the trawler could have damaged the fiber cable, or at least, that she as a journalist did not ask the obvious question: How could the trawl physically have damaged the buried cable, two meters below the seabed?

Previously, we have shown that NRK’s findings about unexplained AIS-tracks and military

radios on Russian trawlers were wrong.⁶⁷ Nevertheless, the editor believed that NRK had shown that 50 vessels could have been spying. This was surprising since the basis for the claim was gone.

To support his view, the editor used the Russian maritime doctrine from 2022 and the threat from Russian sailors with a Norwegian pilot certificate.⁶⁸ However, only three of the AIS-tracks from the 50 vessels that NRK claimed could have been spying were from the time after the doctrine was published. In addition, these three vessels were inspected by Norwegian authorities without any suspicious findings. The supposed threat from Russians with a pilot certificates was that they could use their knowledge of the Norwegian coastline to assist the Russian armed forces in a possible future conflict.

The doctrine cannot have been the cause of the espionage that allegedly took place before the doctrine was issued. And the possible future threat from Russians with pilot certificates cannot justify accusations of espionage that has already taken place. The editor's arguments are not rational.

NRK inferred possible espionage from a very small sample of data. They looked at one trawler on Fugløybanken and found it suspicious that it was close to a military exercise. They looked at one trawler sailing near Snøhvit and Goliat and found it suspicious. They noticed or searched for what confirmed what they believed and ignored signs that didn't fit.⁶⁹ This way they found non-existing patterns.⁷⁰

The journalist from Danmark Radio (DR), Nils Fastrup, said in "The Shadow War" that his greatest concern was that KSAT in Tromsø would "shoot down the source's theory". When the satellite images showed that the Russian vessel *Sibiryakov* *wasn't* trying to mislead with its open position reporting, they interpreted this as support for the theory, without asking a single question about why the vessel openly reported its position if it intended to sabotage the Nord Stream pipeline as the journalists believed.⁷¹

It seems that confirmation bias led the journalists to convince themselves that the Russians were guilty. They believed they had gathered a lot of evidence to support the theory, while in reality they overlooked or ignored information that refuted it.⁷²

All of NRK's publications on espionage from civilian Russian vessels were made by only one editorial team, NRK's investigative editorial team in Northern Norway. The editorial team is led by the project editor, Robin Mortensen.⁷³ The article in "The Barents Observer" was written by the editor himself, Thomas Nielsen. These two editors appear to be responsible for the publications that the EU has used as the basis for sanctioning Murman SeaFood, both directly and through foreign media outlets reproducing the material they have published.

NRK is financed through the Norwegian state budget. "The Barents Observer" (IBO) is mainly financed by project funds from the Ministry of Foreign Affairs (UD), both directly and through the University of Tromsø, as well as through a smaller project from the Ministry of Defense. Only around 7% of the financing is sales revenue. IBO can almost be called the Ministry of Foreign Affairs' own newspaper.

Why were these two state-funded Norwegian media outlets primarily the ones that found erroneous patterns and biasedly directed incorrect suspicions at Russian vessels? Who were they trying to impress and what did they want to achieve?

What is shown may be reason for the owner of NRK, the Ministry of Culture and Equality, and the main financier of IBO, the Ministry of Foreign Affairs, to assess whether this journalism is in accordance with their mission, statutes and project awards.

The Ministry of Foreign Affairs, the Cabinet, and the EU

When EU Regulation 2025/965 with the sanctioning - “listing” - of Murman SeaFood appeared at the Norwegian Ministry of Foreign Affairs, it must have given cause for concern. One challenge was the risk that the cooperation with Russia in managing the shared fisheries in the Barents Sea could be impaired. Another oddity was that the EU placed the damage to the fiber cable to Svalbard in the North Sea. That is a mistake that loudly cries out incompetence.

The sanctions against Murman Seafood were mainly based on events that had taken place in Norway.⁷⁴

The EU claimed that Melkart-5 had undermined and threatened the security of the EU and of third countries, namely Norway, by participating in, and supporting actions aimed at interfering with critical infrastructure, including underwater infrastructure. They listed the break in the Svalbard fiber that they believed was located in the North Sea, the speculations of “The Barents Observer”, and they alleged that the trawler was regularly in the vicinity of Norwegian critical infrastructure and Norwegian military sites.

The Norwegian police investigated the damage to the fiber cable to Svalbard and found that no criminal offense had been committed, and the police in Kirkenes issued a 5 000 kr fine to the captain of Melkart-5 based on Section 4-19 of the Immigration Act, albeit without any legal authority. It is the Norwegian authorities who have the overview and the control of the shipping traffic in Norwegian waters, and who are best placed to know whether the trawler has shown atypical behavior near Norwegian critical infrastructure and military sites. It may appear like the EU has acted inappropriately when they imposed sanctions based on events taking place in Norway.

The EU regulation was issued as a Norwegian regulation by the Norwegian Ministry of Foreign Affairs.⁷⁵ This means that the ministry is obliged to ensure that the issue was as well informed as possible before the regulation was adopted.⁷⁶

There is reason to assume that the Ministry of Foreign Affairs has not obtained the basis for the sanctions from the EU. In the proposal for the Sanctions Act, the Ministry has assumed that the EU’s listing procedures are satisfactory. However, they note that even if Norway makes an independent assessment of whether the persons and entities should be listed according to Norwegian regulations, they will have limited insight into the process that led to the listings.⁷⁷

Therefore, to protect against arbitrary sanctions, the sanctioned person or entity has the right to appeal.⁷⁸ A reasoned, written complaint can be sent to the Norwegian Ministry of Foreign

Affairs.⁷⁹ The Ministry must assess whether the listing is well-founded in light of the comments/objections and any evidence submitted by the complainant. If the Ministry rejects the complaint, the rejection can be appealed to the Cabinet. And if an appeal is unsuccessful, the sanctioned person or entity also has the right to have the case tried in court.

A complaint will necessarily lead to a review of the basis for the EU sanctions. And as we have seen here, this material looks like it is based on the journalism of NRK's investigative editorial team in Tromsø and the wild speculation from "The Barents Observer". A kind of journalism that is completely unsuitable as a basis for a rational foreign policy.

It will therefore be very interesting if Murman SeaFood files a complaint, and if necessary takes legal action to be removed from the list. It will be a very, very challenging exercise to rationally justify why they should not be successful.

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