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The China Strategic Risks Institute (CSRI) is a non-profit, non-partisan research institute providing in-depth analysis of the risks and opportunities posed by the rise of the People's Republic of China. We aim for our research to be accessible to the general public, with recommendations for policymakers, international businesses and NGOs. The CSRI is not a political campaign or lobbying group.

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Contents

Contents	
Key point summary	4
Part One: China's grey zone tactics	5
What does China want from Taiwan?	5
The PRC's ramped up 'grey zone' tactics against Taiwan	5
Why does the grey zone matter?	11
Part Two: Mapping out scenarios for escalation	12
Scenario 1: Establishing a temporary no-fly zone in Taiwan's ADIZ	12
Scenario 2: Incursions into Taiwan's contiguous zone	13
Scenario 3: Major cyber-attacks on Taiwan's infrastructure	15
Scenario 4: Partial economic blockade or 'quarantine'	16
Scenario 5: Occupation of uninhabited outlying islands	17
Scenario 6: Seizure of larger outlying islands	17
Part Three: How can the UK respond?	20
Why do the PRC's grey zone tactics matter to the UK?	21
Building an anti-grey zone strategy	22
Policy Recommendations	23
(1) Raising the cost of the PRC's grey zone aggressions	23
(2) Strengthening Taiwan's resilience to grey zone coercion	25
(3) Re-affirming the international rules-based order	26

Key point summary

- The government of the People's Republic of China (PRC) is carrying out a range of grey zone activities to undermine Taiwan's autonomy, wear down its defensive capabilities and pressure its people into unification with the PRC.
- Grey zone activities allow the PRC to strengthen its position against Taiwan while
 minimising the risk of an international response. Recent examples include near-daily
 incursions of military aircraft past the median line, large-scale military drills and
 economic coercion.
- This paper maps out a range of scenarios where the PRC could escalate grey zone
 activities against Taiwan. International policymakers must be prepared for a full range of
 scenarios, from incursions into Taiwan's contiguous zone to a 'quarantine' of Taiwanese
 goods and occupation of outlying islands.
- The UK has a clear strategic and economic interest in maintaining peace and stability
 across the Taiwan Strait. Countering the PRC's unilateral attempts to alter the status
 quo through grey zone tactics is essential to de-escalating the risk of conflict and is in
 line with the UK's long-standing policy on the PRC and Taiwan.
- This paper presents an anti-grey zone strategy that seeks to deter further escalations by taking proportionate, timely and effective responses to the PRC's tactics, while also acting to strengthen long-term preparedness. This strategy consists of:
 - Raising the cost of the PRC's grey zone tactics: By enacting a series of targeted sanctions on PRC military companies, diplomatic statements and proportionate engagements with Taiwan in response to grey zone activities, the UK and its allies can help shift the cost-benefit calculus for Beijing to deter further escalations.
 - Strengthening Taiwan's resilience to grey zone activities: The UK can play an
 important role in supporting Taiwan's energy resilience and cyber-security
 through dialogues and deepened trade partnerships, as well as supporting its bid
 to join the CPTPP.
 - Reaffirming the international rules-based order: The UK and its allies can reinforce the international rules, norms and institutions that underpin stability in the region by upholding freedom of navigation and countering the PRC's attempts to exclude Taiwan from multilateral systems.

Part One: China's grey zone tactics

What does China want from Taiwan?

The PRC claims to exercise sovereignty over Taiwan, despite never having ruled the island. This claim is rooted in the Chinese Communist Party's (CCP) victory in the 1945-1949 Chinese Civil War, after which the newly established PRC claimed itself heir to the full territories of the preceding Republic of China (ROC) – including Taiwan. In reality, Taiwan has been a self-governing territory since the end of the Civil War, with the island becoming the seat of the defeated Kuomintang (KMT) nationalist-led ROC government in exile.

Exercising control over Taiwan is a stated goal of the PRC government. Successive leaders have described Taiwan as an 'inalienable part of China' and have refused to rule out the use of force to realise this. Under President Xi Jinping this rhetoric has been ramped up even further: Xi has described 'realising China's complete reunification' as an 'unshakeable commitment' and 'historic mission' of the CCP. This commitment to 'resolving the Taiwan question' is also a component of Xi's flagship vision of achieving the 'Chinese dream of national rejuvenation' by 1949, the centenary of the founding of the PRC.¹

To what lengths Xi will go to achieve this vision remains to be seen. The PRC is opposed to the status quo of Taiwan's de facto independence but has so far been unwilling to initiate outright military conflict to force a change. Instead, the PRC's approach has been characterised by escalating 'grey zone' coercion in an effort to increase the political, economic and military pressure on Taiwan to submit to unification.

The PRC's ramped up 'grey zone' tactics against Taiwan

Definitions of 'grey zone' activities vary, but broadly use the term to encapsulate the broad range of activities which fall in the murky space between peace and open conflict. The most effective grey zone activities fall just below the threshold of acts of war, maximising the coercive effect while making it difficult for the opponent to respond without escalating into outright war.

The PRC's deployment of grey zone tactics against Taiwan is broad and wide-ranging, with notable recent escalations including:

Incursions into Taiwan's air space: Like many countries, Taiwan operates a self-designated Air-Defence-Identification-Zone (ADIZ) within which aircraft are identified, located and controlled. In recent years, the PRC has operated near daily flights of

¹ Sacks, 'What Xi Jinping's Major Speech Means For Taiwan'.

military aircraft into Taiwan's ADIZ, with a total of 1,703 in 2023.² Around 41.3% of these passed the unofficial 'median line' dividing the Taiwan Strait. In April 2024, PRC fighter jets were estimated to be just 3 minutes away from Taipei before turning back.³ Notably, a growing number of incursions are conducted by Unmanned Aerial Vehicles (UAVs, drones), making up around 10% of the total. UAV flights present a new challenge as they can fly riskier routes that manned aircraft might avoid.

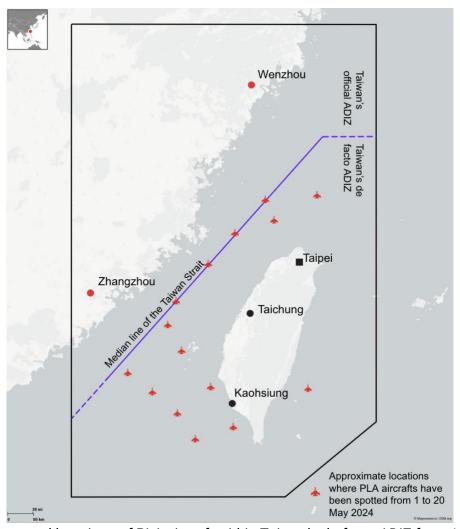


Figure 1: Reported locations of PLA aircraft within Taiwan's de-facto ADIZ from 1 to 20 May 2024^4

² Lewis, '2022 in ADIZ Violations'.

³ 鍾,'中國軍機迫近台灣3分鐘可抵總統府 分析指520前向候任總統賴清德施壓'.

⁴Note that each red aircraft symbol on the map can represent multiple aircraft at approximately the same location spotted on the same or different days. Generated with mapcreator io using aircraft location data published by Taiwan's Ministry of National Defense available at:

https://www.mnd.gov.tw/English/PublishTable.aspx?types=Military%20News%20Update&Title=News%20Channel

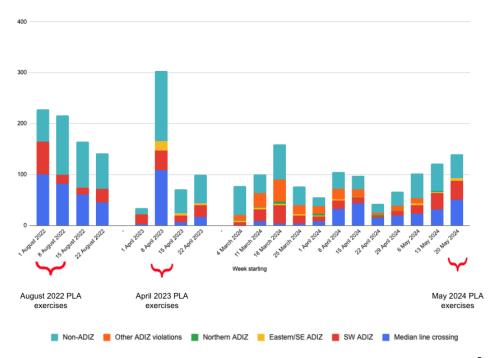


Chart 2: Weekly number of PLA aircraft reported around Taiwan in 2024⁵

Large-scale military drills: The PRC's People's Liberation Army (PLA) has staged three major military exercises near Taiwan in recent years in response to the visit of the then-US House Speaker Nancy Pelosi to Taiwan (August 2022), then-President Tsai Ing-wen's transit stop in the US (April 2023) and after the inauguration of President Lai Ching-te (May 2024). The peak of the August 2022 exercises saw 13 vessels and 68 aircraft reported around Taiwan, forcing numerous civilian flights to reroute or cancel.⁷ The April 2023 exercises saw the first ballistic missiles fired over Taiwan, and included a threatened three-day 'no-fly zone' north of Taiwan, though this was



Figure 2: Areas covered by the 'Joint Sword-2024 A' military drills, May 2024.⁶

⁵ 'Ministry of National Defense R.O.C.-News Channel'.

⁶ Xinhua, 'PLA Conducts Joint Military Drills Surrounding Taiwan Island'; 劉, '解放軍2024 「聯合利劍」演習 vs. 2022首度環台軍演 操演範圍縮小又西靠 — 上報 / 國際'.

⁷ Hart et al., 'Tracking the Fourth Taiwan Strait Crisis'.

later reduced to 27 minutes.⁸ The May 2024 exercises, described by Beijing as "punishment" for Lai's "separatism", were notable in the proximity of operations to Taiwan's outlying islands close to the PRC's Fujian Coast, including Kinmen, Matsu, Wuqiu, and Dongyin (illustrated in Figure 2).⁹

- Encroachments close to Taiwan's contiguous zone: Taiwan's contiguous zone serves as a 12-nautical-mile buffer zone around Taiwan's territorial waters and airspace, which in turn is 12 nautical miles from the coast of its main island. While, to date, PRC military aircraft and vessels are not known to have broached the contiguous zone, incursions are getting increasingly close. The April 2023 and May 2024 exercises saw dozens of PRC and Taiwanese vessels engaged in standoffs at the edge of Taiwan's contiguous zone, with military aircraft flying close to Taiwan's contiguous zone again in June and November that year. Notably, PRC quasi-military vessels began to broach the contiguous zone, with nine intrusions by maritime research vessels since September 2023, a sharp increase from just two in each of the previous three years. Maritime research vessels are likely conducting mapping exercises to assist in future military operations in the waters.
- Ramped-up military capabilities: The PRC has been rapidly building up its military capabilities against Taiwan in recent decades. The PLA now fields the world's largest conventional cruise and ballistic missile arsenal, which could be used to overwhelm Taiwan's air and sea defences and clear the way for an amphibious invasion. At the same time, the PLA has bolstered its Anti-Access/Area Denial (A2/AD) capabilities, including new hypersonic glide missile systems and anti-ship ballistic missiles, challenging the US' ability to reinforce its deployments in the region in the event of escalating conflict. These capabilities serve a 'grey zone' purpose when not in use by holding a credible threat of invasion against Taiwan, increasing the pressure on Taiwan to agree to unification by peaceful means.
- Restricting freedom of navigation through the Taiwan Strait: The PRC claims the right to exercise 'sovereign jurisdiction' over its Exclusive Economic Zone (EEZ), which includes the Taiwan Strait. In particular, the PRC opposes the 'freedom of navigation' missions undertaken by military vessels through the Taiwan Strait. This is contrary to the UN Convention on the Laws of the Sea (UNCLOS) which allows for ships to pass through EEZs as if on the high seas. The PRC has attempted to enforce its interpretation through shadowing the foreign ships passing through the Strait, in some cases

⁸ Davidson and Hawkins, 'China Appears to Backtrack over No-Fly Zone near Taiwan'.

⁹ AFP, 'China's Military Surrounds Taiwan as "Punishment".

¹⁰ Blanchard, 'Taiwan Says Chinese Air Force Approached Close to Island's Coast'; Lee, 'Chinese Forces Approached Close to Taiwan Coast to "intimidate" Voters before Key Elections - Sources'.

¹¹ Gabert-Doyon, Cook, and Hille, 'Chinese Research Ships Increase Activity near Taiwan'; Funaiole, Powers-Riggs, and Hart, 'Skirting the Shores'.

¹² US Department of Defense, 'Military and Security Developments Involving the People's Republic of China 2023'.

performing dangerous manoeuvres close to US ships.

- Unilateral re-routing of civilian aircraft: Earlier this year, the PRC's civil aviation
 administration unilaterally revoked cross-strait agreements to re-route a number of
 civilian flight paths through the Taiwan Strait. Notably, the new flight paths bring PRC
 civilian aircraft closer to the median line while also increasing traffic near flight paths to
 Taiwan's outlying islands of Kinmen and Matsu. This move challenges Taiwan's ability
 to control air traffic through the Taiwan Strait and further raises the stakes in an already
 contested airspace.¹³
- Cyber-attacks on key services: Taiwan is the target of 55% of cyber-attacks in the Asia Pacific region, with analysts recording 224.8 billion cyberattacks in the first half of 2023 the vast majority of which are believed to originate from the PRC.¹⁴ Notable recent cases by PRC state-backed hackers include an attack targeted dozens of Taiwanese government agencies, a hack stealing over 1.7tb of sensitive data from Taiwan's largest telecommunications company, and a severe ransomware attack temporarily paralysing Taiwan's state-owned oil producer CPC corp.¹⁵ During Pelosi's visit to Taiwan, Distributed Denial of Service (DDoS) attacks forced government websites to go offline for a few hours, including the Presidential Office and Taipei Taoyuan International Airport.
- Coercive economic diplomacy: The PRC adopts a 'carrot-and-stick' approach to erecting and removing trade barriers with Taiwan. Although Taiwan has attempted to reduce its dependency on trade with the PRC, the PRC remains the largest buyer of Taiwanese goods, accounting for 22.1% of total exports from Taiwan in 2023. 16 Over successive DPP governments in Taiwan, the PRC has attempted to exert pressure by imposing import bans targeting a number of sectors with high dependencies on the PRC market, including agriculture, alcoholic beverages and fish. 17 In the lead-up to Taiwan's 2024 elections, the PRC suspended some tariff reductions within the cross-strait Economic Cooperation Framework Agreement (ECFA) for the chemical sector and even threatened to terminate the agreement entirely. The timing of the suspension and the lifting of a ban on grouper fish soon after was interpreted as an attempt to give support to a key opposition party constituency. 18

¹³ Shattuck, 'China's New Civil Flight Routes'.

¹⁴ Huang, 'Taiwan Hit by 15,000 Cyberattacks per Second in First Half of 2023 | Taiwan News | Aug. 17, 2023 11'

¹⁵ Microsoft Threat Intelligence, 'Flax Typhoon Using Legitimate Software to Quietly Access Taiwanese Organizations'; Hou and Tarabay, 'Taiwan Calls on US Support to Defend Banks Against Cyberattacks - Bloomberg'; France24, 'Hackers Stole "sensitive" Data from Taiwan Telecom Giant'.

^{16 &#}x27;關港貿單一窗口CPT Single Window'.

¹⁷ Hioe, 'China Slaps Export Bans on Taiwanese Goods – Again'.

¹⁸ Hioe, 'China Threatens to End ECFA Ahead of Elections'; Reuters, 'China Lifts Ban on Taiwanese Grouper Fish Imports in Carrot and Stick Diplomacy'.

- Enforced diplomatic isolation: The PRC has been highly successful in excluding Taiwan from any meaningful participation in the UN and its sub-organisations. In particular, it has misused UN General Assembly (UNGA) Resolution 2758 (1971) to justify Taiwan's exclusion even from UN bodies for which full statehood is not a prerequisite. Consequently Taiwan is the most populous contested state not represented in any form at the UN. Countries which pursue closer bilateral ties with Taiwan also come under significant pressure from the PRC. For example, Lithuania was targeted by a range of punitive trade measures after the replacement of the 'Taipei' with 'Taiwan' in the name of Taiwan's Representative Office in Vilnius. Although a handful of countries do still fully recognise Taiwan's statehood, the PRC has been successful in gradually reducing this number from 22 in 2014 to 12 today through offering strong economic incentives to countries which switch recognition, as well as allegations of bribery and political interference.¹⁹
- Disinformation and influence campaigns: The PRC has a long history of undertaking influence campaigns in Taiwan, with an uptick in such attempts around key elections. The growing importance of social media has led to novel attempts to spread misinformation and gain influence. In 2023, Meta uncovered a PRC influence campaign involving more than 7,500 accounts across different platforms, with many of the accounts targeting Taiwan. A number of Taiwanese NGOs have voiced concerns about the PRC co-opting social media influencers and journalists to amplify pro-CCP talking points.²⁰ Notably, ahead of the 2024 elections, Taiwanese authorities also launched an investigation into alleged PRC attempts to bribe village and neighbourhood representatives with cheap tours to the PRC in an alleged attempt to gain grassroots local support.²¹ As demonstrated by the hotly contested legislative reform bill following President Lai's inauguration, there are deep divisions within Taiwan's domestic politics which could be exploited by PRC misinformation and influence campaigns in future scenarios.

Why does the grey zone matter?

The PRC's grey zone tactics against Taiwan serve a triple purpose. Firstly, grey zone activities are designed to gradually encroach upon Taiwan's autonomy. As demonstrated in the examples above, this includes undermining Taiwan's ability to manage its own air space and territorial waters, and weakening the significance of the previously respected 'median line' between the two territories. Beijing's 'salami slicing' strategy attempts to establish a new normal, gradually changing the status quo of Taiwan's autonomy without the need to resort to open conflict.

¹⁹ 呂, '北京施壓與台灣「斷交潮」持續: 民眾有何看法? 邦交國會否「清零」?'; Panetta, 'A Wild Account of Chinese Political Interference Is Unfolding in Ottawa. No, Not That One'.

²⁰ Kelter, 'How Beijing Is Changing the Way It Involves Itself in Taiwan's Election'.

²¹ 松仁, '北京干涉台灣大選直達基層 大批村長參加"優待"大陸行'.

Secondly, grey zone activities are designed to implement 'cognitive warfare' by increasing the psychological burden on the Taiwanese people. By demonstrating its ability to impinge upon Taiwan at will, the PRC embarasses and undermines the legitimacy of Taiwan's government and portrays the futility of resistance. By linking grey zone escalations to political developments, such as the visit of then-US House Speaker Nancy Pelosi to Taiwan, the PRC hopes also to influence Taiwanese public opinion against political leaders seeking more international standing for Taiwan — though sometimes these attempts may backfire. As Taiwan's domestic politics becomes increasingly fractured, the PRC may seek to use grey zone tactics to put further pressure on Taiwanese political debates. The coinciding of the PRC's large scale military drills with a controversial legislative reform bill following President Lai's inauguration demonstrates how grey zone activities can be used to further divisions within Taiwan at moments of political contest.²²

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Thirdly, grey zone activities are designed to gradually erode Taiwan's defences by draining resources and reducing alertness to new threats. The cost of responding to the increased number of incursions into Taiwan's ADIZ has led to Taiwan's Ministry of Defence announcing that fighter jets would only intercept on an 'as needed' basis rather than every time.²³ Grey zone activities also allow the PRC to practise military manoeuvres that may later be used against Taiwan, with the PRC's People's Liberation Army (PLA) notably lacking in recent combat experience.

²² 杨, '台湾立法院朝野对立 分析人士'.

²³ Shattuck, 'The PLA Air Force Erases the Taiwan Strait Centerline'.

Part Two: Mapping out scenarios for escalation

Efforts to map out how the PRC could escalate aggressions against Taiwan have typically focussed on the 'worst-case scenarios', namely an economic blockade or invasion of the main island. Focus on these scenarios is understandable given the high humanitarian cost and major disruption to the global economy that both cases would entail. How the international community should respond to such major escalations with far-reaching global consequences must be at the forefront of any government's foreign policy planning.

However, there are many reasons why the PRC may continue to take a more gradual and less overt approach to achieving its objectives for Taiwan. The PRC's grey zone strategy is already allowing it to make significant progress in undermining Taiwan's autonomy. As outlined above, this has allowed the PRC to erode the significance of both the median line and Taiwan's ADIZ – two key attempts by Taiwan to normalise its de-facto sovereignty over the island – without requiring direct military confrontation nor triggering a substantive international response. Policy strategists in Beijing may look at other 'red lines' around Taiwan's autonomy and gamble that these too can be gradually eroded through grey zone escalations.

Continuing to pursue a grey zone strategy poses far fewer risks to the PRC than conventional warfare. Firstly, it does not commit the PRC to extensive outlay of military resources to campaigns it may not win. Grey zone activities give the option to scale up or scale down escalations at any time without substantial loss of face or resources. Secondly, it minimises opportunities for an international response. Grey zone activities are, by definition, designed to fall below the threshold of 'acts of war' and are less likely to inspire outrage in the international community. Thirdly, grey zone activities are a better fit for the PRC's narrative of conflict over Taiwan as an 'internal affair' rather than an external war. Full-scale confrontation between the PRC and Taiwan's militaries risks appearing to both domestic and international audiences as a conflict between two warring states. In contrast, lower-level aggressions to undermine Taiwan's autonomy are more in line with the PRC's narrative of Taiwan as nothing more than an errant province of China.

Scenario 1: Establishing a temporary no-fly zone in Taiwan's ADIZ

One of the more unusual moves during the PRC's large-scale military exercises in April 2023 was the announcement of a temporary closure of airspace in a zone intersecting with Taiwan's ADIZ 85 nautical miles off Taiwan's north coast to allow for a satellite launch. Following complaints from Taipei, this position was largely retracted, with the no-fly zone reduced from 15 hours over 3 days to just 27 minutes. However, the episode shows how the PRC may choose to escalate grey zone activities in the future.

A temporary no-fly zone over a section of Taiwan's ADIZ — whether enforced for a period of hours or days — would cause significant disruption to a busy air corridor with high volumes of traffic. This would hurt Taiwan's economy while also undermining the Taiwanese government by challenging its authority to manage its own airspace. Provided such an activity does not take place over Taiwan's territorial airspace, this would also be an extremely difficult provocation for Taiwan to respond to. The nature of the aggression could be further complicated by the likelihood that the PRC authorities would not label the activity as a no-fly zone or a result of military activity. Instead, a no-fly zone could be justified with the protection of civilians — as in the case of the satellite launch during the April 2023 military exercises.

Scenario 2: Incursions into Taiwan's contiguous zone

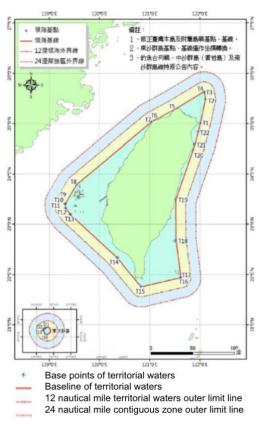


Figure 4: Map of Taiwan's territorial sea and contiguous zone. ²⁴

An incursion by a PRC military aircraft or vessel into Taiwan's contiguous zone would mark a significant escalation in grey zone activities. While air and sea incursions regularly broach the median line, no public record has yet been made of any PRC military aircraft or vessels broaching the contiguous zone. However, the growing number of military incursions by land and sea that have come close to Taiwan's contiguous zone since 2023 suggests that the PRC is testing these limits too.²⁵ As with the median line, the PRC may see this as a further marker of Taiwan's autonomy that it can gradually erode with limited response. While Taiwan has said that it would treat any military aircraft or vessels intruding into Taiwan's territorial airspace as a 'first strike' and thereby reserves the right to repel with force, no such commitment has been made about the contiguous zone. As such, it acts as an important buffer zone to prevent miscalculation and escalation. By erasing this buffer zone, the PRC would be significantly raising the chances of grey zone activities spilling into open conflict.

To complicate this scenario further, incursions may not be led by the PLA aircraft or vessels. Avoiding

using its formal armed forces gives the PRC plausible deniability and makes a clear response more challenging. This strategy has been most obvious in the South China Sea, where it has

²⁴ 海洋委員會 Ocean Affairs Council of the Republic of China, '中華民國第一批領海基線'.

²⁵ Blanchard, 'Taiwan Says Chinese Air Force Approached Close to Island's Coast'.

used its coast guard – rather than Navy – to conduct high-risk manoeuvres against the Philippines' coast guard vessels in disputed waters. As noted above, a number of PRC maritime research vessels have already made multiple crossings into the contiguous zone, suggesting a similar strategy may be being used for Taiwan.

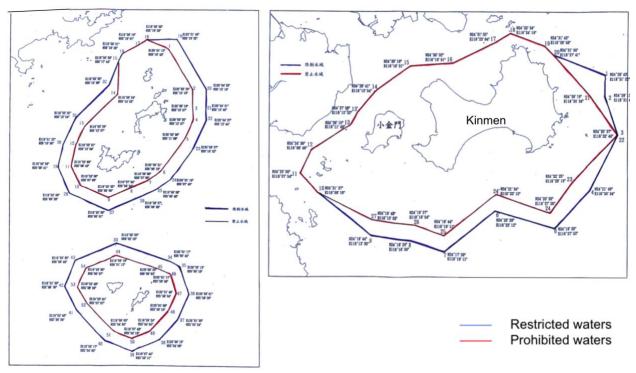


Figure 3: Restricted and prohibited waters around the Matsu Islands and Kinmen. Source:

Mainland Affairs Council²⁶

Scenario 3: Major cyber-attacks on Taiwan's infrastructure

Conducting a major cyber-attack on Taiwan's infrastructure would be in keeping with the PRC's known capabilities in this area. Developing offensive cyber-capabilities has been a core part of the PRC's military strategy since 2015 and has already had significant success against targets in Taiwan.²⁷ PRC-backed hackers exploited 'living-off-the-land techniques' to remain undetected in major government and national infrastructure systems in the US, UK and elsewhere for years.²⁸ It is thus likely that the PRC already has malware in place ready to cause major disruption to Taiwan's critical infrastructure through a cyber-attack on command.

²⁶ 中華民國 大陸委員會 - Mainland Affairs Council Republic of China (Taiwan), '馬祖地區限制(禁止)水域圖'.

Collier, 'Chinese Hackers Spent 5 Years Waiting in U.S. Infrastructure, Ready to Attack, Agencies Say'.
 'NCSC and Partners Issue Warning about State-Sponsored Cyber Attackers Hiding on Critical Infrastructure Networks'.

A major cyber-attack that causes loss of life or severe physical damage could be considered an act of war and would mark a departure from the PRC's grey zone strategy. More consistent within the grey zone strategy would be cyber-attacks that embarrass the Taiwanese government and require costly repair and damage limitation in fields such as communications, energy, transportation systems and waste. Banking systems underpinning Taiwan's financial network have also been identified by analysts as particularly vulnerable to cyberattack, with the potential for impacts on the stock market and currency.²⁹ Depending on the scale and sophistication of the cyber-attack, there may be plausible deniability on behalf of the PRC. In any case, the PRC would likely deny responsibility for any of the attacks and try to obscure any links to the hackers.

Apart from a virtual cyberattack, Taiwan's reliance on submarine cables to connect to the internet also presents an infrastructure vulnerability that could be exploited in a grey zone scenario. In February 2023, two internet cables connecting the outlying Matsu islands to Taiwan were severed by PRC fishing vessels and sand dredgers in February 2023, leaving residents without internet for weeks. Although the Taiwanese government stopped short of claiming the incident was a deliberate provocation by the PRC, some commentators have called it a 'dry run' for further aggression.³⁰ The cutting of internet cables under the sea bed to Taiwan's main island would cause major disruption to its communications infrastructure, with knock-on impacts on logistics and global supply chains.³¹

Scenario 4: Partial economic blockade or 'quarantine'

While PRC military strategists have aired the possibility of enforcing a full economic blockade of Taiwan as a way to coerce it into unification, such a move would be risky and a marked departure from the PRC's grey zone strategy. Economic blockades are widely recognised as an act of war, and the response of Taiwan and the international community would be difficult to predict.

In contrast, a short, time-limited economic blockade could raise economic pressure on Taiwan while minimising the time window for the international community to respond in a coordinated manner. For example, the PRC could temporarily control the air and maritime space around Taiwan, preventing civilian ships and aircraft from entering or leaving Taiwan for a period of hours or days. Alternatively, a partial economic blockade could be limited by targeting only the import of specific goods. For example, Taiwan depended on fossil fuel imports for above 97.7% of its energy needs in 2021.³² While the Taiwanese government does hold stockpiles of these

²⁹ Hou and Tarabay, 'Taiwan Calls on US Support to Defend Banks Against Cyberattacks - Bloomberg'; Chiu, 'Analyzing Taiwan's Readiness And Response To PRC Offensive Cyber Operations - The Yale Review Of International Studies'.

³⁰ Braw, 'China Is Practicing How to Sever Taiwan's Internet'.

³¹ Brock, 'U.S. and China Wage War beneath the Waves - over Internet Cables'.

³² Kucharski, 'Taiwan's Greatest Vulnerability Is Its Energy Supply'.

fuels, some, such as natural gas, had only 11 days' worth of reserve in 2022.³³ Either action could be sufficient to disrupt trade, weaken confidence in Taiwan's economy and undermine the legitimacy of Taiwan's government. As with previous escalations, this could be tied into attempts to punish Taiwan for perceived steps towards formal independence.

A further complication may be the choice of less overtly aggressive measures to disrupt Taiwan's trade flows. The PRC could conduct stop-and-search operations on Taiwanese ships headed to the mainland in order to block or delay Taiwanese goods exported to the PRC. This scenario is sometimes referred to as a 'quarantine' measure, as pest control has previously been used to justify import bans against Taiwanese agricultural exports. However, it is possible that a range of reasons could be used to obscure these measures, from health and safety to quality assurance. Warning signs that the PRC may already be considering these measures came as part of the April 2023 exercises, when the PRC's Fujian maritime safety administration announced a three-day 'special joint patrol and inspection operation' within sections of the Strait, including on Taiwan's side, though none were reported to have taken place.

Scenario 5: Occupation of uninhabited outlying islands

While Taiwan's outlying Kinmen, Matsu and Penghu archipelagos all include larger, well-populated and heavily defended islands, each grouping also includes smaller uninhabited islands. Notably, the May 2024 large-scale military exercises saw drills close to Wuqiu and Dongyin, which lie less than 27 km and 50 km from the PRC's Fujian coast respectively, as well as the larger Kinmen and Matsu islands. These smaller islands would present easier targets for PRC forces to occupy while minimising the risk of conflict and civilian casualties. Occupying these islands would allow the PRC to make small but tangible territorial gains and score a major propaganda victory. Occupation would give the Taiwanese government a difficult choice of whether to expend lethal force trying to remove PRC forces from their new positions and, in doing so, risk further escalation over relatively insignificant territories. If executed successfully, such a foothold could also be used by the PRC as a staging point for further grey zone activities or efforts to take other territories in the island groups.³⁴

Again, the situation could be further complicated if the first occupiers of such islands are not formal PRC military forces. Taiwan's coast guard has ongoing issues with unregistered PRC fishing vessels conducting illegal fishing in 'restricted' and 'prohibited' waters around the Kinmen and Matsu archipelagos, designations which Beijing does not formally acknowledge. PRC fishing fleets refusing to leave after seeking refuge on uninhabited islands in a real or feigned emergency would present Taiwan's coast guard with a difficult problem. A deadly collision between the Taiwanese coast guard and an intruding PRC fishing vessel in February 2024 shows such situations could escalate.³⁵ In the future, it is possible to see the PRC using

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³³ Reuters, 'Taiwan to Boost Energy Inventories amid China Threat'.

³⁴ Chubb, 'Taiwan Strait Crises'.

³⁵ Ng, 'Taiwan'.

such incidents to justify its coast guard or navy entering restricted waters to assist PRC fishing vessels in confrontations with Taiwan's coast guard.

Scenario 6: Seizure of larger outlying islands



Figure 5: Position of Taiwan's outlying islands

Seizure of Taiwan's larger outlying islands may also present an option for the PRC to increase pressure on Taiwan while stopping short of attacking the main island. This would allow the PRC to make tangible territorial gains while also demonstrating its military capabilities and political intent. Islands seized could act as strategic staging points for a future invasion of the main island, and could put further pressure on the Taiwanese government to submit to unification discussions.

While such moves would mark a clear departure from the PRC's current grey zone strategy, they would still be in keeping with the PRC's incremental 'salami slicing' approach. While the seizure of outlying islands would be a clear act of war, there is a chance that it would be interpreted by the US and others as showing some degree of restraint compared to an attack on the main island, thereby limiting the

extent of any US or allied military response. While PRC forces would undoubtedly face resistance from Taiwanese defences, both sides might avoid escalating the conflict zone to either the PRC mainland or Taiwan island.

The implications of this scenario will depend on which outlying island is seized. The islands of Kinmen and Matsu would represent highly symbolic and strategically significant seizures, These islands are the closest to the PRC and have comparatively large populations of 141 thousand and 107 thousand, respectively.³⁶ Both islands are heavily fortified, and quelling Kinmen, in particular, is seen by PRC military strategists as a necessary first step to any future invasion of

³⁶ DaftLogic, 'Distance Calculator'; 澎湖縣政府 Penghu County Government, '人口統計'; 金門縣政府 Kinmen County Government, '金門縣政府全球資訊網'.

Taiwan. Lying less than 10km from the PRC's Fujian coastline, the PRC may judge that international reaction against these islands may be relatively muted. Historical (and now defunct) US military treaties with Taiwan did not include commitments to defend Kinmen and Matsu. However, the islands' heavy fortification and large civilian populations raise the risk of a bloody, protracted and unpredictable conflict for the PRC. In contrast, the Pratas (Dongsha) and Taiping (Itu Aba) islands in the South China Sea are far from Taiwan's main island, sparsely populated and less heavily defended than those in the Taiwan Strait. Seizing Pratas island could have some strategic benefits to extending the presence of the PLA Navy in the region, while Taiping island has an airstrip and is the largest of the PRC's claims over the Spratly Islands – which Vietnam and the Philippines both also claim. However, these strategic gains are small compared to the potential costs of such moves. Aggressions in the South China Sea risk angering a much broader set of regional actors, in a region already increasingly hostile to Beijing.

Part Three: How can the UK respond?

Why do the PRC's grey zone tactics matter to the UK?

The PRC has warned the UK and its allies not to be involved in issues around Taiwan, which it sees as an 'internal affair'. At the same time, some European leaders have expressed concern about being inadvertently dragged into a conflict primarily arising from US-PRC superpower rivalry.³⁷ Both of these perspectives miss the distinctive strategic interest that the UK and its allies have in Taiwan and the broader region. ³⁸ ³⁹ ⁴⁰

By far, the largest threat to the UK's strategic interests posed by the PRC's grey zone tactics is the risk that such actions escalate inadvertently into open conflict. Grey zone aggressions create scenarios which are highly unpredictable and prone to escalatory spirals through miscalculation and chance. Aside from the catastrophic humanitarian consequences of a conflict between the PRC and the US over Taiwan, Taiwan's

The UK's 'one-China' policy

The UK was one of the first Western countries to formally recognise the People's Republic of China (PRC) in 1950, concurrently dropping its recognition of the Republic of China (Taiwan) and later supporting the PRC's takeover of the seat for China at the UN. This stance is often described as the 'one-China policy' and is similar to policies held by the US and other allies.

The UK's 'one-China policy' still allows for significant room for manoeuvre with Taiwan, despite not having formal diplomatic ties. The UK has a self-described "long standing policy" of "a strong unofficial relationship based on dynamic commercial, educational and cultural ties" with Taiwan, managed through the British Office in Taipei, which functions as a de-facto embassy. In recent years, the UK has been increasingly vocal in its support for Taiwan's participation in multilateral institutions for which statehood is not a prerequisite, including the World Health

importance to the world economy means that conflict would have a detrimental impact - with

³⁷ Anderlini and Caulcutt, 'Europe Must Resist Pressure to Become "America's Followers," Says Macron'.

³⁸ Hansard, 'Taiwan - Hansard - UK Parliament'.

³⁹ Mission of the People's Republic of China to the European Union, 'Questions and Answers Concerning the Taiwan Question (2):What Is the One-China Principle? What Is the Basis of the One-China Principle?'

⁴⁰ Hansard - UK Parliament, 'China (Exchange Of Ambassadors)'.

estimates that the conflict could cause US \$2.5 trillion in annual losses to the global economy even before including the impact of any economic sanctions and counter-sanctions.⁴¹

However, even before reaching the point of open conflict, the PRC's grey zone tactics against Taiwan risk undermining the UK's interests on a number of levels:

- Regional instability: The UK's 2023 Integrated Review Refresh set out maintaining a 'free and open Indo-Pacific' as one of the core tenets of the UK's strategic interest in the region, including maintaining a 'regional balance of power' in which 'no single power dominates' and 'states can make choices free from coercion'.⁴² The PRC's attempt to gradually slice away at Taiwan's autonomy through grey zone coercion presents a clear challenge to these principles and cannot be separated from its broader attempt to assert its territorial claims in the South and East China Seas.
- Risks to international trade: Grey zone activities such as large-scale military drills or attempts to restrict shipping through the Strait have the capacity to cause severe disruptions to one of the world's most important trade routes. Taiwan's production of over 70% of the world's semiconductors means that disruption to global supply chains in nearly all manufacturing sectors would be particularly acute.⁴³ Europe would be particularly vulnerable to such disruption, with almost half of the world's container ships passing through the Taiwan Strait in 2022 the prime route for goods shipped from East Asia to Europe.⁴⁴
- Undermining of international law: The PRC's attempts to exert its military presence across the Taiwan Strait and South China Sea are a direct challenge to UNCLOS which is foundational to global maritime trade and the peaceful resolution of disputes. Specifically, the PRC claims that the Taiwan Strait does not constitute international waters but instead forms part of the PRC's Exclusive Economic Zone (EEZ), and that it has the right to regulate maritime activity in this area. Even if the PRC's extensive EEZ claims (which include 90% of the South China Sea) were not disputed by its neighbours, this does not give the PRC the right to police traffic through the Strait. Under UNCLOS all ships including military vessels would still have the right to use the Strait as a 'transit passage' between the high seas for the purposes of international navigation. 45

Building an anti-grey zone strategy

⁴¹ Vest, Kratz, and Goujon, 'The Global Economic Disruptions from a Taiwan Conflict – Rhodium Group'.

⁴² Cabinet Office, 'Integrated Review Refresh 2023'.

⁴³ Kohlmann, 'How Taiwanese Semiconductors Reign Supreme – DW – 08/04/2022'.Or f

⁴⁴ Varley, 'Taiwan Strait: Tensions Raise Risks in One of Busiest Shipping Lanes - Bloomberg'.

⁴⁵ Reuters, 'Australia Says China's South China Sea Claims Are Unlawful'.

By definition, grey zone activities are designed to be difficult to respond to, falling just below the threshold of open conflict. Policymakers are understandably hesitant about getting caught up in an escalatory cycle that could spiral out of control. However, the UK's clear strategic interest in maintaining peace and stability in the region means that it must leverage whatever resources it can to push back against the PRC's grey zone escalations. The incremental, progressive logic of the PRC's grey zone escalations means that interventions at the earlier 'light grey' stage are more effective and less risky than interventions at the 'dark grey' stage. Timely interventions to prevent the PRC from escalating aggressions is a far less risky conflict prevention strategy than waiting until Taiwan's red lines are on the verge of being crossed.

This paper sets out a series of policy recommendations based around a three-part anti-grey zone strategy. Firstly, the UK must **raise the cost of the PRC's grey zone aggressions**. By raising the diplomatic and economic costs of grey zone coercions, the UK and its allies can help shift the cost-benefit calculus to Beijing of maintaining and escalating such actions. To avoid escalating the situation further, such responses must be proportionate to the severity of the grey zone aggression taking place, and must also be reversible in order to provide an incentive for de-escalation.

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Timely interventions to prevent the PRC from escalating aggressions is a far less risky conflict prevention strategy than waiting until Taiwan's red lines are on the verge of being crossed.

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Secondly, the UK must act now to **strengthen Taiwan's resilience** to grey zone coercion. The PRC's actions against Taiwan are not restricted to the military domain alone. By deepening trade cooperation and sharing expertise on renewable energy and cybersecurity the UK can help Taiwan minimise the impact of coercive actions. With many of these recommendations operating outside of the military domain, these actions are also less overtly provocative towards Beijing.

Thirdly, the UK should utilise its significant diplomatic influence to **reaffirm the international rules-based order**, upholding peace and stability in the region. By upholding the rules, norms and structures of the multilateral system, the UK can reaffirm the foundations of a free and open Indo-Pacific. This helps to protect the UK's interests not just in the Taiwan Strait, but across the region.

Importantly, the UK should reassure the PRC that a more forthright response to Beijing's grey zone tactics against Taiwan does not constitute a change in the UK's 'One China' policy, nor does it reflect support for Taiwan's independence. Opposing the PRC's escalations against Taiwan is in line with the UK's longstanding policy on the issue, which has always emphasised its desire for a peaceful resolution of cross-strait differences through dialogue – not through threats, intimidation and coercion.

Notable UK policy statements on Taiwan (2021 - 2024)	
05 May 2021	The UK joins the G7 in backing Taiwan's participation in the World Health Assembly, a stance re-stated in subsequent years. ⁴⁶
03 August 2022	G7 Foreign Ministers release a statement expressing concern over live- fire exercises in the Taiwan Strait as US House Speaker Pelosi visits Taiwan, with the UK also summoning the PRC Ambassador over the incidents. ⁴⁷
25 April 2023	Foreign Secretary James Cleverly reiterates the UK's opposition to any "unilateral action to change the status quo" and the UK's desire to "see a peaceful settlement of the differences across the Strait", as the PRC. ⁴⁸
14 November 2024	The UK and Taiwan sign an Enhanced Trade Partnership with a focus on investment, digital trade, and renewable energy and net zero. 49
19 April 2024	The UK joins the G7 foreign ministers in calling for Taiwan's engagement in multilateral institutions, with expanded language calling for participation "in all international organisations as a member where statehood is not a prerequisite and as an observer or guest where it is." 50
24 May 2024	British Office Taipei and its counterparts from countries including the US, Australia, and Germany published a statement supporting Taiwan's "meaningful engagement with the WHO" in 2024. ⁵¹
Source: EU-Taiwan Tracker, CEIAS (2024); own research	

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⁴⁶ Foreign, Commonwealth & Development Office, 'G7 Foreign and Development Ministers' Meeting'.

⁴⁷ Foreign, Commonwealth & Development Office, 'Preserving Peace and Stability across the Taiwan Strait'.

⁴⁸ Foreign, Commonwealth & Development Office, 'Our Position on China'.

⁴⁹ Foreign, Commonwealth & Development Office, 'Enhanced Trade Partnership Arrangement between Taiwan and the United Kingdom'.

⁵⁰ Foreign, Commonwealth & Development Office, 'G7 Foreign Ministers' Meeting Communiqué (Capri, 19 April 2024) – Addressing Global Challenges, Fostering Partnerships'.

⁵¹ British Office Taipei, 'Support for Taiwan's Meaningful Engagement with the WHO in 2024'.

Policy Recommendations

(1) Raising the cost of the PRC's grey zone aggressions

- Statements publicising the PRC's grey zone activities: The PRC's grey zone strategy is designed to slip under the radar of international scrutiny. By identifying, noticing, and publicising the PRC's aggressive behaviour, the UK can raise the diplomatic costs to Beijing for these actions. The UK's statements on specific instances of the PRC's grey zone coercion have so far largely been limited to reactions to the large-scale military activities of August 2022 and April 2023. Raising other less obvious, but equally pernicious, grey zone activities will help to reaffirm norms around Taiwan's autonomy while gradually shifting the cost-benefit calculus for Beijing. Such statements are not out of line with the UK's longstanding 'one-China' policy. Indeed, the UK can use these statements to highlight that the PRC's coercive activities are in opposition to the peaceful resolution of cross-Strait differences that the UK has committed to under its 'one-China' policy.
- Sanctions on PRC military-linked companies: Sanctions targeting a number of the PRC's military-adjacent companies can be a proportionate response to future escalations of grey zone activities. Sanctions can target companies directly linked to grey zone activities, for example, on aerospace companies supplying the PLA in the event of escalated air incursions on Taiwan or technology companies in the event of a major cyberattack. Sanctions could be designated under a PRC-specific-country list through the Sanctions and Anti-Money Laundering Act (2018), with powers to enforce financial sanctions (such as asset freezes) or trade sanctions (such as restrictions on technology exports). Alternatively, UK investors could be barred from investing in certain PRC military companies linked to grey zone escalations through proposals for an outbound investment regime, which the UK government has committed to introducing. Even where the financial impact of sanctions is limited, such measures can have an important signalling effect.
- Restricting RMB currency trading through London: The PRC's access to London's world-leading financial markets represents an important point of leverage that could be exerted in response to a future, more extreme escalation of grey zone tactics. London is the world's largest off-shore RMB market outside of the PRC, and is a key part of the PRC's drive to internationalise the RMB and reduce its dependence on the US dollar. In response to grey zone escalations, the UK government could review, revoke or deny renewal to the RMB 350bn 'swap line' agreed between the Bank of England and the People's Bank of China, which acts as a safety net for RMB trading in London. More severe responses could include imposing sanctions on the China Construction Bank (CCB), which acts as the sole designated RMB clearing bank in the UK, or instructing the Prudential Regulation Authority to review the licences of the CCB and other PRC banks in

the UK.

• Proportionate diplomatic engagement with Taiwan: The UK can raise the diplomatic costs of coercive actions against Taiwan by linking future grey zone escalations to greater levels of engagement and international cooperation with Taiwan. This helps to counter the PRC's narrative that the West's engagement with Taiwan is deliberately provocative to Beijing by demonstrating that growing international concern over Taiwan is a direct result of the PRC's aggression. For example, government ministers or parliamentary delegations could visit Taiwan after significant grey zone escalations to take part in 'fact-finding missions' or to show solidarity and re-state their support for peaceful resolution under the UK's 'One China' policy. Similarly, concern with the PRC's grey zone activities in the air and maritime domain could be used to justify calling for greater Taiwanese engagement with ICAO and IMO or to host unofficial side meetings with Taiwanese representatives at these conventions.

(2) Strengthening Taiwan's resilience to grey zone coercion

- Supporting Taiwan's renewable energy development: Taiwan's reliance on energy imports is a vulnerability that may be exploited in a number of grey zone scenarios. Supporting Taiwan's deployment of renewable energy helps to minimise these risks, while also providing major opportunities for UK firms. In particular, Taiwan's potential for offshore wind an area in which the UK specialises has led to a number of collaborations between UK and Taiwanese firms. Using the UK as an alternative source to PRC made green technologies can also help reduce the risk of economic coercion through cyberattack or export restrictions. The UK government should continue to support these companies through UK Export Finance awards and should bolster the resources of the British Office in Taipei to further such collaborations under the UK-Taiwan Enhanced Trade Partnership.
- Launching cyber-defence collaborations: The UK should launch a cyber-security dialogue with Taiwan modelled on the 2023 UK-Singapore Cyber Dialogue, with officials from the National Cyber Security Centre and other government departments taking part, to share information on emerging cyber-threats and discuss effective responses. At a more informal level, UK officials could also convene sessions focussing on cybersecurity within the Global Cooperation and Training Framework (GCTF) a forum led by Taiwan to share best practice in common challenges across the region. The UK should also use its influence as a founding member of the Helsinki-based European Centre of Excellence for Countering Hybrid Threats to push for Taiwanese participation in research and training. Taiwan's cybersecurity market which is projected to grow by

⁵² 英國在台辦事處 British Office Taipei, '台灣邁向 2050 淨零碳排,英國政府和企業為最佳永續夥伴 | 天下雜誌'.

10.8% annually through 2028 – also presents a significant opportunity for UK firms.⁵³ The British Office in Taipei should be resourced to promote UK cybersecurity services through supporting UK firms to take part in trade shows such as the annual Cybersec Forum Taipei.

- Supporting Taiwan's application to the CPTPP: The UK, which will soon conclude its accession to the CPTPP, should publicly support Taiwan's bid to join the CPTPP and work to persuade other members to do the same. The PRC launched its application to join the CPTPP less than a week before Taiwan in 2021. While there are doubts about the PRC's abilities to meet the common standards required by the CPTPP, members may be under significant diplomatic pressure to approve the PRC's application. If successful, the PRC would likely then veto any attempt by Taiwan to join the group. To avoid this, the UK should also push for Taiwan's application to be considered before or concurrently with the PRC's, or veto the PRC's application.
- Increasing export of military and dual-use technologies: US arms sales to Taiwan have been held up by significant delays, with an estimated backlog of US \$19.1 billion in February 2024. 54 The UK should enter trilateral discussions with the US and Taiwan on what role UK suppliers may be able to play in complementing US equipment sales and helping to clear order backlogs, with particular opportunities in air defence, command and control, integration of datalink, and electronic warfare. UK equipment may be particularly valuable to Taiwan due to significant interoperability with existing US systems. Importantly, the UK should commit to approving further sales of spare parts after the initial sale, preventing the issues encountered by Taiwan in its purchase of France's Mirage 2000-5s fighter jets. The UK has issued at least £450 million worth of limited-value military export licences to Taiwan since July 2020, with more licences that have unlimited value, suggesting significant opportunities for the UK's defence industry. 55

(3) Re-affirming the international rules-based order

• Freedom of navigation operations: The UK should increase the number of freedom of navigation' operations (FONOP) through contested sections of the South and East China Seas, including the Taiwan Strait, to assert the rights of all ships to transit international waterways. In particular, the upcoming visit of the UK's Carrier Strike Group to the Indo-Pacific in 2025 should deploy a frigate to transit the Taiwan Strait, as occurred in the 2021 visit. However, one deployment every few years is insufficient to counterbalance the scale of the PRC's grey zone activities around Taiwan. The UK should seek to increase its FONOP deployments to the region, which do not have to be led by its aircraft

⁵³ International Trade Administration, 'Taiwan - Cybersecurity'.

⁵⁴ Gomez and Giltner, 'Taiwan Arms Backlog, February 2024 Update'.

⁵⁵ Campaign Against Arms Trade, 'UK Export Licence Data'.

carriers or even warships. In particular, the UK should seek to expand existing coordination with France to include other European countries, such as Germany, the Netherlands, Spain and Italy, with the objective of achieving a permanent European presence in the region. To help achieve this, the UK and EU could establish a joint Coordinated Maritime Presence in the region, to allow information sharing and coordination between EU and UK naval vessels.

- Resisting Beijing's international lawfare: As highlighted above, the PRC's grey zone strategy is intertwined with contested international rules and norms. The UK should use its outsized influence in multilateral institutions to push back against these attempts. The UK should follow the US in publicly stating its opposition to the PRC's attempts to use UNGA Resolution 2758 to justify Taiwan's exclusion from the UN. Instead, the UK, which voted in favour of Resolution 2758 in 1971, should clarify that the Resolution does not address questions of sovereignty over Taiwan or preclude any form of engagement with the UN. 56 Additionally, the UK should oppose the PRC's attempts to claim the rights of an archipelagic state (laying claim to 'internal waters' between islands) despite clearly being a continental state, and its attempts to deny the right of 'innocent passage' to warships through its waters and extensive EEZ claims. 57
- Supporting Taiwan's participation in multilateral institutions: While attempts to grant Taiwan full UN membership are unlikely to succeed, there is scope for participation in bodies for which statehood is not a prerequisite. The UK should coordinate efforts with its allies to promote Taiwan's participation in the World Health Organization (WHO), UN Framework Convention on Climate Change (UNFCCC), the UN Educational, Scientific and Cultural Organization (UNESCO) and other bodies. Given that Taiwan plays an important role in global shipping and aviation and that the PRC's grey zone activities have impacted civilian air and maritime traffic, there is also a strong case for Taiwan's participation in the International Civil Aviation Organization (ICAO) and the International Maritime Organization (IMO). Although statehood is a prerequisite for full membership of ICAO and IMO, relevant Taiwanese officials or industry leaders should still be invited to take part in consultations and working groups with key stakeholders. For UN conventions where Taiwan is denied participation, UK officials should still show support for Taiwan's engagement by hosting and attending side meetings outside of the official agenda with Taiwanese representatives. Pushing for Taiwan's participation in multilateral institutions for which statehood is not a prerequisite is not in contradiction with the UK's one-China policy and has been supported in recent G7 statements.⁵⁸
- Engaging Taiwan through alternative institutions: While Taiwan remains excluded from multilateral institutions, the UK should mitigate the impacts of Taiwan's isolation by

⁵⁶ 'Restoration of the Lawful Rights of the People's Republic of China in the United Nations'.

⁵⁷ Mastro, 'How China Is Bending the Rules in the South China Sea'.

⁵⁸ Foreign, Commonwealth & Development Office, 'G7 Foreign Ministers' Meeting Communiqué (Capri, 19 April 2024) – Addressing Global Challenges, Fostering Partnerships'.

engaging in alternative forums. In particular, the UK should deepen its role in Taiwan's GCTF by seeking partner status alongside Australia, Japan and the US. The UK and Taiwan share many common interests in areas such as supply chain resilience, renewable energy deployment and cyber-security, all of which could be addressed within the GCTF. The UK should also use its influence as the founder of the AI Safety Summit to push for Taiwan's inclusion in future editions of the Summit, which will be held in Seoul in 2024 and Paris in 2025.

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33

⁵⁹ <u>https://air.mnd.gov.tw/EN/About/About_List.aspx</u>