

RETHINKING CHINA'S GRAY-ZONE STRATEGIES: CASES FROM THE EAST CHINA SEA, SOUTH CHINA SEA, AND TAIWAN STRAIT

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Abstract

This paper investigates China's gray-zone strategies in the South China Sea, East China Sea, and Taiwan Strait, addressing how China's use of non-military gray-zone strategies differs across these three maritime regions and what implications these variations hold for regional security. This study redefines gray-zone strategy as a country's attempt to change or influence another country's sovereignty rights or policies through governmental or non-governmental actions, which is different from military brinkmanship. It identifies five categories of non-military gray-zone tactics: narrative warfare, psychological warfare, legal warfare, mixing of civilian and military activities, and governmental jurisdiction warfare. Based on a comparative case analysis of the three areas, the study finds two key characteristics. First, China adopts military means for severe sovereignty violations while relying on non-military gray-zone strategies for lesser infringements to avoid escalation. Second, the greater the perceived impact on sovereignty, the more China employs riskier gray-zone tactics. In the South China Sea, China employs all five tactics to expand economic sovereign rights and create an order alternative to the U.S.-led liberal international order. In the East China Sea, it leverages narrative and jurisdictional tactics to undermine Japan's control while avoiding military confrontation. In the Taiwan Strait, psychological warfare dominates as China seeks to internalize the strait and domesticate Taiwan. Overall, the paper suggests collective, asymmetric responses targeting China's vulnerabilities to enhance deterrence and maintain regional stability.

Keywords

Gray-zone strategy, China, South China Sea, East China Sea, China, Taiwan Strait.

Resumo

Este artigo estuda as estratégias de zona cinzenta da China no Mar da China Meridional, Mar da China Oriental e Estreito de Taiwan, abordando como o uso de estratégias de zona cinzenta não militares pela China difere nessas três regiões marítimas e quais as implicações dessas variações para a segurança regional. Este estudo redefine a estratégia de zona cinzenta como a tentativa de um país de alterar ou influenciar os direitos ou políticas de soberania de outro país por meio de ações governamentais ou não governamentais, o que é diferente da política de risco militar. Ele identifica cinco categorias de táticas não militares de zona cinzenta: guerra



narrativa, guerra psicológica, guerra jurídica, mistura de atividades civis e militares e guerra de jurisdição governamental. Com base em uma análise comparativa de casos das três áreas, o estudo identifica duas características principais. Primeiro, a China adota meios militares para violações graves da soberania, enquanto confia em estratégias não militares da zona cinzenta para infrações menores, a fim de evitar uma escalada. Segundo, quanto maior o impacto percebido sobre a soberania, mais a China emprega táticas mais arriscadas da zona cinzenta. No Mar da China Meridional, a China emprega todas as cinco táticas para expandir os direitos de soberania económica e criar uma ordem alternativa à ordem internacional liberal liderada pelos EUA. No Mar da China Oriental, ela usa táticas narrativas e jurisdicionais para minar o controle do Japão, evitando o confronto militar. No Estreito de Taiwan, a guerra psicológica domina, à medida que a China busca internalizar o estreito e domesticar Taiwan. No geral, o artigo sugere respostas coletivas e assimétricas direcionadas às vulnerabilidades da China para aumentar a dissuasão e manter a estabilidade regional.

Palavras-chave

Estratégia da zona cinzenta, China, Mar da China Meridional, Mar da China Oriental, China, Estreito de Taiwan.

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Introduction: China's Gray-zone Actions

On June 17, 2024, the China Coast Guard (CCG), supported by maritime militia and the People's Liberation Army Navy, surrounded, rammed, and boarded a Philippine Navy inflatable boat while it was conducting a resupply mission to Second Thomas Shoal. During the incident, CCG personnel used knives, bats, and axes to damage the Philippine boat, resulting in one Philippine navy serviceman losing his right thumb (Asia Maritime Transparency Initiative, 2024). Although the Philippine government quickly squelched speculation that the event might invoke the 1951 Philippines–U.S. Mutual Defense Treaty (Gomez, 2024), continued CCG aggression in the South China Sea makes it increasingly likely that the treaty could be invoked in the near future. Philippine President Ferdinand Marcos has stated that the treaty would “kick into action” if a “Filipino serviceman is killed because of an attack or an aggressive action by another foreign power” (Gutierrez, 2024).

Similar incidents have occurred in the East China Sea, where the CCG frequently patrols disputed areas claimed by Japan. The frequency of these patrols increased dramatically after Japan nationalized the Diaoyu/Senkaku Islands in 2012, and hot pursuit events involving the Japanese Coast Guard (JCG) have become almost routine. Beyond the South China Sea and East China Sea, the CCG has also extended its so-called law enforcement operations to the Taiwan Strait. On February 14, 2024, two Chinese fishermen died while fleeing from Taiwan's Coast Guard after being intercepted for illegal, unreported, and unregulated (IUU) fishing in waters under Taiwan's administration.¹ Subsequently, the CCG began patrolling prohibited and restricted waters around Taiwan's Kinmen Islands, claiming that these patrols constitute normal law enforcement.

These are aggressive actions by the CCG; however, China also engages in other tactics such as deploying maritime militia to surround disputed islets and sever their connections to other claimants, issuing fishing bans in disputed seas, and promoting historical rights narratives in the South China Sea. Such actions are considered gray-zone strategies. While they may not lead to war like direct military actions, they can incrementally change the status quo. The U.S. Quadrennial Defense Review (QDR) in 2010 noted that many changes fall within this ambiguous gray zone, including military mobilization, economic warfare, and information warfare (Secretary of Defense, 2010). These gray-zone

¹ At around 1 p.m. on February 14, 2024, a Chinese speedboat carrying four people crossed the maritime boundary and intruded into the waters near Kinmen. When it refused inspection, Taiwan's Coast Guard pursued the vessel, during which the speedboat capsized, resulting in two fatalities and two survivors (Wu, 2025).



strategies have increasingly raised regional concerns. How can such actions be distinguished conceptually? Are there differences in China's gray-zone strategies across the East China Sea, Taiwan Strait, and South China Sea? This paper first examines the literature on gray-zone strategies, arguing that the concept requires greater specificity to be meaningful. Furthermore, it contends that China is more likely to adopt gray-zone strategies in areas with multiple disputing states to maximize their "avoidance of war" effect. The comparison of the three seas supports this argument.

Gray-zone strategy: Origin and Literature

Gray-zone strategies are not a modern invention in the realm of national strategy. If one adopts a broad definition of strategies that operate between war and peace, such concepts can be traced back to ancient China. Sun Tzu, the renowned military strategist from the Spring and Autumn period, articulated in *The Art of War* that the highest form of strategy is to subdue the enemy without fighting, compelling surrender without deploying troops or attacking the enemy directly. In modern history, the Cold War exemplified gray-zone dynamics, as the United States and the Soviet Union avoided direct warfare yet engaged in proxy wars, psychological operations, infiltration, and arms races—tactics that fall within the broad spectrum of gray-zone strategies. The term "gray-zone" first appeared in an official U.S. government document in the 2010 Quadrennial Defense Review, which noted that future challenges would increasingly emerge in ambiguous areas between war and peace. The report suggested that strengthening allies to respond to such challenges would reduce risks to U.S. forces and extend security to areas where unilateral action was impractical (Secretary of Defense, 2010).

In East Asia, Japan experienced a gray-zone crisis in September 2010 with the "Minjin Fishing Vessel 5179 Incident," when a Chinese trawler collided with a Japanese Coast Guard vessel near the Diaoyu/Senkaku Islands (Bau, Tso, & Liao, 2014). The Japanese government is aware that civilian or paramilitary forces are being used to change the status quo while compelling the targeted country to take the initiative in settling the situation through some form of force. These incursions blur the line between crime and defense, as well as between law enforcement and military activities (Pajon, 2017). Japan's 2010 National Defense Program Guidelines subsequently identified China's growing maritime activities—including coast guard and fishing vessel incursions—as gray-zone challenges involving sovereignty disputes short of outright conflict. Tensions escalated after Japan nationalized the Diaoyu/Senkaku Islands in 2012, with frequent incursions by Chinese military aircraft and CCG ships attempting to establish a "new normal." Scholars have examined China's systematic use of such tactics. Holmes and Yoshihara (2012) argue that drawing from Mahan's sea power theory, China employs gray-zone strategies to expand maritime influence, as seen in the 2012 Scarborough Shoal standoff, where China used non-combat maritime militia vessels to occupy the shoal without conventional military force—an approach they term "small-stick diplomacy." Denny Roy (2015) similarly notes that China's tactics in the East and South China Seas are aggressive yet calibrated to avoid provoking direct military retaliation. Zhang (2019, pp. 119–120) describes China as a "cautious bully," noting that it uses



military coercion less frequently as it becomes stronger. This suggests that focusing solely on the growth of China's material capabilities cannot fully explain its behavior.

Mazarr (2015) provides a comprehensive analysis, asserting that China's gray-zone strategies aim to establish a China-led order in the South China Sea. He categorizes gray-zone tactics into six types by intensity: narrative warfare, denial of prosperity, civilian intervention, active infiltration, coercive signaling, and proxy sabotage. For instance, China uses narrative warfare to assert historical claims and economic measures to coerce rivals, while deploying civilian organizations to consolidate control, as in Scarborough Shoal. Mazarr warns that while these tactics may avoid immediate conflict, they risk increasing international tensions and escalating into war. McLaughlin (2022) argues that gray-zone operations are designed to "exploit or create legal uncertainties for a military or strategic advantage."

Beyond China, states like Russia also employ gray-zone strategies, such as annexing Crimea by infiltrating masked troops, installing a proxy government, and legitimizing annexation through a referendum. Chen Yong (2019) defines gray-zone strategies as competitions between states or between state and non-state actors within the spectrum between war and peace, highlighting their ambiguity and risk. Barno and Bensahel (2015) caution that such strategies, though non-traditional, can threaten core U.S. interests. Brands (2016) similarly describes them as coercive and aggressive tactics disguised as non-military conflict to alter the status quo, terming them "gray-zone conflicts."

Finally, Cheng and Hung (2019) argue that the challenges posed by gray-zone strategies stem not from the tactics themselves but from the power of the actors employing them. They contend that these strategies are ultimately peaceful forms of conflict resolution, echoing Sun Tzu's notion of winning without fighting. The case study of the Philippines also demonstrates that China's gray-zone strategies are intended to induce a sense of helplessness in other countries, causing them to either acquiesce or become numb to China's actions. Although the Duterte administration initially acquiesced, it later shifted its policy and responded to China's actions with greater resolve (de Castro & Chambers, 2022). Nonetheless, American scholars largely view these strategies as expressions of non-military coercion intended to change the international order. For example, a publication by the Center for Strategic and International Studies (CSIS) notes that the U.S. Department of Defense has employed Freedom of Navigation Operations (FONOPs) to deter China's gray-zone activities threatening sea lanes in the Indo-Pacific region, and has also partnered with the Philippines to publicly expose China's actions in the area as a way of countering its gray-zone strategies (Sheppard et al., 2019, pp. 27, 62).

Adjust Gray-zone Strategy

Revise definition

The literature on gray-zone strategies reveals that the most common definition refers to strategies that lie between war and diplomacy. These encompass military, economic, social, and political actions characterized by aggression aimed at expanding one's power to gradually change the status quo. Zheng and Hong (2019) summarize four characteristics of gray-zone strategies: revisionism, asymmetry, ambiguity, and



gradualism. In terms of objectives, gray-zone strategies seek to incrementally alter the status quo by leveraging asymmetries in capabilities and costs between themselves and their adversaries. This approach operates below the threshold of war, avoiding direct military retaliation and introducing ambiguity regarding whether a given action constitutes preparation for war and how it should be countered. Ultimately, gray-zone strategies yield gradual effects akin to "salami slicing," making it difficult for neighboring countries to respond effectively. However, Dai Zheng and Hong You-sheng's compilation of definitions and tactics indicates that the broad conception encompasses a wide array of actions, such that any move hindering another country's interests without declaring war may be labeled a gray-zone strategy. This broad definition dilutes the perceived security threat and opportunities for counteraction.²

Therefore, it is necessary to distinguish between military and non-military tactics. Mixing military tactics with non-military ones under the same label risks diminishing the severity of military tactics and the significance of non-military ones. Military tactics should not be considered gray-zone strategies. While the term "gray-zone" originally aimed to capture strategies that breach peace without provoking war, military tactics are preparations for war and are likely to trigger escalation. Thus, they should be treated as strategies with the potential for war, rather than as gray-zone strategies.

Specifically, Russian General Valery Gerasimov's (2013) concept of "hybrid warfare" asserts that modern warfare increasingly employs unconventional and non-traditional forces, including private military companies and hybrid tactics, as a new norm of warfare. These are methods designed for war and carry a high potential to escalate into conflict. This is also why Patalano (2018) argues that the concept of gray-zone strategy adds little nuance to the existing literature on state warfare and strategy. That is, this kind of tactics are considered as methods for war and are possible to lead to war. Cooper and Shearer (2017) also argues that China's adoption of gray-zone approaches differs from Russia's hybrid warfare, as China focuses on accumulating influence through economic means and non-military tactics while deliberately avoiding direct combat.

This distinction also clarifies the difference between brinkmanship and gray-zone strategies. Brinkmanship involves using military tactics to demonstrate a willingness to go to war, aiming to persuade the target state that confrontation is approaching the threshold of armed conflict. In contrast, a state adopting gray-zone strategies signals that it does not seek war, instead employing limited non-military measures to change the situation incrementally without provoking strong objections. In summary, both strategies aim to avoid war, but brinkmanship involves military tactics and bluffing readiness for war, while gray-zone strategies reveal a lack of willingness to fight and prioritize non-military tactics.

Including military tactics under the umbrella of gray-zone strategies also diminishes the significance of non-military tactics. States may downplay an adversary's gray-zone moves, perceiving them as insufficient to warrant military concern, thereby enabling incremental salami-slicing changes to the status quo. Distinguishing military from non-military tactics helps spotlight gray-zone moves so that states can respond proactively.

² This section incorporates content from Liao (2022).



A precise definition of gray-zone strategies' objectives, timing, and tactics is necessary. This paper defines gray-zone strategies as a country's attempt to change or influence another country's sovereignty rights or policies through governmental or non-governmental actions, thereby redefining mutual strategic interests. The ultimate goal remains the preservation of national security and sovereignty within the traditional security domain, even if non-state actors are involved. These actions are driven by national motives aimed at securing state interests rather than private interests. While the executors of operations may include state or non-state actors, planning and command must originate from the state. Thus, non-state actors' independent actions that accidentally violate another state's sovereignty should not be considered gray-zone strategies.

Gray-zone Tactics

As for tactics, this paper argues that only non-military tactics constitute gray-zone strategies. Specifically, gray-zone tactics include narrative warfare, legal warfare, governmental jurisdiction warfare, psychological warfare, and mixing of civilian and military activities.

Narrative warfare refers to the contest for discursive authority, exemplified by China's invocation of historical rights to justify its maritime claims and territorial demarcation in the South China Sea. Legal warfare manifests in two forms: first, the use of domestic legislation to regulate the behavior of foreign actors; second, efforts to seize interpretive authority over international laws and customary norms. For instance, China has increasingly invoked its reading of UNGA Resolution 2758 to legitimize its One-China Principle and delegitimize Taiwan's status as a separate political entity in the international system. The third category, governmental jurisdiction warfare, is exemplified by the China Coast Guard's (CCG) law enforcement activities in disputed waters and the imposition of summer fishing bans in the South China Sea, both unilaterally asserting jurisdiction over foreign actors in contested areas. This category also encompasses denial of prosperity tactics, such as economic sanctions or trade quarantines to coerce a target state.

Psychological warfare includes espionage, active infiltration, proxy sabotage, and propaganda. Although these tactics have long existed in traditional diplomatic practices, they become gray-zone strategies when directed aggressively toward a specific adversary. For example, Russia's annexation of Crimea was preceded by an integrated campaign of psychological warfare: masked troops seized key strategic locations, a pro-Russian local government was installed through proxies, and a referendum was held to legitimize annexation. Lastly, mixing civilian and military activities involves utilizing civilian forces to hinder foreign operations or conceal military objectives. The facilities constructed by China in the South China Sea exhibit dual-use characteristics, extending its military projection capabilities. Through deploying maritime militia forces to encircle Scarborough Shoal, China ultimately established effective control over the disputed area.

This definition and typology align with Sun Tzu's classification of national strategy. In *The Art of War*, Sun Tzu wrote: "The best warfare is to win by strategy, followed by diplomacy, then military action, and lastly, besieging cities." Ideally, a country influences or changes



another state's sovereignty rights or policies through cunning strategies, achieving objectives without deploying troops. The second approach involves diplomatic measures to disrupt alliances, the third entails military engagement, and the least desirable is direct territorial occupation. Thus, gray-zone strategies correspond to the first type: "winning through strategy," where the adversary perceives confrontation as too risky and success as unlikely, leading to the abandonment of resistance.

Based on this definition, gray-zone strategies are crucial for safeguarding national sovereignty. Understanding how a country can employ gray-zone strategies to protect its own interests and how it can respond to others' gray-zone strategies is essential for maintaining the status quo. When a state employs gray-zone strategies, its goal is to signal that confrontation carries significant risks, compelling the opponent to adjust policies accordingly. Effective responses should therefore focus on addressing the underlying objectives of such strategies rather than merely reacting to their methods, in order to mitigate risks and counter their impacts effectively.

Theorizing China's Gray-zone Strategy

China has actively employed gray-zone strategies in the Indo-Pacific region in recent years. However, the frequency and types of these strategies vary. The following sections examine the three maritime areas in the Indo-Pacific where China employs gray-zone strategies for different purposes, thereby shaping regional dynamics and destabilizing the status quo.

South China Sea: Struggle between Two Orders

Since the end of World War II, the U.S.-led order of free and open international seas has become the global mainstream. Although the United States has not ratified the 1982 United Nations Convention on the Law of the Sea (UNCLOS), its norms—such as the delineation of the high seas—continue to guide state conduct in maritime domains. In the South China Sea, China, Vietnam, Malaysia, Brunei, the Philippines, and Taiwan assert overlapping maritime claims. China claims maritime rights within the so-called ten-dash line, effectively encompassing almost the entire South China Sea. Taiwan claims that Taiping Island (Itu Aba) qualifies as an island entitled to a 200-nautical-mile Exclusive Economic Zone (EEZ), overlapping with claims by Vietnam, Malaysia, the Philippines, and Brunei.

China's gray-zone strategies in this area are highly diversified, encompassing narrative warfare, legal warfare, governmental jurisdiction warfare, psychological warfare, and the mixing of civilian and military activities. Narrative warfare involves reinforcing the legitimacy of historic rights within the ten-dash line through ancient maps and academic research (McLaughlin, 2022). Legal warfare includes reinterpreting international and customary law, such as asserting maritime delimitation rights through land reclamation and artificial island construction. China has also enacted domestic laws with extraterritorial implications—such as the Coast Guard Law, amended Maritime Traffic Safety Law, and the Outline of Military Non-War Military Operations—to expand the scope and scale of its forces' overseas activities. Following the promulgation of its Coast Guard



Law in 2021, which explicitly listed “safeguarding national sovereignty” as a purpose and authorized the use of weapons against foreign infringements, China further expanded its legal basis for enforcement. The law also grants the Coast Guard authority to expel or tow away foreign military or government vessels. In May 2024, the CCG issued Administrative Order No. 3, regulating enforcement procedures, thereby extending domestic legislation into the international domain.

Specifically, China's Coast Guard Law and Administrative Order No. 3 authorize coast guard patrols and boarding inspections to coerce other states, preventing them from exercising their sovereign rights and enabling China to conduct governmental jurisdiction warfare. This has resulted in numerous collisions between CCG vessels and fishing boats from other countries, such as Vietnam. The CCG also frequently patrols near the natural gas fields located within disputed EEZs of countries such as Malaysia, Vietnam, and Indonesia. In particular, confrontations with Vietnam are common in the vicinity of the Vanguard Bank oil field (Sebastian, 2021). Psychological warfare includes covert command and funding activities to infiltrate foreign government agencies and sponsoring large networks of online trolls (“Little Pinks”) and hackers targeting government and private institutions. For example, on July 29, 2016, Chinese hackers infiltrated Vietnam's major international airports and broadcast messages declaring “the South China Sea belongs to China” (Hsu, 2016).

Finally, mixing civilian and military activities involves deploying large numbers of fishing vessels acting as maritime militia. Equipped with advanced satellite communications and water cannons, they surround disputed territories to demonstrate China's sovereignty. Such an action represents a gray-zone strategy that most closely resembles military operations.³ This tactic dates back to 1973 during the Paracel Islands dispute, when China dispatched armed “fishermen” (maritime militia) to land on the islands, eventually prompting naval clashes with South Vietnam (Xinhua News, 2017). This tactic has since evolved into what O'Rourke (2019) terms the “Cabbage Strategy,” which involves encircling disputed areas with layers of fishing vessels, coast guard ships, and naval warships to assert sovereignty claims and enable occupation without direct conflict.

The most successful example is Scarborough Shoal, where China established de facto control by deploying fishing vessels, then fisheries patrol ships under the pretext of protecting fishermen, ultimately blocking Philippine control (Bau, Tso, & Liao, 2014). China used similar tactics against Philippine resupply missions to the BRP Sierra Madre grounded at Second Thomas Shoal (Ren'ai Jiao). China initially deployed maritime militia vessels to surround the area, making it difficult for the Philippines to conduct resupply operations. This was followed by Chinese coast guard ships coercing Philippine government vessels to alter their course, with the apparent aim of forcing the Filipino troops stationed on the Sierra Madre to abandon the ship. In 2024, the CCG announced that it would impose control measures on Philippine vessels it deemed to have “illegally intruded” into the waters surrounding Second Thomas Shoal. The Philippine Coast Guard subsequently accused the CCG of damaging its supply vessels. On June 17, armed CCG personnel boarded a Philippine Navy resupply boat and injured Filipino naval personnel. Tensions between the two sides escalated until July 2, when Chinese and Philippine

³ Therefore, in 2019, the United States declared that it would regard maritime militia, coast guard, and navy forces as equivalent in its operational considerations (Sevastopulo and Hille, 2019).“



foreign ministers convened the 9th meeting of the Bilateral Consultation Mechanism on the South China Sea (BCM), bringing about a temporary halt to the confrontation.

Overall, China's main objective in the South China Sea is to expand its sovereign rights and influence rather than physically occupy other claimants' territories. Although the claimant states in the South China Sea are individually weaker than China, their large number means that any rash use of military force by China could potentially trigger the formation of an anti-China coalition. The use of gray-zone strategies has thus become China's preferred approach in this region (Zhang, 2019). These tactics provoke less initial controversy and enable China to justify its actions incrementally, altering the status quo and international norms through a salami-slicing approach. Unlike the U.S., which upholds international law and a rules-based order as the foundation of South China Sea governance, China seeks to construct an order based on sovereignty principles and negotiations, thereby reshaping existing power dynamics. The contest for regional order between China and the United States thus continues.

East China Sea: New Normal

Relative to the South China Sea, the East China Sea has delimitation disputes involving only China, South Korea, Japan, and Taiwan (Park, 1975, 27). In 1974, Japan and South Korea signed two agreements concerning the continental shelf in areas where their maritime claims overlapped (Makoto and Becker-Weinberg, 2024). In 2001, China and South Korea signed the China-South Korea Fisheries Agreement, which established provisional measure zones in the Yellow Sea to be jointly managed by both parties. Although China and Japan reached the 2008 "Consensus on principles of the China-Japan East China Sea issue," which set out a cooperative framework for delimiting their Exclusive Economic Zones and for oil and gas development, the agreement lacked implementing details and thus has remained largely ineffective.

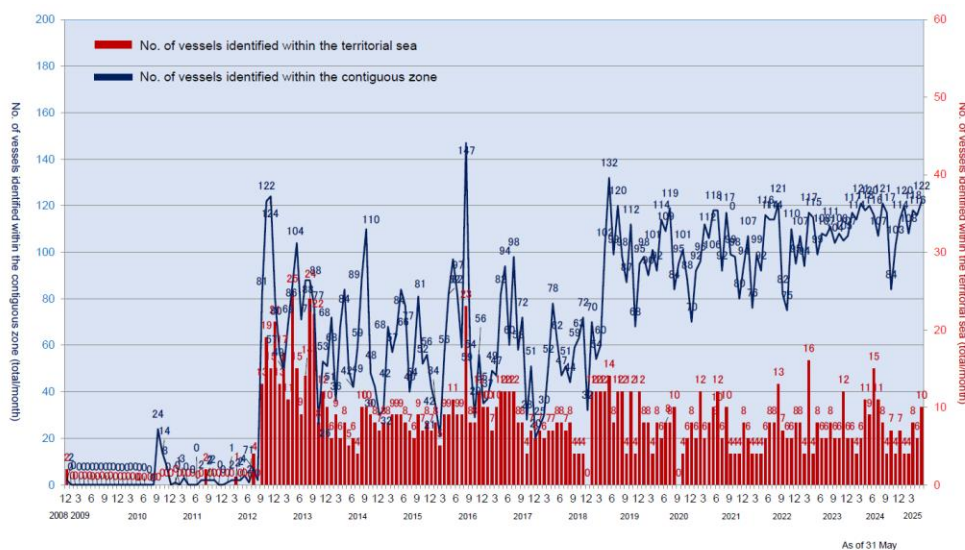
China's gray zone tactics in the East China Sea similarly involves allowing large numbers of Chinese fishing vessels to operate there, thereby expanding the scope of China's claimed fishing grounds, even at the risk of colliding with JCG vessels. For example, in the 2010 Minjinyu 5179 incident, the Chinese trawler Minjinyu 5179 collided with Japanese patrol ships and was subsequently detained by Japan. The incident ultimately ended with Japan expressing regret, which was regarded as a victory for China's claim of legitimate fishing rights (Bau, Tso and Liao, 2014). However, unlike its gray-zone tactics in the South China Sea, China has not employed large numbers of maritime militia vessels to encircle the Diaoyu/Senkaku Islands or to obstruct Japan's exercise of administrative jurisdiction over them. Instead, it has relied on governmental jurisdiction warfare. In addition, China has justified its sovereignty safeguarding actions in the East China Sea by asserting sovereignty over the Diaoyu/Senkaku Islands and by invoking arguments such as the natural prolongation principle in its continental shelf delimitation claims.

Another gray-zone tactic that China employs in the East China Sea is governmental jurisdiction warfare, which is supported by legal warfare with extraterritorial effects through domestic legislation, such as the aforementioned Coast Guard Law and Administrative Order No. 3. Since Japan nationalized the Diaoyu/Senkaku Islands in



2012, CCG vessels have increased the frequency of their patrols in the East China Sea, even entering the territorial waters surrounding the Diaoyu/Senkaku Islands, as shown in Figure 1 (Ministry of Foreign Affairs of Japan, 2025).

Figure 1. Trends in CCG and Other Vessels in the Waters Surrounding the Diaoyu/Senkaku Islands



Source: Ministry of Foreign Affairs of Japan. 2025, https://www.mofa.go.jp/region/page23e_000021.html

Despite Japan's protests and JCG efforts to drive them away, Chinese incursions have increased in both number and duration (Pajon, 2017).. Since November 2023, CCG has published statements on its official website, including titles such as "The China Coast Guard has lawfully managed and controlled Japanese vessels illegally entering the territorial waters of our Diaoyu/Senkaku Islands," asserting that its actions constitute legitimate law enforcement against Japanese vessels. These statements declare, "The Diaoyu/Senkaku Islands and their affiliated islands are China's inherent territory...We urge Japan to immediately stop all illegal activities in these waters (China Coast Guard, 2023)" reiterating China's claim of sovereignty over the Diaoyu/Senkaku Islands and demanding that Japan cease entering what it considers its territorial waters. In June 2024, four armed Chinese Coast Guard vessels entered the islands' territorial waters, prompting Tokyo to lodge a strong protest demanding their immediate withdrawal (Reuters, 2024). Later, the massive CCG 2901 vessel, one of the world's largest maritime law enforcement ships, sailed around the Diaoyu/Senkaku Islands (Yomiuri Shimbun, 2024). In March 2025, the JCG reported that CCG vessels remained in the islands' territorial waters for a record 92 hours and 8 minutes (Kosuke, 2025). China's maritime law enforcement operations near the Diaoyu/Senkaku Islands have grown progressively more assertive.

In 2025, China erected a sea structure in the Yellow Sea within an area of overlapping claims with South Korea, off the Korean Peninsula's west coast. Although China claimed it was fish-farming equipment, it prompted concern from South Korea (Yim, 2025). China



has employed similar tactics in the East China Sea, prompting Japanese demands for explanation. Although China claims such structures are unrelated to sovereignty, they are viewed as potential gray-zone strategy tools, given their possible future use for radar systems or interference with foreign vessels' navigation.

China has employed gray-zone tactics in the East China Sea, including narrative warfare, legal warfare, and contests over governmental jurisdiction, to gradually undermine Japan's previously unchallenged dominance and to create the perception of joint administration with Japan. This strategy has eroded Japan's exclusive administrative control, establishing what has been termed a "new normal," although in practice Japan retains effective control over the Diaoyu/Senkaku Islands.⁴ Overall, the so-called "new normal" in the East China Sea does not represent a stable state but rather a dynamic process in which China continues to strengthen its presence. Even the previously calm Yellow Sea has begun to experience ripples as a result. Indeed, China's gray-zone strategies are being used to gradually alter the status quo.

Taiwan Strait: Internalization

The Taiwan Strait issue is fundamentally different in nature from China's disputes in the East and South China Seas. Since the establishment of the People's Republic of China (PRC) on October 1, 1949, the PRC and the Republic of China (ROC) in Taiwan have existed as two separate governing authorities. While China has exercised actual control only over the mainland, it has never abandoned its intention to unify Taiwan. In other words, China has consistently maintained that Taiwan is an integral part of its territory.

Beyond military exercises intended to intimidate Taiwan, China disseminates disinformation and seeks domestic proxies within Taiwan to directly influence public perceptions, thereby creating panic or achieving deterrent effects. For example, during U.S. House Speaker Nancy Pelosi's visit to Taiwan in 2022, numerous Taiwanese government and private sector websites were attacked or rendered inoperable. Additionally, screens at Taiwan Railways stations and convenience stores displayed statements insulting Pelosi (Tsai, 2022). Admittedly, such tactics are unlikely to yield immediate results during peacetime. However, once both sides enter a period of heightened tension or confrontation, these strategies could achieve what Sun Tzu described as defeating the enemy's will to resist before actual combat begins. Moreover, China may actively co-opt pro-China individuals in Taiwan to disseminate information detrimental to the Taiwanese government, thereby undermining internal cohesion.

Secondly, China has employed narrative warfare to emphasize the inevitability of Cross-Strait unification. It highlights the 1943 Cairo Declaration and the 1945 Potsdam Declaration, both of which stipulated that Taiwan would be returned to China, arguing

⁴ According to interviews conducted by the author in June 2024 with scholars at the National Institute for Defense Studies, Tokyo University and Keio University, the Japanese government has integrated the real-time communication systems of the Japan Maritime Self-Defense Force (JMSDF) and the JCG, enabling the Coast Guard to receive timely intelligence regarding Chinese vessels. However, they also noted that if CCG ships refuse to leave, the JCG can do no more than monitor and shadow them, as taking further action could provoke a dispute. The scholars pointed out two main reasons for this dilemma: first, Japan lacks a plan for 24-hour continuous patrols; and second, the situation is still considered a law enforcement matter, thus not warranting U.S. involvement.



that the PRC, as the successor state, inherits this sovereignty, rendering the Taiwan issue an internal matter. However, internationally, countries such as the U.S., the United Kingdom, and Japan maintain that the 1951 San Francisco Peace Treaty, which formally ended World War II, did not explicitly state that Taiwan should be returned to China. In recent years, China has further equated United Nations General Assembly Resolution 2758—which granted the PRC China's seat at the UN—with its "One China Principle," underscoring its narrative that both sides of the Strait belong to one China. Moreover, China asserts sovereignty over Taiwan and treats the One China Principle as a precondition for diplomatic relations, requiring other countries to acknowledge that "Taiwan is part of China." Domestically, it has enacted the Anti-Secession Law, the National Security Law, and the Counter-Espionage Law, defining support for Taiwan independence as an act that endangers national security. Such measures imply an expansion of extraterritorial jurisdiction, signaling not only legal warfare but also potential enforcement actions constituting governmental jurisdiction warfare.

Following the "Kinmen 0214 Incident" in 2024, CCG vessels began driving away and attempting to board Taiwanese fishing boats operating within restricted waters designated by Taiwan. China also denied the existence of the long-standing tacit understanding regarding the median line in the Taiwan Strait. CCG ships, military aircraft, and naval vessels have repeatedly crossed this median line. Furthermore, in 2022 China conducted encirclement exercises around Taiwan to warn against its decision to host U.S. House Speaker Pelosi, with the designated exercise zones even including a small portion of Japan's claimed EEZ. In 2024, it carried out Joint Sword-2024A and 2024B exercises, followed by multiple encirclement drills starting in April 2025. The areas designated for these exercises have gradually moved closer to Taiwan's declared territorial waters, demonstrating China's intent to assert its control and jurisdictional authority in the surrounding areas.

Overall, the gray-zone tactics China employs in the Taiwan Strait are aimed at internalizing the Strait as China's inland waters and domesticating Taiwan such as narratives warfare, legal warfare, and psychological warfare. Since the Kinmen 0214 incident, although China has deployed more coast guard vessels to patrol and has increasingly crossed the median line of the Taiwan Strait—thereby undermining the previous tacit understanding of separate administrative control over respective waters—it has not yet carried out actual boarding inspections or law enforcement operations. Regarding the Taiwan Strait, China primarily uses military means to demonstrate its position. Notably, in June 2025, China's aircraft carriers *Liaoning* and *Shandong* conducted an unprecedented simultaneous deployment into the Western Pacific, crossing the Second Island Chain. This demonstrated China's potential for long-range operations and served to shift international attention from the Taiwan Strait to the western Pacific.

Comparisons of the Three Cases

Based on the comparison of the above three cases, it is evident that due to differences in objectives and the number and strength of neighboring countries, China has adopted different approaches in its use of gray-zone strategies. Two key characteristics can be summarized.

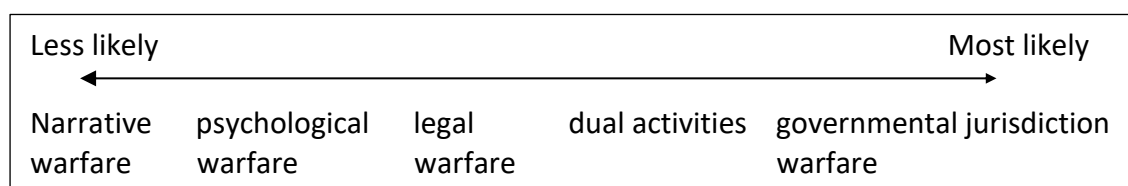


First, the frequency and type of gray-zone strategies that China employs in the South China Sea, East China Sea, and Taiwan Strait vary according to its strategic objectives in each region. The greater level of the impacts on sovereignty, the less frequently gray-zone strategies are employed, and the more likely China is to resort to military means to signal its concern in the area. The greater the impact on sovereignty, the less frequently gray-zone strategies are employed, and the more likely China is to resort to military means to signal its concerns. That is, China tends to employ military means in response to issues it perceives as serious violations of its sovereignty, while adopting gray-zone strategies for situations it views as involving lesser infringements. In the Taiwan Strait, China relies less on gray-zone strategies and more on quasi-military actions, such as deploying over 500 missiles aimed at Taiwan, regularly sending military aircraft and naval vessels across the median line, and conducting military exercises that gradually approach Taiwan's territorial waters. In the East China Sea, the CCG accompanied by military vessels is the primary tool used to intervene in the status quo. In contrast, in the South China Sea, gray-zone tactics are effective for harassing other countries aiming to gradually change the status quo, while military means may provoke stronger resentment and lead to conflict, making them less preferable.

Specifically, China's objectives in the South China Sea are twofold: to assert economic sovereign rights and to establish an alternative order to the U.S.-led liberal international order. Physical occupation of the entire South China Sea is not its primary goal. Moreover, its opponents in the region are relatively weak and fragmented; none can individually challenge China's power, though their collective number exceeds that of China's opponents in the East China Sea and Taiwan Strait. To avoid provoking excessive reactions and escalation into military conflict, China is more inclined to employ gray-zone strategies. In the East China Sea, China's goals include preserving its sovereign rights and asserting sovereignty over the Diaoyu/Senkaku Islands. However, its opponent, Japan, is not weak and benefits from the protection of the U.S.-Japan security treaty. Hence, to avoid war or confrontation with the U.S., gray-zone strategies are preferred, but more severe levels are employed to signal its serious concerns over the Diaoyu/Senkaku Islands. Lastly, China's goal in the Taiwan Strait is unification with Taiwan, for which it has never ruled out the use of force. Thus, gray-zone strategies are less emphasized, as China is willing to demonstrate its resolve to avoid losing Taiwan.

Secondly, regarding the likelihood of triggering military conflicts, the five gray-zone tactics identified in this paper can be ranked as shown in Figure 1. The greater the impact on sovereignty, the more China tends to employ gray-zone tactics with higher risks of provoking conflict. In contrast, when sovereignty is less affected, it prefers gray-zone tactics that are less likely to escalate into war.

Figure 1. Severity of Gray-Zone Tactics



Source: the author. Note: Dual activities refer to the mixing of civilian and military activities.



Given that China's objective in the Taiwan Strait is to achieve sovereignty over Taiwan, it remains prepared for the possibility of war, even if it does not anticipate immediate conflict, and thus does not hesitate to employ gray-zone tactics carrying a high risk of escalation. In the East China Sea, which also involves sovereignty disputes, China prefers employing high-intensity gray-zone tactics but seeks to avoid provoking military conflict due to the presence of the U.S.-Japan alliance. In the South China Sea, where multiple rival claimant states exist, China tends to employ gray-zone tactics that are less likely to provoke military conflict. By doing so, it allows different countries to interpret its actions in varying ways, increasing the likelihood of avoiding war (Liao, 2021, pp. 33–35).

Conclusions

Gray-zone strategies are not a newly emergent phenomenon. However, in recent years, they have re-emerged on the international stage due to Russia's annexation of Crimea and China's increasingly assertive and aggressive behaviors in the Indo-Pacific region. Nonetheless, including tactics with explicit military characteristics under the definition of gray-zone strategies risks obscuring the significance of non-military means within gray-zone operations, as well as their fundamental objective of avoiding open warfare. Therefore, this paper redefines gray-zone strategies as a country's attempt to change or influence another country's sovereignty rights or policies through governmental or non-governmental actions, thereby redefining mutual strategic interests. Based on a review of the literature, this study identifies five types of non-military gray-zone tactics, ranked according to their potential to trigger military conflict: narrative warfare, psychological warfare, legal warfare, mixing of civilian and military activities, and governmental jurisdiction warfare.

Based on this analysis, this paper examines China's use of gray-zone tactics in the South China Sea, East China Sea, and Taiwan Strait, and identifies two key characteristics. First, China tends to employ military means in response to issues it perceives as serious violations of its sovereignty, while adopting gray-zone strategies in situations it views as involving lesser infringements. Second, the greater the impact on its sovereignty, the more China tends to employ gray-zone tactics that carry a higher risk of provoking conflict. In contrast, when sovereignty is less affected, it prefers gray-zone tactics that are less likely to escalate into war. These two characteristics can be attributed to the different objectives China pursues in the South China Sea, East China Sea, and Taiwan Strait, as well as variations in the nature and capabilities of its opponents. Consequently, the effects produced by gray-zone strategies in these three regions also differ.

In the South China Sea, China's gray-zone strategies have produced evolutionary impacts on the international order. Although these tactics are non-military in nature, they implicitly signal the possibility of subsequent military action. Through such psychological deterrence aimed at undermining the adversary's will to resist, the actor can gradually alter the status quo in a 'salami-slicing' manner. For instance, despite winning the 2016 arbitration case on the South China Sea, the Philippines lost control of Scarborough Shoal due to China's gray-zone tactics. Yet former President Duterte publicly stated that the Philippines could not and would not confront China unless it meant going to war. In this sense, gray-zone strategies function as tools of coercive deterrence, seeking to replace



the U.S.-led liberal international order based on the rule of law with a China-led order grounded merely in rule by law.

It is noteworthy that in all three regions—the South China Sea, East China Sea, and Taiwan Strait—China's use of gray-zone strategies is underpinned by its expanding military capabilities. In the South China Sea, China has enhanced its effective control over disputed features through island-building, administrative measures, and resource extraction, using these as a foundation to actively reshape regional order in competition with the U.S.-led liberal international order, shifting the power configuration toward a new equilibrium. In the East China Sea, although a "new normal" of joint management between China and Japan appears to have emerged, this arrangement is neither symmetrical nor static. For instance, Japan Coast Guard (JCG) patrol vessels are not equipped with heavy weaponry such as cannons, whereas CCG vessels are, meaning the seemingly stable situation could tilt further in China's favor at any time. In the Taiwan Strait, the effects of China's gray-zone strategies are felt more as psychological deterrence against the Taiwanese public, as well as in establishing both the capability and legitimacy to exclude international intervention.

In light of this, while countries must handle and respond to China's use of gray-zone tactics with caution, greater attention should be paid to the underlying expansion of China's military capabilities and influence. When confronted with these near-harassment gray-zone tactics, countries should also consider responding with asymmetric or lower-cost measures that nonetheless are of great concern to China, such as increasing exchanges with Taiwan or enhancing Taiwan's international status. If such actions are taken by individual states, they may provoke Chinese retaliation. However, if countries act collectively to strengthen their relations with Taiwan, even minor progress could be enough to significantly unsettle China and shift its original strategic focus. In other words, rather than allowing China to address the South China Sea, East China Sea, and Taiwan Strait separately through distinct gray-zone tactics, a coordinated approach that targets China's vulnerabilities could prove far more effective in countering its use of gray-zone strategies.

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