The Foreign Affairs Committee
Løgtingið
Torshavn
Tinganes
FO-100 Torshavn
Faroe Islands

17 October 2025

By Email Only: logting@logting.fo

Dear Foreign Affairs Committee,

Re: Parliamentary Bill to Amend the Statute on Restrictive Measures in Connection with Actions Against Ukraine (the 'Draft Bill')

Case No: 25/20885

1. Thank you for your invitation to provide a summary of Norebo's position for consideration by the Foreign Affairs Committee (the 'Committee'). We are grateful for the opportunity to assist the Committee in its important work on its consideration of the Draft Bill and for the chance to contribute constructively and transparently.

2. We understand that this summary of Norebo's position is to be provided so that you can decide whether further participation by Norebo in this process would assist the Committee. We would welcome the opportunity to meet the Committee in person in the Faroe Islands at the Committee's convenience with a small team led by English King's Counsel for Norebo, Mr Hodge Malek KC,[1] so that we can present the evidence and provide our full submissions.

3. We approach the Committee's request with great respect for Faroese institutions and procedures. Our sole objective is to assist the Committee with a fair and accurate assessment of the materials relevant to the Draft Bill and any prospective company-specific measures. We believe that careful consideration of the primary evidence will be helpful to the Committee and to Løgtingið in reaching a balanced and well-informed view.

[1] https://3vb.com/barrister/hodge-malek-kc/

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4. In that spirit, we stand ready to provide, on written request, any further documentation the Committee may consider useful, including the submissions lodged by Norebo with the Council of the European Union and Court of Justice of the EU, expert reports, witness statements, inspection reports, and other documents contained in Norebo's detailed evidence bundle filed with the EU institutions.

Summary of Norebo's Position on the Allegations by the European Union

5. This summary consolidates the key points previously raised in our correspondence with the Ministry of Foreign Affairs, Industry and Trade and with Løgtingið.

6. This matter concerns serious allegations that have been made against Norebo by various news outlets regarding involvement in espionage and sabotage, which are inaccurate and without any evidential foundation.

7. Norebo is an international, privately owned fishing and seafood business headquartered in Murmansk in the Russian Federation. It is responsible for supplying a significant portion of white fish (i.e. Cod, Haddock, Pollock etc) to the EU and the UK markets annually.

8. Norebo has answered the allegations against it with detailed, objective evidence that proves there is no substance to them. It appears likely that these repeated attacks on Norebo in news outlets have been provoked by commercial rivals opportunistically exploiting the fact that Norebo is incorporated in Russia and taking advantage of current western public perception of the Russian Federation.

9. Despite attacks against Norebo in the media over several years, no EU institution or European government expressed any concern over Norebo prior to the EU imposing sanctions on Norebo on 20 May 2025. Whilst food is exempt from EU sanctions, the EU has relied on powers to impose sanctions over so-called 'destablising' conduct (i.e., alleged involvement in espionage and sabotage).

10. In response to this designation, Norebo applied for reconsideration of the designation by the EU Council, and filed an annulment application to the General Court of Justice of the European Union.

The EU's 'Evidence Pack'

11. The EU Council supplied Norebo with the 'evidence' upon which the decision to designate was made. The EU has confirmed that the sole evidence relied upon is 18 news articles (the 'Evidence Pack'). The Evidence Pack includes no official documents, expert evidence or governmental sources. There are no such sources or sensitive underlying documents that have been relied on.

12. The Evidence Pack is composed of translated media articles which are almost entirely unverified and contain repetitive allegations or suggestions. The summaries of the articles in the Evidence Pack are also frequently incorrect[2]. The articles are often inconsistent, anonymous, and unsupported by any primary evidence (see enclosed table of key allegations with Norebo's responses to each allegation).

13. Many of the news articles have simply repeated earlier media reports or relied on speculative or technically inaccurate interpretations of maritime activity. Several are shown to contain material factual errors, including mistaken identification of vessels and companies. Some appear to derive from commercial rivals and hostile actors with a history of commissioning adverse coverage about Norebo.

14. Norebo requested that the EU Council confirm that the Evidence Pack is the only evidence relied on[3]. The EU Council provided the Evidence Pack and confirmed in writing that there is no further evidence relied upon besides these articles[4].

15. This was further confirmed by the EU Council on 7 October 2025 in a letter stating:

> *"First, you submit that the Council should have relied on official sources, rather than on press reports, which you consider to be unreliable and/or unverifiable and based on incomplete information… it is extremely difficult in practice to access certain sources… and to potentially gather evidence from persons who are prepared to be identified. In the absence of*

[2] The decision of the Council is based on English translations of foreign-language articles, many of which appear to be generated using automated tools such as Google Translate. These are not certified or official translations. Several contain serious mistranslations that materially affect the meaning and appear to overstate or distort the allegations made. In some cases, the EU's own summaries misrepresent the content of the translated articles.

[3] On 5 June 2025, Daldewolf SRL BV, on behalf of Norebo, formally requested "*access to the Council's file and documentation concerning our client in order to verify the evidence and documentation on which the Council based its decision to list it under sanctions".*

[4] On 24 June 2025, the EU Council responded by letter attaching the 'EU Evidence Pack' and stating "*all information and documents relied upon to justify [Norebo's] designation*" was within the EU Evidence Pack.

investigative powers in third countries, EU authorities must be able to rely on publicly available information, reports, press articles, or other similar sources of information…".

16. The EU Council have clearly shown that they have not looked at any of the detailed evidence submitted by Norebo. The EU Council simply relies on allegations principally made by second and third tier news agencies, on the apparent basis that "*it is difficult in practice to access certain [types of] sources*". However, this position is unsustainable when even a cursory look is taken at Norebo's evidence.

Norebo's evidence filed with the EU Council

17. The enclosed table summarises the 5 key allegations made in the EU Council's Evidence Pack, together with Norebo's responses and the evidence on which its responses are based. We explain Norebo's responses in slightly greater detail below:

(1) NRK, in an article in the Evidence Pack, alleged that the trawler Taurus undertook movements indicative of espionage, including proximity to a visiting U.S. submarine near Tromsø. These allegations have been repeated in later press articles. However, the allegations are untrue. In relation to most of the periods stated in the article, Taurus was not even owned by Norebo. As regards the alleged incident in December 2022 when Taurus was alleged to have passed close to a US submarine, in fact the Taurus had in fact departed Tromsø following the directions of the Norwegian port authorities, under pilotage by a Norwegian port pilot, and after a full inspection by the Norwegian Coast Guard.

(2) It was alleged that the Kapitan Sokolov assisted the Chinese vessel Newnew Polar Bear in damaging subsea infrastructure in European waters. Again, this is demonstrably untrue. Public, on-record updates from the Finnish National Bureau of Investigation state that the damage to the Balticconnector pipeline was caused by the Newnew Polar Bear by dragging an anchor. There is no mention of the Kapitan Sokolov by the authorities whatsoever. Furthermore, the AIS tracking data confirms the Kapitan Sokolov was over 50 nautical miles away from the incident at the relevant time.

(3) Further articles alleged that the Belomorye had been operating suspiciously near a Norwegian gas hub/LNG area. However, this too is a baseless allegation. The Belomorye's AIS and satellite records show the ship was at the time almost 100 nautical miles away.

(4) An article by 'Follow The Money' alleged that the Canopus undertook suspicious movements near undersea pipelines off the coast of the Netherlands. However, this is another baseless allegation, based solely on misinterpretation of AIS data by non-qualified persons. In fact, the AIS and satellite records, together with the Dutch port authority's emails confirming docking and departing, show the ship was docked in Velsen harbour 20 nautical miles south at the relevant time.

(5) It is alleged that trawlers Ester and Lira were Norebo vessels that conducted suspicious fishing patterns and had old Soviet era communications equipment on board which could have been used for espionage. Again, this allegation is simply wrong. The Ester and Lira are not, and never have been, owned by Norebo. A simple search will show you they are owned by Atlantrybflot JSC and Sea Start Co Ltd.

18. Finally, it is important to note that the EU based its sanctions decision on media articles making allegations, without substantive proof, about events said to have occurred predominantly in the Norwegian Seas. However, neither the Norwegian Coast Guard nor the Joint Russian–Norwegian Fisheries Commission has advanced any such claim. In fact, the Norwegian authorities have confirmed that they never alleged criminal activity by Russian vessels[5].

Norebo's expert evidence

19. We also obtained the assistance of an independent expert in maritime movements and dual-use technologies, Mr Colin Wood OBE, a former officer in the British Army, member of the UK Special Forces, and senior UK intelligence official. He has a wealth of experience in maritime and dual-use technologies.

20. Mr Wood has concluded that none of the allegations in the EU's Evidence Pack stands up to scrutiny when the vessel logs, positional tracking data, and equipment records are reviewed. He judged that in each case the conduct and specifications of the vessels are consistent with lawful, commercial fishing activity:

[5] The Norwegian authorities confirmed to the Permanent Russian-Norwegian Committee on Management and Control in Fisheries at its meeting on 3-5 June 2025 that the Norwegian Coast Guard: *"denied allegations that the Coast Guard had accused Russian fishing vessels of unlawful activities".* The Norwegian Coast Guard went on to publish a statement that stated: *"we in the Coast Guard have never accused Russian fishing vessels of doing anything illegal"*.

"In every instance, the underlying AIS and operational data demonstrate routine commercial or mechanical explanations rather than clandestine activity…

a. The consolidated monitoring evidence demonstrates that Norebo Vessels have operated within the international, national (for example, Norwegian legal frameworks) laws and regulations for all monitoring dates reviewed since 2018. Multiple high-profile allegations in the Council dossier lack corroborating primary data and can be explained by ordinary fishing operations, port-state routines, or mis-identification."

21. Mr Wood finds that there is no credible basis for any suggestion of espionage, sabotage, or hybrid operations. In his expert opinion, the EU's 20 May 2025 Decision is based on factually incorrect data, mistaken identity or has an innocent commercial explanation. Vessel logs, AIS tracking data, and inspection records contradict any suggestion of covert rendezvous or espionage-grade equipment, and the likely reason for the allegations of suspicious movement are simply inexperienced journalists misinterpreting the satellite tracking data of routine fishing voyages.

22. We also had the Evidence Pack reviewed by an independent expert in journalism: Mr Christopher Blackhurst, a prominent and renowned journalist of over 45 years' experience, and former editor of The Independent. In the expert report prepared by Mr Blackhurst he confirms that the articles relied upon by the EU Council fall significantly below recognised journalistic standards. His review concludes that the reporting is frequently copied from other unverified media, lacks attribution to verifiable sources, and is indicative of a wider pattern of journalistic repetition rather than any independent investigation:

"I am astonished that an official measure of this seriousness was seemingly based upon the items contained in 'the Evidence Pack'. None of them would qualify as 'top drawer' journalist investigation, and none display a deep understanding of the subject under discussion. They are presented in a breathless, excitable fashion and are… entirely one-sided. In journalistic terms, they are 'over-hyped' and would not be picked up and followed by a serious, high quality, objective news outlet. The use of ChatGPT on occasion is telling.

Given my extensive experience of leading and handling investigations and in dealing with internal media lawyers, who normally must approve everything ahead of publication, I am frankly surprised that some of the articles were even published. They certainly would not have appeared in the form they have at any of the major news titles where I have worked, both as an editor and as a reporter."

23. Taken together, the primary evidence and expert reports contradict the allegations advanced in the Evidence Pack. Furthermore, the vessel ownership records, AIS and satellite datasets, port and inspection records, and independent third-party documents all further demonstrate that the ship movements, and other matters identified in the media articles, have straightforward commercial explanations and do not support the inferences drawn.

Summary of Norebo's Position on the Draft Bill

24. We respectfully submit that the Committee's assessment of the Draft Bill, and of any prospective company-specific measure, should be informed by the primary, detailed evidential record presented by Norebo and its expert reports. The Committee should not be misled into basing its decisions on ill-informed journalism without any verifiable sources. It should not replicate EU sanctions merely because the EU has done so without assessing the underlying evidence for itself.

25. The Draft Bill engages issues of real consequence for the Faroe Islands and for Norebo. The fisheries economy depends upon predictable access arrangements, reciprocal quota settlements, and stable commercial relationships across catching, processing, logistics, and export.

26. Company-specific restrictive measures that affect major suppliers risk disrupting those arrangements, constraining market participation for Faroese vessels and exporters, and creating uncertainty for on-shore employment and investment in processing, transport, and ancillary services[6].

27. We are also aware that there has also been significant public debate and concern within the Faroe Islands regarding the potential economic impact of any company-specific measures under the Draft Bill. We recognise that the Committee will be best placed to appreciate the tenor of

[6] Since 2021, under this regime, the Faroe Islands have been granted yearly quotas for fishing in the Barents Sea and the Russian EEZ averaging approximately:

- 12,500 metric tonnes of Cod,
- 1,300 metric tonnes of Haddock,
- 900 metric tonnes of Plaice, and
- 3,700 metric tonnes of Shrimp

In the same period Norebo has been licenced by the Russian Federation to fulfil significant volumes of its' yearly fishing quota in the Faroese EEZ. The Russian Federation depends on Norebo to fulfil approximately 30% of its quota for Blue Whitling, 20% of its quota for Mackerel, and 50% of its quota for Herring. This amounts to a yearly average of approximately:

- 22,000 metric tonnes of Blue Whiting
- 2,400 metric tonnes of Mackerel
- 3,600 metric tonnes of Herring

local discussion. Our sole point is that these are matters in which the factual basis should be tested carefully. Public policy should not be based on unverified allegations. Otherwise, there is a foreseeable risk of unintended harm to Faroese interests that could be avoided by assessing the primary record before any executive step is taken.

28. An evidence-led approach would help to ensure that decisions taken in Tórshavn reflect the standards of fairness and proportionality that Faroese institutions uphold.

29. The evidential materials we have assembled are both detailed and extensive. The core bundle exceeds two thousand pages and includes ownership records, vessel logs, AIS and satellite datasets, port records, inspection reports, third-party invoices, sworn witness statements, and expert reports. These materials are best reviewed with the benefit of structured explanation and the ability to interrogate the data.

Conclusion and Request for Meeting with the Committee

30. For these reasons, we respectfully request the opportunity to meet the Committee in person in the Faroe Islands at the Committee's convenience, in order to present the evidence and provide our full submissions. At that meeting, we would take the Committee through the principal allegations and the corresponding primary evidence, answer questions, and facilitate secure access to the underlying datasets and reports.

31. We would propose to attend a meeting with a small team lead by Mr Hodge Malek KC, so that the Committee has direct access to the person who has drafted and led the defence of Norebo in the General Court of the European Union.

32. We are willing to accommodate any scheduling, format, or confidentiality requirements the Committee may set. We can also provide an executive index and document map in advance to support an efficient review of the papers.

33. We look forward to hearing from you.

Yours faithfully

Devonshires

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