



Wilton Park



Report

**Sanctions, Incentives, and Human Security:
Economic Statecraft and Humanitarian Crises**

Monday 16 – Wednesday 18 May 2022 | WP1992

In partnership with:





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Introduction

Since the end of the Cold War, sanctions have become a key tool of multilateral and national foreign policy, imposed to address international challenges ranging from ending internal conflict and territorial aggression to thwarting nuclear proliferation, massive human rights violations, and terrorism. The Fourth Freedom Forum (FFF) and the University of Notre Dame's Kroc Institute for International Peace Studies have for nearly three decades conducted research on sanctions through their Sanctions and Security Research Project (SSRP). They have produced policy-relevant recommendations for governments, non-governmental organizations, and multilateral institutions, in particular the UN, on the use and impact of sanctions, developing sanctions methodology, and making sanctions a targeted—or smart—rather than a blunt instrument whose use could trigger unintended consequences.

In the 1990s and early 2000s, sanctions were often used by the UN Security Council, which, under Article 41 of the UN Charter, is able to impose a number of “measures not involving the use of force ... to give effect to its decisions” and can “call upon Members of the United Nations to apply such measures”. During that period, UN sanctions evolved. Initially they were comprehensive, affecting entire economies and populations which resulted both in difficulties in their implementation and unintended consequences. Efforts to refine sanctions eventually led to the design and imposition of more targeted measures aimed deliberately at decisionmakers or goods (including armaments and certain commodities) fuelling the conflicts.

Over the past decade, contentious politics among the permanent members of the UN Security Council have stalled the Council's resort to sanctions. To compensate for this paralysis and often to enforce further existing UN sanctions, individual member states or other multilateral actors have become the key sanctions imposers. During this period, sanctions have become deeply entangled in major humanitarian disasters. In several targeted areas, sanctions have failed to stifle massive violence, and conversely, ample evidence points to socioeconomic deterioration in the targeted countries.

Further, unilateral sanctions imposed by powerful states have contributed to significant, negative socioeconomic impacts on innocent civilians. This trend became even more consequential during the global COVID-19 pandemic when various medical and related products faced supply disruptions, often correlated with sanctions. Considerable challenges from the humanitarian relief, NGO, human rights, and academic research sectors, as well as a momentum created by the reports of the UN Human Rights Council's Special Rapporteur on the impact of unilateral coercive measures on the enjoyment of human rights, have moved accountability of sanctions impact to the top of the global agenda.

To scrutinise in-depth the humanitarian impact of sanctions, in early 2021, the Sanctions and Security Research Project commissioned case studies on Iran, Syria, and Venezuela, to come up with recommendations for more effective safeguards to prevent negative humanitarian impacts and offer ways of improving the effectiveness of sanctions and strengthening of incentives for changes that would lead to the sanctions' removal.

The May 2022 Wilton Park conference brought together a diverse group of 40 sanctions and humanitarian sector experts from around the world to discuss their research and to examine ways of including stronger safeguards to prevent sanctions' negative humanitarian impacts, which among other positive outcomes would improve the effectiveness of sanctions. The Iran, Syria, and Venezuela case studies helped launch the discussion on how to design and implement restrictions on products and activities that threaten international peace and security, while allowing access to goods and services that are essential to the welfare of civilian populations of the targeted states. The participatory conference then proceeded to explore policy prescriptions for applying pressure not on civilians, but on decision-makers and stakeholders responsible for wrongful policies.

Other current sanctions cases, especially the sanctions imposed by several individual states and the European Union following the February 2022 Russian invasion of Ukraine, came up several times in the conversations and perhaps gave the discussions a heightened sense of immediacy. In the first half of the conference, there was a detailed analysis of the complex negative impacts of sanctions through the lens of various cases. In the second half, as guided by the participants, there emerged a focused resolve to study how to create new remedies, codes of conduct, and possibly structures, in which sanctions would be less punishing on civilians.

Key takeaways

From the various ideas presented the following central themes emerged:

- With the last sanctions regimes created by the UN Security Council in 2017, currently, most sanctions are imposed by individual states - with the United States being the most frequent single sanctions imposer - or by regional or intergovernmental organisations, such as the European Union or the African Union.
- Several current sanctions regimes are missing the key elements the 1990 and early 2000s conceptual work on sanctions (often referred to as “sanctions processes”) were characterised by:
 - Clearly articulated goals and clear conditions for lifting;
 - Prompt or require the target to engage in some type of political dialogue;
 - Sanctions being part of a longer-term strategy; and
 - Sanctions to be seen as a tool to change a behaviour rather than a punishment
- Various sanctions regimes imposed during the last decade combine a number of targeted sanctions that lead to results similar to comprehensive economic sanctions by affecting entire populations and economies, as opposed to more narrowly targeting decision-makers.
- Humanitarian exemptions are difficult to navigate and overcompliance and risk aversion on the part of banks and private business actors frequently becomes their default approach.
- Accountability for harmful impacts of sanctions applied unilaterally is less likely to occur than with UN sanctions, where there is regular reporting to the Security Council on various aspects of sanctions.
- Domestic constituencies tend not to be well informed about the impact sanctions may

have on the populations of the targeted states and are thus not likely to call for accountability.

- Sanctions are often used by repressive and less than competent governments as a convenient excuse for the poor humanitarian condition of their country.
- When repressive governments get sanctioned, they tend to repress their populations even more. It is naïve to think, and no empirical evidence supports, that sanctions will bring a revolt and a change of government.
- There is a need for an updated sanctions narrative, including a concerted educational effort aimed at constituencies in the sanctioning states and for a set of legal and ethical principles to guide sanctions imposers.

The evolving nature of sanctions

1. The Wilton Park conference gathered a group of sanctions experts that was diverse both geographically and in terms of age and time spent working on sanctions. The group included several veterans of the 1990s and early 2000s “sanctions processes” as well as people who began working on sanctions when the UN-imposed sanctions were already in decline. The months leading up to the Wilton Park meeting had seen an unprecedented wave of various sanctions imposed by individual states, the EU, and private business actors on Russia after its invasion of Ukraine in February. From being a topic discussed by experts and written about in academic journals, by the time of the conference, sanctions had made their way to mainstream media and daily conversations.
2. Much of the terminology and narratives used to describe sanctions derive from the post-Cold War period of intense work on sanctions methodology. The measures imposed more recently need an updated narrative, more precise terminology, and a considerable amount of effort to address the challenges they pose both in terms of their effectiveness—or lack thereof—as well as their unintended and harmful consequences.
3. Over the years, the UN sanctions developed what is known as the sanctions’ architecture, consisting of Security Council’s sanctions committees; Panels of Experts assisting most of the committees; and a specialised professional unit supporting sanctions-related work within the UN secretariat. While each sanctions committee establishes its own guidelines and working methods, the different Security Council sanctions regimes share several features. In principle, sanctions are seen as part of a Security Council wider strategy towards the sanctioned nation, entity, or situation.
4. The Security Council receives regular information about sanctions’ implementation and relevant developments from experts ‘on the ground’. The goals of the sanctions, as well as the conditions for their removal, are—albeit with varying degrees of clarity—articulated in the resolutions mandating the sanctions or their renewals. Perhaps most importantly, there exists a vast quantity of publicly available information about each of the UN sanctions regimes accessible on the Security Council website.
5. In today’s political and security environment, multilateral sanctions have given way to unilateral or coalition-driven sanctions. While sharing some basic features, these sanctions regimes do not use the UN Charter as their basic legal framework. In practical terms, current sanctions lack the common denominator of agreed principles regarding their goals, conditions for removal, periodic assessments, and guidance for the plethora of challenges related to their implementation and exemptions applications. Most importantly, the design of several of the current sanctions regimes fails to effectively target decision-makers and in turn entire populations and economies are harmfully affected.

6. Further, over the past decade sanctions have become entangled in major humanitarian disasters. In some cases, sanctions have failed to stifle serious violence or socio-economic deterioration. In others, unilateral measures imposed by powerful states have contributed to significant negative impacts on the socio-economic status of innocent civilians.
7. As illustrated in the three case studies furnished to the conference participants, the “maximum pressure” approach when sanctions acquire many of the features of comprehensive sanctions, has brought minimal or no political gain. Moreover, it can be argued that it has increased the economic pain for the ordinary people. The case studies each provided an illustration of how targeted sanctions, while aimed at making the top decision-makers change their behaviour, in practice have had huge negative impacts on the countries’ inhabitants while the intended reforms have not materialised.

The key concerns identified at the conference

“Today’s challenge is keeping targeted sanctions targeted.”

8. The overarching concern expressed during the meeting was that the majority of sanctions currently applied—and likely to be applied in foreseeable future—have been blunt or “dumb” measures, rather than the still prevailing narrative that international sanctions were targeted, or “smart”. Ideally, the latter were to be aimed at elites and not ordinary citizens, that their political goals were clear and their impact, while not always fully commensurate with the goals, was on the whole, positive. Participants, however, raised ethical concerns about the current “maximum pressure” or “maximum pain” approach in imposing sanctions. Further, questions were raised about the legitimacy of some unilateral sanctions in cases when they undermine the socio-economic systems that are key to the very functioning of the targeted country.
9. Even when sanctions regimes are in principle targeting only specific sectors of the economy or specific individuals, they often acquire features of comprehensive economic sanctions. Thus, as was the case with comprehensive measures, they affect entire populations, hurting ordinary people more severely than the elites. The United States, currently the most active sanctioner, plays a significant role in widening the impact of sanctions beyond the stated targets. The U.S. imposed financial or trade sanctions stretch the application of U.S. financial laws worldwide. These ‘extra-territorial’ or secondary sanctions may be (and have been) imposed on non-U.S. targets for defying and violating U.S. sanctions.
10. The combination of complicated and often ambiguous regulations with fear of potentially very high penalties for violations of these regulations has led to the phenomenon referred to as “overcompliance” or “de-risking” by various economic actors. This affects multiple countries, both sanctioned and not, where several of them are already impacted by severe humanitarian crises.
11. Risk assessment analyses conducted by the private actors involved in trade or banking relationships in sanctioned countries often lead to the conclusion that it is in the company’s interest to withdraw, rather than remain engaged in transactions. Severing the business and losing the potential profits is seen as preferable to taking the risk and incurring costs of being ‘caught’ as violating the sanctions. Targeting a central bank is one of the most extreme sanctions measures and a relatively rare one, but where it occurs it has devastating impact on the entire economy. In such cases sanctions affect most sectors and in practice become comprehensive.
12. Banks are particularly likely to stay away from transactions that might violate sanctions as they see little incentive to engage, and risks are huge. As a result, in some sanctioned countries, any type of banking involving foreign transactions has become complicated and nearly impossible. This situation has had serious

humanitarian implications for ordinary people, especially for those relying on humanitarian aid for survival as related financial transactions have become more cumbersome and slower. Similarly, people supported by private remittances from relatives abroad have been affected by the overcompliance on the part of the financial sector.

13. Humanitarian actors have exercised their share of overcompliance, or de-risking, as well. Because of the cumbersome procedures to avoid violating the sanctions, some organisations have reduced their activities or even left certain countries. This is particularly true for smaller aid organisations that do not have their own legal infrastructure or funds to seek expert advice on how to navigate the sanctioned environment.
14. In Iran, where the current U.S. sanctions restrict the government revenues and available assets of the Central Bank, they cause direct and indirect negative impacts on the well-being of average Iranians. The government's not being able to access its foreign currency reserves has led to structural damage to manufacturing, producing, and importing goods critical to key areas of Iran's economy, such as dairy, meat, and medical production. One of the government's responses to cash flow shortages caused by the sanctions has been to print more money. This, in turn, has fuelled inflation that increases costs for basic goods, diminishing the affordability for ordinary people of essential items such as food or medicine.
15. These sanctions may have actually empowered the most repressive elements of the power elite. Yet, despite the harsh crackdowns in 2021-22, Iranians in large numbers continued to protest the economic situation that they argued was being poorly managed by the regime.
16. In war-ravaged Syria, multiple factors have contributed to the current acute humanitarian crisis. While most sanctions (such as targeting the Central Bank) target government-controlled areas, in practice they affect the population of the whole country. Since June 2020, U.S. sanctions under the Caesar Syria Civilian Protection Act prohibit trade between Syria and all other countries. Many industries, even those dedicated to humanitarian trade, cannot operate under such extensive sanctions. Even if it were possible to identify a supply chain with no sanctioned parties, the process of auditing every vendor imposes another cost and takes time.
17. Sanctioning the key source of revenue for the government—such as oil in the case of Venezuela—may have a similar effect to the sanctioning of central banks and disproportionately affects ordinary citizens. The targeted country's government is unable to generate revenues for importing goods essential to the proper functioning of the country's economy. This, in turn, may lead to a humanitarian crisis affecting most of the state's population.
18. Several participants raised concerns about what could perhaps be broadly described as policy deficiencies of various sanctions regimes. Some sanctions seemed to be applied without clearly articulated goals and/or conditions for their removal; some sanctions seemed to be meant purely punitively, rather than aiming at behavioural changes of decision-makers. Several participants stressed that for sanctions to have an impact, they need to be part of a wider and consistent strategy; interact with the diplomatic and peacebuilding efforts; and be adjusted depending on developments. All sanctions regimes should include incentives for their targets to indeed change their behaviour.
19. Syria provides an illustration in this context. In response to the outbreak of the Syrian war in 2011, the United States, the European Union, and other countries, imposed sanctions initially aiming to force the change of government. When the "regime change" objective was adjusted later to a "reform" agenda, the sanctions were not adjusted to correspond to the new objective. Instead, more onerous sanctions were imposed, under the Caesar Act, prohibiting trade between Syria and all other

countries. Thus, the sanctions became disconnected from the policy goals for which they had been originally conceived.

20. Sharpening the sanctions as part of the “maximum pressure” approach, without proper strategic thinking and without parallel creative diplomatic efforts, may have an opposite effect: minimal or no political gain accompanied by maximum economic pain experienced largely by the population rather than the political elites.
21. In some cases, the targeted governments have used the sharp economic sanctions as a convenient excuse for their own ineptness, corruption, or repressiveness. It is also possible that they may have strengthened the position of the targeted countries’ leaders.
22. In Venezuela, while the oil and financial sanctions have exacerbated the economic crisis, the political, humanitarian, and economic crisis pre-dated the sanctions and was largely caused by the economic mismanagement and social repression by Venezuela’s leaders. The official national narrative, however, has been that the current crisis has been brought about by the sanctions.
23. In Syria, the original goal of sanctions imposed at the start of the conflict, was the removal from office of its president, Bashar al-Assad. More than ten years later, Assad is still in power and—as some participants suggested—the sanctions may have actually strengthened his position. The additional unilateral sanctions further pushed elements of Syria’s economy into informal sectors, leading to the development of illegal trade networks controlled by Syria’s security services. This shift has allowed forces loyal to the regime to profit from providing “security” for illegal transactions. This, in turn, has led to more coercive power over the population, who must pay the loyalists exorbitant prices for goods and services.
24. Several participants wondered whether in some cases sanctions, rather than stopping or mitigating a conflict, may actually contribute to prolonging it. Particular concern was noted about sanctions hampering peace in situations like Colombia, where non-governmental parties to a peace settlement continue to be sanctioned. In 2016, following a decades-long civil war, a peace deal was signed between the government and the rebel group the Revolutionary Armed Forces of Colombia, known by its Spanish acronym as FARC. Its members disarmed and began the process of reintegration into the economic and political life of the country. But the U.S. continued sanctioning FARC until 2021. Some 13,000 demobilised FARC members encountered numerous obstacles in returning to civilian life, especially inability to open bank accounts or being excluded from certain training programs that had U.S. funding. Some became disillusioned with the peace accords and joined dissident armed groups that had not been parties to the peace accords and have continued to operate.
25. A special case are UN counterterrorism sanctions imposed on groups and individuals. There is no broadly agreed definition of terrorism. In addition, researchers have shown that the most common way for terrorism to end is via a negotiated settlement but counterterrorism sanctions make it illegal for other actors to have any contact with the listed individuals. Thus, sanctions in practice may inhibit the long, detailed, and in-person work involved to achieve a negotiated settlement. The continued designation of certain groups will affect post-settlement reconciliation and demobilisation efforts. Furthermore, it was noted that efforts to improve due process and provide a mechanism for redress, such as the creation of an ombudsperson for the UN sanctions on al Qaida and the Islamic State, should be extended to include this mechanism for all sanctions regimes targeting individuals and entities.
26. The duration of sanctions came up repeatedly during the discussions. Concerns ranged from noting the phenomenon of “frozen sanctions” when imposed measures are left in place for decades without change, review, or regard to their impact, to questions about situations where sanctions were or would be lifted and how that

process and its aftermath should be handled.

27. There has been little attention given on the part of the international community to the viability of a heavily sanctioned economy to recuperate. The mere lifting of sanctions does not automatically create a return to normalised economic activity, recovered trade, and a growing GDP as structural obstacles created by sanctions linger on. In some countries, the impact of sanctions is often felt long after the measures were lifted. Several participants pointed out that decision-makers should consider sanctions recovery as part of the sanctions policy cycle and that sanctioning states should be responsible for assisting in or facilitating the recovery process.
28. Furthermore, sanctions often also have a spill-over effect on neighbouring countries or areas. In this context the U.S. is a special case. It is not only the most active sanctioning state, but due to its unique role in the world of finance, it has asserted that its financial laws are applicable worldwide. This logic has led to the U.S. imposing secondary sanctions on actors deemed in violation of these laws outside of U.S. territory. The U.S. secondary sanctions have prompted sovereignty discussions among the European Union members, in particular.

The way forward: what work is needed

“We want sanctions that work.”

29. The Wilton Park conference offered an opportunity to assess the range of current research being done on the impact of sanctions and to identify possible gaps where further in-depth research would be useful. Topics covered in the presentations included humanitarian consequences of overcompliance with sanctions; the difficulties humanitarian actors face navigating the complexities of the U.S. Department of the Treasury’s Office of Financial Assets Control (OFAC) regulations; the impact of unilateral sanctions on the movement of international humanitarian funds into Syria; the impact of U.S. sanctions on conflict situations, and the need for a reassessment of counterterrorism sanctions after two decades of their implementation.

Increase the relevant research

30. While the discussions reflected a wealth of existing or soon to be concluded research, there was agreement that certain areas would benefit from continuing research and policy formulations that may be derived from these studies. More detailed examination through an evidence-driven approach of the unintended impact of sanctions on social, economic, and financial sectors was identified as needed to help depoliticise the policy discussions.
31. Processes related to sanctions removal, including prior to and in the aftermath of their lifting, were mentioned among topics that would benefit from further study. It was felt that more factual information could be useful as stories of post-sanctions environments and their ability to recover have been seriously understudied. A related area of useful further study mentioned was crime and corruption that are endemic to sanctions evasion and severely affect the functioning of a targeted country in its post-sanctions recovery.
32. The decision-makers’ ability (or lack thereof) or their political will to modify sanctions already in place to better fit the evolving situations on the ground was also seen as an area where policy research and related policy advocacy work would be useful.

Education and capacity building

“Current sanctions are a widely used tool but the research on them and understanding are insufficient.”

33. At various points of the Wilton Park meeting participants highlighted the need for a better understanding of sanctions within the countries that impose them, and all

countries involved in their implementation. Better understanding of this tool is needed both at decision-making and public opinion levels. Sanctions have become a go-to tool used without serious understanding of how it works.

34. The sanctioners need to provide guidance to other states, humanitarian organisations, and private businesses on the complexities of the measures they impose and their legal implications for these different actors. Providing consistent, clear, and accessible information is particularly important with respect to the U.S., given that many of the U.S.-imposed sanctions imply the application of U.S. financial laws worldwide.
35. There is also a need for more training and capacity building for sanctions implementors and for raising public awareness of sanctions and their impact. More resources should be devoted to the drafting and design of sanctions, and there should be sharing of resources and best practices. Strengthening the community of experts who provide advice to governments could ensure that the effects of sanctions are better known and taken into account when imposing new sanctions or reviewing those already in place. With sanctions application being a dynamic process that needs information, developing a comprehensive database of all sanctions cases or other forms of information management would also be helpful.
36. Narratives on sanctions need to be updated to include the humanitarian impact of unilateral sanctions. In this context, including in the narratives, closeup pictures of populations affected by sanctions, could be effective. These narratives should also involve introducing socio-economic rights and social justice concepts and, where feasible, the perspective of populations living under sanctions. In the efforts of reframing the narratives there also needs to be empirical evidence that underscores the direct human side and a reminder that in some cases sanctions are an alternative to a war.
37. Those working on sanctions could benefit from establishing contacts with and using the resources created by the UN Human Rights Council's Special Rapporteur on the impact of unilateral coercive measures on the enjoyment of human rights, Alena Douhan.

Recommendations

Meeting in breakout groups, followed by a plenary session, participants formulated several recommendations aimed at different actors.

Policy– and decision–makers in the individual sanctioning nations or coalitions

- Based on international humanitarian and human rights law, develop policy prescriptions for applying pressures not on civilians, but on decision makers and stakeholders who are responsible for wrongful policies.
- Make an assessment of the humanitarian impact of the sanctions a standard early step in the sanctioning process.
- To increase the likelihood for a sanctions regime to have the desired effect, always build incentives into the sanctions' original design.
- Clearly articulate the goals of each sanctions regime.
- Include a review process in each sanctions regime imposed.
- Ensure an ongoing diplomatic capacity between the sanctioner and the actors being sanctioned to promote the achievement of the sanctions' goals.
- This diplomacy should also deal with issues of sanctions' side-effects and disproportionality if they arise.
- Develop a standing checklist of factors to be considered prior to imposing the sanctions to avoid committing serious and difficult to rectify errors due to haste

that often accompanies the process of imposing sanctions.

Policy– and decision–makers collectively

- Strive to create coordination mechanisms among different sanctioners and sanctions regimes that have the same target.
- Create a system for global humanitarian licensing.
- Create a legal infrastructure for private remittances that will protect them under a sanctions regime given that any remittance disruptions have particularly serious humanitarian implications for ordinary people.
- Make post-sanctions recovery part of the sanctioning policy process.

A code of conduct?

“If there are rules to war, there should be rules to economic wars as well.”

At various points of the Wilton Park discussions, participants identified a need for an internationally agreed set of principles that would guide actors applying sanctions. Terms such as “a doctrine on the use of economic force” or “a code of conduct for the application of sanctions” were mentioned and comparisons with the Geneva Conventions were made.

Such a doctrine would need to be based on solid ethical grounds and should introduce concepts such as liability for unintended consequences of sanctions and responsibility to restore societies and economies devastated by sanctions. It would also identify areas of economy that would be excluded from sanctioning. Certain military doctrines could be useful to examine in terms of principles and strategy.

Proposed elements included:

- Periodic legislative review of any sanctions regimes (no sanctions should exist for more than three years without a review)
- An international accountability mechanism. It could be an independent accountability framework that monitors implementation of sanctions and their impact and gathers good practices, principles, and guidelines.
- Introduction of the principles of proportionality and temporality in imposing sanctions.
- Introduction of the idea of remedying harms caused by sanctions.
- Grounding sanctions in human rights and humanitarian law and reflecting a concern about a target reaching the Sustainable Development Goals.

There was a consensus among the participants of the conference that discussions on the current use of sanctions needed to be expanded to involve governments and a broader range of non-governmental organisations. Greater public awareness of the current extensive use of unilateral sanctions and their humanitarian consequences was also needed. There were suggestions of establishing coalitions within different constituencies.

There was also a resolve to engage in advocacy with key stakeholders such as the U.S. and the European Union. Highlighting destabilising effects of sanctions on target countries may find traction with U.S. decision-makers who could see such destabilisation as a threat to U.S. security. At the EU, there is currently a momentum in discussions on sanctions, in part prompted by the U.S. use of secondary sanctions and European sovereignty concerns. But there also is an openness to new ideas and suggestions.

The recent wave of sanctions imposed on Russia, with the goal of isolating the country in response to its invasion of Ukraine, will undoubtedly generate new questions and make the continued discussions even more timely.

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