

Scholarship, Think-Tank, United Nations, and NGO Reports on the Humanitarian and Human Rights Impacts of Economic Sanctions (2019-2024)¹

A Working Bibliography

This bibliography is a working compilation of scholarship, think-tank, United Nations, and NGO reports on the humanitarian impacts of economic sanctions from 2019 to mid-2024. It is provided as a resource for scholars, policymakers, and journalists interested in these issues.

The initial version of the bibliography was prepared for and then updated after the May 2022 Wilton Park conference. This first version included more United Nations documents than the more recent iteration, which was compiled following the May 2023 conference at Wilton Park. Those focused on UN work in this area should search directly on the UN website.

The first version of the bibliography contained several country specific articles and reports. We retained those in this version, and have added some of the most relevant studies for 2022-24.

In addition, this current version has more extensive annotating of sources than the earlier version. When sources contained their own abstract, we simply reproduced a quote from that abstract. For other sources, we authored the summaries, which are not in quotes.

AHSR will update the bibliography periodically. We encourage specialists and users to alert us to new reports, articles, and other thematically appropriate material that should appear in updates of this bibliography. Please send your recommendations to Igerber@ffforum.org.

¹ This bibliographic compilation and detailed annotation is authored by Beatrix Geaghan-Breiner until June 2022 and thereafter by Audrey Thill with assistance from George A. Lopez. Last updated 3 April 2024.

United Nations Reports

Antonio Guterres: *The Highest Aspiration: A Call to Action for Human Rights* (2020)

https://www.un.org/sg/sites/www.un.org.sg/files/atoms/files/The_Highest_Aspiration_A_Call_To_Action_For_Human_Right_English.pdf.

A/HRC/42/46: Negative impact of unilateral coercive measures on the enjoyment of human rights - Report of the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, July 5, 2019,

<https://www.ohchr.org/en/documents/thematic-reports/ahrc4246-negative-impact-unilateral-coercive-measures-enjoyment-human>.

A/HRC/45/7: Report on the negative impact of unilateral coercive measures: priorities and road map, July 22, 2020, <https://www.ohchr.org/en/documents/thematic-reports/ahrc457-report-negative-impact-unilateral-coercive-measures-priorities>.

A/HRC/43/36: Report on the HRC panel discussion on unilateral coercive measures and human rights, April 8, 2020,

<https://www.ohchr.org/en/documents/reports/ahrc4336-report-hrc-panel-discussion-unilateral-coercive-measures-and-human>.

A/75/209: Report on the impact of unilateral sanctions on human rights during the state of emergency amid the COVID-19 pandemic, July 22, 2020,

<https://www.ohchr.org/en/documents/thematic-reports/a75209-report-impact-unilateral-sanctions-human-rights-during-state>.

A/HRC/48/59/Add.2: Report of the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena Douhan, October 4, 2021, <https://documents-dds-ny.un.org/doc/UNDOC/GEN/G21/269/56/PDF/G2126956.pdf?OpenElement>.

A/HRC/48/59/Corr.1: Report on the notion, characteristics, legal status and targets of unilateral sanctions, September 10, 2021,

<https://undocs.org/Home/Mobile?FinalSymbol=A%2FHRC%2F48%2F59%2FCorr.1&Language=E&DeviceType=Desktop&LangRequested=False>.

A/HRC/48/59: Report on the notion, characteristics, legal status and targets of unilateral sanctions, April 26, 2022,

<https://www.ohchr.org/en/documents/thematic-reports/ahrc4859-report-notion-characteristics-legal-status-and-targets>.

A/76/174/Rev.1: Report on the targets of unilateral coercive measures: notion, categories and vulnerable groups, September 13, 2021,
<https://www.ohchr.org/en/documents/thematic-reports/a76174rev1-report-targets-unilateral-coercive-measures-notion-categories>.

Reports on the Humanitarian Impact of Sanctions

Altmann, Thomas, and Jason Giersch. “Sanctioned Terror: Economic Sanctions and More Effective Terrorism.” *International Politics* 59, no. 2 (April 2022): 383–97.
<https://doi.org/10.1057/s41311-021-00318-z>.

“The literature on unintended consequences of economic sanctions is well developed, but few studies have addressed terrorism in target states, and none have assessed whether that terrorism becomes more effective when sanctions are in place. In this study, we test whether economic sanctions lead to an increase in the lethality of terrorism. Using data from multiple sources, we find that while sanctions are unrelated to the rate of success of terrorist attacks, they are positively associated with the number of fatalities resulting from terrorist attacks. These findings further the need for policymakers to consider the consequences sanctions have on the target country populace.”

Bartlett, Jason. “Five Ways to Improve Sanctions Coordination Between the U.S. Government and Humanitarian Aid Groups.” *Lawfare*, February 15, 2022.
<https://www.lawfaremedia.org/article/five-ways-improve-sanctions-coordination-between-us-government-and-humanitarian-aid-groups>.

Bartlett offers several recommendations to reduce the negative impact of sanctions on humanitarian crises within sanctioned jurisdictions and align U.S. sanctions policy with the Biden administration's commitments:

1. Establish a special office within OFAC to coordinate sanctions-related inquiries between humanitarian aid organizations and the Treasury;
2. Add a humanitarian aid-specific portfolio to the newly appointed sanctions coordinator position in the State Department;
3. Provide explicit authorization for humanitarian aid organizations operating in sanctioned countries that allows financial institutions to easily identify and facilitate aid-related transactions entering these countries;
4. Publish a fact sheet for each country-specific sanctions program and country-related humanitarian crisis; and
5. Within country-specific fact sheets, OFAC should clarify permissible financial transactions and activities, including family and friend remittances to non-sanctioned individuals.

Batmanghelidj, Esfandyar. “To Make Sanctions Policy More Humane, Limit Food and Medicine Inflation.” *Just Security*, January 2022.

<https://www.justsecurity.org/79974/sanctions-policy-humane-limit-food-medicine-inflation/>.

The humanitarian consequences of sanctions are usually assessed in terms of food and medicine availability whereas the affordability of food and medicine in targeted countries is often overlooked. In Iran, food and healthcare prices have risen 186% and 125%, respectively, since Trump reimposed secondary sanctions in November of 2018. Inflation in targeted countries persists despite humanitarian exemptions in sanctions regimes. The author recommends the U.S. government implement a “tender” process to grant special licenses to financial institutions that are willing to facilitate humanitarian-related transactions. Any such licenses should be granted only to those willing to process a sufficient quantity of transactions at a reasonable price.

Batmanghelidj, Esfandiyar, and Erica Moret. “The Hidden Toll of Sanctions: Why Washington Must Reckon With the Devastating Inflation Its Policies Cause.” *Foreign Affairs*, January 17, 2022.

<https://www.foreignaffairs.com/articles/world/2022-01-17/hidden-toll-sanctions>.

The authors highlight the capacity of sanctions to induce inflation and identified three primary ways this occurs. First, sanctions damage the financial channels necessary to pay for goods and services quickly and reliably. Second, sanctions undermine supply chains by limiting the number of suppliers willing to facilitate the sale of humanitarian goods. Third, sanctions prevent long term investments in the infrastructure necessary to reduce a country's reliance on imports. The reduced availability of essential goods is uniformly observed in sanctioned countries, suggesting it is not an indirect consequence but rather a direct effect of sanctions policy. The authors call for sanctioning authorities to proactively prevent dramatic increases in food and medicine prices in targeted countries.

Book Club with Jeffrey Sachs. “Francisco Rodriguez, *The Human Consequences of Economic Sanctions*,” August 2023.

<https://podcasts.apple.com/us/podcast/book-club-with-jeffrey-sachs/id1555300202?i=1000625218185>.

“Join Professor Jeffrey Sachs and economist Francisco Rodriguez as they discuss Professor Rodriguez’s newest publication, *The Human Consequences of Economic Sanctions*. Professor Rodriguez offers us a comprehensive assessment of the effects of unilateral sanctions on the living standards in target countries. The effects of sanctions are dramatic: rising poverty, falling living standards, and premature deaths. These consequences go far beyond politics, and hit the civilian population very hard. Professor Sachs and Rodriguez offer a fascinating discussion that sheds light on economic warfare, and how it is deployed in the world today.”

Brubaker, Rebecca, and Sophie Huvé. “Conflict-Related UN Sanctions Regimes and Humanitarian Action: A Policy Research Overview.” *International Review of the Red Cross*, February 2022. <https://international-review.icrc.org/articles/conflict-related-un-sanctions-regimes-and-humanitarian-action-916>.

“This paper offers a brief overview of the potential interplay of United Nations (UN) sanctions regimes applied in contexts of armed conflict and humanitarian action. It traces how this issue has emerged within the counterterrorism (CT) sphere, before examining the possibilities of compatibility and risks for humanitarian action in conflict-related sanctions regimes. The paper lays out research gaps and outlines a new path for policy research focused on UN sanctions regimes imposed in the context of armed conflicts (“conflict-related”) yet falling outside the pure CT space. The paper concludes by illuminating why establishing further evidence on this issue is critical to both the legitimacy and the effective use of UN sanctions.”

Center for Strategic & International Studies. *Launch of the Feb. 2022 Issue of the International Review of the Red Cross: “Counterterrorism, Sanctions and War.”* Webinar, 2022. <https://www.csis.org/events/launch-feb-2022-issue-international-review-red-cross-counterterrorism-sanctions-and-war>.

Counter terrorism (CT) measures and targeted sanctions have created complex challenges such as risk aversion, legal and logistical barriers, and uncertainty, which impact humanitarian actors working in high-risk jurisdictions. In this webinar, panelists highlight specific challenges created by CT measures, sanctions, and overcompliance while also offering recommendations to mitigate them. Some of these recommendations include states protecting neutral and impartial humanitarian action, creating standing and well-designed exemptions, engaging in dialogue with relevant stakeholders, and harmonizing language in sanctions, funding agreements, and legal frameworks. Relevant articles published in this edition of the *International Review of the Red Cross* are included in this bibliography.

Charity & Security Network. *Ask an Expert: Human Impacts & Exploring Sanctions Termination*, Oct 2023. https://www.youtube.com/watch?v=H-e6bSbE-lc&ab_channel=Charity%26SecurityNetwork.

The Charity & Security Network hosted a webinar with a panel of sanctions researchers to “discuss the complex and devastating impacts sanctions have on human and economic development, human rights, and civil society, in addition to the humanitarian harms, the need for impact assessments, and how to move from sanctions relief to reconstruction. While sanctions policy debates and studies have examined the efficacy and implementation of sanctions, the panelists unpacked the underexplored focus on the processes, causes, and consequences of terminating sanctions. Special case studies included: Afghanistan, Iran, and Venezuela. Our panelists included: Esfandiyar Batmanghelidj, founder and CEO of Bourse & Bazaar

Foundation, a London-based think tank; Francisco Rodriguez, founder of the nonprofit Oil for Venezuela and professor at the University of Denver; and Hana Attia, postdoc at the University of Salzburg and research associate at the German Institute for Global and Area Studies (GIGA).”

Charity & Security Network. *Ask an Expert: UNSCR 2664 at One Year, Dec 2023.*
<https://charityandsecurity.org/csn-events/event-summary-ask-an-expert-unscr-2664-at-one-year/>

This panel hosted by The C&SN features experts who were involved in the development and negotiations or other advocacy and research that contributed to the adoption of UN Security Council Resolution 2664. Panelists discussed those advocacy efforts, the current situation under UNSCR 2664, and recommendations.

Charity & Security Network. “Event Summary: Ask an Expert: OFAC/BIS Licensing & Sanctions,” Dec 21, 2023. <https://charityandsecurity.org/event/event-summary-ask-an-expert-ofac-bis-licensing/>.

The C&SN hosted a webinar aimed at NGOs to help them better understand the regulatory requirements of US unilateral sanctions, compliance, and appeal processes for general, specific, and export licenses. Panelists explained the process NGOs go through to secure licenses and made recommendations to improve their applications. The session was not recorded due to the sensitive nature of the topic.

Charity & Security Network. “Negative Impacts of Sanctions on Civil Society.” May 2021. <https://charityandsecurity.org/wp-content/uploads/2021/05/CSN-Sanctions-Issue-Brief-May-2021.pdf>.

The article discusses the negative impacts of economic sanctions on civil society, emphasizing that while sanctions are often employed to influence government behavior, they frequently harm civilian populations and civil society organizations. The brief highlights challenges faced by civil society under broad-based and counterterrorism sanctions, emphasizing the inadequacy of current humanitarian exemptions. Recommendations include restoring the humanitarian exemption in the International Emergency Economic Powers Act (IEEPA), enhancing congressional oversight, discontinuing broad-based sanctions, improving financial access for civil society, and others.

Charity & Security Network. “Sanctions.” <https://charityandsecurity.org/issue-areas/sanctions/>.

This page includes the C&SN’s curated list of research and resources on the humanitarian impacts of economic sanctions.

Chaufan, Claudia, Nora Yousefi, and Ifsia Zaman. “The Violence of Non-Violence: A Systematic Mixed-Studies Review on the Health Effects of Sanctions.” *International Journal of Social Determinants of Health and Health Services* 53, no. 2 (April 2023): 216–32. <https://doi.org/10.1177/00207314221138243>.

In a systematic review of medical and public health literature, the authors examine the connection between targeted sanctions and health outcomes in light of the COVID-19 pandemic. A majority of the reviewed articles contained evidence of health impact, including higher rates of mortality and infectious and noncommunicable disease rates. Studies also found a correlation between sanctions and negative health outcomes in countries with more targeted sanctions. The authors believe that “sanctions should not be deployed because it predictably undermines global health and inevitably impairs the enjoyment of a right to health.”

Cortright, David, and George Lopez. “The Continuing Challenge of Sanctions Reform,” 2021. <https://www.fourthfreedomforum.org/publications/the-continuing-challenge-of-sanctions-policy-reform-2/>.

This short essay is an introduction to the three reports that make up the December 2021 issue of *Peace Policy*. All three reports urge the United States to enhance humanitarian exemptions and establish special financing mechanisms for the purchase of essential civilian goods. They also argue that Washington should use sanctions as negotiating tools, not as instruments of punishment.

Crystal, Caroline. “Landmark UN Humanitarian Sanctions Exemption Is a Massive Win but Needs More Support.” Carnegie Endowment for International Peace, March 20, 2023. <https://carnegieendowment.org/2023/03/20/landmark-un-humanitarian-sanctions-exemption-is-massive-win-but-needs-more-support-pub-89311>.

UN Security Council resolution 2664 is a long-overdue “massive win” for humanitarian actors who struggle to provide assistance to people in sanctioned jurisdictions. This article briefly covers the history of humanitarian carve-outs in UN sanctions regimes and provides an overview of the strengths and limitations of resolution 2664. While the standing exemption will alleviate some financial and logistical barriers previously created by asset freezes, it may not go far enough to address barriers created by financial de-risking, sanctions overcompliance, and other types of sanctions, such as travel bans and embargoes.

Debarre, Alice. “Making Sanctions Smarter: Safeguarding Humanitarian Action.” International Peace Institute, December 2019. https://www.google.com/url?q=https://charityandsecurity.org/wp-content/uploads/2019/07/1912_Making-Sanctions-

[Smarter.pdf&sa=D&source=docs&ust=1695754292124908&usq=AOvVaw3LjJlxJi0x6gU2zC-wzMjc.](#)

This report explores the impact of sanctions regimes on humanitarian action through four case studies: DPRK, Syria, Afghanistan, and Somalia. It identifies the primary ways in which sanctions affect humanitarian aid delivery and funding. It includes recommendations aimed at enhancing the effectiveness of sanctions by safeguarding humanitarian activities, such as through humanitarian language inclusion in sanctions regimes, raising awareness, monitoring and reporting, providing clearer guidance, and improving risk management and sharing in order to align with international humanitarian law.

———. “One Year On: Where Do We Stand on the Milestone Humanitarian “Carve-out” in UN Sanctions Regimes?” International Peace Institute, December 2023, <https://theglobalobservatory.org/2023/12/one-year-on-where-do-we-stand-on-the-milestone-humanitarian-carve-out-in-un-sanctions-regimes/>.

This article reviews the impact and challenges of Resolution 2664, which established humanitarian carve-outs enabling aid organizations to operate more freely in sanctioned environments. On the one hand, humanitarian actors have reported positive developments such as more easily transferring funds through formal banking channels. Ongoing challenges include the non-applicability to unilateral sanctions by Member states and its limited scope of only covering asset freezes. The author concludes with several recommendations to further safeguard humanitarian action in sanctioned jurisdictions.

———. “Safeguarding Humanitarian Action in Sanctions Regimes.” International Peace Institute, June 2019. https://www.ipinst.org/wp-content/uploads/2019/06/1906_Sanctions-and-Humanitarian-Action.pdf.

Sanctions have become a prominent foreign policy tool, primarily aimed at specific individuals and entities, but often with unintended consequences in conflict or humanitarian crisis situations. Efforts have been made to address these challenges, but the coexistence of sanctions and counterterrorism measures further complicates humanitarian action. This issue brief discusses the impact of sanctions on humanitarian efforts, highlights the challenges in resolving these issues, and suggests potential avenues for improvement, emphasizing the need for clearer safeguards for humanitarian activities within sanctions regimes.

Douhan, Alena F. “Humanitarian Impact of Unilateral Sanctions.” In *The Routledge Handbook of the Political Economy of Sanctions*, edited by Ksenia Kirkham. London: Routledge, 2023. <https://doi.org/10.4324/9781003327448>.

“The rapid expansion of various forms of unilateral sanctions is taking place in the face of intensive political debate, with very little attention paid to their legality and humanitarian impact. These measures, however, have a devastating effect on the ground, often affecting all people in a country and beyond its borders, especially the most vulnerable groups. The situation is exacerbated by the very limited possibilities for assessing the humanitarian impact of unilateral sanctions, and the nearly non-existent mechanisms of responsibility and redress. This chapter provides an overview of the unilateral sanctions environment, identifies human rights areas affected by unilateral sanctions and discusses impact of unilateral sanctions on humanitarian work.”

Douhan, Alena F. “Impact of Unilateral Coercive Measures on the Right to Health.” Human Rights Council, United Nations, July 2023.

<https://www.ohchr.org/en/special-procedures/sr-unilateral-coercive-measures/annual-thematic-reports>.

“In this report, the Special Rapporteur, Alena Douhan, provides an overview and assessment of the impact of unilateral sanctions on various aspects of the right to health, including access to healthcare, vaccination, prevention of diseases, access to tests, medicine, medical equipment. The report addresses the issue of the impact of unilateral coercive measures on the SDG 3, including maintenance and development of the healthcare system, and impact on the most vulnerable, including persons with disabilities, those suffering from rare and severe diseases, children, women, older persons. The report further considers the impact of unilateral coercive measures on the availability of medical assistance in emergency situations, as well as the efficacy of humanitarian exemptions.”

Douhan, Alena F. “Secondary Sanctions, Civil and Criminal Penalties for Circumvention of Sanctions Regimes and Overcompliance with Sanctions.” Report of the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena F. Douhan. New York: Human Rights Council, United Nations General Assembly, July 15, 2022.

<https://www.ohchr.org/en/documents/thematic-reports/ahrc5133-secondary-sanctions-civil-and-criminal-penalties-circumvention>.

In this report to the Human Rights Council, Special Rapporteur Alena Douhan provides an overview and assessment of secondary sanctions used to enforce unilateral sanctions extraterritorially, the issue of overcompliance, and the implication of sanctions for human rights. Overcompliance in the financial sector interferes with the procurement and provision of humanitarian goods and work of non-governmental organizations. The report states that overcompliance occurs in both targeted and sectoral sanctions, “sometimes to the point of equalling comprehensive sanctions that impact an entire population.” The Special Rapporteur writes that using extraterritorial

jurisdiction to impose secondary sanctions, civil suits, or criminal suits on individuals and entities is illegal under international law.

Drezner, Daniel W. “How Not to Sanction.” *International Affairs* 98, no. 5 (September 6, 2022): 1533–52. <https://doi.org/10.1093/ia/iac065>.

This paper examines two case studies of sanctions, those against Iraq in the 1990s and the two Gulf wars and the Trump administration’s re-imposition of sanctions on Iran in 2018. The author claims these sanctions regimes as “catastrophic failures,” meaning they were designed without clear objectives or demands and therefore failed to achieve policy goals while creating significant costs for the senders and targets. The author argues that the mistakes made in these cases hold lessons for current sanctioning authorities against Russia. “While it is possible that this maximum-pressure campaign will work, it is also possible that the future will consist of the imposition of punishing sanctions but no resolution to the conflict.”

Early, Bryan R, and Dursun Peksen. “Does Misery Love Company? Analyzing the Global Suffering Inflicted by US Economic Sanctions.” *Global Studies Quarterly* 2, no. 2 (March 31, 2022). <https://doi.org/10.1093/isagsq/ksac013>.

This paper introduces a “Freedom from Misery” index to measure the extent to which U.S. sanctions increase the “misery gap” between itself and the targeted country. The authors contend that “US sanctions, particularly those inflicting major costs on targeted economies and those imposed for human rights reasons, immiserate their targets’ populations. Extensions of the analysis further show that U.S. sanctions widen the misery gap between the United States and target states, contributing to greater international inequality. The finding suggests that policymakers should weigh the potential for inflicting misery upon their targets into decisions about when to use sanctions and how harsh they should be.”

Eckert, Sue E. “Counterterrorism, Sanctions and Financial Access Challenges: Course Corrections to Safeguard Humanitarian Action.” *International Review of the Red Cross* 103, no. 916–917 (April 2021): 415–58. <https://doi.org/10.1017/S1816383121000953>.

According to the report, more than 270 million people are in need of humanitarian aid, and yet the provision of this assistance is increasingly hampered by sanctions and counterterrorism (CT) measures. This article covers the impact of UN sanctions and CT measures on humanitarian action, focusing on Security Council Resolutions 1267 and 1373. It explores the following three challenges related to humanitarian aid in sanctioned jurisdictions, including a lack of clarity and legal protection for humanitarian actors, financial access challenges and de-risking, and donor funding contracts. The report then identifies constructive use of humanitarian exemptions in the cases of Somalia and North Korea. Recommendations are given for each of the three

challenges, with a concluding call to action for the UNSC to do more to safeguard humanitarian action in sanctioned jurisdictions.

Eckert, Sue E., and Jacob Kurtzer. “Mitigating Financial Access Challenges: Proposals from the CSIS Multi-Stakeholder Working Group on Financial Access.” Center for Strategic and International Studies, October 2022.
https://csis-website-prod.s3.amazonaws.com/s3fs-public/publication/221025_Eckert_MSWG_Proposals.pdf?VersionId=q.ek7KW4xGmpvQSehJyWDaBzuN3TYgKE.

This report provides an overview of financial access challenges in high-risk, sanctioned jurisdictions such as regulatory concerns, lack of payment channels, absence of incentives for financial institutions to work with humanitarian actors, and bank closures. In particular, non-profit organizations (NPOs) cite the “chilling effect,” experienced as denied or delayed financial transfers, as their most significant challenge. There are nonetheless many initiatives responding to these problems, including by the U.S. government, donors, regulators, and multilateral groups, which are described in this report. The report concludes with recommendations to help alleviate financial access concerns held by non-profit organizations and other humanitarian actors.

European Commission. “Commission Guidance Note on the Provision of Humanitarian Aid in Compliance with EU Restrictive Measures (Sanctions),” June 30, 2022. https://finance.ec.europa.eu/system/files/2022-07/220630-humanitarian-aid-guidance-note_en.pdf.

This Guidance Note aims to inform humanitarian actors on how to comply with EU restrictive measures adopted pursuant to Article 215 of the Treaty on the Functioning of the European Union (‘EU sanctions’). It outlines the scope of EU sanctions, important definitions, descriptions of humanitarian exemptions and derogations, and their applicability to processes and stakeholders in the humanitarian aid sector.

Ferraro, Tristan. “International Humanitarian Law, Principled Humanitarian Action, Counterterrorism and Sanctions: Some Perspectives on Selected Issues.” *International Review of the Red Cross* 103, no. 916–917 (April 2021): 109–55.
<https://doi.org/10.1017/S1816383121000965>.

Counterterrorism (CT) measures “take many forms, including international, regional and domestic sanctions against individuals, groups and other entities. Such efforts pursue the legitimate aims of security and international peace – things that terrorism undermines and goes against – but they have, at the same time, implicated a degree of overlap and confusion between international humanitarian law (IHL), on the one hand, and the law and policy framework underwriting CT measures and sanctions regimes, on the other, particularly as both apply to and affect principled humanitarian

action. This article addresses this area of overlap and confusion. First, it examines the applicability of IHL to CT measures and operations. Next, it addresses the co-application of IHL, CT regulations and sanctions regimes, from the mindset of preserving IHL without impeding CT measures and their objectives. The article then examines the legal questions that arise when sanctions regimes and CT measures affect IHL-mandated and IHL-protected activities undertaken by impartial humanitarian organizations. Finally, the article analyzes recent developments and makes proposals aimed at preserving an effective humanitarian space in contexts where IHL, CT legal frameworks and sanctions apply simultaneously.”

Germani, Federico, Julian W. März, Caroline Clarinval, and Nikola Biller-Andorno. “Economic Sanctions, Healthcare and the Right to Health.” *BMJ Global Health* 7, no. 7 (July 2022): e009486. <https://doi.org/10.1136/bmjgh-2022-009486>.

This article argues that sanctions undermine a population’s right to health when they impede or diminish healthcare services or access to medication and medical supplies. The authors recommend using concepts such as justice, vulnerability, proportionality, and responsibility when assessing the impact of sanctions on health outcomes. The article concludes with several recommendations for policymakers and the assertion that medical supplies should be exempt from sanctions.

Gibson Dunn. “2022 Year-End Sanctions and Export Controls Update,” February 7, 2023. <https://www.gibsondunn.com/wp-content/uploads/2023/02/2022-year-end-sanctions-and-export-controls-update.pdf>.

Recent developments in US, EU, and UK sanction regimes in 2022 are presented in this report, with a focus on Russia and China. 2022 was a significant year, with 30 countries imposing an unprecedented number of sanctions against Russian entities and individuals. Significant de-risking occurred as thousands of companies withdrew from Russia to avoid exposure to sanctioned entities. Several developments related to humanitarian conditions in sanctioned countries also occurred. For instance, OFAC issued general licenses to ease restrictions and permit certain transactions with Venezuela and Afghanistan. The U.S. also became the first country to implement UNSC resolution 2664, which created a standing exemption—or humanitarian carve-out—across UN sanctions regimes. To implement that resolution and facilitate humanitarian aid in sanctioned jurisdictions, OFAC issued or amended numerous general licenses across several of its sanctions programs.

Gibson Dunn. “2023 Year-End Sanctions and Export Controls Update,” February 7, 2024. <https://www.gibsondunn.com/2023-year-end-sanctions-and-export-controls-update/>

In 2023, the US, EU, and UK continued to “push the limits” on imposing and enforcing sanctions, especially against Russia and China. President Biden has imposed an unprecedented number of targeted sanctions against, including recent designations

against entities in Myanmar, China, Nicaragua, and Russia for their alleged human rights abuses. According to Gibson Dunn, industry actors continue to press governments for clarification on sanctions compliance and exemptions in order to avoid spill-over effects on their activities.

Gillard, Emanuela-Chiara, Sangeeta Goswami, and Fulco Van Deventer. “Screening of Final Beneficiaries – a Red Line in Humanitarian Operations. An Emerging Concern in Development Work.” *International Review of the Red Cross* 103, no. 916–917 (April 2021): 517–37. <https://doi.org/10.1017/S1816383121000448>.

“Funding agreements for humanitarian action frequently include restrictions and requirements in their grants that aim to ensure that recipients of the funding comply with counterterrorism measures and sanctions adopted by the donor. These measures can be problematic if they prevent humanitarian actors from operating in accordance with humanitarian principles or are incompatible with international humanitarian law. While attention has focused primarily on requirements in grants for humanitarian action, increasingly donors to development work have also started including sanctions- and counterterrorism-related restrictions in their grants. The present article focuses on one such measure that is currently a live concern: requirements to screen and, thus, potentially exclude final beneficiaries. It explains why these requirements go over and above what sanctions and counterterrorism measures require, and why they are inconsistent with humanitarian principles and international humanitarian law. The article also explores the position in relation to development interventions.”

Gordon, Joy. “Financial Blacklisting and the Return Toward Indiscriminate Sanctions.” In *The Routledge Handbook of the Political Economy of Sanctions*, edited by Ksenia Kirkham. London: Routledge, 2023. <https://doi.org/10.4324/9781003327448>.

While asset freezes are designed to target individual persons or companies, there are many cases in which these targeted measures have “spill-over” effects on the general population. This primarily occurs in two situations: one, sanctions targeting a state enterprise that plays a critical role in the country's economy or infrastructure (e.g., national oil company or shipping lines); and two, sanctions targeting government officials in major institutions (e.g., central banks).

Gordon, Joy. “The Brutal Impact of Sanctions on the Global South.” *Symposium on Third World Approaches to International Law & Economic Sanctions*, *Yale Journal of International Law*, June 28, 2023. <https://www.yjil.yale.edu/the-brutal-impact-of-sanctions-on-the-global-south/>

This article addresses the disparity between how the Global North and Global South use sanctions and experience their economic and humanitarian effects. The author argues that “sanctions are overwhelmingly a tool of wealthy and powerful nations, used

almost exclusively against countries that are vastly smaller and economically precarious. This is the case for sanctions regimes imposed among nations, and it is also true of sanctions imposed by the UN Security Council, the international community's vehicle of global governance." Gordon highlights the global reach of US unilateral sanctions and the "chilling effect" this has on financial institutions, leading to the termination of correspondent bank relations in sanctioned countries.

Gordon, Joy. "The Not So Targeted Instrument of Asset Freezes." *Ethics & International Affairs* 33, no. 3 (2019): 303–14.
<https://doi.org/10.1017/S0892679419000315>.

This paper proposes that asset freezes are not as targeted or "smart" as some scholars and practitioners claim. Asset freezes on government agencies and companies that hold a substantial role in the economy can be actually comprehensive in effect. Additionally, the chilling effects of asset freezes and targeted sanctions can create ripple effects in the targeted country's economy, motivating international banks to withdraw from targeted countries and making "smart" sanctions comprehensive in effect.

Gutmann, Jerg, Matthias Neuenkirch, and Florian Neumeier. "Sanctioned to Death? The Impact of Economic Sanctions on Life Expectancy and Its Gender Gap." *The Journal of Development Studies* 57, no. 1 (January 2, 2021): 139–62.
<https://doi.org/10.1080/00220388.2020.1746277>.

This study examines the relationship of UN and US economic sanctions to life expectancy in sanctioned countries. "Our results indicate that an average episode of UN sanctions reduces life expectancy by about 1.2–1.4 years. The corresponding decrease of 0.4–0.5 years under US sanctions is significantly smaller. In addition, we find evidence that women are affected more severely by the imposition of sanctions. Sanctions not being 'gender-blind' indicates that they disproportionately affect (the life expectancy of) the more vulnerable members of society. We also detect effect heterogeneity, as the reduction in life expectancy accumulates over time and countries with a better political environment are less severely affected by economic sanctions. Finally, we provide some evidence that an increase in child mortality and Cholera deaths as well as a decrease in public spending on health care are transmission channels through which UN sanctions adversely affect life expectancy in the targeted countries."

Gutmann, Jerg, Matthias Neuenkirch, and Florian Neumeier. "The Impact of Economic Sanctions on Target Countries: A Review of the Empirical Evidence." *EconPol Forum* 24, no. 3 (2023): 5–9.

Sanctions have continued to expand and evolve since the end of the Cold War. Today, a growing body of work illuminates the unintended effects of sanctions on economic,

political, legal, and human development outcomes in targeted countries. This paper review identifies themes in the literature and remaining gaps. It finds significant evidence that sanctions take a toll on target economies, affecting GDP per capita and the level and distribution of income. It also finds that sanctions have unintended consequences on human development in targeted countries. The effectiveness of sanctions in changing a target's behavior, however, is disputed in the literature. Notwithstanding the unintended consequences of sanctions, the authors argue that in cases of war or human rights abuses, "it is unclear whether the side effects of sanctions are worse than the population's fate if the international community fails to act."

Ha, Le Thanh, and Pham Xuan Nam. "An Investigation of Relationship between Global Economic Sanction and Life Expectancy: Do Financial and Institutional Systems Matter?" *Development Studies Research* 9, no. 1 (December 31, 2022): 48–66. <https://doi.org/10.1080/21665095.2022.2032237>.

This study examines the impact of cross-border sanctions on health by using the life expectancy rates of those in the sanctioned country. It finds that the imposition of sanctions—especially arms, financial, travel and other sanctions—has a "significant negative effect on the national health of the targeted countries." The authors attribute this to reduced GDP growth which diminishes government spending on healthcare. The study found that the existence of a developed financial system, institutional and regulatory quality, and government effectiveness attenuates the impact of sanctions on life expectancy.

Hausmann, Paul, Elodie Pearson, and Maja Liechti. "Assessing the Impact of Sanctions on Humanitarian Work." Geneva, Switzerland: Geneva Graduate Institute, World Council of Churches, World Evangelical Alliance, Caritas Internationalis, December 2022. https://www.caritas.org/wordpress/wp-content/uploads/2023/03/Final_Report_ARP_Sanctions-2.pdf.

This study was commissioned by several faith-based organizations to understand how sanctions create administrative and operational challenges for their humanitarian work. Administrative challenges identified in the report include the financial and legal burdens of interpreting and complying with sanctions and risk-aversion by humanitarian actors and their supply chains. Operational challenges include delays and barriers to necessary financial transactions, imports and exports from the sanctioned country, and travel bans. The report also compiles existing strategies adopted by these organizations to cope with the impact of sanctions, including informal money transfer systems, advocacy campaigns, consulting with pro-bono lawyers, and seeking more UN contracts. Recommendations are given based on interviews with the organizations and sanctions experts. These include, among others, advocating for standing general humanitarian exemptions, documenting the impact of sanctions on their work, sharing information with similar organizations, and creating a resource person on sanctions.

Herbert, George. “The Unintended Consequences of Economic Sanctions.” Institute of Development Studies, March 21, 2022. <https://doi.org/10.19088/K4D.2022.100>.

This review paper covers studies on the unintended impacts of sanction, finding some supporting evidence for negative consequences. The reviewed studies identified sanctions as contributing to financial crises, inequality, economic informality, food insecurity, and other humanitarian consequences. The review also highlights methodological weaknesses in the reviewed studies, such as econometric studies that do not differentiate between types of sanctions (e.g., comprehensive versus targeted).

Huvé, Sophie, Guillemette Moulin, and Tristan Ferraro. “Unblocking aid: the EU’s 2023 shift in sanctions policy to safeguard humanitarian efforts,” *Humanitarian Law & Policy*, January 23, 2024. <https://blogs.icrc.org/law-and-policy/2024/01/23/unblocking-aid-eu-2023-sanctions-policy-humanitarian-efforts/>.

As a result of advocacy efforts pressing for sanctions to have humanitarian safeguards, the UNSC adopted Resolution 2664, excluding humanitarian action from UN financial sanctions. The EU subsequently implemented the humanitarian exemption, integrating it into 27 out of 39 sanctions regimes by the end of 2023. Nonetheless, challenges remain, including gaps where UN exemptions do not apply (e.g., Syria) and exemptions that do not cover all types of relevant actors. The authors recommend that the EU should create standing exemptions that align with UNSCR 2664 as a default in EU sanctions. This would ensure that humanitarian aid is protected within the framework of international humanitarian law (IHL).

Huvé, Sophie, and Rebecca Brubaker. “Humanitarian Exemptions in UN Sanctions Regimes.” *UN Sanctions and Humanitarian Action Policy Memo Series*. United Nations University, March 31, 2022. <http://collections.unu.edu/view/UNU:8748>.

The purpose of this briefing document is to define and clarify terms related to humanitarian exemptions as they exist under UN sanctions regimes and provides several examples. By definition, a humanitarian exemption permits an activity that otherwise would have been prohibited by a sanctions measure and may be granted for sanctioned or impartial actors. The briefing describes the three distinct procedural models: standing exemptions, exemption requests, and exemption notifications.

———. “The Notion of ‘Humanitarian Activities’: UN Sanctions and Humanitarian Action Policy Memo 2/4.” United Nations University, March 2022. <https://collections.unu.edu/eserv/UNU:8747/UNSHA-PolicyMemo2.pdf>.

Under international humanitarian law (IHL), impartial organizations have the right to engage in humanitarian activities that “seek to preserve the life, security, dignity, and mental and physical well-being of victims” of conflict. Yet the implementation of UN

sanctions by Member States and other stakeholders can interfere with the provision of aid to people who are sanctioned or live in sanctioned jurisdictions. This thematic brief defines and contextualizes “humanitarian activities,” explains the compatibility of humanitarian activities with UN sanctions regimes, and identifies potential tensions between IHL and UN sanctions regimes.

Huvé, Sophie, Rebecca Brubaker, Adam Day, and Zuzana Hudáková. “Enforcing UN Sanctions and Protecting Humanitarian Action: Towards a Coherent and Consistent Approach.” New York: United Nations University, February 2022.

<https://reliefweb.int/report/world/enforcing-un-sanctions-and-protecting-humanitarian-action-towards-coherent-and-consistent-approach>.

“While in principle UN sanctions and humanitarian action share common goals of helping to prevent the worst aspects of armed conflict, in practice they can come into contradiction with each other.” Based on original interviews, case studies, and an online survey, this report looks at the relationship—both positive and negative—between UN sanctions regimes and humanitarian action in armed conflict settings. It finds that while the unintended negative impact sanctions receive much attention, sanctions have had some limited positive impact on humanitarian action as a result of using language supportive of International Humanitarian Law (IHL). Furthermore, most of the problems experienced by humanitarian actors resulted indirectly from sanctions overcompliance. Additionally, sanctions designers and humanitarian actors are often siloed, leading to very different views of the same situation. The report concludes with recommendations for the UN Security Council, Member States, donors, private sector actors, and humanitarian actors.

Hollings Center for International Dialogue. “Cost-Benefit Analysis of Economic Sanctions,” January 5, 2024. <https://hollingscenter.org/cost-benefit-analysis-of-sanctions/>

Dr. Dursun Peksen speaks about the use of sanctions as a political tool and the adverse impacts on humanitarian organizations. For instance, humanitarian operations experience delays in processing payments due to bank de-risking. Peksen calls for greater dialogue between humanitarian organizations and sanction-sending countries. This video was produced as part of the Center’s Responsible Business dialogue program: The Efficacy of Economic Sanctions.

Hollings Center for International Dialogue. “Humanitarian Organizations and Sanctions Challenges,” January 5, 2024. <https://hollingscenter.org/humanitarian-organizations-and-sanctions-challenges/>

“Basma Alloush discusses the growing complexity of sanctions as a political tool and its consequential impact on humanitarian organizations. The challenges faced by these organizations are twofold: first, in navigating the intricate nature of various

sanctions regimes and understanding their legal implications, and second, in dealing with the adverse effects of bank de-risking. The prolonged payment processing times for essential operations such as program expenses and staff salaries in heavily sanctioned countries have led to increased costs and reduced options, affecting the quality of products and services. The speaker emphasizes the need for continuous engagement and dialogue between humanitarian entities and sanctioning authorities, particularly with financial institutions, to address these challenges and find common ground for more efficient operations in sanctioned environments.”

Hwami, Munyaradzi. “A Comparative Scoping Review of the Impact of International Economic Sanctions on Education.” *Compare: A Journal of Comparative and International Education* 52, no. 6 (August 18, 2022): 949–65.
<https://doi.org/10.1080/03057925.2020.1846120>.

“The purpose of this scoping review was to map the literature on the effects of international economic sanctions on education. Searches of eight electronic databases and the gray literature were conducted to identify published empirical studies. Six eligible studies were selected. This review observes the limited empirical research and data to provide a better understanding of how education systems are affected by economic sanctions, highlighting the lack of research and, consequently, educators’ voices on education in sanctioned societies.”

Inter-Agency Standing Committee. “IASC Briefing on the Humanitarian Exemption to UN Sanctions Regimes: Implementation and Reporting.” Zurich, July 20, 2023.
<https://interagencystandingcommittee.org/iasc-briefings/iasc-briefing-humanitarian-exemption-un-sanctions-regimes-implementation-and-reporting>.

This informational briefing covers topics related to the landmark achievement, UN Security Council resolution 2664, which creates a standing humanitarian carve-out across all UN sanctions regimes. Panelists in the briefing include representatives from the Inter-Agency Standing Committee members and UN agencies, legal experts, and others who provide information in following three areas: an overview of the resolution and its parameters, reporting requirements under the resolution, and what remains to be done by Member States and other stakeholders to maximize the positive impact of the resolution. While resolution 2664 is an essential step to address existing barriers to humanitarian action, more work is needed to address overcompliance by donors, the financial sector, and humanitarian actors. Additionally, changes are needed in various legal frameworks to recognize this carve-out.

International Crisis Group. “Sanctions, Peacemaking and Reform: Recommendations for U.S. Policymakers.” International Crisis Group, August 28, 2023. https://icg-prod.s3.amazonaws.com/s3fs-public/2023-08/008-us-sanctions_1.pdf.

Recent years have seen both an increasing use of sanctions by U.S. policymakers as well as an awareness of their collateral effects on civilian populations. ICG welcomes reforms by the U.S. government to mitigate these effects yet claims they are incomplete. “While the U.S. looks to sanctions to further its goals in numerous conflicts, sanctions also sometimes obstruct peacemaking – that is, activities in the service of violence prevention and conflict resolution. The more Washington uses sanctions, the more far-reaching the downsides are and the more pressing it is to address them. The U.S. government should better align sanctions policy with peacemaking efforts. It could do so by setting clear objectives for sanctions programs, subjecting them to rigorous periodic review, expanding and making permanent carve-outs for peace activities, and addressing private-sector concerns about investment in previously sanctioned jurisdictions.”

———. **“U.S. Sanctions, Peacemaking and Reform Visual Explainer,” August 2023.** <https://www.crisisgroup.org/content/us-sanctions-peacemaking-and-reform>.

A visual explainer was launched alongside the ICG report, *Sanctions, Peacemaking and Reform: Recommendations for U.S. Policymakers*. It features a timeline of key events in U.S. sanctions history, maps and graphics visualizing the size and scope of sanctions, and covers several salient points about sanctions and their relationship to peace and security. In particular, ICG identifies U.S. sanctions as “sticky” or hard to change once adopted, increasingly complex, and lacking routine, comprehensive evaluation. Recommendations for the U.S. government include: clarifying sanctions goals, reviewing their performance and impact on peacemaking objectives in particular, establishing standing carve-outs for peacemaking activities, and mitigating over compliance and risk aversion in the private sector.

Jadoon, Amira and Bryan Early. “Embargoes, Weapons, and Violence: The Conditional Effects of Arms Embargoes on Civilian Targeting.” *Foreign Policy Analysis* 20, no. 2 (2024). <https://doi.org/10.1093/fpa/orae008>.

This study investigates the link between arms embargoes and the strategies embargoed governments use to eliminate domestic threats. An analysis of arms embargoes between 1989 and 2004 supports their theory that import restrictions on arms is associated with greater civilian repression. The authors argue that “policymakers who employ arms embargoes should consider increased violence against civilians as a potential unintended consequence and closely monitor target governments’ use of repression.”

Kapoor, Radhika, Dustin A. Lewis, and Naz K. Modirzadeh. “An Interpretive Note for U.N. Member States on Security Council Resolution 2664 (2022).” Cambridge, MA: Harvard Law School, March 2023. <https://blogs.harvard.edu/pilac/files/2023/03/HLS-PILAC-Res.-2664-Interpretive-Note.pdf>.

UN resolution 2664 created exemptions across UN sanctions regimes to facilitate humanitarian assistance and activities supporting basic human needs. In doing so, it implicated numerous actors whose “core obligations arising from it are notably complex and raise correspondingly intricate issues concerning interpretation and implementation.” This interpretive note is directed at UN Member States and Security Council Sanctions Committees to increase understanding and implementation of the resolution, particularly the humanitarian exemption. It evaluates the material, personal, temporal, and geographical scope of the “carve-out” and explains “initial considerations that U.N. Member States may bear in mind with a view to supporting efforts to implement resolution 2664 (2022) systematically, in accordance with international law, and consistent with the Security Council’s intention.”

Lopez, George A. “It’s Time to End Senseless, Endless Sanctions.” *Responsible Statecraft*, August 7, 2020. <https://responsiblestatecraft.org/2020/08/07/its-time-to-end-senseless-endless-sanctions/>.

The article discusses the history and impact of economic sanctions imposed by the United Nations Security Council and the United States over the past three decades. It highlights that despite efforts to develop more targeted “smart sanctions,” prolonged sanctions have had disastrous consequences for civilians in countries like North Korea, Iran, and Venezuela, leading to the perception that sanctions constitute economic warfare. The article emphasizes the need for a reformulated approach to sanctions, emphasizing diplomacy alongside sanctions and multilateral cooperation. It also suggests that sanctions can be effective in addressing issues like human rights abuses and nuclear non-proliferation when combined with asset freezes and travel bans on enablers of abusive regimes. The article calls for a “whole of government” approach to sanctions, including restructuring various agencies and involving Congress, relief agencies, and NGOs in policy development to minimize harm to innocent civilians.

———. **“Sanctions Will Kill and Rarely Win When Implemented with ‘Full Force.’” *Responsible Statecraft*, August 23, 2021. <https://responsiblestatecraft.org/2021/08/23/sanctions-will-kill-and-rarely-win-when-implemented-with-full-force/>.**

Contrary to the claim that “nobody is killed by sanctions,” there is substantial evidence of devastating social, economic, and medical harm to civilians during sanctions episodes, such as in Iraq two decades ago. Additionally, the “maximum pressure” campaigns during the Trump administration did not produce desired political outcomes and, in some cases, had negative consequences. Successful sanctions, the author argues, require a more nuanced, restrained, and adaptable approach, often complemented by diplomatic engagement and economic incentives. Furthermore, the author calls on sanctions senders like the U.S. to mitigate unintended consequences on innocent civilians and take responsibility for harm during sanctions episodes.

———. “Time to Recalibrate US Sanctions for Human Rights.” *Inkstick Media*, January 7, 2022. <https://inkstickmedia.com/time-to-recalibrate-us-sanctions-for-human-rights/>.

Given the evidence of harm caused by sanctions on civilian populations, the author argues that the U.S. must reconsider and revise its hard-hitting sanctions policies, especially in the cases of Syria, Venezuela, and Iran. Proposed strategies include creating financial channels for humanitarian aid, revising sanctions on oil exports, and easing restrictions that limit financial access for civilians. “The time for recalibrating sanctions to enhance, not deteriorate, basic human rights, has arrived.”

Lopez, George A., and Beatrix Geaghan-Breiner. “Establishing an Ethics of Post-Sanctions Peacebuilding.” In *Wicked Problems: The Ethics of Action for Peace, Rights, and Justice*, edited by Austin Choi-Fitzpatrick, Douglas Irvin-Erickson, and Ernesto Verdeja, 161–70. Oxford University Press, 2022. <https://academic.oup.com/book/43065/chapter-abstract/361503832?redirectedFrom=fulltext>.

Mallard, Grégoire, Farzan Sabet, and Jin Sun. “The Humanitarian Gap in the Global Sanctions Regime: Assessing Causes, Effects, and Solutions.” *Global Governance: A Review of Multilateralism and International Organizations* 26, no. 1 (April 9, 2020): 121–53. <https://doi.org/10.1163/19426720-02601003>.

This article considers solutions to the governance shortcomings of humanitarian exemptions in global sanctions regimes. It focuses on the risk aversion and de-risking by international banks that are relied on by humanitarian actors working in targeted countries. The authors recommend a multilateral approach to governing sanctions exemptions, proposing the development of a panel of Treasury officials from the G-20+ and the introduction of a blockchain-based currency. The authors call for more dialogue between public and private actors and more creativity in designing FinTech solutions to current financial barriers created by sanctions.

Meissner, Katharina L., and Patrick A. Mello. “The Unintended Consequences of UN Sanctions: A Qualitative Comparative Analysis.” *Contemporary Security Policy* 43, no. 2 (April 3, 2022): 243–73. <https://doi.org/10.1080/13523260.2022.2059226>.

This article uses the Targeted Sanctions Consortium data set to examine negative externalities of UN sanctions. The authors identify five examples of negative externalities (or unintended consequences), including increases in corruption and criminality, authoritarianism, human rights violations, barriers for humanitarian aid, and diminished institutional capacity in sanctioned jurisdictions. Across all UN sanctions episodes included in the TSC data, 94 percent of sanctions episodes were associated with one of these unintended consequences.

Miromanova, Anna. “Sanctions and their Impacts on Medical Trade and Health Outcomes.” *Review of International Economics* 1, no. 32 (February 2024): <https://doi.org/10.1111/roie.12700>.

This study measures the impact of sanctions on the international medical supplies trade and mortality rates. It finds that “sanctions, particularly those imposed by the United States, decrease the volume of medical exports to targeted countries, potentially leading to worse health outcomes.” Sanctions corresponded with increased mortality rates, especially in countries with aid delivery termination, blockades, and partial embargoes.

Moret, Erica. “More Civilian Pain than Political Gain (Again?): The Demise of Targeted Sanctions and Associated Humanitarian Impacts.” In *Multilateral Sanctions Revisited: Lessons Learned from Margaret Doxey*, edited by Andrea Charron and Clara Portela. Kingston: McGill Queen’s University Press, 2022.

———. “Safeguarding Humanitarian Banking Channels: How, Why and by Whom?” Oslo: Norwegian Refugee Council, January 2023. <https://www.nrc.no/globalassets/pdf/reports/safeguarding-humanitarian-banking-channels/safeguarding-humanitarian-banking-channels.pdf>.

In the first of four reports, Moret presents the outcomes of an expert dialogue on de-risking and the need to protect humanitarian banking channels. “The report finds: Correspondent banks remain the main blockage to humanitarian payment channels. More guidance and engagement are needed from governments and regulators to correspondent banks to support humanitarian banking channels into high-risk jurisdictions. Investment is needed to understand the opaque and fast changing correspondent banking environment. Regulators should take steps to engage directly with correspondent banks to provide guidance and comfort as well as to establish trust on the need to facilitate humanitarian transactions. Improving sanctions design is necessary across all multilateral and autonomous regimes to anticipate and mitigate their impacts on humanitarian banking channels. Innovative solutions should be explored including the use of Fintech, of new or existing public bodies to transfer funds as well as of non-mainstream currencies. Recommendations are provided that identify the most promising policy solutions to safeguard humanitarian banking channels.”

———. “Time to Act: Harmonizing Global Initiatives and Technology-Based Innovations Addressing De-Risking at the Interfacing Sanctions-Counterterrorism-Humanitarian Nexus.” In *International Sanctions: Improving Implementation Through Better Interface Management*, edited by Sascha Lohmann and Judith Vorrath. German Institute for International and Security

Affairs, 2021. [https://www.swp-berlin.org/publications/products/arbeitspapiere/WP International Sanctions.pdf](https://www.swp-berlin.org/publications/products/arbeitspapiere/WP_International_Sanctions.pdf).

This article discusses the continued use and humanitarian impact of economic sanctions with a focus on the European Union (EU). Of particular concern is "over-compliance" in the private and not-for-profit sectors. This over-compliance, known as "de-risking" and the "chilling effect," has left many vulnerable and fragile countries and populations "unbanked," making it difficult for them to access basic healthcare and essential goods. The article recommends regulatory and policy changes to address this growing global crisis and offers recommendations, including improving guidance and training, humanitarian banking channels, alternative payment platforms, and leveraging new technologies to ensure funds reach high-risk jurisdictions.

———. **“Unilateral and Extraterritorial Sanctions in Crisis: Implications of Their Rising Use and Misuse in Contemporary World Politics.”** In *Research Handbook on Unilateral and Extraterritorial Sanctions*, edited by Charlotte Beaucillon. Edward Elgar Publishing, 2021. <https://doi.org/10.4337/9781839107856.00009>.

“The world has seen a dramatic rise in the use of unilateral sanctions in recent years. While the uptake of new United Nations sanctions appears to have stabilised, a growing number of countries and regional organisations - spanning advanced and emerging economies - are employing autonomous sanctions in an increasing variety of contexts, for a growing number of objectives and against a mounting range of targets. These shifts come hand-in-hand with multilateralism’s crisis of legitimacy; a shift in US foreign and security policies under the Trump presidency, including the ‘maximum pressure’ campaign and growing use of extraterritorial sanctions. Teemed with wider counterterrorism and anti-money-laundering regulations, this increasingly complex compliance landscape is again having consequential and widely-documented humanitarian impacts, with the Covid-19 pandemic bringing these factors further into the spotlight. This chapter explores likely reasons for these shifts; outlines different types of unilateral sanctions, and examines ramifications of these shifting global sanctions practices.”

———. **“Use of Money or Value Transfer Services by Non-Governmental Organisations.”** Norwegian Refugee Council, June 9, 2023. <https://www.nrc.no/resources/reports/use-of-value-transfer-systems-by-non-governmental-organisations/>.

“This report is the second in a series examining potential solutions to bank de-risking. The report finds: The terminology used to describe these financial transfer mechanisms can have significant consequences. Hawala is often used to refer to these transfer systems, but the term can carry negative associations among some stakeholders. The paper suggests that ‘money or value transfer services’ could be a suitable alternative that captures the wide range of mechanisms available. Donor

stances on the use of value transfer services in the humanitarian sector vary across countries and tend to lack clarity or tailored guidance, including on permissible activities. Financial institutions' risk appetite for humanitarian transactions that involve value transfer services vary widely, but many refuse to service payments or close accounts if transactions involve money or value transfer services. Recommendations are provided that could improve NGO's ability to use value transfer services and address some of the current challenges they face."

———. **"What Is the Role of Financial Sanctions in Tackling Modern Slavery and Human Trafficking?'" Finance Against Slavery and Trafficking Initiative (FAST), United Nations University Centre for Policy Research (UNU-CPR), 2022.**
http://collections.unu.edu/eserv/UNU:8896/UNU_FAST_FinancialSanctions.pdf.

Targeted sanctions are a policy tool that can disrupt illicit financial flows and restrict actors "engaging in, or facilitating, modern slavery and human trafficking." However, this report finds that this particular use of sanctions is not widespread and "no formal mechanisms exist to allow for more systematic joint planning, monitoring, or assessment across all sanctions regimes." In fact, sanctions have rarely been used by the UN to address human trafficking-related matters. On the other hand, the US has a long history of using sanctions to target transnational organized crime, some of which involved elements of human trafficking and modern slavery. The report offers recommendations to increase understanding of how sanctions can disrupt modern slavery and human trafficking, increase collaboration, and reduce unintended risks."

———. **"When Should the United States Use Hard-Hitting Sectoral and Financial Sanctions?" Geneva Graduate Institute, Global Governance Centre, 2021.**
<https://theglobal.blog/2021/11/05/when-should-the-united-states-use-hard-hitting-sectoral-and-financial-sanctions/>.

Moret asserts that the U.S. has a responsibility to ensure its sanctions inflict little damage to vulnerable populations. In order to safeguard the legitimacy of sanctions, Washington should use targeted measures and adopt steps to reduce over-compliance with financial sanctions. Hard-hitting sectoral sanctions should only be employed in a limited number of contexts, and only when closely tied to a wide range of policy tools.

Nadel, Sam, and Oliver Walton. "Counter-terrorism and Humanitarian Action: UK INGO Responses since 2015." *Disasters*, July 14, 2023.
<https://doi.org/10.1111/disa.12603>.

This article studies the impact of counter-terrorism (CT) measures and sanctions on international non-governmental organizations (INGOs) in the UK. It finds that INGOs adopted more conservative approaches to forming partnerships with local organizations in sanctioned areas, thus undermining efforts to increase localization.

UK-based INGOs have historically responded to CT measures with risk aversion and developed strategies to enable their humanitarian work. Over time, there has been improved coordination by these INGOs, and in some instances, willingness to push back against regulations. The study also found clear signs of improved co-operation and dialogue amongst stakeholders in the UK, particularly through the work of the Tri-Sector Group (TSG).

Office of Financial Sanctions Implementation and Office of Foreign Assets Control. “Humanitarian Assistance and Food Security Fact Sheet: Understanding UK and U.S. Sanctions and Their Interconnection with Russia.” OFSI and U.S. Department of the Treasury, June 28, 2023. <https://ofac.treasury.gov/media/931946/download?inline>.

This fact sheet provides guidance on U.S. and UK Russia-related sanctions, authorizations, and exceptions which are relevant to humanitarian actors, NGOs, international organizations (IOs), financial institutions, and companies engaged in agricultural trade or the provision of medical supplies and assistance. OFAC writes that, “activities by NGOs and IOs to provide relief to people impacted by the Russian Federation’s war against Ukraine are not the target of U.S. or UK sanctions.”

O’Leary, Emma. “Politics and Principles: The Impact of Counterterrorism Measures and Sanctions on Principled Humanitarian Action.” *International Review of the Red Cross* 103, no. 916-917 (2022): 459-477. <https://international-review.icrc.org/articles/politics-and-principles-the-impact-counterterrorismmeasures-on-principled-humanitarian-action-916>.

More than ever, researchers and diverse stakeholders are focused on how counterterrorism (CT) measures and sanctions adversely affect principled humanitarian action. This article “looks at the impact of growing risk aversion in relation to CT measures and sanctions among donors, humanitarian organizations and other actors on principled humanitarian action, and highlights recent efforts to address and mitigate these impacts. The central argument is that CT and sanctions risks cannot be eliminated from humanitarian action. As such, policy change is needed to protect principled humanitarian action from further detrimental impacts and to ensure that people can access the assistance they need, regardless of where they are located.”

Onder, Mehmet. “Consequences of Economic Sanctions on Minority Groups in the Sanctioned States.” *Digest of Middle East Studies* 31, no. 3 (August 2022): 201–27. <https://doi.org/10.1111/dome.12268>.

This article makes the assertion that economic sanctions cause ethnic discrimination in sanctioned countries. It explores the economic, political, and social effects of economic sanctions on vulnerable groups within target states using the Minorities at Risk (MAR)

data set and others described in the paper. It finds that sanctioned regimes use harsher policies towards minorities that lack power. “Past research has neglected how Middle Eastern regimes, such as the Syrian and Iranian governments, treated minorities during sanctions. This study paves the way for further research on how sanctions impact minority groups in the Middle East who are scapegoats for the negative impacts of sanctions.”

Pelter, Zoë, Camila Teixeira, and Erica Moret. “Sanctions and Their Impact on Children: Discussion Paper.” UNICEF, February 2022.

<https://www.unicef.org/globalinsight/media/2531/file/%20UNICEF-Global-Insight-Sanctions-and-Children-2022.pdf>.

Despite reforms to make them more “targeted,” sanctions often cause economy-wide disruptions and obstruct humanitarian aid delivery, causing disproportionate harm to children. This report covers current sanctions regimes and humanitarian exceptions and assesses the impact on children in targeted countries. It looks specifically at health, water, and sanitation; adequate and nutritious food; adequate standard of living; education; and the COVID-19 response. The authors conclude with recommendations for sanctions designers, urging them to make sanctions more targeted, clarify and streamline humanitarian exceptions and licensing, protect banking channels, monitor and attenuate the humanitarian impact of sanctions, and conduct legal reviews to ensure sanctions are aligned with international law.

Perry, Kate. “Better for Whom? Sanction Type and the Gendered Consequences for Women.” *International Relations* 36, no. 2 (June 2022): 151–75.

<https://doi.org/10.1177/00471178211018843>.

“How does sanction type negatively impact women in gendered ways in the target state? I argue that economic sanctions place a financial burden on the target state which leads to government cuts to social spending, specifically in public education. Women rely disproportionately upon spending on public education, and thus, are impacted more harshly than men when these programs are underfunded by the government. I find that contrary to policy expectations, targeted sanctions do not have a reduced impact on women’s human rights in the target state compared to comprehensive sanctions once this impact is disaggregated from standard human rights indices and specific mechanisms in the state are examined...compared to comprehensive sanctions, I find that targeted and human rights sanction types are worse for women’s gender equality metrics via this influence on government social spending. However, I illustrate that when the target state increases spending on primary education in the post-sanctions period, the overall negative impact of sanctions on women can be mitigated.”

Perry, Kate, and Dursun Peksen. “Economic Sanctions and Labour Rights Abuses in Target Countries.” *European Journal of Political Research*, February 25, 2023, 1475-6765.12581. <https://doi.org/10.1111/1475-6765.12581>.

“Though much research has focused on major political and humanitarian consequences of economic sanctions, little is known about how economic sanctions affect economic rights and freedoms in target countries.” In this article, the authors examine how EU, U.S., and UN sanctions affect labor rights in targeted countries. “Results from a time-series cross-national analysis lend strong support for the proposition that sanctions are significantly and directly related to worsened labour rights conditions. We further show that sanctions also indirectly contribute to labour rights violations through negative effects on human rights conditions and reduced bureaucratic capacity in target countries. Overall, our study deepens our understanding of the complicated outcomes of sanctions on individuals in target states and illustrates the need for further exploration into the interwoven effects of this popular policy tool.”

Pintor, Matteo Pinna, Marc Suhrcke, and Christoph Hamelmann. “The Impact of Economic Sanctions on Health and Health Systems in Low-Income and Middle-Income Countries: A Systematic Review and Narrative Synthesis.” *BMJ Global Health* 8, no. 2 (2023). <https://doi.org/10.1136/bmjgh-2022-010968>.

In this systematic literature review, the authors assess the impact of sanctions on health outcomes and healthcare in low and middle income countries. Most studies in the review were published in peer-reviewed medical journals and examined the impact of sanctions on health (i.e., nutrition and early mortality) and health systems in targeted countries, especially Iraq, Haiti, and Iran. It identified the major links between sanctions and poor health outcomes, government and civilian coping mechanisms, and the short and long term effects of sanctions. The authors assert that general conclusions about the impact of sanctions are difficult because “sanctions are multidimensional hazards, and their impact varies depending on many factors, including the economic leverage of the sanctioning party, the exemption system in place and the evolution of measures over time.” Nonetheless, the authors believe negative impacts can be reduced with increased use of risk assessment frameworks, data collection, and monitoring.

PoliSync Centre for International Policy Engagement. “Forum for Innovation in Humanitarian Payments.” <https://www.polisync.org/humanitarianforum>.

This forum brings together stakeholders for a dialogue on overcoming challenges related to humanitarian fund transfers, emphasizing the use of digital payment technologies and innovative policy measures. The forum aims to facilitate safe and legal humanitarian payments to vulnerable communities in underbanked areas by facilitating discussions, research exchange, and use of innovative technologies. The approach combines a global perspective with a focus on specific country case studies.

Portela, Clara. “Easing, Suspending, Phasing Out: The Forgotten Potential of Sanctions Relief.” Luxembourg: European Union Institute for Security Studies, September 4, 2023.

https://www.iss.europa.eu/sites/default/files/EUISSFiles/Brief_16_Sanctions.pdf.

Sanctions are “sticky,” in other words, they often lack clearly defined objectives and timelines and therefore drag on indefinitely. The author presents the question, “What if, instead of compelling behavioural change in third-country leaderships or the influential elites that support them, sanctions were useful in eliciting concessions in exchange for the easing of restrictive measures?” In this report, the author makes the case for a “gradual and conditional approach” to sanctions that grants relief in exchange for behavior change by the target government. To adopt such a strategy, the EU could learn from its experience in development cooperation based on the EU-ACP (African, Caribbean, and Pacific) Partnership framework.

Portela, Clara, and Juan S. Mora-Sanguinetti. “Sanctions Effectiveness, Development and Regime Type. Are Aid Suspensions and Economic Sanctions Alike?” *World Development* 172 (2023): 106370. <https://doi.org/10.1016/j.worlddev.2023.106370>.

In this study, the authors assess “how resilient different regime type are to sanctions, and then investigate whether results for aid suspensions differ from those for sanctions in general. After that, we hypothesise that wealth protects autocracies less from aid suspensions than from other sanctions because their effects are markedly harder to evade. With the help of econometric analysis, we test our hypotheses on original data that feature aid suspensions as a stand-alone category. Test results unequivocally corroborate the superior resistance of single-party regimes and monarchies. Importantly, with the only exception of the monarchic category, our results confirm the comparability of aid suspensions with other sanctions with regard to their effects on different regime types, corroborating that their marginal role in sanctions scholarship is unwarranted. A final test on the role of target prosperity uncovers an intriguing nuance: affluence strengthens target resistance to foreign policy sanctions but not to aid suspensions. This confirms our evasion hypothesis: while alternative trade routes can offset a ban on trade with a set of senders, substitute donors are rare. We conclude with some implications for further study.”

Prezas, Ioannis. “From Targeted States to Affected Populations: Exploring Accountability for the Negative Impact of Comprehensive Unilateral Sanctions on Human Rights.” In *Research Handbook on Unilateral and Extraterritorial Sanctions*, edited by Charlotte Beaucillon. Edward Elgar Publishing, 2021.

<https://doi.org/10.4337/9781839107856.00032>.

“The purpose of this chapter is to explore the main issues pertaining to accountability of source entities for the negative impact their comprehensive unilateral sanctions

produce on persons living in the targeted states. It first maps the human rights impact of these sanctions, before turning to the substantive and procedural hurdles to accountability, that is, the uncertain existence of extraterritorial human rights obligations of source entities and the scarcity of available remedies whether at the interstate level or before human rights adjudicative bodies. It also argues that beyond these hurdles the causality link between comprehensive sanctions and a violation of human rights in a given situation may be almost impossible to establish. It then discusses the humanitarian impact of comprehensive unilateral sanctions through the prism of countermeasures, before concluding by some remarks on the complex interplay between sovereignty-oriented and human rights-oriented arguments in this highly politicized field of international law.”

Quirós-Fons, Antonio, and Thomas Kruiper. “Missing Targets: Which Entities Are Affected by UN Counter-Terrorism Sanctions?” *Security Journal*, June 22, 2023. <https://doi.org/10.1057/s41284-023-00386-1>.

This study looks at the impact of counter-terrorism measures on listed entities. The authors compared data in the UN Consolidated List and Interpol Special Notice platform and found several inconsistencies in how the entities were described and tagged. “This could lead to confusion by authorities using the lists.” They also argue that sanctions listings have a greater impact on non-terrorist organizations, such as humanitarian organizations or financial service providers, due to reputational damage. “Even when entities succeed in getting delisted, the damage is already done. Ironically, the impact on non-terrorist entities is bigger than on some terrorist organizations, who carry their listing as a badge of honor to attract recruits” while continuing their activities.

Rad, Assal. “Should Sanctioning Countries Be Blamed for Causing Human Suffering?” *The National Interest*, April 28, 2022. <https://nationalinterest.org/feature/should-sanctioning-countries-be-blamed-causing-human-suffering-202011>.

The main argument of this article is that the United States' use of broad-based sanctions is not only ineffective in achieving their intended policy goals but also causes significant harm to innocent civilians in the targeted countries. The author criticizes the lack of accountability in the international order, particularly when it comes to the reach of U.S. unilateral sanctions. The article calls for a reevaluation of these policies to ensure that they do not violate international law and result in collective punishment of civilian populations. It calls for the establishment of rules for economic warfare and for greater accountability to countries that violate those rules.

Rodríguez, Francisco R. “The Human Consequences of Economic Sanctions.” Washington, DC: Center for Economic and Policy Research, May 2023. <https://www.cepr.net/report/the-human-consequences-of-economic-sanctions/>.

In a survey and assessment of 32 quantitative studies, most demonstrated a link between economic sanctions and negative impacts on per capita income, inequality, health and nutrition, mortality, and/or human rights. This report provides an in-depth look at three sanctioned countries: Iran, Afghanistan, and Venezuela, and identifies the ways in which sanctions have impacted economic and social indicators in those countries. The author argues that humanitarian exceptions and general licenses have so far failed to attenuate the impact of sanctions on civilians due to regulatory ambiguity and over-compliance.

Sarfati, Agathe. “An Unfinished Agenda: Carving Out Space for Humanitarian Action in the UN Security Council’s Counterterrorism Resolutions and Related Sanctions.” New York: International Peace Institute, March 2022.

<https://www.ipinst.org/2022/03/carving-out-space-for-humanitarian-action-in-UNSC-counterterrorism-resolutions-and-sanctions>.

This report explores the impact of Resolution 1267 sanctions regime (Taliban and ISIL/al-Qaida) and Resolution 1373 and subsequent counter-terrorism resolutions on the delivery of humanitarian aid. Several concerns addressed in this policy paper include the “chilling effect” and de-risking, restrictive clauses in donor contracts, barriers created by host states, and legal risk faced by humanitarian actors. December 2021 brought several key developments: a humanitarian exception for the Taliban sanctions regime in Afghanistan; an intent clause and language more explicitly aligned with International Humanitarian Law (IHL) in the ISIL/alQaida sanctions regime; and the Counter-Terrorism Committee Executive Directorate (CTED) will focus more on the links between counterterrorism and IHL and humanitarian action. The report concludes with several key recommendations for humanitarian actors, the UNSC, and member states, calling UNSC and Member States to allocate adequate resources to monitor and ameliorate the impact of sanctions on humanitarian action.

Schaar, Johan. “The Burden of the Unintended: The Humanitarian Consequences of Sanctions and the Role of the Red Cross Red Crescent.” Swedish Red Cross, April 2021.

<https://www.alnap.org/system/files/content/resource/files/main/The%20Burden%20of%20the%20Unintended.pdf>.

“When imposing sanctions, states have the obligation to act in accordance with international law. But sanctions remain a problematic instrument of international policy, despite the replacement of broad and blunt trade sanctions with more precise, targeted sanctions. Research generally finds them ineffective in reaching their political objectives. Frequent enforcement of simultaneous UN, EU and unilateral sanctions lead to serious unintended and gendered effects on the welfare of civilian populations. The operational space of humanitarian organizations is constrained, despite humanitarian exceptions and exemptions. Sanctions lead to increased repression and

violations of human rights, rather than the opposite. This report provides recommendations directed to the Red Cross Red Crescent on how to achieve a strategic shift in the focus and nature of accountability, away from humanitarian organizations and their actions, to states and their responsibility to prevent excessive hardship of civilian populations under sanctions.”

Shelton, Dinah. “INTRODUCTORY NOTE TO RES. 2664 (U.N.S.C.) AND RES. 52/13 (U.N.H.R.C.).” Cambridge University, 2023. DOI:10.1017/ilm.2023.33.

The author notes the contrast between UN Security Council resolution 2664, which established humanitarian carve-outs in UN sanctions, and Human Rights Council resolution 52/13, which condemned unilateral sanctions due to their infringement on human rights. This paper highlights Member States’ positions on both of these resolutions.

Simon, Delaney. “Peacemaking and U.S. Sanctions.” Washington, DC: International Crisis Group, October 4, 2022. <https://www.crisisgroup.org/united-states/peacemaking-and-us-sanctions>.

ICG briefed the Tom Lantos Human Rights Commission of the U.S. House of Representatives on the unintended consequences of sanctions in conflict settings. Sanctions have been known to interfere with peacebuilding goals in the following ways: by precluding use of sanctions relief in negotiations; impeding peace deal implementation; prolonging economic crisis in post-conflict settings; creating operational challenges for peacebuilding organizations; failing to have adequate carve-outs and exceptions that meet the needs of peacebuilding organizations. Recommendations include increasing clarity about the goals of sanctions, ongoing review and reauthorizing of sanctions, and including carve-outs for peacebuilding activities.

Sutton, Rebecca, and Emanuela-Chiara Gillard. “Beyond Compliance: International Humanitarian Law, Humanitarian Need and Civilian Harm in Armed Conflict.” United Kingdom: PeaceRep: The Peace and Conflict Resolution Evidence Platform, 2022. <https://peacerep.org/wp-content/uploads/2022/11/Beyond-Compliance-International-Humanitarian-Law-in-Armed-Conflict.pdf>.

This report interrogates the relationship between International Humanitarian Law (IHL) and the needs of humanitarian actors and civilians in conflict settings. Sanctions are one of the five drivers of “humanitarian need” and “civilian harm” identified in this report. Sanctions disrupt commercial transactions and services and dissuade private sector actors from engaging conflict settings. The authors call for a consultative process that engages the actors involved in designing and enforcing sanctions as well as those negatively impacted by them (e.g., humanitarian actors and banks).

Tilahun, Nathanael, and Obiora Okafor. “Economic Sanctions and Humanitarian Principles: Lessons from International Humanitarian Law.” *Yale Journal of International Law*, June 26, 2023. <https://www.yjil.yale.edu/economic-sanctions-and-humanitarian-principles-lessons-from-international-humanitarian-law/>.

This article explores economic sanctions and their inadvertent harm to civilians, drawing parallels between the regulatory frameworks of sanctions and those applied in times of war. It underscores the discrepancy in standards safeguarding civilians during armed conflicts versus economic sanctions. The article also highlights the absence of well-defined criteria for gauging the extent and duration of sanctions, which can result in long-term consequences. To address these challenges, the authors call for enhanced regulatory clarity and suggest an international code of conduct could be used to align sanctions with the principles of distinction and proportionality to minimize the suffering of civilians.

The Harris Poll. “U.S. Attitudes toward U.S. Relationships with North Korea and China.” *Harris on Demand*, January 31, 2024. https://theharrispoll.com/wp-content/uploads/2024/02/AFSC-Key-Findings-Guide_2024.pdf

This poll was conducted by the Harris Poll and prepared for the American Friends Service Committee. It found that the majority of Americans believe that the US should lift sanctions if they violate international law, interfere with humanitarian aid, or harm civilians.

United Nations. “Unilateral Sanctions Particularly Harmful to Women, Children, Other Vulnerable Groups.” *United Nations News*, December 2021. <https://news.un.org/en/story/2021/12/1107492>.

Alena Douhan, the Special Rapporteur on the negative impact of unilateral coercive measures on human rights, emphasizes that sanctions disproportionately harm vulnerable groups in targeted countries, especially women. Over-compliance with sanctions complicates financial and logistical support needed for humanitarian aid, prompting some NGOs to halt operations in affected nations. Sanctions also disrupt critical infrastructure, disproportionately affecting women responsible for securing necessities like healthcare and clean water. Douhan warns that sanctions can impede the achievement of Sustainable Development Goals and calls for focused monitoring and collaboration among the United Nations, NGOs, and humanitarian actors to ensure necessary support reaches those in need.

United Nations. “Side Event: Impact of UCMS on the Right to Development and Implementation of Sustainable Development Goals.” *OHCHR*, March 28, 2024, <https://www.ohchr.org/en/events/events/2023/side-event-impact-ucms-right-development-and-implementation-sustainable>.

At this side event to the 52nd session of the Human Rights Council, a panel of experts including Special Rapporteur Alena Douhan spoke about the impacts of unilateral coercive measures on humanitarian actors and UN Sustainable Development Goals. The purpose of the event was to hear input from stakeholders on the topic, strengthen cooperation to mitigate this issue, and assess the current challenges caused by over-compliance and secondary sanctions.

United Nations. “United States: Unilateral Designation of States as Sponsors of Terrorism Negatively Impact Human Rights, Warn UN Experts,” *OHCHR*, February 8, 2024. <https://www.ohchr.org/en/press-releases/2024/02/united-states-unilateral-designation-states-sponsors-terrorism-negatively>.

UN experts, including Special Rapporteur Alena Douhan, called on the U.S. government to review its current Sponsors of Terrorism (SST) designation framework. They argue that unilateral SST designations infringes on human rights and violates international law.

United States Mission to the United Nations. “Joint Statement by the United States and Ireland on the One-Year Anniversary of UN Security Council Resolution 2664.” Office of Press and Public Diplomacy, December 11, 2023. <https://usun.usmission.gov/joint-statement-by-the-united-states-and-ireland-on-the-one-year-anniversary-of-un-security-council-resolution-2664/>.

On the one-year anniversary of UNSC Resolution 2664, the United States Mission to the UN and Ireland recognize it has provided “much-needed clarity” to humanitarian and private sector actors operating in crisis situations. They call on UN member states to continue implementing Resolution 2664 into their domestic legal systems.

U.S. Department of the Treasury. “The Department of the Treasury’s De-Risking Strategy.” Washington, DC: U.S. Department of the Treasury, April 25, 2023. https://home.treasury.gov/system/files/136/Treasury_AMLA_23_508.pdf.

De-risking can push financial activities into un-regulated space, affecting remittances and hindering access to financial services for vulnerable communities. This document lays out a strategy which aims to mitigate financial crimes and sanctions evasion, maximize the effectiveness of sanctions, and create an enabling environment for humanitarian activities and cross-border transactions. Among its many recommendations are making guidance on regulatory expectations more clear, tracking and reporting on de-risking, longer notice periods for account terminations, revised AML/CFT regulations, strengthening international cooperation, and adopting innovative technologies. The Treasury calls for greater collaboration between public and private stakeholders to mitigate the consequences of de-risking.

Verdier, Pierre-Hugues. “Sanctions Overcompliance: What, Why, and Does It Matter?” *North Carolina Journal of International Law* 48 (June 2023): 471–99.

Sanctions today are generally more targeted and rely on cooperation by financial institutions and multinational corporations to prevent sanctions evasion. These institutions may over-comply with sanctions to avoid risk. The author argues that this overcompliance is a rational response to legal, enforcement, and jurisdictional uncertainty of sanctions by market actors, which in turn, is a rational decision by policymakers to provide the minimum guidance that does not enable sanctions evasion. The paper identifies drivers of overcompliance and its consequences, including impact on humanitarian actors. Due to the lack of incentives and relatively small scale of the transactions, the author argues that external pressure is needed to ensure that financial institutions continue to serve humanitarian actors.

Walker, Justine. “Risk Management Principles Guides for Sending Humanitarian Funds Into Syria and Similar High-Risk Jurisdictions.” Geneva Graduate Institute Global Governance Centre, May 2020.

<https://www.graduateinstitute.ch/sites/internet/files/2020-05/26-MAY-SYRIA-Risk%20Management%20GuideFINAL.pdf>.

This guide provides essential information and practical recommendations for banks, humanitarian organizations, and donors to collaborate effectively, ensuring aid reaches Syrian civilians in compliance with EU/US/UN sanctions and broader regulatory requirements. While initially developed for Syria, the guide offers a transferrable framework applicable to other high-risk regions marked by sanctions, conflict, and concerns about terrorist financing. While these guidelines represent progress, there's still work to be done to ensure effective humanitarian exemptions. This involves promoting collaborative licensing across competent authorities, using project licenses more extensively, ongoing discussions on proximity and proportionality, and endorsing transparent and viable payment channels, including alternative methods, for humanitarian fund transfers.

———. **“The Public Policy of Sanctions Compliance: A Need for Collective and Coordinated International Action.” *International Review of the Red Cross* 103, no. 916–917 (April 2021): 705–16. <https://doi.org/10.1017/S181638312100093X>.**

Comprehensive, unilateral sanctions, and counterterrorism measures have created significant barriers for delivering aid to highly sanctioned jurisdictions. “This paper sets out to explain the challenges of aligning sanctions compliance efforts with the delivery of humanitarian aid into highly sanctioned environments. It highlights that while the policy of sanctioning authorities is to encourage and permit humanitarian activity, there remain significant obstacles to achieving this objective. The paper offers insights into the key areas of complexity and the most urgent aspects requiring clarification. It expressly illustrates that striking the correct balance between the delivery of critical

humanitarian responses and the application of United Nations and unilateral sanctions will necessitate some realignment. The paper concludes by highlighting the need for governments and sanctioning authorities to adopt a forward-leaning approach, and by stressing the necessity of collective and coordinated international action.”

Country-Specific Reports

Last updated December 2023

Afghanistan

Bartlett, Jason. “Sanctions by the Numbers: Spotlight on Afghanistan.” Center for a New American Security, October 2021.

<https://www.cnas.org/publications/reports/sanctions-by-the-numbers-afghanistan>.

This report tracks and visualizes the past twenty years of sanctions programs on Afghanistan. It outlines that the major challenges that the United States faces for Afghanistan-related sanctions: (1) defining who and what exactly is "the Taliban," (2) the potential impact of sanctions on humanitarian assistance after Taliban takeover, and (3) how this all may affect future U.S.-U.N. sanctions coordination on the Taliban.

“David Miliband’s Testimony to the Senate Foreign Relations Committee Subcommittee on Afghanistan,” February 8, 2022. <https://www.rescue.org/press-release/david-milibands-testimony-senate-foreign-relations-committee-subcommittee-afghanistan>.

In his testimony to the Senate Foreign Relations Committee Subcommittee on Near East, South Asia, Central Asia, and Counterterrorism, Miliband appealed to its members to U.S. economic policy vis-a-vis Afghanistan. International sanctions set in response to the Taliban’s takeover have exacerbated an economic crisis in the country. The author calls for immediate action in five key areas: reprogram the Afghanistan Reconstruction Trust Fund for basic services, clarify sanctions and compliance requirements to encourage private sector engagement, gradually unfreeze funds, contribute to efforts by multilateral institutions (e.g, World Bank) to support the central bank, and scale up humanitarian aid.

International Crisis Group. “Beyond Emergency Relief: Averting Afghanistan’s Humanitarian Catastrophe,” December 6, 2021. <https://www.crisisgroup.org/asia/south-asia/afghanistan/317-beyond-emergency-relief-averting-afghanistans-humanitarian-catastrophe>.

In this policy report, the International Crisis Group argues that economic sanctions are unlikely to change the Taliban's behavior and will only hurt the most vulnerable Afghans. Sanctions are also likely to trigger state collapse, destabilizing the region and

provoking another migration crisis. The authors state that emergency relief is not enough. If the international community wishes to avoid a humanitarian crisis, it must help state institutions provide essential services, including health care, education, and a basic financial system.

International Peace Institute. “A Humanitarian Perspective on the Independent Assessment in Afghanistan.” New York: International Peace Institute, June 2023. <https://www.ipinst.org/wp-content/uploads/2023/06/IPI-E-RPT-Humanitarian-Perspective.pdf>.

This report shares highlights from a roundtable event hosted by IPI at which humanitarian experts discussed the current humanitarian situation in Afghanistan. Among the issues raised was de-risking related to sanctions against the Taliban. Misunderstanding of sanctions and excessive risk aversion by banks has caused numerous delays or refusals to transfer funds necessary for humanitarian assistance. Furthermore, some donors continue to use restrictive terms and conditions in their contracts which further encumber the work of humanitarian organizations. The report concludes with recommendations for the Independent Assessment of the international community’s response to Afghanistan, submitted by the UN secretary-general to the UN Security Council in November 2023.

Kurtzer, Jacob, Moss, Kelly, and Sue Eckert. “US Sanctions Squeeze Humanitarian Assistance in Afghanistan.” Washington, DC: Center for Strategic and International Studies, September 2021. <https://www.csis.org/analysis/us-sanctions-squeeze-humanitarian-assistance-afghanistan>.

In this CSIS analysis, the authors address the rapidly worsening humanitarian crisis in Afghanistan. They argue that frozen foreign assets, uncertainty over the scope of licenses granted by the Treasury, and reluctance to engage with the Taliban are some impediments to humanitarian assistance. The report recommends for the U.S. to clarify the scope of the broad general licenses permitting humanitarian trade with Afghanistan, and establish a safe payment channel for NGOs and humanitarian agencies to move urgently needed funds into the country.

Moret, Erica. “Barriers to Afghanistan’s Critical Private Sector Recovery.” Oslo: Norwegian Refugee Council, March 2023. https://www.nrc.no/globalassets/pdf/reports/barriers-to-afghanistans-critical-private-sector-recovery/afghanistans-private-sector-recovery_format.pdf.

“Afghanistan has undergone a series of complex political, economic and social changes since the return to power of the Taliban in August 2021, whereby the plight of the Afghan people has deteriorated into an unprecedented humanitarian catastrophe. To date, most research and policy efforts have centered on the humanitarian catastrophe and the plight of women and girls. Less attention has been placed on

constraints facing trade with Afghanistan, including those negatively impacting supply chains of essential goods that are necessary to address the basic needs of Afghan people. This report seeks to fill a knowledge gap on some of the key challenges facing Afghan trade, especially relating to food and essential goods needed for basic survival. It explores challenges associated with international targeted sanctions; financial sector de-risking; shifts in domestic regulations; implications of Russia's invasion of Ukraine in 2022; and wider trade and economic constraints. It includes best-practice and coping strategies employed by the private sector operating in Afghanistan and a series of policy recommendations based on input from Afghan companies and those operating in the wider region. This report concludes that capacity building and awareness-raising is urgently warranted to reassure the international business community that Afghanistan should be open to business. The UN and US' targeted sanctions regimes are limited to a set of individuals and entities in Afghanistan and do not apply to the entire country."

———. **"Life and Death: NGO Access to Financial Services in Afghanistan."** Oslo: Norwegian Refugee Council, January 2022.

https://www.nrc.no/globalassets/pdf/reports/life-and-death/financial-access-in-afghanistan_nrc_jan-2022.pdf.

Humanitarian organizations are often unable to transfer money at the scale and speed required to respond to the mounting crisis in Afghanistan. This is largely due to domestic and international factors, such as increasing financial isolation, the Afghan Central Bank's frozen assets, capital controls, sanctions overcompliance, and financial sector de-risking. This report maps out available payment channels (including formal/regulated and informal/unregulated), the degree to which they can provide physical cash to NGOs, and offers recommendations for how these channels could be scaled up. Additional measures are also needed to address wider macroeconomic challenges, such as preventing the Afghan banking sector from collapse, mitigating inflation, and resuming trade.

———. **"The Role of Sanctions in Afghanistan's Humanitarian Crisis."** *The Global Observatory*, International Peace Institute, October 14, 2021.

<https://theglobalobservatory.org/2021/10/the-role-of-sanctions-in-afghanistans-humanitarian-crisis/>.

The article discusses the role of international sanctions in addressing the crisis in Afghanistan and the need to design them in ways that avoid civilian harm. It discusses some of the ways sanctions disproportionately impact civilians and suggests strategies to mitigate this. Recommendations include easing certain sanctions, establishing humanitarian banking channels, broadening exemptions for essential goods and aid, proactively ensuring trade and humanitarian access, engaging public health and humanitarian experts in sanctions design, and safeguarding remittance channels.

Muhammedally, Sahr. “Humanitarian Crisis in Afghanistan Demands Urgent Action.” Center for Civilians in Conflict, 2022.

<https://civiliansinconflict.org/blog/humanitarian-crisis-in-afghanistan-demands-urgent-action/>.

Since the political transition in August 2021, Afghanistan has experienced sanctions, crumbling public finances, and poverty. The international community has failed to develop an effective and comprehensive approach that can support Afghans with this new political reality. Walking away from Afghanistan now, the author argues, is the wrong thing to do.

Smith, Adam M. “The Humanitarian and Policy Challenges of U.S. Sanctions on the Taliban.” Just Security, August 2021. <https://www.justsecurity.org/77957/the-humanitarian-and-policy-challenges-of-u-s-sanctions-on-the-taliban/>.

The author argues that the United States must address the negative consequences of its sanctions in Afghanistan. Failing to do so could create a humanitarian crisis similar to Yemen. The U.S. should utilize the capacity of the National Security Council, OFAC, the State Department, and the intelligence community to devise strategies and tools that ensure its policies vis-a-vis Afghanistan do not lead to greater catastrophe.

Smith, Graeme. “Afghanistan: The Humanitarian Crisis and U.S. Response.” Washington, DC: International Crisis Group, February 9, 2022. <https://www.crisisgroup.org/asia/south-asia/afghanistan/afghanistan-humanitarian-crisis-and-us-response>.

In testimony to the U.S. Senate Committee on Foreign Relations, Graeme Smith calls for U.S. support for Afghanistan to go beyond short-term aid to help prevent further economic collapse. With the humanitarian situation growing more severe, Smith calls for action in two key areas: preventing the collapse of essential public services and supporting economic revival. Recommendations include using existing funds, like the Afghanistan Reconstruction Trust Fund, to support the public sector and education, adjusting sanctions to allow the central bank to function, and gradually unfreezing assets. Pragmatic, limited cooperation with the Taliban is necessary to achieve a stable and self-sustaining Afghanistan.

Weisbrot, Mark. “US Sanctions on Afghanistan Could Be Deadlier Than 20 Years of War.” Center for Economic and Policy Research, February 4, 2022. https://www.google.com/url?q=https://cepr.net/us-sanctions-on-afghanistan-could-be-deadlier-than-20-years-of-war/&sa=D&source=docs&ust=1695757511748493&usq=AOvVaw085tZXiC7YOqt_nmbHiKMRw.

Weisbrot argues that freezing the \$7 billion of Afghanistan's assets held in the U.S. Federal Reserve will have significant economic consequences for Afghanistan. These assets are equivalent to about forty percent of Afghanistan's economy, and 14 months of imports (e.g., food, medicine, and other essential goods). Without these reserves, Afghanistan will be unable to maintain a stable financial system and economy.

Cuba

Fidel Domínguez Mederos, Ernesto. "Right to Live Without a Blockade: The Impact of US Sanctions on the Cuban Population and Women's Lives." United Kingdom: Oxfam, May 2021. <https://webassets.oxfamamerica.org/media/documents/bp-cuba-blockade-women-250521-en.pdf>.

"Right to Live without a Blockade reveals the impact of nearly six decades of sanctions imposed by successive US governments on the Cuban population. It focuses on the human dimensions, presenting testimonies that illustrate the consequences of the blockade on the daily lives of those in Cuba, women in particular. The report also includes historical data and information on the measures applied. In the context of a global pandemic, it is more urgent than ever to change this US policy toward Cuba. Oxfam calls for the normalization of US-Cuba relations."

Democratic People's Republic of Korea (DPRK)

Barannikova, Anastasia. "Sanctions against North Korea: An Unintended Good?" Center for Strategic and International Studies, April 1, 2019. <https://www.csis.org/analysis/sanctions-against-north-korea-unintended-good>.

Sanctions on North Korea, particularly under UN Security Council Resolution 2375, have negatively impacted segments of the population, hindered humanitarian efforts, and caused food and medicine shortages. Yet this article also notes how sanctions have redirected resources like coal, seafood, and light industry products towards domestic consumption, fostering increased production and self-sufficiency. North Korea's efforts to achieve economic and energy independence demonstrates resilience in the face of sanctions. Furthermore, sanctions have paradoxically strengthened Kim Jong-un's domestic power by uniting society against perceived external threats. Ultimately, sanctions have not achieved their primary goal of influencing North Korea's nuclear and missile programs and the effectiveness of sanctions may decline as the country forms stronger ties with other major powers.

Brockmann, Kolja. "European Union Sanctions on North Korea: Balancing Non-Proliferation with the Humanitarian Impact." Stockholm International Peace Research Institute, December 2020. <https://www.sipri.org/commentary/topical-background/2020/european-union-sanctions-north-korea-balancing-non-proliferation-humanitarian-impact>.

The international sanctions against North Korea, comprising UN Security Council sanctions, EU autonomous sanctions, and unilateral measures by various countries, aim to curb North Korea's nuclear weapons, missile programs, human rights abuses, and cyberattacks. Despite these comprehensive sanctions, their ability to meet these policy objectives has been limited. This article examines EU autonomous sanctions in the wider sanctions regime, proposing recommendations to improve sanctions compliance and reduce humanitarian consequences. It emphasizes the need for a clear policy strategy, specific guidance for trade in medical goods and humanitarian aid, renewed engagement with humanitarian organizations, and a resumption of political dialogue with North Korea, all aimed at contributing to denuclearization, risk reduction, and alleviating humanitarian concerns.

Korea Peace Now. “The Human Costs and Gendered Impact of Sanctions on North Korea,” October 2019. <https://koreapeacenow.org/wp-content/uploads/2019/10/human-costs-and-gendered-impact-of-sanctions-on-north-korea.pdf>.

This report highlights the impact of sanctions on North Korea, which have evolved into a near-total trade, investment, and financial transaction ban. Increasingly, UN agencies have raised alarm about the humanitarian and human rights consequences of these sanctions, particularly on vulnerable groups, including women. The report finds that sanctions hinder the provision of urgent humanitarian aid, impede the country's economic development, and disproportionately affect women, leading to increased rates of domestic violence, sexual violence, and human trafficking. It recommends resolving the underlying security crisis according to international law, lifting sanctions violating international norms, adopting measures to mitigate their adverse effects, conducting gender-sensitive impact assessments, and ensuring women's participation in peace negotiations.

Lee, Jessica J. “It’s Time to Reconsider Sanctions on North Korea.” *The Diplomat*, 2021. <https://thediplomat.com/2021/03/its-time-to-reexamine-us-sanctions-on-north-korea/>.

While the North Korean regime is responsible for human rights violations and widespread poverty, the article argues that the international community bears some responsibility for the humanitarian crisis which has been exacerbated by sanctions. Excessive sanctions have hindered humanitarian efforts and the global COVID-19 response. The Markey-Levin bill, introduced in 2021, was designed to address these issues and calls for a more comprehensive and ethical approach to North Korea policy.

Park, Kee B., Miles Kim, and Jessup Jong. “The Human Costs of UN Sanctions and Funding Shortfalls for Humanitarian Aid in North Korea.” *38 North*, August 22, 2019. <https://www.38north.org/2019/08/parkkimjong082219/>.

This article discusses the unintended consequences of sanctions on North Korea, particularly the impact on humanitarian aid programs in 2018. The authors estimate that thousands of North Korean lives could have been saved if not for sanctions-related delays and funding shortfalls affecting aid programs. Delays in obtaining sanctions exemptions for humanitarian aid items, lengthy approval processes, and broad prohibited categories caused significant problems for aid delivery. The article emphasizes the need for a more efficient exemption process, a "white list" for low-security-risk humanitarian goods, and addressing funding shortfalls to prevent further harm to innocent civilians in North Korea.

Zadeh-Cummings, Nazanin, and Lauren Harris. "Humanitarian Aid in North Korea: Needs, Sanctions, and Future Challenges." Centre for Humanitarian Leadership, 2020. https://centreforhumanitarianleadership.org/wp-content/uploads/2020/04/CHL_North-Korea-Report_Final.pdf.

This report provides an overview of the current humanitarian situation in DPRK and examines the impact of sanctions, both unilateral and multilateral, and their impact on aid delivery. It identifies four levels of impact, including the exemptions process, dealings with third parties, interactions with sanctioning/implementing governments, and opportunities for humanitarian collaboration with North Korean counterparts. Key recommendations include continuous monitoring by the UNSC, redesigning exemption and travel ban processes by the US government, addressing banking channel issues, maintaining funding for humanitarian programs, and investing in advocacy to highlight the impact of sanctions on aid delivery.

———. **"The Impact of Sanctions against North Korea on Humanitarian Aid." *Journal of Humanitarian Affairs* 2, no. 1 (January 1, 2020): 44–52. <https://doi.org/10.7227/JHA.033>.**

"The Democratic People's Republic of Korea (DPRK, or North Korea) has been a recipient of international humanitarian aid from international organisations (IOs) and non-governmental organisations (NGOs) since 1995. In recent years, multilateral and unilateral sanctions in response to the DPRK's nuclear programme have created a new layer of difficulty for humanitarians looking to engage with the authoritarian state. This paper explores how sanctions are affecting humanitarian work in practice, utilising interviews with practitioners. The research first surveys documentation, particularly from IOs, to establish how humanitarians understand contemporary needs inside the country. Next, this paper examines the impacts of sanctions on aid efforts, with a particular focus on multilateral United Nations Security Council (UNSC) sanctions and unilateral American measures. Unpacking humanitarian challenges and potential ways to navigate the sanctions regime provides a foundation for academics and humanitarian practitioners to better understand both the DPRK and possible avenues for principled, effective aid."

Bajoghli, Narges, Vali Nasr, Djavad Salehi-Isfahani, and Ali Vaez. *How Sanctions Work: Iran and the Impact of Economic Warfare*. California: Stanford University Press, 2024.

“Sanctions have enormous consequences. Especially when imposed by a country with the economic influence of the United States, sanctions induce clear shockwaves in both the economy and political culture of the targeted state, and in the everyday lives of citizens. But do economic sanctions induce the behavioral changes intended? Do sanctions work in the way they should? To answer these questions, the authors of *How Sanctions Work* highlight Iran, the most sanctioned country in the world.”

Barron, Elsa, Tom Ellison, and Dr. Alex Naegele. “Looming Climate Security Crises in Iran: As Water Runs Dry in Iran, Security and Climate Risks Escalate.” Center for Climate & Security, September 13, 2023.

<https://storymaps.arcgis.com/stories/530c113115794717a283006758618dd4>.

Climate change is projected to dramatically reduce the available water in Iran. Increased water scarcity and Iran’s international isolation from sanctions will compound existing economic and development challenges within Iran. This report includes numerous maps that demonstrate the overlap of water scarcity, decline in agricultural production, and regions with episodes of social unrest and violence. Potential future scenarios could see increased state repression of protests, regional conflicts, and “extremist exploitation” environmental degradation and humanitarian crises. The authors recommend adjusting sanctions to enable investments and inputs needed for water, energy, agriculture, and disaster responses.

Batmanghelidj, Esfandyar. “The Inflation Weapon: How American Sanctions Harm Iranian Households.” Goshen, IN: Fourth Freedom Forum, January 2022.

<https://www.fourthfreedomforum.org/publications/the-inflation-weapon-how-american-sanctions-harm-iranian-households/>.

This report provides an overview of U.S. sanctions on Iran and traces the connection between the macroeconomic impact of sanctions and the reduced welfare of households. Particularly since 2018, sanctions have become increasingly restrictive, with a significant impact on inflation. The report highlights how these sanctions have hindered the well-being of ordinary Iranians, affecting access to essential goods, food, and medical supplies, especially during the COVID-19 pandemic. It also discusses the need for a more humane and incentive-based approach to sanctions, suggesting measures such as suspending sanctions during the pandemic, controlling inflation, restoring subsidies for food and medicine, and incentivizing economic engagement with Iran if nuclear reduction guarantees are met.

Batmanghelidj, Esfandiyar, and Zep Kalb. “Coercion and Inequality: The Distributional Effects of Sanctions in Iran.” *Phenomenal World*, August 23, 2023. <https://www.phenomenalworld.org/analysis/iran-sanctions-inequality/>.

Not all actors and institutions are affected equally when sanctions broadly target an economy. The authors argue that scrutinizing the distributional effects of sanctions is key to understanding why they often fail to change the targeted government’s behavior. The case of Iran demonstrates how powerful autocrats, individuals, and firms can withstand the worse effects of sanctions compared to civilians. As U.S. sanctions against Iran have expanded over the past decade, macroeconomic indicators such as GDP and currency value have declined as is typical for sanctioned countries. However, Iran’s economic elite have acquired an even larger share of wealth during that same time. The authors argue that this distributional effect of sanctions is in part to blame for their failure to change Iranian leaders.

Brockmann, Kolja, and Keith A. Preble. “Mitigating Humanitarian Impact in a Complex Sanctions Environment: The European Union and the Sanctions Regimes against Iran.” *Stockholm: Stockholm International Peace Research Institute*, September 1, 2021. <https://www.jstor.org/stable/resrep37830>.

This report provides an overview of humanitarian impacts of sanctions on Iran. The authors analyzed food commodity prices from 2012 to 2021, finding sanctions correlate with increased prices in food such as rice and lentils. They also found a correlation between the imposition of EU sanctions on Iran and Iran's decreased trade in medical goods with the EU. Several recommendations are given to mitigate over compliance and the impact of sanctions on humanitarian organizations.

Farzanegan, Mohammad Reza, and Esfandiyar Batmanghelidj. “Understanding Economic Sanctions on Iran: A Survey.” *The Economists’ Voice*, June 22, 2023. <https://doi.org/10.1515/ev-2023-0014>.

In a survey of literature published since 2006 on the economic effects of sanctions on Iran, the authors discuss the methodological challenges associated with studying the impacts of sanctions. The review identifies ongoing debates around research methodologies, parameters, and gaps in how scholars study macroeconomic and sectoral trends. The authors recommend scholars use econometric models to study social, political, environmental, and sectoral effects of sanctions and determine which effects are case-specific and which are generalizable. They write, “without a more complete body of economic research to draw upon, policymakers lack the ability to comprehensively predict and assess the impact of sanctions, whether on Iran or any other country. Iran will likely remain the most important case study as researchers seek to fill those gaps.”

Human Rights Watch. “‘Maximum Pressure’ US Economic Sanctions Harm Iranians’ Right to Health,” October 29, 2019.

<https://www.hrw.org/report/2019/10/29/maximum-pressure/us-economic-sanctions-harm-iranians-right-health>.

The report discusses the impact of the Trump administration's withdrawal from the Iran nuclear agreement (JCPOA) in May 2018, which led to the reimposition of economic sanctions on Iran. While humanitarian exemptions were built into the sanctions, they have failed to prevent significant negative consequences for Iranians' access to essential medicines and healthcare. Over compliance by banks and other consequences have been severe, with shortages of critical medicines, particularly affecting patients with rare diseases and chronic conditions. The report calls for clearer guidance to facilitate humanitarian trade and ensure Iranians' access to essential goods, emphasizing the human rights obligations of both the U.S. and Iranian governments in this context.

Kahalzadeh, Hadi. “‘Maximum Pressure’ Hardened Iran Against Compromise: Sanctions Shrank the Middle Class and Empowered the Revolutionary Guards.” *Foreign Affairs*, March 2021. <https://www.foreignaffairs.com/articles/iran/2021-03-11/maximum-pressure-hardened-iran-against-compromise>.

Kahalzadeh argues that maximum pressure sanctions altered the social class structure of Iran, moving a significant portion of the middle class to the poverty level. Iran's middle class has shrunk from 45 percent of the population in 2018 to 30 percent in March 2020. Sanctions have led to political consolidation for hardliners and a decimation of more liberal, middle class elements in society. Maximum pressure, therefore, has stigmatized the prospect of engagement with the West.

Kalb, Zep. “The Class Biases of Economic Sanctions in Iran: Labour Market Position and Household Welfare.” Bourse & Bazaar Foundation, July 3, 2023.

<https://www.bourseandbazaar.com/research-1/2023/07/01/the-class-biases-of-economic-sanctions-in-iran>.

“This report evaluates the effect of economic sanctions on household welfare in Iran between 2010-20, using data from the annual Household Expenditure and Income Survey (HEIS) published by the Statistical Center of Iran. The report takes an occupational class approach to understand how the impact of sanctions was mediated by households' position in the labor market.”

Katzman, Kenneth. “Iran Sanctions.” Congressional Research Service, February 2022. <https://sgp.fas.org/crs/mideast/RS20871.pdf>.

Since Iran's 1979 Islamic revolution, the U.S. has used economic sanctions as a tool to change the Iranian government's behavior. While these sanctions have damaged

Iran's economy, they haven't fundamentally changed Iran's strategic objectives, such as expanding regional influence and developing ballistic missiles and armed drones. This covers the history of the JCPOA and sanctions and recent talks between Iran and the U.S. to restart the deal.

Madani, Kaveh. “Have International Sanctions Impacted Iran’s Environment?” *World* 2, no. 2 (April 21, 2021): 231–52. <https://doi.org/10.3390/world2020015>.

“This study provides the first extensive overview of the unintended environmental impacts of international economic sanctions on Iran. It is argued that while sanctions are certainly not the root cause of Iran’s major environmental problems, they have had an undeniable impact on Iran’s environment by: (1) restricting its access to technology, service, and know-how; (2) blocking international environmental aid; and (3) increasing the natural resource-intensity of its economy. Sanctions have effectively limited Iran’s economic growth and its ability to decouple its economy from natural resources, thereby growing the role of natural resources in Iran’s political economy. Overall, sanctions have made economic production much costlier to its environment, which is not currently considered a priority in the policy agenda of the Iranian leaders who manage the country in survival mode while aggressively pursuing their ideology. The study calls for increased attention to the overlooked environmental impacts of sanctions on Iran with major health, justice, and human rights implications that could be transgenerational and transboundary.”

Moeeni, Safoura. “The Intergenerational Effects of Economic Sanctions.” *The World Bank Economic Review* 36, no. 2 (May 9, 2022): 269–304. <https://doi.org/10.1093/wber/lhab024>.

“While economic sanctions are successful in achieving political goals, they can hurt the civilian population. These negative effects could be even more detrimental and long lasting for future generations. This study estimates the effects of economic sanctions on children’s education by exploiting the United Nations sanctions imposed on Iran in 2006. Using the variation in the strength of sanctions across industries and difference-in-differences with synthetic control analyses, this study finds that the sanctions decreased children’s total years of schooling by 0.1 years and the probability of attending college by 4.8 percentage points. Moreover, households reduced education spending by 58 percent—particularly on school tuition. These effects are larger for children who were exposed to the sanctions for longer.”

Mohammadi-Nasrabadi, Fatemeh, Delaram Ghodsi, Arezoo Haghighian-Roudsari, Fatemeh Esfarjani, Mohammad-Reza Khoshfetrat, Zeinab Houshialsadat, Maryam Mohammadi-Nasrabadi, Ghasem Fadavi, and Reza Majdzadeh. “Economic Sanctions Affecting Household Food and Nutrition Security and Policies to Cope With Them: A Systematic Review.” *International Journal of Health Policy and Management*, July 17, 2023, 1. <https://doi.org/10.34172/ijhpm.2023.7362>.

This systematic review aimed to assess the impact of economic sanctions on household food and nutrition security in countries subjected to sanctions and to identify coping strategies. Out of the included studies covering Iran, Cuba, Russia, Iraq, and Haiti, sanctions were found to be associated with declining GDP, currency devaluation, food quality deterioration, inflation, unemployment, increased mortality rates, energy and protein deficiencies, and higher poverty rates. To enhance food security, strategies included international humanitarian assistance, prioritizing vulnerable groups through healthcare expansion, food ration systems, import substitution, domestic production support, and compensation packages for vulnerable households.

Murphy, Adrianna, Zhaleh Abdi, Iraj Harirchi, Martin McKee, and Elham Ahmadnezhad. “Economic Sanctions and Iran’s Capacity to Respond to COVID-19.” *The Lancet Public Health* 5, no. 5 (May 2020): e254. [https://doi.org/10.1016/S2468-2667\(20\)30083-9](https://doi.org/10.1016/S2468-2667(20)30083-9).

Iran’s ability to combat the COVID-19 pandemic was severely hindered by economic sanctions imposed by the United States, which were intensified after the U.S. withdrew from the nuclear deal in 2018 and further tightened in 2020. The nation’s already struggling healthcare system was hit hard, with shortages of test kits, protective gear, and ventilators, and an economic crisis caused by steep increases in medicine prices, affecting millions of patients. The dire situation not only threatens Iran’s ability to manage the virU.S. in the future but could lead to further economic collapse and an inability to contain the virU.S. effectively.

National Iranian American Council. “Memo: The Humanitarian Impact of Sanctions on Iran,” November 2021. <https://www.niacouncil.org/news/memo-the-humanitarian-impact-of-u-s-sanctions-on-iran/>.

This memo summarizes the impact of sanctions on Iran’s response to COVID-19, the country’s access to humanitarian trade, and the issues associated with humanitarian exemptions. Sanctions imposed on Iran during the Trump administration had detrimental effects on Iran’s economy and people’s welfare. While the Biden administration has engaged in indirect negotiations to reenter the Iran nuclear deal, U.S. sanctions policy towards Iran remains largely unchanged. These sanctions, though theoretically containing humanitarian exemptions, have hindered Iran’s ability to access vital medical supplies, including COVID-19 vaccines. Humanitarian exemptions have so far not effectively facilitated humanitarian trade, causing difficulties for firms and organizations attempting to provide aid in Iran.

———. “The Impact of U.S. Sanctions on Internet Access in Iran,” August 2021. <https://www.niacouncil.org/wp-content/uploads/2021/08/GLD1-Report-Final-Aug-2021.pdf>.

U.S. sanctions inadvertently empowered the Iranian government's efforts to suppress citizens' internet access, as prominent internet services and platforms have exited the Iranian market. This withdrawal deprives civilians of tools to bypass government online restrictions, and it occurs at a time when Iranian authorities are intensifying their control over the digital realm. This report argues that sanctions effectively support Iran's "national internet" project, enabling the government to cut off access to the global internet while maintaining domestic online services. The U.S. Treasury Department's General License D-1 has failed to provide adequate reassurance to companies. To bolster internet communication for Iranians, the U.S. can take action by updating and clarifying General License D-1, streamlining licensing processes, and offering public assurances to encourage such engagements.

Norwegian Refugee Council. "US-Iran Tension Threatens Lifeline to Millions Across Middle East," January 2020. <https://www.nrc.no/news/2020/january/us-iran-tension-threatens-lifeline-to-millions-across-the-middle-east/>.

This report highlights the critical humanitarian situation in the Middle East, where tens of millions of people require assistance due to the impact of violent conflict, sanctions, and movement restrictions. This statement also highlights the adverse impact of sanctions on humanitarian efforts for the 3 million Afghan refugees in Iran. Egeland calls for de-escalation among international and regional powers and emphasizes the need for diplomatic dialogue to find solutions to alleviate the suffering of those in need who are not connected to political conflicts.

Sajadi, Haniye Sadat, and Reza Majdzadeh. "Health System to Response to Economic Sanctions: Global Evidence and Lesson Learned from Iran." *Globalization and Health* 18, no. 1 (December 29, 2022): 107. <https://doi.org/10.1186/s12992-022-00901-w>.

"This study proposes a set of mitigating measures and response strategies to improve the health systems of countries under sanctions. This three-stage study was conducted in Iran within the 2020–2021 period, in which a rapid review of evidence was carried out to identify the measures implemented or proposed to make the health system resilient in confronting sanctions. According to the findings, the most critical areas for the resilience of a health system in confronting sanctions include strengthening particular components of governance, improving efficiency, and caring for vulnerable populations."

Sajadi, Haniye Sadat, Faeze Yahyaei, Elham Ehsani-Chimeh, and Reza Majdzadeh. "The Human Cost of Economic Sanctions and Strategies for Building Health System Resilience: A Scoping Review of Studies in Iran." *The International Journal of Health Planning and Management* n/a, no. n/a (n.d.). <https://doi.org/10.1002/hpm.3651>.

“This review aimed to analyse the impacts of international economic sanctions on the overall health status of Iranians and the health system performance of Iran, in addition to identifying effective strategies for making the health system resilient to sanctions.”

Seyfi, Siamak, Colin Michael Hall, and Tan Vo-Thanh. “The Gendered Effects of Statecraft on Women in Tourism: Economic Sanctions, Women’s Disempowerment and Sustainability?” *Journal of Sustainable Tourism* 30, no. 7 (July 3, 2022): 1736–53. <https://doi.org/10.1080/09669582.2020.1850749>.

“Despite sanctions being one of the most common and far-reaching forms of economic statecraft, there is a notable absence of research on the gendered effects of economic sanctions on women’s empowerment in general, and more particularly in relation to tourism. This is surprising given that the burden of economic sanctions is overwhelmingly felt by women due to their vulnerable socio-economic and political status in targeted countries. Drawing upon a disciplinary base in international relations and political science and using a gendered lens via a series of interviews, this study sought to explore the gendered effects of economic sanctions on Iranian women’s empowerment in the country’s tourism and hospitality industry. The study’s findings indicate that sanctions have negatively affected and deteriorated economic, psychological, social and political aspects of women empowerment.”

United Nations. “Iran: Over-Compliance with Unilateral Sanctions Affects Thalassaemia Patients Say UN Experts,” February 14, 2023. <https://www.ohchr.org/en/press-releases/2023/02/iran-over-compliance-unilateral-sanctions-affects-thalassaemia-patients-say>.

UN experts Alena Douhan and Obiora C. Okafor reported that thalassaemia patients in Iran are suffering as a result of strict compliance with U.S. sanctions. These sanctions have led to reduced access to essential medication from abroad. This lack of access has resulted in increased complications and deaths. The experts believe humanitarian exemptions in US sanctions regulations are too vague and complex, resulting in greater risk aversion by foreign companies. The experts called for the effective implementation of humanitarian exemptions and a stop to secondary sanctions.

United Nations. “Special Rapporteur on Iran: Sanctions and the Government’s ‘inadequate and Opaque’ Response Have Exacerbated COVID-19’s Impact on Iran,” March 2021. <https://www.ohchr.org/en/press-releases/2021/03/special-rapporteur-iran-sanctions-and-governments-inadequate-and-opaque?LangID=E&NewsID=26870>.

During an interactive dialogue at the Human Rights Council, Javaid Rehman, the Special Rapporteur on the situation of human rights in Iran, expressed concerns about how sanctions have hindered Iran’s efforts to combat the COVID-19 pandemic and called for their easing. Many speakers expressed deep concern over Iran’s human

rights situation and called for an end to the mandate, while others urged Iran to release arbitrarily detained individuals and respect human rights.

United Nations News. “Overcompliance with U.S. Sanctions Harming Iran’s ‘Butterfly Kids,” October 2021. <https://news.un.org/en/story/2021/10/1103392>.

According to this press release, a Swedish company that produces bandages crucial for treating a severe skin condition, Epidermolysis Bullosa (EB), has ceased shipments to Iran due to fears of secondary sanctions. As a result, EB patients in Iran are being denied access to essential medical treatment, violating their right to health. UN experts emphasized the responsibility of companies to ensure their operations uphold human rights, and they are working to address this issue and related human rights concerns with the Swedish company and government.

Palestine

Charity & Security Network. “OFAC Issues Compliance Communiqué: Guidance for the Provision of Humanitarian Assistance to the Palestinian People.” November 30, 2023. <https://charityandsecurity.org/news/ofac-issues-compliance-communicue-guidance-for-the-provision-of-humanitarian-assistance-to-the-palestinian-people/>.

On November 14, 2023, the Office of Foreign Assets Control (OFAC) released a Compliance Communiqué providing guidance for the provision of humanitarian assistance to the Palestinian people. The Treasury’s goal is to ensure Palestinian people in Gaza can access humanitarian aid while still denying Hamas access to funds. This article explains the main prohibitions and authorizations in the document, including NGO activities, agricultural commodities, medicine, medical devices, U.S. government official business, and international organizations. The Communiqué also addresses questions related to authorized NGO activities, donations, U.S. companies’ provision of goods and services, importation of fuel or gas by NGOs, transfer of funds to designated groups, and interactions with governing institutions. The Charity and Security Network call on donors to continue supporting trusted organizations and be wary of unfounded narratives regarding charities’ involvement with terrorist financing.

OFAC. “Guidance for the Provision of Humanitarian Assistance to the Palestinian People.” November 14, 2023. <https://ofac.treasury.gov/media/932311/download?inline>.

OFAC issued this compliance communiqué to clarify the prohibitions and authorizations in current US sanctions against Hamas. The intent is to ensure that legitimate humanitarian assistance continues to make it to Palestinian civilians. OFAC writes that “donors seeking to support the Palestinian people are encouraged to donate to trusted organizations.”

Palestinian Children Relief Fund. “The Impact Of Sanctions On Humanitarian Aid.”
<https://www.pcrf.net/information-you-should-know/item-1700244206.html#>.

The article discusses the impact of economic sanctions on humanitarian aid, emphasizing how sanctions can inadvertently create challenges in delivering aid during crises. Specifically, financial restrictions, transportation barriers, and bureaucratic hurdles due to sanctions can impede aid, even with humanitarian carve-outs in UN sanctions regimes. The Israel-Gaza conflict serves as a real-world example, illustrating how sanctions exacerbate the humanitarian crisis, affecting medical supplies and the mental health of the civilian population. The article calls for more dialogue on this issue coupled with urgent action to ensure effective humanitarian aid delivery, especially in Gaza and other low-income countries.

Peksen, Dursun. “The Human Rights Effect of Economic Sanctions.” August 4, 2023. <https://devpolicy.org/the-human-rights-effect-of-economic-sanctions-20230804/>.

This article describes how sanctions tend to do “more harm than good” leading target countries to become more repressive and violate the human rights of citizens. And while civilians may find their access to resources diminished, sanctioned leaders often maintain their access. The author recommends “in cases where sanctions have been in place for years with no desired change in target regime behaviour, policymakers should consider lifting them to minimise the sanctions-induced instability and civilian harm.”

Peters and Peters. “Sanctions & Gaza: How are Banks & Aid Agencies Navigating Terrorist Financing and Sanctions.” December 13, 2023,
https://www.youtube.com/watch?v=2Rlls6zW8us&ab_channel=PetersandPeters.

In this webinar, sanctions experts discuss how banks and aid agencies are navigating terrorist financing and sanctions and the impact on humanitarian aid delivery in Gaza during the armed conflict. The overlap of multiple counter-terrorism measures, Israeli counterterrorism legislation, and the collapse of the banking sector in Gaza has exacerbated challenges for aid organizations. The panelist each shared recommendations for how to mitigate financial exclusion and increase humanitarian aid to civilians in Gaza.

Russia & Ukraine

Francis, Alexandra. “Ukraine Symposium: The Impact of Sanctions on Humanitarian Aid. January 27, 2023. <https://lieber.westpoint.edu/impact-sanctions-humanitarian-aid/>.

The article addresses the complex legal framework of U.S. trade restrictions and financial sanctions impacting humanitarian action in Ukraine amid the conflict. OFAC has also issued several special licenses to enable humanitarian aid to reach Ukrainian civilians. Despite these, humanitarian actors face challenges in aid delivery, caused by a combination of de-risking, overlapping sanctions regimes, and restrictive donor policies. The author includes several recommendations, such as OFAC issuing a humanitarian license, expanding existing licenses, creating channels for questions and feedback, and advocating for humanitarian actors.

Moret, Erica. "Sanctions and the Costs of Russia's War in Ukraine." International Peace Institute Global Observatory, May 12, 2022.

<https://theglobalobservatory.org/2022/05/sanctions-and-the-costs-of-russias-war-in-ukraine/>.

Unilateral sanctions against Russia are significant for several reasons, namely their speed and scope. This is the first time a large economic power and energy producer has been severely sanctioned, including their central bank. It is also notable that sanction senders have taken extreme measures despite Russia's ability to retaliate with its own economic coercion and nuclear power. In response to sanctions, numerous companies have voluntarily withdrawn from Russia. It also marks a shift in EU sanctions policy towards greater alignment with the US' "maximum pressure" sanctions campaign. Finally, the author argues that humanitarian safeguards are still needed. "If normal Russians are unable to access formal banking channels, or remit funds home to their families, they will soon join other 'unbanked' swathes of the world, unable to access certain essential goods."

Syria

Abbara, Aula, Abdulkarim Ekzayez, Ahmad Tarakji, Munzer Khalil, and Richard Sullivan. "Sanctions on Syria." *The Lancet*, September 29, 2020.

[https://www.thelancet.com/journals/langlo/article/PIIS2214-109X\(20\)30363-6/fulltext](https://www.thelancet.com/journals/langlo/article/PIIS2214-109X(20)30363-6/fulltext).

In this article, the authors challenge the prevailing perspective on the impact of EU and U.S. sanctions in Syria, contending that these sanctions, aimed at holding the Syrian Government accountable for war crimes, have been unfairly blamed for hindering the government's COVID-19 response. They argue that the politicization of humanitarian aid and the Syrian Government's manipulation of aid and reconstruction funds are significant factors. They also express concerns about the government's COVID-19 response shortcomings, threats to healthcare workers, and border closures affecting humanitarian access. These challenges, they argue, pose a more significant threat to civilians than the sanctions themselves.

Aita, Samir. "The Unintended Consequences of U.S. and European Unilateral Measures on Syria's Economy and Its Small and Medium Enterprises." Atlanta, GA: The Carter Center, December 2020.

https://www.cartercenter.org/resources/pdfs/peace/conflict_resolution/syria-conflict/syria-unintended-consequences-aita-12-20.pdf.

"This report analyzes the effects of U.S. and European unilateral measures (sanctions) imposed upon the Syrian economy since 2011 — more specifically, the impact on its agricultural, small and medium private enterprises (SMEs), and private banking sectors. Through the analyses of each sector's evolution since the early 2000s, the report attempts to distinguish between the various influencing factors in order to demonstrate where the principle of "no harm to the population" was breached." The author recommends implementing programs to increase agricultural production and food security and greater investment in the formal financial sector to mitigate de-risking and reliance on informal value transfer systems.

Alpert, Rachel, and Alyssa Bernstein. "Breaking Down Barriers to Emergency Earthquake Aid in Syria." *Just Security*, March 16, 2023.

<https://www.justsecurity.org/85499/breaking-down-barriers-to-emergency-earthquake-aid-insyria/>.

Humanitarian actors struggled to provide adequate and timely relief to survivors of the Syrian earthquake in 2023. This was in part due to barriers created by sanctions and U.S. export controls. This article describes the physical and logistical challenges exacerbated by sanctions and proposes ways to mitigate them. The authors recommend the U.S. Department of Commerce's Bureau of Industry and Security (BIS) removes export control barriers without compromising "appropriate monitoring and oversight." The authors include a list of recommendations to mitigate some of the barriers posed by sanctions.

Azar, Nancy, and Hend Charif. "Navigating Humanitarian Exemptions to Sanctions Against Syria." *The Carter Center*, October 2020.

https://www.cartercenter.org/resources/pdfs/peace/conflict_resolution/syria-conflict/navigating-humanitarian-exceptions-in-syria-oct2020.pdf.

In the midst of Syria's decade-long conflict, the humanitarian situation is deteriorating significantly, worsened by a crippling economic crisis and comprehensive sanctions. While most Syrians now reside in areas without active conflict, many lack access to essential resources and services. Although humanitarian exceptions to sanctions exist, international non-governmental organizations (INGOs) continue to face challenges to implement their projects. This paper highlights these challenges and offers recommendations to improve access and effectiveness of humanitarian organizations.

Barber, Rebecca. "The New U.S. 'Caesar' Sanctions on Syria Are Illegal." *Just Security*, July 2020. <https://www.justsecurity.org/71189/the-new-u-s-caesar-sanctions-on-syria-are-illegal/>.

The author argues that the extraterritoriality of the Caesar Sanctions, combined with their comprehensive nature and likely devastating humanitarian impacts, make them illegal under international law. The article cites the 2017 Draft Resolution on Unilateral Coercive Measures and the Rule of Law, written by U.N. Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights. The draft text asserts that sanctions are illegal if they apply extraterritoriality and/or if they inflict undue suffering on a civilian population.

Charity & Security Network. “Syria GL 23 Deadline Looming: Earthquake Relief Efforts Lie in the Balance,” August 3, 2023.

<https://charityandsecurity.org/news/gl-23-deadline-looming-syria-earthquake-relief-efforts-lie-in-the-balance/>.

Sanctions and other financial crime regulations compounded logistical and political barriers encountered by humanitarian organizations providing relief to Syria after the February 2023 earthquake. In response, OFAC issued General License (GL) 23—exempting all transactions related to earthquake relief which would otherwise be prohibited by the Syrian Sanctions Regulations—and the UK, EU, and Swiss authorities followed soon after. Despite these important steps, renewing GL 23 and other exemptions is necessary to facilitate ongoing relief and rebuilding support.

Daher, Joseph. “Invisible Sanctions: How Over-Compliance Limits Humanitarian Work on Syria Challenges of Fund Transfer for Non-Profit Organizations Working on Syria.” Berlin, Germany: IMPACT - Civil Society Research and Development e.V, 2020. [https://impact-csr.org/reports/Invisible Sanctions IMPACT EN.pdf](https://impact-csr.org/reports/Invisible_Sanctions_IMPACT_EN.pdf).

This report examines the challenges encountered by non-profit organizations engaged in humanitarian efforts in Syria, drawing insights from organizations working across various European and Middle Eastern countries. The study reveals that NGOs and INGOs operating in Syria confront escalating difficulties, leading to project cancellations as a result of sanctions impacting money transfers and bank accounts. Smaller humanitarian entities face a disproportionate burden of compliance and banking de-risking procedures. The author proposes that sanctions enforcers offer improved guidance and support to international NGOs while asserting that these challenges are not isolated instances but rather inherent in the existing international sanctions regulatory framework.

Fourth Freedom Forum. “Syria: From Punitive Sanctions to an Incentive-Based Approach.” The Carter Center, April 2022.

<https://fourthfreedomforum.org/publications/syria-from-punitive-sanctions-to-an-incentive-based-approach/>.

“Since 2011, in an unsuccessful attempt to bring about a political transition in Syria, the U.S. and the EU have employed unilateral and combined measures, including the imposition of increasingly harsh economic sanctions. This approach has failed to produce the intended result and has contributed to increased instability and suffering in Syria. Sanctions, in particular, are exacerbating the country’s already severe humanitarian crisis, without meaningfully advancing the political process. Sanctions are further contributing to the erosion of the Syrian economy, deepening unemployment, threatening new refugee flows, and leaving millions of idle young men vulnerable to recruitment by violent extremist organizations. Moreover, sanctions have marginalized the Syrian middle class at the expense of war profiteers. New thinking is needed and this paper advances this task considerably.”

Gabija, Leclerc. “Impact of Sanctions on the Humanitarian Situation in Syria.”

Belgium: European Parliamentary Research Service, 2023.

[https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/749765/EPRS_BRI\(2023\)749765_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/749765/EPRS_BRI(2023)749765_EN.pdf).

Syria is experiencing a multidimensional crisis and yet the humanitarian organizations responding to the situation are impacted by the expansive and complex EU and U.S. sanctions regimes. This document provides an overview of the situation in Syria and the unintended impact of EU sanctions, such as financial access problems caused by de-risking, over compliance, the “chilling effect,” and the politicization of aid by the Syrian government. The report covers recent policy initiatives aimed at mitigating those impacts.

Human Rights Watch. “Questions and Answers: How Sanctions Affect the Humanitarian Response in Syria.” Beirut, Lebanon: Human Rights Watch, June 22, 2023. <https://www.hrw.org/news/2023/06/22/questions-and-answers-how-sanctions-affect-humanitarian-response-syria>.

This article responds to frequently asked questions regarding the current status and impact of sanctions on humanitarian work in Syria. Most sanctions include carve-outs designed to reduce civilian harm and facilitate aid in Syria. The aid workers interviewed for this document stated that sanctions nonetheless inhibit their work and prevent them from responding at the necessary scale. After the 2023 earthquakes, for example, organizations and friends or family of survivors struggled to send money into the country despite the existence of humanitarian exemptions.

Kanfash, Mohammad. “Starve or Surrender: Sanctions as a Siege Warfare Strategy in the Syrian Conflict.” *Great Power Competition in the Syrian Conflict* 15, no. 1 (2023). <https://ojs.st-andrews.ac.uk/index.php/syria/article/view/2639>.

“Economic sanctions increasingly represent the foreign policy tool of choice for governments and international organisations seeking to address some of the world's

most pressing political and security challenges. While framed as a peaceful tool of international governance, sanctions have the potential to be as lethal as conventional warfare with severe anguish and suffering for targeted population. Taking Syria as a case study and conceptualizing sanctions as a siege warfare, the article investigates the humanitarian harm that sanctions have imposed on Syrian civilians. The article demonstrates how sanctions have damaged the welfare of innocent civilians and undermined their access to food, water, and medical care. It also shows the limitation of humanitarian exemptions and argues that sanctions run contrary to their stated goals.”

Lund, Aron. “Briefing: Just How ‘Smart’ Are Sanctions on Syria.” *The New Humanitarian*, April 2019.

<https://www.thenewhumanitarian.org/analysis/2019/04/25/briefing-just-how-smart-are-sanctions-syria>.

The article examines the impact of "smart sanctions" imposed by the United States and the European Union on the Syrian government over the past eight years. Critics argue that the broad definition of dual-use products and the cumbersome exemption process have hindered aid organizations' ability to provide assistance. As the U.S. contemplates tightening sanctions, having well-functioning humanitarian exemptions are crucial. While efforts are underway to simplify the exemption process, additional sanctions reform is needed to ensure that humanitarian aid reaches those in need while maintaining pressure on the Syrian government.

Lundqvist, Martin, and Lisa Hultman. “Civilian Wellbeing and Humanitarian Access in the Context of Targeted Sanctions: 30 Years of Sanctions Regimes in Syria, Sudan and Somalia.” Sweden: Swedish Red Cross, February 2022.

<https://www.rodakorset.se/globalassets/rodakorset.se/bilder/5-om-oss/fakta-och-standpunkter/civilian-wellbeing-and-humanitarian-access-in-the-context-of-targeted-sanctions-2022.pdf>.

This report gives an overview of the academic literature on how targeted sanctions impact civilian well-being, covers the humanitarian consequences of targeted sanctions through three case studies – Sudan, Syria, and Somalia – and analyzes the cases comparatively to better understand how their respective sanctions regimes include varying degrees of humanitarian exemptions. The researchers find that Sudan has the weakest humanitarian exemptions. Syria exemplifies a middle ground and Somalia has the strongest humanitarian exemptions of the three cases.

Mehchy, Zaki, and Rim Turkmani. “Understanding the Impact of Sanctions on the Political Dynamics in Syria.” London: The London School of Economics and Political Science, January 2021.

https://eprints.lse.ac.uk/108412/1/CRP_understanding_impact_of_sanctions_on_political_dynamics_syria.pdf.

This paper examines the impact of Western sanctions in three phases, from 2011 to the present, concluding that sanctions failed to change the regime's behavior but contributed to the regime's reliance on Russia and Iran, the rise of warlords and a criminalized economy, and the deterioration of the formal economy, harming legitimate businesses and civil society. The paper calls for a nuanced approach with “meso-level conditionality,” supporting independent business and civil society, providing targeted relief for essential sectors, and establishing a monitoring system to ensure sanctions do not harm ordinary Syrians while not benefiting the regime and its associates.

Moret, Erica. “A Lifeline Under Threat? Syrian Household Remittances in Light of Sanctions, Financial Sector de-Risking, COVID-19, and Regional Developments.” National Agenda for the Future of Syria (NAFS) Phase II. Beirut, Lebanon: United Nations ESCWA, 2022. <https://nafs.unescwa.org/sites/default/files/2023-02/A%20Lifeline-under-Threat-EN-Web.pdf>.

Syrian households rely on remittances from abroad, yet these have been affected by changes related to political, economic, legislative, and security challenges in recent years. In particular, the combined effect of multiple sanction regimes, export controls, and regulations combating the financing of terrorism (CFT) and anti-money-laundering (AML) have created a “chilling effect” on donors, financial institutions, and other stakeholders in dealing with high-risk jurisdictions. This report looks at the effects that sanctions, de-risking, and other political and economic trends have had on remittances sent to the Syrian Arab Republic. It finds that as the formal banking system, money transfer operators (MTOs), and other formal channels have declined, Syrian households increasingly opt for the informal value transfer systems known as hewala (al-hawāla or hawala). Lastly, the report includes recommendations such as greater bilateral coordination on protected remittance corridors, global and regional dialogue on improving the Syrian remittance market, research on digital payment technologies, and strategies to mitigate financial sector de-risking.

———. “Effectiveness of Humanitarian Exceptions to Sanctions: Lessons from the Syria Earthquake.” The Carter Center, July 11, 2023. https://www.cartercenter.org/resources/pdfs/peace/conflict_resolution/syria-conflict/2023/effectiveness-of-humanitarian-exceptions-to-sanctions-syria-earthquake-lessons.pdf.

Following the February 2023 earthquake, the US, EU, UK, and Switzerland adopted humanitarian exemptions to facilitate transactions by relief initiatives and humanitarian actors in Syria. This report explains key characteristics of each exception and assesses the benefits, ongoing challenges such as financial sector de-risking, and areas for potential improvement to inform future sanctions policies. Insights from banks and humanitarian and development actors offer lessons for how carve-outs could be improved. One important first step is for the US, EU, and UK to extend their

exemptions beyond the initial six months to ensure humanitarian and other actors can continue to aid affected regions of Syria.

The World Bank. “Syria Economic Monitor: Lost Generation of Syrians,” 2022.

<https://documents1.worldbank.org/curated/en/099335506102250271/pdf/IDU06190a00a0d128048450a4660ae3b937ae4bd.pdf>.

Prolonged conflict has had a devastating impact on both the population and the economy. It claims that since 2020, the country’s “external economic ties have been severely restrained by the deepening crisis in neighboring Lebanon and Turkey, as well as the introduction of new United States (US) sanctions under the Caesar Act.” Compounding the impact on Syria’s economy are stressors such as the pandemic, extreme weather events, and regional conflicts. These factors have caused a significant decline in economic activity, with Syria’s GDP in 2019 estimated to be only a fraction of what it could have been in the absence of conflict. The report identifies several macroeconomic trends associated with the conflict and sanctions, such as a loss in oil and tax revenues, the collapse of international trade, a growing informal economy, and currency depreciation.

United Nations. “Genuine solidarity with earthquake survivors calls for lifting of sanction-induced restrictions: UN experts,” February 10, 2023.

<https://www.ohchr.org/en/statements/2023/02/genuine-solidarity-earthquake-survivors-calls-lifting-sanction-induced>.

Alena Douhan, UN Special Rapporteur on the negative impact of the unilateral coercive measures on the enjoyment of human rights, and other experts called for the international community to aid victims of the earthquake in Syria and Türkiye by removing sanctions. They welcomed the general licenses issued after the earthquake yet called for more significant steps to ease restrictions on humanitarian aid.

United Nations. “Warning ‘Future Looks Bleak’ for Syrians Living Through Twelfth Year of Crisis, Top United Nations Officials Urge More Resources, Focus on Conflict.” SC/14870. Meetings Coverage and Press Releases. United Nations Security Council, April 2022. <https://press.un.org/en/2022/sc14870.doc.htm>.

Senior United Nations officials have called on the Security Council to prioritize the humanitarian situation in Syria. Geir Pedersen, the Special Envoy of the Secretary-General for Syria, emphasized that Syria remains a hot conflict with intensifying airstrikes and multiple foreign armies operating in the country. Joyce Msuya, Assistant Secretary-General for Humanitarian Affairs, warned that Syria risks becoming a forgotten economic and humanitarian crisis.

Venezuela

Atlantic Council Venezuela Working Group. “Exploring Humanitarian Frameworks for Venezuela,” March 11, 2022. <https://www.atlanticcouncil.org/in-depth-research-reports/report/exploring-humanitarian-frameworks-for-venezuela/>.

In 2021, Venezuela's humanitarian crisis worsened due to mismanagement, corruption, and the decline in oil revenue, fuel shortages, and the pandemic. This policy brief by the Atlantic Council's Venezuela Working Group explores two proposals for oil-funded humanitarian frameworks in Venezuela, with the goal of using the country's oil revenue to provide aid more efficiently. The brief emphasizes the importance of political agreements and transparent governance for successful implementation.

Penfold, Michael. “U.S. Venezuela Policy: Moving Beyond Sanctions.” Wilson Center, October 2022. <https://www.wilsoncenter.org/sites/default/files/media/uploads/documents/U.S.%20Venezuela%20Policy-%20Moving%20Beyond%20Sanctions.pdf>.

A prisoner exchange between the U.S. and Venezuela was seen as a potential catalyst for improved relations between the two countries, with possible benefits including democratic progress in Venezuela, increased cooperation in the energy sector, and the formation of new regional alliances. While the U.S. has eased some sanctions and offered incentives like a potential oil deal with Chevron, the political future in Venezuela remains unclear. The article also emphasizes the importance of addressing Venezuela's political, economic, and governance issues.

Rodríguez, Francisco R. “Sanctions, Economic Statecraft, and Venezuela’s Crisis.” Fourth Freedom Forum, January 2022. <https://www.fourthfreedomforum.org/publications/sanctions-economic-statecraft-and-venezuelas-crisis/>.

“This case study summarizes the evidence on the effect on Venezuela’s economic and social conditions of economic sanctions and other actions of economic statecraft taken by the United States and its allies in response to the country’s political crisis. The preponderance of evidence indicates that sanctions and other statecraft measures—including the formal recognition of a government with no de facto control over the territory—have had a strong and significant negative effect on the Venezuelan economy. These actions have made a sizable contribution to declining oil production, exacerbating the country’s fiscal crisis, and contributing to one of the largest documented peacetime economic contractions in modern history. Many arguments commonly voiced to dispute the effects of sanctions, such as those that appeal to temporal precedence of other causes of the country’s crisis, are either factually incorrect or premised on fallacious logic. Reforming the sanctions regime will be a complex task, given the interaction with other statecraft measures and a broader toxification of the country’s economic relations. Reform attempts should include the introduction of an oil-for-essentials program, support for political humanitarian agreements, issuance of clearer compliance guidelines, introducing an explicit differentiation between strategic and nonstrategic sanctions, and seeking multilateral alignment with international actors on key strategic issues including that of government recognition.”

———. **“Sanctions, Venezuela’s Crisis, and Options for Economic Statecraft.” Notre Dame Peace Policy, December 6, 2021.**

The United States imposed economic sanctions on Venezuela in 2017, escalating them as part of the "maximum pressure" strategy under the Trump administration. These sanctions included barring oil trade, freezing assets, and pressuring non-U.S. firms to cease business in the country. The sanctions, along with Venezuela's economic mismanagement, caused the greatest decline in GDP in Latin American history. Despite efforts by the U.S. to provide humanitarian aid, relief has been limited. The author recommends the U.S. issue clear guidance for sanctions relief for aid agencies, establish an “oil-for-essentials” program, and differentiate between strategic and non-strategic sanctions, offering relief for political commitments.

UN Human Rights Office of the High Commissioner. “Preliminary Findings of the Visit to the Bolivarian Republic of Venezuela by the Special Rapporteur on the Negative Impact of Unilateral Coercive Measures on the Enjoyment of Human Rights,” February 12, 2021.

<https://www.ohchr.org/en/statements/2021/02/preliminary-findings-visit-bolivarian-republic-venezuela-special-rapporteur>.

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Weisbrot, Mark, and Jeffrey Sachs. “Economic Sanctions as Collective Punishment: The Case of Venezuela,” April 2019. <https://cepr.net/report/economic-sanctions-as-collective-punishment-the-case-of-venezuela/>.

This paper examines the significant impact of U.S. economic sanctions on Venezuela since 2017, highlighting the disproportionate impact on the civilian population rather than the government. Sanctions have resulted in reduced food intake, increased disease and mortality rates for adults and infants, and the displacement of millions of Venezuelans due to economic crises and hyperinflation. The paper argues that even more severe harm has been caused by sanctions imposed through executive orders and recognition of a parallel government, which has created additional constraints.