

# Civilian Wellbeing and Humanitarian Access in the Context of Targeted Sanctions

30 Years of Sanctions Regimes in Syria, Sudan and Somalia



**Swedish Red Cross**

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## Executive Summary

In this report we seek to: (a) provide an overview of the academic literature on how targeted sanctions impact civilian well-being; (b) explore humanitarian consequences of targeted sanctions in the context of three in-depth case studies – Sudan, Syria, and Somalia – and; (c) analyse the cases comparatively with an eye to how their respective sanctions regimes include varying degrees of humanitarian exemptions. With regards to (a) we find that the sanctions literature is rather divided on whether targeted sanctions are the way forward or not. Given this division, there is a need for further contextualised qualitative studies on the matter, which this report aims to bring to the table through its in-depth case studies (b). Here, we describe the specific political context in which our three cases are enmeshed, and furthermore analyse how humanitarian work and civilian well-being has been impacted by international sanctions. In the subsequent comparative analysis (c) we read the three cases side by side in an attempt to determine the extent to which humanitarian action and civilian well-being has been shaped by the respective sanctions regimes' humanitarian exemptions.

Overall, it is difficult to disentangle the effects of specific targeted sanctions, since there are often multiple forms of sanctions imposed in parallel. Moreover, the inflow of humanitarian aid often increases in the wake of sanctions, thereby counterbalancing some of the negative effects for civil wellbeing. In Sudan, we cannot observe a direct negative impact on aggregate humanitarian outcomes when the UN sanctions were added – despite those coinciding with the escalation of a brutal war. This is likely the result of the large amounts of aid that were directed at Sudan around the same time. Syria is subjected to a number of different types of targeted sanctions. Nevertheless, several observers have likened the Syrian sanctions regime as such to comprehensive (or general) sanctions. This comprehensive sanctions package coincides with a negative trend in humanitarian outcomes, exacerbated by the war with its large-scale fighting and civilian atrocities. This situation would likely have been worse without the large influx of aid in the same period. In Somalia, most sanctions have been part of the UN sanctions regime. The negative trend in humanitarian outcomes was driven very much by the armed conflict and weak state presence, and the severe famine that hit the country. While Somalia received international aid to tackle the humanitarian crisis, the amounts were lower compared to Sudan and Syria.

Humanitarian actors who work in these countries need to adapt to the sanctions regimes, and the design of sanctions can either facilitate or hinder humanitarian relief. We find that Sudan has the weakest humanitarian exemptions, whereas Syria occupies a comparative middle ground, and Somalia has the strongest humanitarian exemptions of the three cases. In Sudan, intervention by the state government is identified as one of the primary obstacles to humanitarian action. Here, we suggest that the existence of a general humanitarian exemption mandated by the United Nations Security Council (UNSC) might have ameliorated the situation somewhat, as the Sudanese state would then arguably have abided by the normative power of the international community and thus refrained from meddling in humanitarian activity. In Syria, we find that humanitarian actors have struggled from having to apply for derogations in order to carry out some of their activities. This has hampered their ability to operate in the country, and it has therefore taken a severe toll on the many civilians in need. Hence, Syria too could have benefited from a general humanitarian exemption, so as to avoid the often time consuming and uncertain procedures of having to apply for derogations. While these two cases both illustrate the potential benefits of a UNSC-mandated general

humanitarian exemption, the case of Somalia also reveals some challenges. Here, rather than finding state intervention or obtuse derogations procedures as the main problem for humanitarian actors, we see how non-state armed groups and the exclusion of local humanitarian organizations complicate matters. Thus, we stress that while the Somalian general humanitarian exemption is rightly heralded as the current gold standard for humanitarian activities, it is by no means perfect. Hence, in the final chapter of this report we outline an action plan for eventually moving ‘beyond Somalia’.

# 1. Introduction

## Sanctions and humanitarian consequences

International sanctions – to be or not to be? This question seems as timely and complex now as it did in the 1990s, when it was a hotly debated issue following reports of massive civilian suffering in Iraq under an international sanctions regime. While some reports exaggerated the suffering, the episode brought attention to the indisputable fact that international sanctions often have negative impacts on civilians.<sup>1</sup> To ameliorate this, sanctions have increasingly become 'smarter' over the years and are nowadays primarily targeted against specific individuals or sectors with the aim of imposing costs on the regime without hurting the civilian population. Thus, *targeted sanctions* have today become the international norm, as they promise a win-win situation where unwanted behaviour is duly punished without causing unjust harm to civilians or humanitarian activity. However, upon closer scrutiny, academics and civil society actors alike have noted that targeted sanctions are perhaps not as smart as one might have hoped. Criticism abounds. Some argue that targeted sanctions are ineffective in changing the offending behaviour, while others stress that they do in fact cause widespread civilian harm. Having said that, there are also several studies that praise targeted sanctions and argue that they are indeed beneficial from a humanitarian point of view.

## Purpose of the report

From the above we can conclude that there are many diverging viewpoints in the current sanctions debate, and that it is far from having reached a consensus on whether targeted sanctions are the way forward or not. This report is situated in this ongoing debate and it aspires to contribute to it by analysing in-depth three relatively recent cases where various forms of targeted sanctions have been imposed, namely: Sudan, Syria, and Somalia. By way of qualitative case studies we hope to provide contextually rich analyses of how targeted sanctions impact civilians and humanitarian work in complex ways. Writing this report specifically for the RCRC (henceforth: the Movement) we answer to Schaar's (2021) call for systematically collecting data on sanctions regimes, which would enable 'building an evidence base on which to design a long-term influencing strategy' (p. 21) for the Movement. In doing so, we aim to bring the discussion of sanctions firmly back into the agenda of the Movement and to provide policy-relevant recommendations on how to design sanctions that achieve their political ends with minimal costs to the civilian population. This evidence base can then be drawn upon by the Movement and other humanitarian actors when (a) considering how to best operate in sanctioned states, and (b) seeking to influence sanctions committees, governments, and other stakeholders on how to devise sanctions in a way which is sufficiently mindful of humanitarian principles.

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<sup>1</sup>Several credible reports have surfaced which show that the Iraqi regime inflated the official child mortality numbers during this sanctions episode in order to mobilize international sympathy. Still, there are also credible reports which argue that the sanctions regime did indeed increase civilian suffering. See the discussion in Schaar (2021, 7-8) for more details on this matter.

## **Methodology: cases and sources**

Methodologically, this report employs a combination of *literature review*, *case studies*, and *comparative analysis*. The literature review represents an endeavour to get an overview of the research frontier on international sanctions and their humanitarian impact. This serves as a conceptual starting point of the report which sets up its analytical scene and paves the way for the in-depth case studies. A case study is ‘an empirical inquiry that investigates a contemporary phenomenon in depth and within its real-life context’ (Yin 2009, 240). Investigating the real-life context of sanctions regimes is of special interest to us in this report, as there appears to often be a steep disconnect between the ideal of targeted sanctions not having a negative impact on civilians and humanitarian work, and the actual experiences on the ground; a phenomenon which is commonly referred to as the ‘unintended consequences’ of sanctions (Schaar 2021, 18).

In the respective case studies of this report, we draw upon secondary sources such as policy reports and academic books and journal articles to get a grasp of what has been said about the humanitarian impact of international sanctions in our three cases; and then analyse this in line with our aforementioned conceptual starting point. The three cases were selected to enable meaningful comparison between them, which is the aim of chapter 6 of this report. The cases share a number of important similarities: they have been subject to international sanctions; they have a low HDI value;<sup>2</sup> they have been colonised in the past; they are governed by authoritarian regimes, and they have experienced recurring violent conflicts over the past decades. These are of course factors that make it difficult to disentangle the effect of sanctions from other forms of influence; nevertheless, these are the type of cases where humanitarian considerations are most needed. Therefore, they constitute the most relevant cases to explore how sanctions impact humanitarian outcomes. However, they also differ in one important regard, namely in how strong the humanitarian exemptions are that can be found in the three sanctions regimes.<sup>3</sup> This enables us to analyse the cases comparatively with this salient difference in mind.

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<sup>2</sup> HDI (the Human Development Index) is a composite measure assembled by the UN which aims to capture three core dimensions of human development: a long and healthy life, access to knowledge, and a decent standard of living.

<sup>3</sup> There is, generally, some terminological confusion in the sanctions literature when it comes to how the terms ‘exceptions’, ‘exemptions’, ‘derogations’, and ‘licenses’ are used. For the sake of clarity in this report we use the term ‘exemptions’ to refer to those instances when humanitarian actors do *not* need to apply for a permit in order to carry out their activities. We, moreover, use the term ‘derogations’ to refer to those instances when humanitarian actors *need* to apply for a permit in order to carry out their activities. Thus, we refrain from using the terms ‘exceptions’ and ‘licenses’ in this report, even though they do figure in some of the sanctions literature.

## 2. Literature Review and Concepts

### How sanctions affect civilian populations

There is a large literature that explores various aspects of sanctions. The main question of interest to the sanctions community is whether, and under what conditions, sanctions work (see e.g. Peksen 2019 for an overview). Another stream of inquiry, that is more relevant for the purposes of this report, concerns the unintended consequences of sanctions. Research has explored and identified a number of negative side-effects of sanctions for the civilian populations residing in countries targeted with sanctions. Within this literature, we find the identification of a number of negative consequences – including deterioration in public health, repression, discrimination of women, and conflict intensity. Most studies also acknowledge that sanctions are not a uniform treatment, and that effects depend on the type as well as scope of sanctions. Exploring whether the effects of targeted sanctions differ from those of general economic sanctions, and analysing to what extent the consequences depend on the severity of the sanctions in terms of how costly they are to the target state, allow for more policy-relevant conclusions regarding the key question of how to design sanctions that achieve their political goals with minimal costs to the civilian population.

Beginning with health effects, there are a number of studies that have identified negative consequences of sanctions on public health in the targeted country. A study of the health effects of the economic embargo against Haiti in the 90s find that the sanctions had severe negative effects, leading to poorer nutrition, shortage of medicines and vaccines, limited access to clean water infant mortality, and increased mortality for children aged 1-4 (Gibbons and Garfield 1999). Quantitative studies that estimate the average health outcomes across a larger set of cases also identify negative consequences. Allen and Lektzian (2013) find negative consequences of sanctions across a number of public health indicators, including life and health expectancy, food supply, and immunization index. Economic sanctions also lead to increased infant or child mortality rates (Peksen 2011; Parker et al. 2016). A recent study show that sanctions reduce life expectancy among the civilian population in the targeted country – and more so for women, indicating a gender gap in the negative humanitarian consequences (Gutmann et al. 2021). Women are also negatively affected through increased HIV rates as a consequence of reduced female labour participation (Kim 2019).

If we look at unintended consequences more broadly, beyond health effects, the literature has identified negative effects primarily in the realm of human rights. Several studies have independently demonstrated that economic sanctions increase repression and human rights violations (Wood 2008; Peksen 2009; Carneiro and Apolinário Jr. 2016). Like health outcomes, there is also a gender effect here, whereby the systematic discrimination of women increases with economic sanctions (Drury and Peksen 2014). However, these findings have also been problematised. Sanctions are not an exogenous treatment, since they are more likely to be directed against countries with poor human rights record to begin with. Gutmann et al. (2019) therefore explore these dynamics in more detail, trying to account for such endogeneity, and they find no significant effect of sanctions on economic or basic human rights – and even a positive effect on emancipatory rights. Only political rights deteriorate with sanctions, which at least supports the theoretical mechanism underlying several studies linking repression to sanctions. More extreme forms of repression in the form of genocide and political mass killings are seemingly not influenced by the implementation of sanctions (Krain 2017).



## **Are smart sanctions the solution?**

Targeted, or “smart”, sanctions were designed to alleviate the ineffectiveness of comprehensive sanctions in two ways: 1) by targeting the political leadership more directly and, 2) by humanitarian exemptions to reduce the negative consequences for the civilian population (Tostenssen and Bull 2002). But are smart sanctions smart enough to avoid negative humanitarian consequences? The literature is mixed on this issue. One reason may be that types of sanctions have been measures in many different ways – emphasizing various aspects of the sanction design.

Among the more optimistic research findings is that the effect of economic sanctions varies with the costliness of the sanctions. Major economic sanctions have severe health effects whereas minor sanctions do not (Allen and Lektzian 2013). Peksen (2011) furthermore finds that sanctions that are costlier to the target state have more severe health outcomes. The costliness of sanction is not necessarily a measure of targeted sanctions; nevertheless, the costlier the sanction, the less likely that they are targeted by design. While these findings may be intuitive – the harder the sanctions hit the economy, the harder they also hit the civilian population – they are important in highlighting the relevance of sanction design.

Differentiating between economic sanctions and arms embargoes, whereby the latter can be thought of as a form of targeted sanction, Hultman and Peksen (2017) show that while economic sanctions against countries with an armed conflict may increase the intensity of violence, arms embargoes instead seem to reduce violence. Arms embargoes furthermore increase the probability of conflict resolution (Strandow 2006). One objection may be that targeted sanctions are less effective in coercing the targeted state to comply with the demands of the sanctions. However, Shagabudinova, and Berejikian (2007) show that smart sanctions are in fact more effective than traditional sanctions in bringing about a policy change – concluding that there is no trade-off between effectiveness and humanitarian concern. Moreover, the more effective sanctions are, in terms of achieving the intended policy outcomes, the less human rights violations there are (Park and Choi 2020).

Not all studies provide reason for optimism, but instead conclude that smart or targeted sanctions are not better than economic sanctions. For example, Krain (2014) show that diplomatic sanctions cannot effectively reduce the likelihood of mass killings, and Escribà-Folch (2010) find that arms embargoes do not shorten armed conflicts. Several studies even suggest that targeted sanctions generate worse outcomes. Carneiro and Apolinário Jr. (2016) compare the effect of targeted sanctions with that of conventional sanctions and find that targeted sanctions in fact deteriorate respect for human rights in the target country. Similarly, Peksen (2009) shows that human rights sanctions, i.e. those that directly make demands with regards to the human rights performance of the targeted state, also are associated with more human rights abuses compared to other sanctions. This corroborates qualitative evidence from Myanmar and North Korea that smart sanctions are not sufficiently smart to reduce human insecurity (Peou 2019). Human rights violations also increase with the scope of targeted sanctions, measured as the number of individuals that the sanction is directed against (Park and Choi 2020). Even sanctions that target a specific natural resource, such as US sanctions against conflict minerals in Democratic Republic of Congo, are correlated with an increased probability of infant death in areas with mines affected by the sanctions (Parker et al. 2016).

While the literature at large identifies several negative consequences of sanctions, it is also important to consider how humanitarian organizations operate in these countries and

sometimes alleviate some of the negative effects that the sanctions generate. For example, Early and Jadoon (2016) show that countries under US sanctions on average receive an increase in foreign aid from other countries. We also know that humanitarian organizations are often the ones who remain in countries under hardship to provide for civilians' basic needs. This means that negative effects of sanctions might often have been worse in the absence of humanitarian actors.

### **Defining targeted sanctions**

In moving forward, it is important to consider how to operationalise sanctions. Previous research has either classified sanctions in terms of *the costs* that they impose on the target (where targeted sanctions often impose lower costs at the whole) or in terms of *the type* of target, for example as targeting the whole economy or only a particular resource. The latter offers more nuance and guidance into designing targeted sanctions. By focusing on the type of sanction, and in particular the specific target that the sanctions are directed against, we can say more about sanction design and identify more differentiated effects among targeted sanctions. We rely on the classification by Biersteker et al. (2018: 407), according to whom sanctions can be targeted in following ways:

- *individual* sanctions limit resources to specific individuals in the form of asset freezes or travel bans
- *diplomatic* sanctions are directed at governments or political entities in the form of closing embassies or restricting travel by diplomatic personnel
- *sectoral* sanctions are targeted against specific sectors, such as arms trade
- *commodity* sanctions instead put restrictions on specific resources, for example oil or diamonds
- *financial sector* sanctions are targeted at the economy more broadly, for example investment bans

This categorization goes from individual to more general sectoral, thus to some extent reflecting an ordering of the scope of the society that is directly affected. Based on previous research, we might thus expect sanctions targeted at a wider segment of society, e.g. financial sector, to have more severe humanitarian consequences than more limited sanctions, e.g. individual. It should nevertheless not be viewed as an ordinal variable that reflects the scope of the consequences of the sanction. Each of these types of sanctions can vary in their scope. Individual sanctions can target one person or several, and they can vary in terms of the extent of the sanctions on each individual (where, for example, an asset freeze might have more severe implications for an individual than a travel ban). They can also vary in terms of targeting top leaders or administration (Wallenstein and Grusell 2012). Commodity sanctions can be more or less costly to the society depending on how central the commodity in question is to the economy, and what types of restrictions are put in place. We should thus think of these as types of sanctions that can all vary in scope and thus expected costliness.

## Operationalising humanitarian outcomes

In this report we focus on humanitarian outcomes. Public health can be operationalised in a number of ways and there are many additional indicators of humanitarian effects that go beyond health. Turning to the literature reviewed above, health outcomes have been operationalised in different ways. One common indicator is (health adjusted) life expectancy (Allen and Lektzian (2013: 124–25), which captures the aggregate outcome in the population suffering from the hardship of the sanctions. Another indicator is infant or child mortality rates (Gibbons and Garfield 1999; Peksen 2011), that can capture consequences of the sanction regime stemming from malnutrition and poor access to health care. Both of these indicators thus reflect possible downstream effects of sanctions. The challenge here is that those indicators are also shaped by a number of other crises and interventions that countries may experience in parallel to sanctions, including armed conflict, natural disasters, pandemics, and humanitarian aid. The advantage of a qualitative assessment of cases, as undertaken in this report, is the possibility of looking more directly at factors that may cause reduced life expectancy and increased child mortality and that are more immediately affected by sanctions.

We focus on humanitarian outcomes in four areas. First, previous work has identified negative consequences of sanctions on the *access to health care*, including medicines and vaccines (Gibbons and Garfield 1999). Allen and Lektzian (2013) have also more specifically looked at government health expenditures, which directly influences access to health care. Access to health care is central for the well-being of the civilian population, and at the same time something that can be severely affected by sanctions. Here we are interested in exploring to what extent targeted sanctions may exert negative impacts on the access to health care. Access to health care can be measured through quantitative indicators such as the number of hospital beds, government spending on health care, and incidence of various diseases (e.g. tuberculosis). We can also use qualitative descriptions of how access to health care may be unevenly distributed in the country, thus hitting certain subgroups in society more than others, or observations of how prices of certain medicines are directly affected by the imposition of sanctions.

Second, an important humanitarian outcome is *access to food and nutrition* levels. History can show us several examples of conventional economic sanctions that have severe consequences on access to food, leading to starvation and undernourished populations. Allen and Lektzian (2013) assess the impact of sanctions on food supply and Gibbons and Garfield (1999) illustrate how nutrition levels were hit by the sanctions against Haiti. For this, we can rely on indicators such as the prevalence of undernourishment, or household food insecurity. Again, it is important to combine these measures of aggregate outcomes with qualitative assessments of how people are affected through food prices and access to specific nutrients.

Third, *access to water and sanitation* are among the most basic humanitarian needs. We know that these can be negatively affected by economic sanctions (Gibbons and Garfield 1999), but it is possible that targeted sanctions have less of a direct impact. We look at indicators such as access to clean drinking water and basic sanitation services. These needs tend to be particularly acute among large refugee populations, where humanitarian organizations do their best to provide the necessary services.

Lastly, we focus on *physical security*, which captures access to shelter and risk of physical violence. Hence, it does not reflect human rights abuses more generally, but is intended to measure the more immediate humanitarian concerns related to security. Aggregate measures can be crude death rates and the size of refugee populations. Qualitative assessments are necessary to complement this view, especially in terms of how targeted sanctions may influence the physical security of various parts of the population.

In the subsequent analysis, we introduce some data on trends in relevant humanitarian outcomes. For these indicators, we rely primarily on annual data from the World Health Organization (WHO), as well as data for specific indicators from the United Nations Children's Fund (UNICEF), the United Nations High Commissioner for Refugees (UNHCR), other UN agencies, and government health reports. These are all accessed through the Humanitarian Exchange Database, which is a data portal set up by the United Nations Office for the Coordination of Humanitarian Affairs (OCHA).

### 3. Sudan

#### Background to sanctions: political setting

Since its independence from the United Kingdom in 1956, Sudan has suffered myriad violent conflicts; both intrastate and interstate. Starting already in the early 1960s with massive riots in the southern parts of the territory, a civil war erupted which lasted from 1963 to 1972. The primary motivation for the insurgents was secession of the southern part of the state. After almost a decade of secessionist violence, the Addis Ababa peace agreement was signed in 1972, which saw the southern part of the territory remain part of the state of Sudan, yet with some measure of self-rule. While seemingly a win-win agreement, it did not prevent further conflict along the north/south fault line of the state. Indeed, 1983-1985 and 1994-2003 were periods of full-blown civil war, whereas the peace(s) between these episodes was often volatile and ridden with military coups and political instability (UCDP, Sudan).

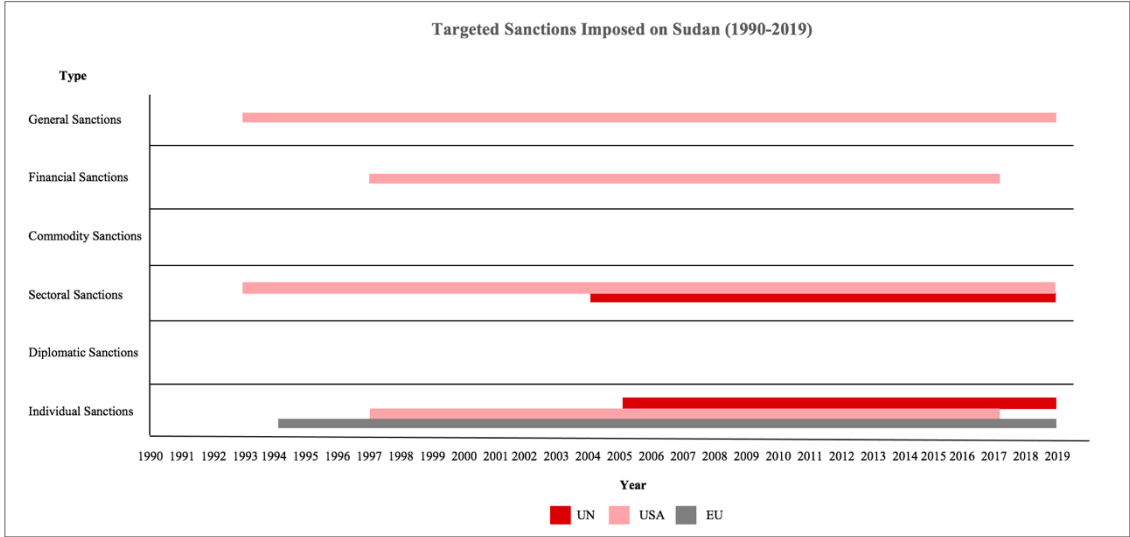
In 2003 (as peace talks were on their way concerning the 'southern issue' – eventually culminating in a peace agreement in 2005 and a somewhat peaceful secession in 2011), violence broke out in another region of the state, namely in Darfur in western Sudan. Here, a number of different rebel groups took up arms against the government of Sudan. While their aim was officially to oust the state government, civilian populations were consistently violated in Darfur, with both rebel groups and government forces – including the government-aligned militia known as the *Janjaweed* – burning villages, looting, raping, and killing civilians (UCDP, Sudan: Government). Over the years 2003 and 2004 the humanitarian situation in Darfur was thus disastrous but it improved somewhat in 2005 as the violence subsided slightly and international humanitarian responses became more concerted. In 2006, the Darfur Peace Agreement was signed, however, it failed to fully contain the violence in the region, which persists to this day (albeit to a lesser degree compared to 2003-2004). As such, government forces and their associated militias have been implicated in large-scale military operations in Darfur, but also in other areas where rebel groups are active such as the Blue Nile areas. These ongoing 'sweeps' to eliminate rebel strongholds have resulted in significant civilian suffering according to observers (Small Arms Survey 2018).

Most commentators attribute the widespread and persistent violence in Sudan partially to the strong centralisation of the Sudanese state, as the capital Khartoum has enjoyed significant political and economic privilege, while the rural areas of the nation have largely been marginalised (UCDP, Sudan). Thus, a persistent inequality lies at the core of Sudan's many violent conflicts. This inequality may, in turn, to some extent be a logical continuation to the practices of the previous colonial administration, which was characterised by 'exclusionary and coercive governance' (Ronaldsen and Leonardi 2014, 611). Likewise, the colonial government favoured certain ethnic and religious groups over others when delegating state authorities to locals; creating divisions which are prevalent to this day and which have been feeding the recurring violent conflicts in Sudan (ibid). This is not to say that the former colonial administration is the only determinant for all of the divisions in present-day Sudan, but merely to suggest that its legacy is to some extent visible in the violent conflicts of the last 60 years.

**Sanctions timeline and exemption**

Given the volatile political setting described above, where civilians have often suffered massively at the hands of both state and non-state actors, a number of international sanctions have been imposed on Sudan since its independence (see Figure 1 below).<sup>4</sup> In 1994, as Sudan descended into a civil war, the European Union imposed sanctions on Sudan, following European Council Decision 94/165/CFSP. This decision was an immediate reaction to the civil war which caused severe suffering for civilians). As such, with council decision 94/165/CFSP the EU imposed an embargo on arms, munitions, and military equipment on Sudan (Council of the European Union 1994). European Council Decision 94/165/CFSP remained in place until 2004, when it was replaced by European Council Common Position 2004/31/CFSP. Here, European leaders, mindful of the deteriorating humanitarian situation in the Darfur region of Sudan, sought to sharpen their previous sanctions against the state. To this effect, 2004/31/CFSP not only banned any sale of arms to Sudan, but it also outlawed technical advice and assistance related to arms, as well as any financial assistance intended for arms supplies.

*Figure 1: Overview of sanctions imposed on Sudan, 1990-2019*



In addition to the EU, the United States have imposed a number of heavy-handed unilateral sanctions on Sudan. US sanctions on Sudan began in earnest in 1993, when the country was put on the State Department list of state sponsors of terrorism. This entailed that the provision of non-humanitarian economic aid was blocked, arms sales to Sudan were banned, and US representatives at international organizations were required to vote against loans to Sudan. Then, in 1997, US President Bill Clinton declared a national emergency due to Sudan allegedly supporting international terrorism, violating human rights, and destabilizing neighbouring governments. To deal with this perceived threat, Executive Order 13067 (1997)

<sup>4</sup> In this report we focus on sanctions imposed by the UN, EU, and the US. These are, as we see it, the most significant senders of international sanctions, and thus, the ones that warrant the most analytical scrutiny.

imposed an asset freeze on Sudanese government officials and prohibited any US trade with Sudan. In 2006, in light of the Darfur conflict, additional measures were taken by the US through Executive Orders 13400 (2006) and 13412 (2006). The former sought to block the property of several specific individuals who were alleged to be responsible for the violence in Darfur, whereas the latter sought to re-affirm the asset freeze imposed through Executive Order 13067; while also adding a ban on any US financial transactions with the Sudanese oil sector. These sanctions remained in place until 2017, when they were lifted by then President Donald Trump (Galbraith 2018, 100-103). Most recently, following a military coup in Sudan in October 2021, the US and the World Bank have suspended their foreign aid to Sudan, while the EU has threatened to do the same. The frozen US foreign aid alone is reportedly worth 700 million USD (BBC 2021).

The United Nations imposed an arms embargo on Sudan as a response to the violence escalating in the Darfur region in 2004. Thus, the United Nations Security Council (UNSC) Resolution 1556 targeted specific military outfits operating in Darfur, including the government-aligned Janjaweed militia, and banned any trade in arms with these groups (UNSC 2004). Furthermore, through Resolution 1591 in 2005 the UNSC imposed an asset freeze and a travel ban on select individuals who were assumed to be impeding the peace process in Darfur (UNSC 2005a). While the specific individual targets of these resolutions have changed over the years, the UN sanctions regime against Sudan remains in place to this day (2021), as governed by the UN Sudan Sanctions Committee (established pursuant to Resolution 1591).

The UN sanctions regime contains a *limited* humanitarian exemption, in that it stipulates that the arms embargo shall not apply to the supply of non-lethal military equipment solely intended for humanitarian activities (Debarre 2019, 40). Similar provisions can be found in the EU sanctions framework, where it is stressed that 'the embargo should allow for humanitarian exemptions to the current arms embargo and permit de-mining operations to be undertaken in Sudan' (Council of the European Union 2004). Similar provisions can be found in the US sanctions framework on Sudan, where it is stressed that humanitarian, diplomatic, and journalistic activities are exempt from the sanctions, whereas other activities may be permitted on a case-by-case basis by applying for a derogation.

### **Humanitarian development**

In the midst of the various international sanctions imposed on Sudan and the recurring wars and military coups, humanitarian development has been halting, as evidenced by the rather slow increase in Sudan's human development index (HDI) value over the last three decades (see Figure 2 below, data from UNDP 2021). Sudan's HDI value for 2019 is 0.510 which puts the country in the *low human development* category, occupying spot 170 out of a total of 189 countries in the index.

Looking at some more specific health indicator trends in Sudan, we find that life expectancy has increased from 55.5 years in 1990 to 65.3 years in 2019. Likewise, infant mortality rates have gone down from 82.2 per 1000 live births in 1990, to 42.1 in 2019 (see Figure 3 below, data from WHO 2021b). When it comes to malaria incidence rates, a decline from 89.1 per 1000 people at risk in 2000 to 46.8 in 2019 (UNDP 2021). Finally, the percentage of people using at least basic sanitation services in the country has gone up from 21% in 2000 to 28% in

2019, but maintaining throughout the period a clear gap between urban and rural populations (see Figure 4 below, data from WHO 2021b). Broadly speaking, then, the health of the Sudanese population is on a slow upward trajectory; despite the manifold conflicts and international sanctions the country has faced since 1990.

Figure 2: Human Development Index – Sudan, 1990–2019

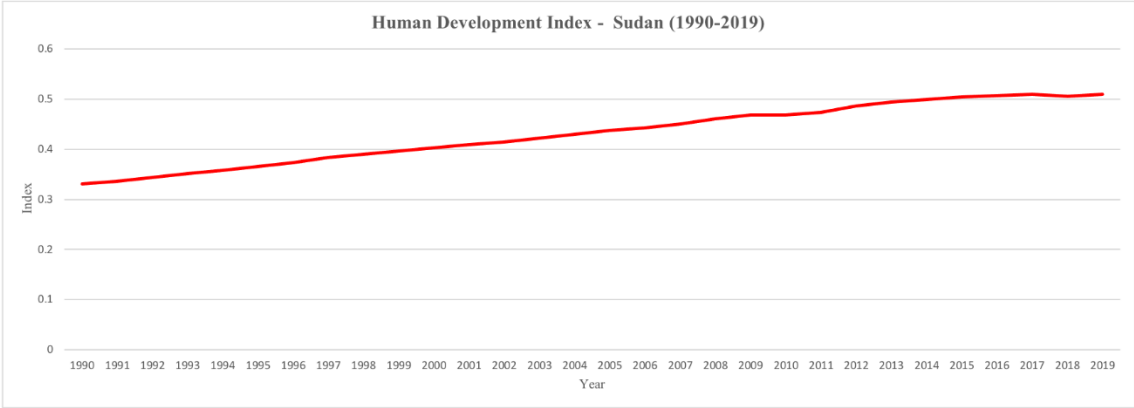


Figure 3: Infant Mortality Rate – Sudan, 1990-2019

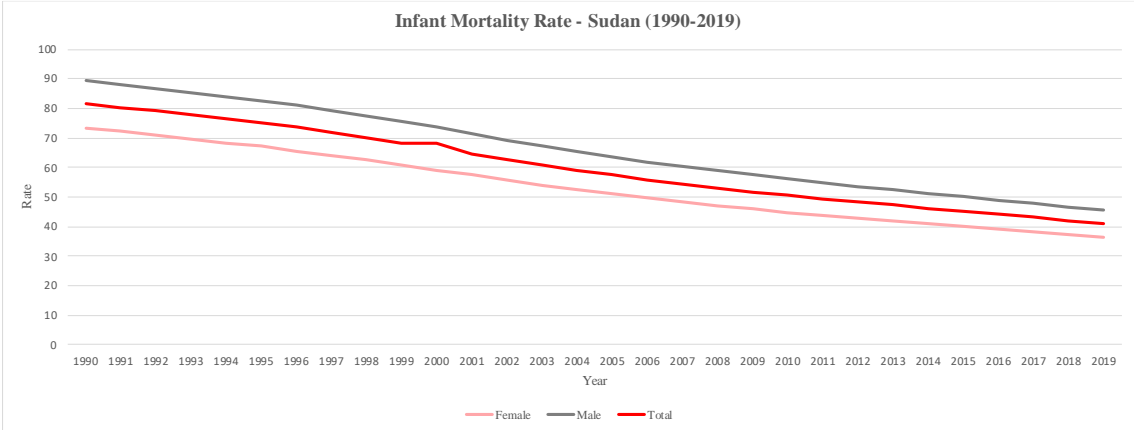
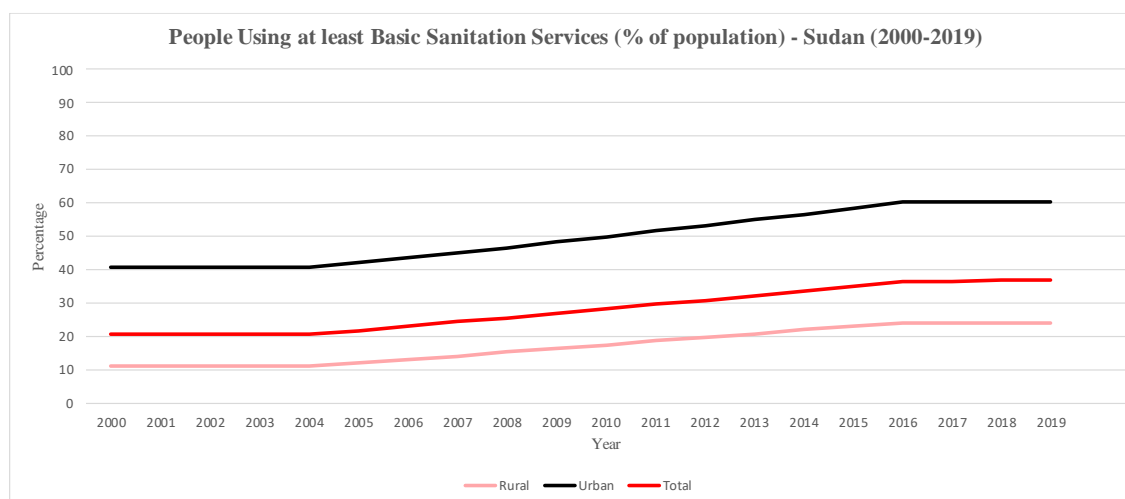




Figure 4: Percentage of people using basic sanitation services – Sudan, 2000-2019



Part of this may be explained by the humanitarian aid that has been committed to Sudan. In the 1990s, both the US and the EU imposed various sanctions on Sudan, including general, financial, sectoral, and individual sanctions. In 2004 and 2005, the sanction regime against Sudan was expanded when the UN issued both sectoral and individual sanctions. Over these years, humanitarian funding to Sudan increases significantly. Between 2003 and 2005, OCHA’s Financial Tracking Service (2021b) notes that funding to Sudan increases from 195 million USD to 1 billion USD. This inflow of aid could very well have counterbalanced the negative impact of the sanctions, thereby maintaining the slow but steady improvement in the humanitarian indicators as visualized in the figures.

### In-depth analysis

Overall, there is a tendency in the academic and policy literature alike to argue that sanctions against Sudanese government officials and companies – as outlined above – have had detrimental impacts on the broader economy in the country, thus negatively affecting civilian livelihoods (including their health). As noted by Aluoch, ‘albeit smart, these [sanctions] have had serious ramifications on the welfare and well-being of the whole economy and nation’ (2015, 80). Here, Aluoch does not speak of any specific sanctions measure, but rather, she refers to the whole sanctions regime imposed on Sudan since the early 1990s. Similar arguments are made in several policy reports, including ‘Modernized Sanctions for Sudan: Unfinished Business for the Obama Administration’ (2016) written by John Prendergast and Brad Brooks-Rubin on behalf of the *The Enough Project*. In the report, the authors argue that the sanctions regime on Sudan has had significant spillover effects on commercial activities, thus impacting the broader economy and ultimately the civilian well-being in the country. While these are not unconvincing arguments in and of themselves, they are not conducive to disentangling the type of sanctions that do indeed have negative impact on civilians from those that do not (to the same extent) impact civilians negatively. Thus, these studies – while illuminating in certain regards – do not align with our purposes in this report as we seek to differentiate between sanction types in terms of their impact on civilian health and well-being.

Having said that, there are some studies that go into more detail on the different sanction types in question and how they impact Sudanese civilians differently. First of all, there is an interesting report written by the Small Arms Survey at the Graduate Institute of International and Development Studies in Geneva. Their report ‘Lifting US Sanctions on Sudan: Rationale and Reality’ (2018) focuses on how US sanctions on Sudan have impacted the country in myriad ways and what it entails that the sanctions have mostly been removed since 2017. The report argues that the US *arms embargo* on Sudan has been ineffective as the Sudanese regime has been able to secure weapons and military equipment from other sources: including Russia and the Netherlands. This has entailed that the government has been able to continue its large-scale military-strategic offensives against alleged rebel groups in Darfur and the Blue Nile area at the cost of immense civilian suffering (Small Arms Survey 2018, 26). Thus, in the case of Sudan it is apparent that the US sanctions regime has been unable to stop the violations of international humanitarian law caused by government military offensives, due to the fact that the Sudanese state has been able to procure military equipment from other sources than the US. Indeed, the target state’s linkages with alternative regional powers has been indicated in the sanctions literature as one of the main obstacles for targeted sanctions – such as arms embargoes – in reaching their political objectives (Skyrokykh 2021, 5).

The Small Arms Survey report (2018) furthermore looks at how *humanitarian access* has fared under and after US sanctions on Sudan. Overall, humanitarian access has been deeply challenging in Sudan over the last three decades, largely due to the fact that the Sudanese government has obstructed humanitarian actors from reaching conflict areas by citing security concerns as the main rationale. Inside observers note in this regard that the Sudanese government has operated a ‘bureaucratic machinery designed to systematically deny international humanitarian actors’ access to and contact with affected populations’ (Small Arms Survey 2018, 42). Here, the US sanctions regime could potentially have had a more positive humanitarian impact than it ended up having. Indeed, strengthening humanitarian access was one of the five requirements that US diplomats wanted to see met in order to lift the sanctions on Sudan. Still, the US removed their sanctions at a time when the Sudanese government continued to block humanitarian access in several areas of the country; including the East Jebel Marra and the Rokoro locality as well as the areas of South Kordofan and Blue Nile (Small Arms Survey 2018, 31-32). Having said that, the Sudanese government and its Humanitarian Aid Commission (HAC) has reportedly become somewhat more permissive with granting humanitarian access in certain areas of the country, as compared to how it operated before US sanctions were lifted (ibid). Thus, while the conditionality on improved humanitarian access in order to lift US sanctions appears to have been at least partially successful, one cannot help but wonder if it could have achieved even more in terms of negotiating access also to areas that remain inaccessible to humanitarian actors to this day.

Finally, a study commissioned by the United States Institute of Peace explores how US sanctions on Sudan impact Sudanese people in their everyday lives (Verjee 2018). In this report we learn, first, how the government of Sudan has used the sanctions regime as a sort of political tool; as a convenient way to explain away the economic hardships that the country has faced over the past decades: blaming all the problems on the sanctions. As such, the government rhetoric served to take attention away from a number of endogenous factors which have contributed to the economic struggles of Sudan. Then, when most of the US sanctions were lifted in 2017 and the Sudanese economy spiralled into a recession and the prices of medicine and food shot up drastically, it became apparent to many citizens that the

government rhetoric was inherently flawed (Small Arms Survey 2018; Verjee 2018). Second, in the report we also learn how US sanctions measures really have impacted civilian everyday lives; even after the sanctions regime was lifted in 2017. As an illustrative example, Verjee's study recounts how a local businessman in 2018 tried to order ink cartridges for his printing operation in Khartoum from a major American company, but was refused to do so as the company in question argued that it could not accept Sudanese payments, despite the fact that the US *trade ban* was lifted over one year prior (2018, 3). This speaks to the problem of over-compliance (Heckathorn 1990, 378) which is often highlighted in the sanctions literature as one of the 'unintended consequences' of international sanctions (Schaar 2021, 15); here manifested as a sort of 'post-compliance'.

To sum up: in the case of Sudan we have seen how an authoritarian state has utilised the sanctions regime as a political tool to stave off domestic criticism about the financial difficulties of the state. We have, moreover, learnt that the Sudanese authorities have endeavoured to keep certain areas of the country inaccessible for humanitarian actors, as these parts of the country contain rebel strongholds which the government has sought to squelch militarily. Here, the arms embargo on Sudan appears to have been somewhat ineffective as the state has gained access to arms from other sources. Furthermore, even though most US sanctions on Sudan were lifted in 2017, they have continued to impact everyday life of Sudanese citizens due to the logic of over-compliance. With regards to the limited humanitarian exemption inscribed in the sanctions framework on Sudan, it is hard to assess whether it has done its job or not. Since humanitarian actors have often faced interference from the Sudanese government *prior* to any hands-on work, the limited humanitarian exemption has not really been properly 'tested' in the Sudanese context.

## 4. Syria

### Background to sanctions – political setting

Following 25 years of French colonial administration, Syria gained its independence in 1946. The years immediately after independence were characterised by severe political instability. The political turbulence continued until Hafez al-Assad seized power (through a military coup) in 1971 and became the president of Syria. When he died in 2000, he was succeeded by his son Bashar al-Assad, who remains in power to this day (2021). The Assad family has ruled Syria since 1971 through the Ba'ath party. The party was founded in 1947 and its ideology is based on a merger of nationalism, pan-Arabism, socialism, and anti-imperialism. Baathism as such envisions a coming together of Arab nations into a single state without any foreign influence, while governing the economy in a socialist manner (UCDP Syria).

While Syria's populace is dominated by Sunni Muslims, there are a number of religious and ethnic minorities within its borders, including Alawite Muslims, Christians, and Kurds. Notably, the Assad family is Alawite, and as such it has ensured that the bulk of power positions in the government, the armed forces, and the financial establishment has belonged to fellow Alawites. Needless to say, this has created grievances amongst the Syrian population, most notably among the vast majority of the populace which is Sunni Muslim. Amongst the Christian population, however, Assad's rule has been somewhat popular for the religious freedom it practices, as well as its insistence that the government remain secular. Thus, when the 'Arab Spring' swept the Middle East in 2011, it was primarily the disenfranchised Sunni Muslim civilians who stood up against what they perceived as the Ba'ath party's discriminatory governance – spearheaded by president Bashar al-Assad. The protests spread quickly across Syria and turned violent almost immediately, with the government coming down hard on the thousands upon thousands who called for regime change. As a reaction to this excessive use of force from the state apparatus, opposition groups began forming armed militias, and soon the civil war was a fact (UCDP Syria).

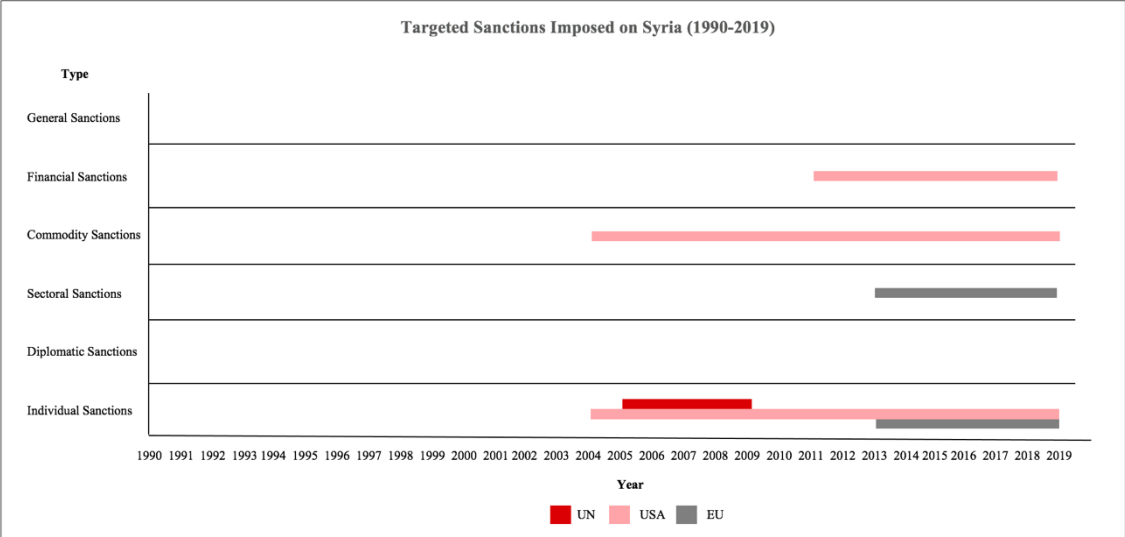
The Syrian civil war has been a humanitarian disaster with both government forces and rebel groups deliberately targeting civilians. As a case in point, in 2013 Aleppo was hit with heavy air bombardment from the state military, killing over 500 civilians. Likewise, rebel groups have allegedly resorted to summary mass-executions of civilians in towns – such as north Latakia – that are seen by rebels as pro-Assad (UCDP Syria: Government). Overall, the civilian suffering reached its peak in 2014 and 2015, which resulted in massive civilian flight from the country in what in common parlance has often been referred to as the 'Syrian Refugee Crisis'. While the civil war is still ongoing as of 2021, the fighting is now much less intense than it was in its first years.

### Sanctions timeline and exemptions

As a response to the civil war (and especially the violence against civilians that it has entailed), myriad international sanctions have been imposed on the Syrian regime (see Figure 5 below). One of the most far-reaching sanctions regimes is the one that the EU imposed in 2011. The EU responded to the Syrian civil war by imposing numerous targeted sanctions against al-Assad's regime, including a travel ban, an arms embargo, and an asset freeze. This represents 'one of the EU's most comprehensive sanctions packages ever imposed against a

third country’ (Boogarts et al. 2016, 217). Eventually, the EU sanctions package would also include a ban on Syrian oil imports; which is reportedly very costly to the regime. The officially stated aims of the EU’s measures are ending repression, compelling a withdrawal of the Syrian army, and supporting democratic reforms (ibid). EU’s sanctions package remains in place as of 2021.

Figure 5: Overview of sanctions imposed on Syria, 1990-2019



Since 2004, the US has also been involved in targeted sanctions against Syria, as the country was then alleged to support terrorism, destabilize the region, and pursue weapons of mass destruction. Starting with Executive Order 13338 (2004), a comprehensive sanctions package was initiated, which mostly remains in place to this day. Executive Order 13338 introduced an asset freeze on certain individuals and entities, and a ban on the export of specific goods to Syria (the list of targeted individuals was subsequently expanded via Executive Orders 13399 of 2006 and 13460 of 2008). Then in 2011 – in light of alleged human rights abuses in the civil war – further Syrian government officials had their assets frozen through Executive Orders 13572 (2011) and 13573 (2011). In 2020 US sanctions were further strengthened by blocking the property, denying visas, and slapping financial and travel restrictions on certain Syrian officials through the Caesar Syrian Civilian Protection Act and Executive Order 13894 (2019). These sanctions all remain in place today (2021).

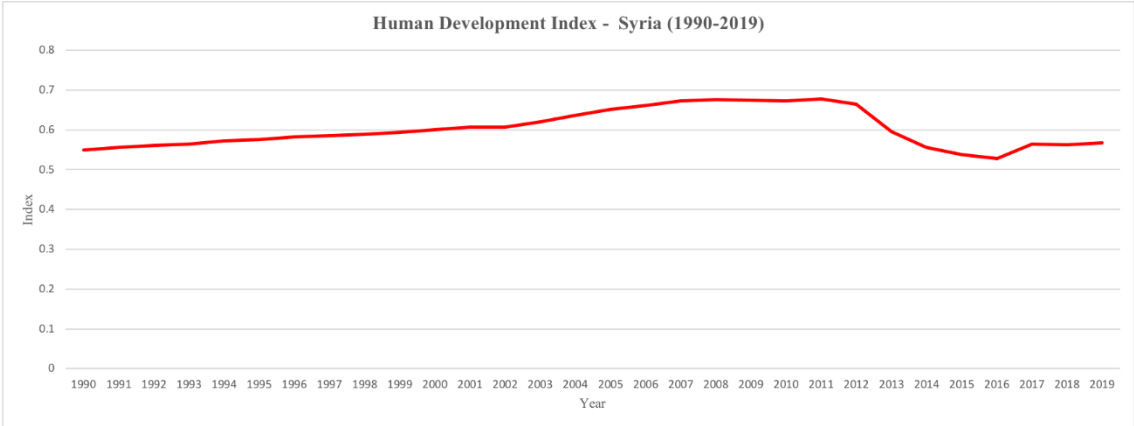
Finally, the UN imposed sanctions on Syria in 2006 through UNSC Resolution 1636 (UNSC 2005b). This entailed a travel ban and asset freeze on certain Syrian government officials who were allegedly involved in the assassination of Lebanese Prime Minister Rafic Hariri. These sanctions remained in place until 2009. Due to geopolitical reasons, however, a UN-led sanctions response to the humanitarian violations of the Syrian civil war starting in 2011 has thus far not been possible, as Russia and China have consistently vetoed any such attempts in the UNSC (Moret 2015, 128).

There are certain humanitarian exemptions built into both the EU and the US sanctions framework on Syria, which are intended to safeguard humanitarian action in the face of these sanctions. In the EU, humanitarian actors may apply to member state authorities for certain derogations to the sanctions regime provided that ‘the equipment, goods or technology are intended for food, agricultural, medical or other humanitarian purposes’ (Debarre 2019, 40). Moreover, EU sanctions include a blanket exemption on fuel purchases for humanitarian purposes in Syria. Thus, humanitarian actors from the EU are able to secure transportation in the country despite EU’s ban on Syrian oil purchase (ibid). In the US, there are *general exemptions* allowing for humanitarian assistance and certain other trade, and it is furthermore possible to apply for *derogations* for humanitarian activities that fall outside of the scope of these general exemptions (Azar 2020, 7-8).

**Humanitarian development**

In terms of humanitarian development trends, Syria remains roughly at the same level as it was in 1990. After a gradual increase in its HDI value from 1990-2010, the onset of the civil war in 2011 represented a steep decline in human development (see Figure 6 below). Hence, Syria’s HDI value was at similar levels in 1990 (0.55) and in 2019 (0.56). As such, Syria’s HDI value places it in the *low human development category* (UNDP 2021).

Figure 6: Human Development Index – Syria, 1990–2019



Exploring some concrete health indicators in Syria over the past decades, the general trend suggested in the HDI value is somewhat nuanced. For example, life expectancy at birth was 70.6 years in 1990, whereas it had increased to 72.7 years in 2019 (UNDP 2021). Likewise, infant mortality rates have gone down from 30.5 per 1000 live births in 1990, to 14.0 in 2019 (see Figure 7 below, data from WHO 2021c). The tuberculosis incidence shows a similar downward curve, as it was 39.0 per 100.000 people in 2000, compared to 19.0 in 2019 (see Figure 8 below, data from WHO 2021c). Thus, these indicators reveal that while the civil war and the international sanctions have indeed hit Syria hard, there have also been positive developments in public health over the same period.

As described above, Syria was already under US sanctions (commodity and individual) when the war broke out in 2011 and the EU also imposed commodity and individual sanctions in 2013. During this time, the humanitarian funding increased drastically: from only 15 million USD in 2009 to 960 million USD in 2013 (OCHA Financial Tracking System 2021c). Funding continued to increase by year, with a high in 2020 at 2.3 billion USD. While requirements were often the double, indicating that funding was not sufficient to cover the needs, the measurable negative humanitarian consequences of the sanctions (spurred by the escalating war) would likely have been even worse.

Figure 7: Infant Mortality Rate – Syria, 1990-2019

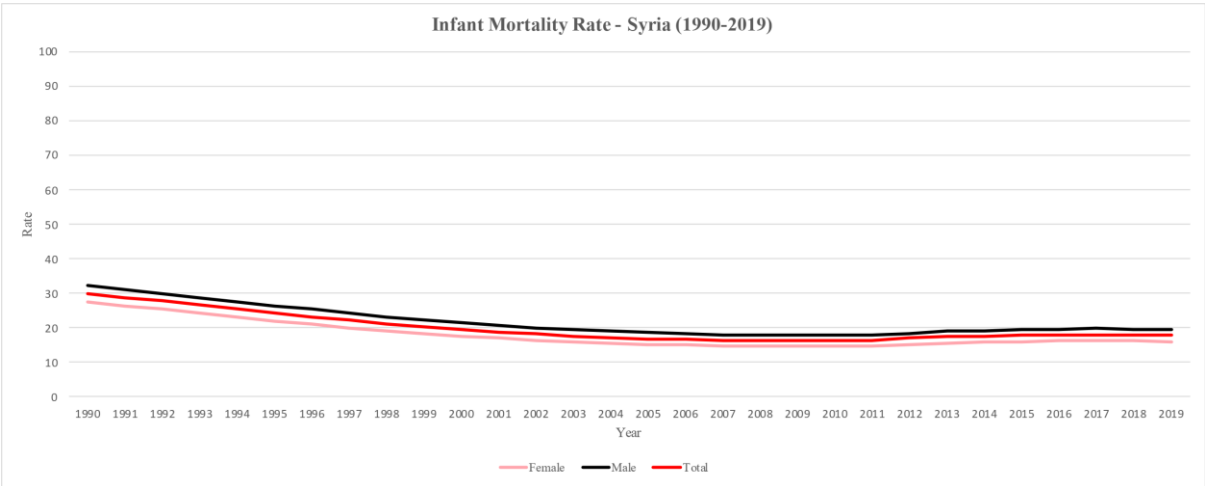
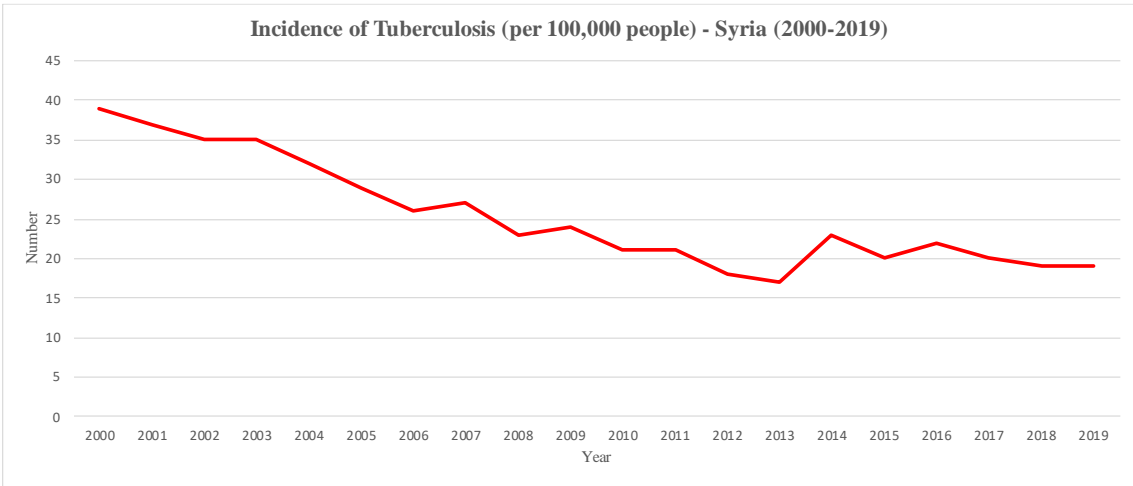


Figure 8: Tuberculosis incidence – Syria, 2000-2019



**In-depth analysis**

First of all, there is a broad consensus in the literature on international sanctions on Syria that it is exceedingly difficult to separate the humanitarian consequences of the civil war from the humanitarian consequences of the sanctions. While some scholars have tried to use advanced

qualitative methods to resolve this issue, they ultimately come to the conclusion that the humanitarian consequences of the civil war and the international sanctions on Syria are entangled and mutually re-enforcing. As a case in point, Andronik's process-tracing study argues that 'changes in the [humanitarian] indicators occurred through a series of causal mechanisms. This thesis does not argue that sanctions were the sole cause of changes in the indicators, rather they were *a contributing factor*' (2018, 28, emphasis added). This problem is further exacerbated by the fact that the sanctions on Syria have been so severe and far-reaching. This has compelled some academics to argue that the Syria sanctions regime represents a divergence from the current international norm of imposing only *targeted* sanctions, as the various measures imposed on Syria – when taken together – appear somewhat similar in scope to comprehensive (i.e. general) sanctions. For example, when discussing EU sanctions on Syria, Moret notes that 'these measures are unusual in that they were agreed with unparalleled speed by EU member states and are unprecedented on account of their broadness and reach' (2015, 128; see also Azar 2020, 6-7).

Having said that, there is also substantial qualitative evidence from the academic literature which suggests that not only have the Syrian civil war itself impacted human development negatively, but so have the targeted international sanctions which were imposed as a reaction to it. As argued by Seeberg when discussing EU sanctions on Syria, 'the international sanctions have also significantly added to the negative socioeconomic repercussions of the armed conflict borne by considerable segments of the civilian population, particularly its most vulnerable groups' (2015, 28). Other studies go into more detail on the matter. For example, it has been found that international sanctions on Syria have hindered the delivery of essential medical equipment and medicines 'including those for cancer, diabetes and heart disease, which are not produced locally and is having an impact upon the thousands dependent upon such medication to treat long-term conditions' (Sen et al. 2012, 198). Moreover, Moret finds that sanctions targeting the Syrian energy and financial sectors have had an especially negative impact on the broader Syrian economy, as they have caused cash reserves to plummet, thus disrupting the Syrian government's access to funds; including foreign currency and credit (2015, 129). Finally, Azar notes how humanitarian organizations operating in Syria have struggled to gain access to certain goods and services, financial channels, and operational partners, due to international sanctions. Humanitarian organizations have, for example, had a hard time finding reliable substitutes for sanctioned Syrian banks, telecommunications providers, and transportation services (2020, 7).

As noted above, there are certain exemptions in place which are intended to safeguard humanitarian relief to Syria in spite of the rather severe sanctions regime. But do these exemptions actually work? There are indications in both the policy and academic literature that they do not fully do their job, for a number of reasons.<sup>5</sup> First, there is the rather widespread issue of bank *de-risking*. Here, studies have shown that international banks are commonly reluctant to transfer money to and from Syria, due to the sanctions that are in place. Simply put, banks do not want to take the risk of being fined for potentially violating the sanctions regime, and thus, opt to avoid any transactions with Syrian counterparts. Notably, this also impacts international humanitarian organizations working in Syria, who are

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<sup>5</sup> These are – of course – not the only issues facing humanitarian organizations working in Syria under sanctions, but some of the most salient ones. For an even fuller account of the matter, please see Azar (2020).



formally exempt from the sanctions but in practice suffer from them as banks engage in de-risking. Azar (2020, 11) illustrates the crux in the following manner: ‘this risk aversion approach often disrupts humanitarian activities and diminishes severely the scale of humanitarian responses. Also, the de-risking practice isolates the entire region from the global banking system, which can drive illicit activity further underground’. Thus, not only do the sanction entail that humanitarian organizations have problems with carrying out financial transactions in Syria, it also means that they are sometimes compelled to rely on informal (and often illegal) financial systems (Azar 2020, 12). This is as much a practical concern as it is an ethical one.

Second, a significant obstacle for many humanitarian organizations operating in Syria is related to the licensing requirements stipulated in the US and EU sanction exemption regulations. In order to perform otherwise sanctioned activities, humanitarian organizations may apply for derogations to do so. However, these processes are generally complicated and time-consuming, which often entails that organizations either avoid applying entirely, or do apply and get stuck in a bureaucratic back-and-forth which can last for months (Azar 2020, 8). Ultimately, this means that humanitarian organizations may have to compromise on the ideal of working according to a needs-based logic, and instead focus on activities and populations that do not require applying for a derogation (but who may not be the most needy). This stands in contradiction to principled humanitarian action which is intended to ‘relieve the suffering of individuals, wherever it may be found, *guided solely by their needs*, and to give priority to the most urgent case of distress’ (O’Leary 2021, 2-3, emphasis added). Obviously, this is a rather problematic position for humanitarian organizations to be in, which is directly caused by the cumbersome procedures involved in applying for derogations.

Third, as in the case of Sudan discussed above, there is a pervasive issue of over-compliance with international sanctions on Syria. Here, humanitarian organizations are struggling to structure their activities in a manner which ensures that they do not violate the various sanctions regimes; the rules of which are often complex and written in a highly bureaucratic tone. Moreover, many industries and companies with whom humanitarian actors need to cooperate in Syria are either directly or indirectly associated with the Assad regime. Thus, rather than working with them and taking the risk of violating sanctions, many humanitarian actors in the country have reported a ‘chilling effect’ by which they over-comply with the sanctions regimes for fear of accidentally violating any of their measures (Azar 2020, 10).

To sum up: in Syria we have seen a vast and comprehensive sanctions regime since 2011, imposed primarily by the US and the EU. These sanctions have – when taken together – amounted to something akin to a comprehensive (or general) sanctions regime, which has negatively impacted civilians in myriad ways, as outlined above. While it is often times hard to disentangle the negative humanitarian impacts caused by sanctions from those caused by other factors (such as conflict), there is a general consensus in the literature that the international sanctions are at least *partially* to blame for the widespread civilian suffering. In both the EU and the US sanctions there have been humanitarian exemptions, however, due to the complex and time-consuming procedures involved in applying for humanitarian derogations, various humanitarian actors have reported having had to scale back or otherwise fully abandon their activities in Syria.

## 5. Somalia

### Background to sanctions – political setting

Somalia gained its independence from Italy in 1960, following some 80 years of colonial governance (Gassem 2002, 4). The borders of the state – the Republic of Somalia – were based on former colonial demarcation lines, originally drawn up by the United Kingdom and Italy. Consequently, state borders were largely void of local legitimacy which became immediately obvious in the north-western Somaliland region, where a large majority of the population voted against a shared constitutional framework with Somalia in 1961 (Walls 2009). Following this, a military coup was attempted in late 1961. While unsuccessful, the *coup d'état* drew force from the internal tensions inside Somalia, as it sought to establish an independent government in the Somaliland region. Thus, from the very inception of the Republic of Somalia, the region of Somaliland nurtured ambitions for independence (Shinn 2002). The political tensions between Mogadishu (Somalia) and Hargeisa (Somaliland) gradually grew over the subsequent decades, and in 1981 the Somali National Movement (SNM) was formed: a Somaliland based guerrilla group with the aim of ousting the Mogadishu government led by General Mohammed Siad Barre, which was conceived as illegitimate and repressive (Omaar 2010). In 1988 the animosities between SNM and the Barre regime had escalated into a civil war, which lasted until 1991 when the fall of Barre and his government came at the hands of the SNM. At this point, the central government in Mogadishu completely collapsed, rendering Somalia a 'failed state' (Heleta 2014). In the same year, the Central Committee of the SNM autonomously declared independence from Somalia and named Abdirahman Ahmed Ali the interim president of the Republic of Somaliland (Shinn 2002).

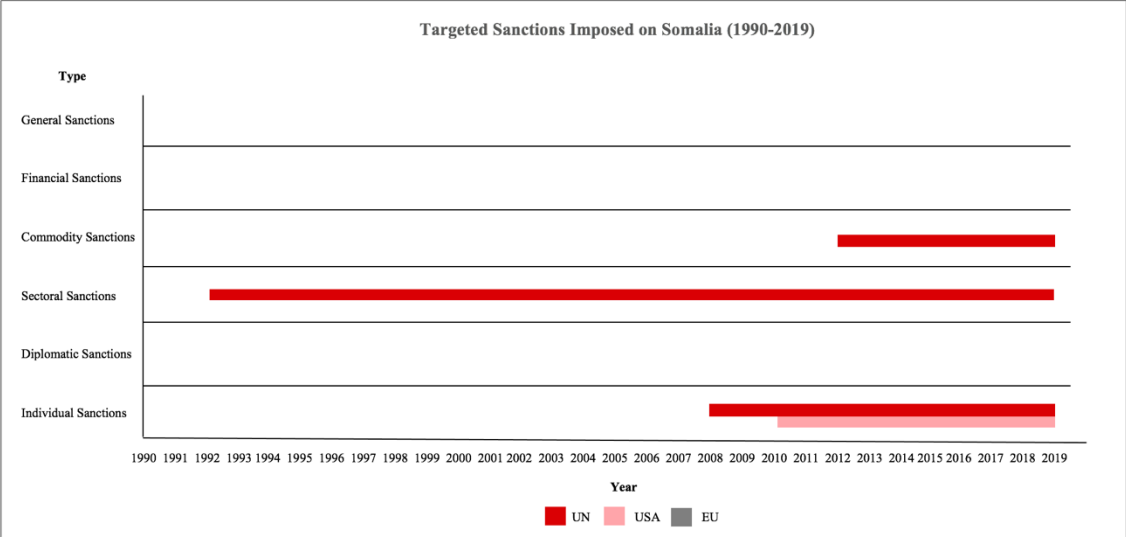
Meanwhile, after the fall of the Barre regime, Somalia remained without a central government for several years, during which time various armed outfits scrambled for power in a civil war, resulting in massive humanitarian suffering – compounded by a wide-spread famine caused by drought. Between 1992-1995, UN troops were deployed in Somalia in an attempt to restore order and contain the violence. While highly ambitious in its aims, the two UN missions ultimately failed to stop the civil war. Likewise, US troops deployed in 1993-1995 faced similar difficulties in Somalia resulting in the so called 'Mogadishu effect' (i.e. waning political support at home due to military failure overseas) (Munkler 2004, 26). Overall, while multiple attempts at peacemaking have been pursued over the last two decades, violent conflict is still highly prevalent in Somalia, with the Islamist group Al-Shabaab being the main insurgent group in the state at the present moment (2021). In order to contain the spread of Al-Shabaab, a number of international actors have been involved, including the US and, most notably, the African Union mission in Somalia (AMISOM) (UCDP Somalia: Government).

### Sanctions timeline and exemptions

In 1992 a UN arms embargo was imposed on Somalia, while the country was in the midst of a civil war. Here, UNSC Resolution 733 sought to 'immediately implement a general and complete embargo on all deliveries of weapons and military equipment to Somalia' (UNSC 1992a). Resolution 733 also spoke explicitly of the importance of safeguarding humanitarian

assistance to Somalia, by urging ‘all parties to take all the necessary measures to ensure the safety of personnel sent to provide humanitarian assistance [...] and to ensure full respect for the rules and principles of international law regarding the protection of civilian populations’ (ibid). Meanwhile, subsequent UNSC Resolution 751 called for the establishment of a UN military operation in Somalia and a committee of the Security Council tasked with monitoring the arms embargo against the state (UNSC 1992b).

Figure 9: Overview of sanctions imposed on Somalia, 1990-2019



In 2008, the UNSC adopted Resolution 1844, which imposed travel bans and asset freezes on a number of targeted individuals in Somalia, whom the SC deemed to have either (a) engaged in acts that threaten the peace, security or stability of Somalia; (b) acted in violation of the general and complete arms embargo against the state or; (c) obstructed the delivery of humanitarian assistance to Somalia (UNSC 2008). This resolution came at a time when Somali piracy was allegedly responsible for violating the arms embargo as introduced in Resolution 733; thus necessitating targeted measures against these individuals. In order to strengthen the arms embargo even further, UNSC Resolution 1907 of 2009 called upon member states to inspect any cargo on its way to Somalia in order to ensure that it does not contain any arms or military equipment (UNSC 2009). In UNSC Resolution 1916 of 2010, the importance of humanitarian aid was further stressed, and certain general exemptions were made to the UN sanctions regime in order to facilitate the delivery of such aid to Somalia (UNSC 2010; see also the section below on humanitarian exemptions). Furthermore, UNSC Resolution 2036 of 2012 banned member states from trading in Somali charcoal; as that had proven to be a significant source of revenue for Al-Shabaab (UNSC 2012). Finally, UNSC resolution 2498 of 2019 introduced a ban on trading with Somalia in certain materials that could be used to build so called improvised explosive devices (IEDs), seeing as Al-Shabaab had increasingly been relying on IEDs in their attacks (UNSC 2019).

In addition to the UN sanctions regime, the US has imposed unilateral sanctions on Somalia. Through Executive Order 13536 of 2010, the US sought to freeze the assets of certain entities (individual or corporate) who were deemed responsible for the ongoing violence in Somalia, including the increasing piracy off its coast (Executive Order 13536). Later in 2012,

Executive Order 13620 added a charcoal ban – in line with the UN measures discussed above – to the US’s sanctions vis-a-vis Somalia (Executive Order 13620). Please see Figure 9 below for a visualization of the Somalian sanctions regime.

The Somalia UN sanctions regime is thus far the only one that has a built-in exemption for humanitarian activities. This general exemption has been renewed annually since 2010 and it stipulates that ‘the obligations imposed on Member States [...] shall not apply to the payment of funds, other financial assets or economic resources necessary to ensure the timely delivery of urgently needed humanitarian assistance in Somalia’ (UNSC 2010). While this has generally been celebrated by humanitarian actors as a progressive move, it also has certain limitations, namely that it is limited to organizations with observer status with the UN and UN implementing partners, and it moreover does not cover humanitarian protection activities (Debarre 2019, 40).

### Humanitarian development

When it comes to humanitarian development, Somalia is a somewhat difficult case to study. Due to ongoing violent conflict and political instability, there is a dearth of data on humanitarian developments in the country. Indicatively, the country does not currently (as of 2021) have a HDI value. Still, *some* data are available, including relevant health indicator trends. As such, infant mortality rates have gone down from 107.9 per 1000 live births in 1990 to 76.6 in 2019 (see Figure 10 below, data from WHO 2021a). Similarly, the malaria incidence has subsided from 125.6 per 1000 people at risk in 1990 to 37.1 in 2018; furthermore, life expectancy at birth has gone up from 45.4 in 1990 to 57.4 in 2019 (WHO 2021a). Lastly, the percentage of people using at least basic sanitation services has increased from roughly 20% in 2000 to 39% in 2019, although with a significant urban-rural divide (see Figure 11 below, data from WHO 2021a). Thus, in spite of violent conflicts, political instability, and international sanctions, some salient health indicators in Somalia display a positive trend.

Figure 10: Infant Mortality Rate – Somalia, 1990-2019

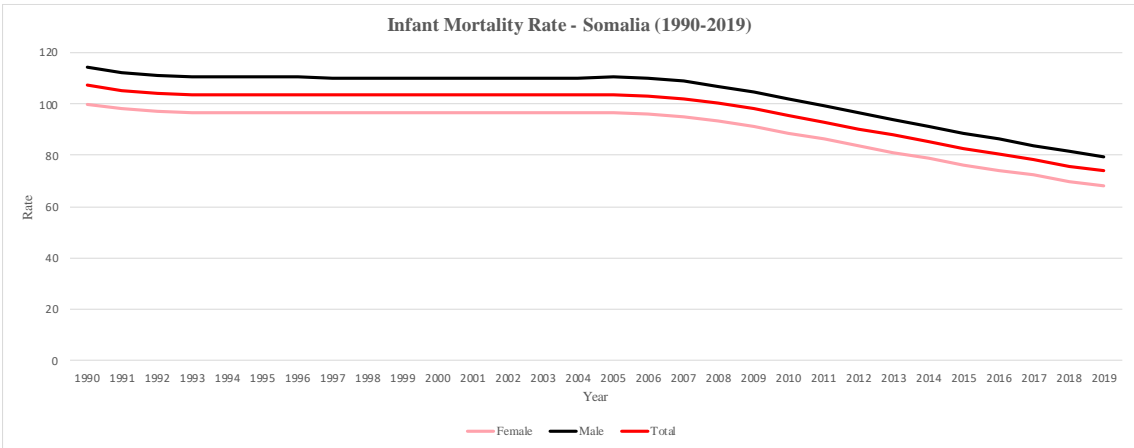
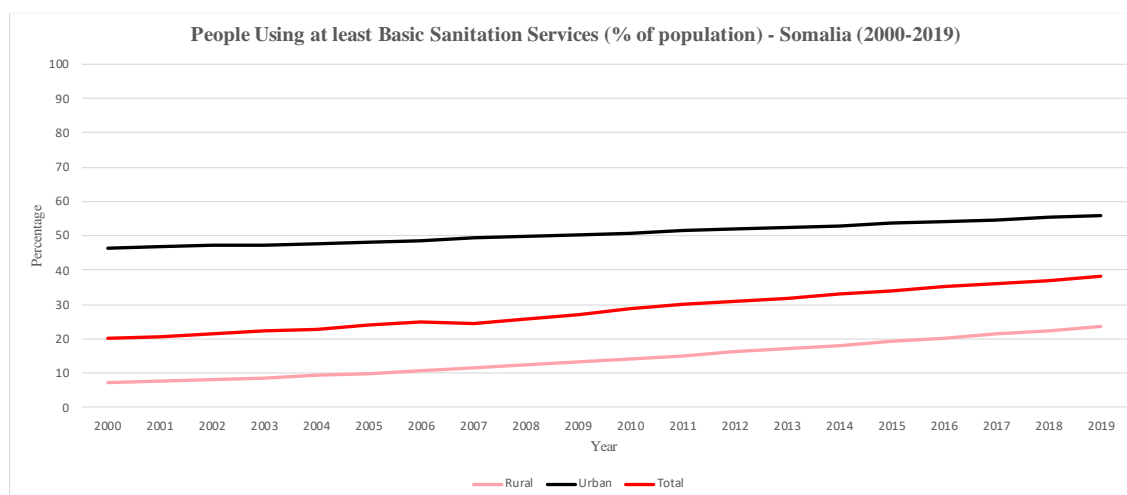


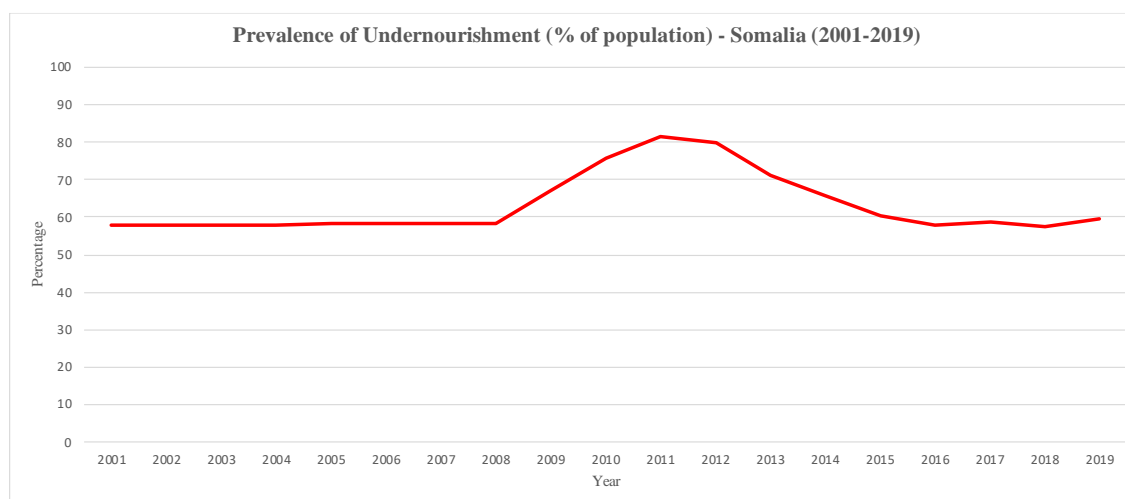
Figure 11: Percentage of people using basic sanitation services – Somalia, 2000-2019



However, looking at adequate access to food and nutrition, the picture becomes much less positive, as there is a widespread and pervasive prevalence of undernourishment (which is exacerbated by recurring droughts and violent conflict). This trend is visualised in Figure 12 below (data from the World Bank 2021). Please note that while undernourishment goes up significantly between the years 2009-2013 as a consequence of droughts, the ‘base level’ of undernourishment is still very high, with roughly 57% of the population being undernourished under ‘normal’ – i.e. non-drought – circumstances.

Somalia has been subject to sectoral UN sanctions since the early 1990s. Individual UN sanctions were imposed in 2008 (and by the US in 2010) and this was complemented with commodity sanctions in 2012. During this period, humanitarian funding has come in waves. Beginning at low levels, there was a steady increase from 100 million USD in 2005 to 559 million USD in 2009 (OCHA Financial Tracking System 2021a). However, there was a slight drawdown in 2010, followed by a sharp increase in 2011 following the famine, and a subsequent reduction every year up until 2017 when there was a new wave of humanitarian funding.

Figure 12: Prevalence of undernourishment in Somalia, 2001-2019



### In-depth analysis

First of all, we should further discuss the general humanitarian exemption that has been in place in the Somali sanctions regime since 2010. Overall, humanitarian actors are lauding this as a successful initiative which has enabled access to vulnerable populations in the country, despite the rather restrictive measures imposed through international sanctions (HRW 2019). Importantly, the Somali exemption makes it possible for humanitarian activities to proceed without the bureaucratic intricacies of first having to apply for a derogation, which makes it possible for humanitarian actors to respond to pressing crises in the country in a swift and neutral manner. Compared to the situation in Syria, where *derogations* often have to be sought prior to carrying out certain activities, humanitarian actors operating in Somalia are clearly at an advantage. Likewise, compared to Sudan where the government has restricted humanitarian access for political reasons, the existence of a general exemption in Somalia likely safeguards against such politicised intervention, at least to a certain degree.

As mentioned above, the Somali exemption is thus far the only such general exemption that has been included in a UN sanctions regime, and hence we should explore in-depth how it came to be in the first place. Here, the dire humanitarian situation in Somalia in 2010 seems to be one of the main contributing factors. As such, a severe famine plagued parts of the country which was controlled by Al-Shabaab; a non-state armed group subject to an asset freeze under international sanctions. Thus, humanitarian actors were concerned that aiding these populations suffering from the famine might entail that they violated the sanctions regime and that they could risk being prosecuted under international law (Gillard 2017, 7). In order to remedy this situation, the UNSC included the general humanitarian exemption in Resolution 1916 of 2010. It is important to note, however, that this did not happen without prior (and concerted) lobbying by international humanitarian actors, who managed to convince the UNSC to include the exemption. Alas, this intense lobbying was a necessity, seeing as 'the Security Council is an extremely cautious body, and will not adopt an exemption of its own accord. It needs to be actively pushed into doing so' (ibid). Furthermore, it should be stressed that the famine in Somalia in 2010 was nothing short of a humanitarian crisis, which certainly

helped when pushing for a general exemption (Gillard 2017, 8). Finally, the UNSC decision to do so was arguably facilitated by the fact that Somalia was not at the time on a geopolitical fault line. These two final points beg the question of how humanitarian organizations might have fared in pursuing an exemption had the famine not been so severe, and had Somalia been a pawn in a geopolitical game.

While the humanitarian exemption in the Somalian sanctions regime appears to have been largely successful in ensuring that humanitarian actors can carry out their work as per humanitarian principles, it is also important not to romanticise it. Indeed, there are some critical voices on the exemption which are relevant to discuss. First, the Somalian sanctions exemption only applies to humanitarian organizations with observer status with the UN and UN implementing partners, as mentioned above. This entails that smaller and local humanitarian organizations are generally excluded from it, and hence have to worry about possibly violating the sanctions regime in their day-to-day activities. This is rather problematic as such organizations are those that are – arguably – the most locally knowledgeable and connected, and who are therefore ideally situated to provide humanitarian relief; as also argued in the broader debate on the importance of localising development aid (see for example: *Doing Development Differently Manifesto* n.d.). There are, moreover, humanitarian actors who have opposed the Somalian sanctions exemption on other grounds, namely that it comes with certain conditionalities from the UNSC. For, in the early days of the Somalian sanctions exemption, humanitarian organizations were mandated by the UNSC to report on any misuse or misappropriation of humanitarian assistance by armed groups that they would come across in their activities. This was perceived by some humanitarian actors as a politicisation of their work, as they were only tasked with reporting on such misuse in relation to non-state armed groups. This, some felt, stood in contradiction to the humanitarian principle of neutrality, and it was thus conceived as problematic (Gillard 2017, 11). However, after raising this issue with the UN, the reporting requirement has been re-written, and as it stands now it refers to *any* misappropriation of humanitarian funds independent of who is guilty of it.

Even though the Somalian exemption has been renewed every year since 2010, it came close to losing its practical relevance in 2019. This was at a time when Kenya proposed that Al-Shabaab should be included in the UN counter-terrorism sanctions regime – a regime which does not contain a general humanitarian exemption. Hence, had the proposal passed in the SC there was a fear from the humanitarian community that it would overwrite the humanitarian exemption found in the Somalian sanctions regime, thus making it virtually impossible for humanitarian actors working in Al-Shabaab controlled areas of the country. As noted by a humanitarian representative, such a turn of events would have been ‘the nail in the coffin of an independent, impartial, and neutral humanitarian response’ in Somalia (Debarre 2019, 17). Luckily, six members of the UNSC opposed the Kenyan request, which ensured that the Somalian exemption maintains its practical relevance to this day (HRW 2019).

Furthermore, it should be mentioned that while the general humanitarian exemption has clearly done a lot to facilitate the delivery of aid to Somalia, it is still a country which suffers from immense humanitarian need, as illustrated above in section (c). Thus, it is important not to hail the exemption as a panacea that will ‘fix’ all humanitarian problems in Somalia. Finally, there are reportedly humanitarian organizations who are reluctant or unable to operate in Al-Shabaab controlled areas of the country; even with the general humanitarian exemption

in place. One of the main issues here is that Al-Shabaab does not normally welcome international organizations to its territories, and when it does, the organization tends to 'direct' the delivery of aid to those who are loyal to it (Debarre 2019, 16). This, needless to say, is antithetical to the humanitarian ideal of operating without bias, and hence many humanitarian organizations prefer to work in areas where they can provide assistance without such political meddling (ibid).

To sum up: in Somalia we have seen how a general humanitarian exemption to the UN sanctions regime has significantly facilitated the delivery of humanitarian assistance since 2010. The exemption came about as a concerted lobbying effort by humanitarian actors in the midst of a severe famine in 2010. While overall lauded as a humanitarian success story, the general exemption is not without its flaws. Primarily, it is restricted to 'UN-approved' international organizations, which thus excludes a vast number of local and/or less recognized humanitarian actors. Moreover, although the exemption is reportedly doing its job for the most part, it has neither stopped Al-Shabaab from barring international humanitarian organizations from its territories, nor has it changed the fact that a large portion of the Somali population still suffers from (among other issues) undernourishment. Thus, while certainly a remarkable achievement, the general humanitarian exemption should not be treated as a panacea.



## 6. Comparing the Three Cases

Reading the three cases side by side, there are some differences in how various targeted sanctions have been combined. Nevertheless, the most salient difference between them appears to be the variation in humanitarian exemptions in their respective sanctions regimes. As such, Sudan represents the case with the weakest humanitarian exemptions, while Syria holds the middle ground, and Somalia has the strongest humanitarian exemptions of the three cases. In several other important regards, however, the cases are quite similar: they are governed by authoritarian regimes; they are suffering from low human development; they have been colonised in the past; they have experienced recurring violent conflict since the 1990s, and they have been subject to international sanctions regimes. Thus, in this section we analyse how the variation in the sanctions regimes and their humanitarian exemptions may have impacted the different humanitarian outcomes that we see. As a caveat, we should stress that there may of course be other variables that have had an impact on humanitarian outcomes; which are unlikely to be caused solely by the differences in humanitarian exemptions in the respective sanctions regimes. Still, we do argue that this difference is at least *a part* of the causal mechanisms which have produced said outcomes. Ultimately, further in-depth studies (with data collection in the countries of interest) would be helpful in unpacking the causal mechanisms at work in the respective cases. Thus, what is presented below should be read as a preliminary analysis, which would need to be further substantiated by empirical studies.

All three cases have experienced sanctions regimes that comprise a combination of various targeted sanctions. While it is difficult to disentangle their individual effects, a few observations can be made. Sudan is the only country with general sanctions in place (imposed throughout the whole period we study), which means that the other targeted sanctions that have also been imposed are not sufficient to overcome the negative humanitarian impact of the general sanctions. It is worth noting, however, that Sudan has seen a weak positive trend in humanitarian outcomes despite sanctions. Moreover, we cannot observe a direct negative impact when the UN sanctions were added – despite those coinciding with the escalation of a brutal war. This is likely the result of the large amounts of aid that were directed at Sudan around the same time. Hence, aid and the work by humanitarian organizations can counterbalance the potential negative consequences of sanctions.

Syria is subjected to a number of different types of targeted sanctions. Nevertheless, several observers have likened the Syrian sanctions regime as such to comprehensive (or general) sanctions. This highlights the point that targeted sanctions can vary in the degree to which they impact the society at large, and a combination of several targeted sanctions can add up to something that resembles general sanctions – even if they were each designed to avoid such general and indiscriminate consequences. In the case of Syria, the comprehensive sanctions package coincides with a negative trend in humanitarian outcomes, exacerbated by the war with its large-scale fighting and civilian atrocities. The HDI dropped and we also observe an increase in tuberculosis cases. This situation would likely have been worse without the large influx of aid in the same period.

When it comes to Somalia, most sanctions have been part of the UN sanctions regime, covering only three of the targeted sanction types. Only looking at co-variation in time, new sanctions imposed in 2008 were followed by a negative trend in undernourishment. Of course,

that development was driven very much by the armed challenge from Al-Shabab, and the subsequent famine that hit the country. While Somalia received international aid to tackle the humanitarian crisis, the amounts were lower compared to Sudan and Syria. Comparing the three cases only based on the types of sanctions imposed, it is difficult to see any clear patterns – especially since all cases have multiple sanction types imposed simultaneously. Therefore, we move on to explore the issue of exemptions and other factors that appear particularly relevant.

In Sudan, we see how the state has repeatedly restricted humanitarian access for international organizations; resulting in problems with delivering humanitarian assistance. Since humanitarian organizations have often been restricted from carrying out their work in Sudan, the limited humanitarian exemption inscribed in the sanctions framework has not really been ‘tested’ in this setting. Thus, there is not enough empirical data at this point to assess whether it has done its job or not. Still, one might wonder if the existence of a general humanitarian exemption mandated by the UNSC (as in the case of Somalia) would have compelled the Sudanese state to refrain from meddling with humanitarian organizations’ access in the first place. We argue that this is a plausible scenario, especially when compared to the Somalian case, where no such meddling by the state occurred despite having similar issues with violent conflict involving non-state armed groups as Sudan. Thus, a UN-mandated general humanitarian exemption might have a deterring effect on authoritarian governments, who know full well that any interference with humanitarian delivery would stand in violation of the UNSC resolution, and it could thus spark both legal prosecution and international outcry.

In the case of Syria, we find myriad examples of how international humanitarian organizations have been negatively impacted by sanctions; resulting in a reduced ability to deliver assistance to civilian populations in dire need. Here, the problems appear partially related to the broadness of the sanctions regime. In the Syrian sanctions framework there are, however, fairly strong humanitarian exemptions in place which are intended to ensure the smooth delivery of humanitarian relief in the face of the broad sanctions regime. Here, one of the most complicating aspects that come out of reports from humanitarian organizations operating in Syria is the cumbersome procedures of having to apply for derogations in order to carry out activities that are not covered by a general exemption in the respective sanctions frameworks. Such procedures take considerable time and resources away from humanitarian actors, and overall have a chilling effect on their work. This is especially the case since many of these procedures lack transparency and it is unclear to most humanitarian organizations what is expected from such applications and how (and when) they are evaluated. Arguably a general humanitarian exemption, as in Somalia, would have ameliorated this issue. Still, considering how geopolitically sensitive Syria is – to the point that the UNSC has its hands tied by some of its permanent members – it is unlikely that we will see any such developments in the foreseeable future.

In Somalia, we find the sanctions regime with the strongest humanitarian exemptions of our three cases. This appears to have had an overall positive impact on the delivery of humanitarian aid in Somalia, where few (if any) humanitarian actors express frustration with the complicated procedure of having to apply for derogations for their activities. Likewise, we have not observed any significant state interference in humanitarian delivery in Somalia; a fact which can arguably be explained (at least partially) by the existence of the UNSC-

mandated general humanitarian exemption. While we did not see any state interference in humanitarian delivery in Somalia, we did find that Al-Shabaab were guilty of doing so. As this is a non-state armed group which is generally treated as a pariah by the international community, it is rather unsurprising that they would not be influenced by the UNSC's general humanitarian exemption and its attendant normative power.

Finally, it is worth noting that the comparative analysis presented above is ultimately informed by what humanitarian actors have chosen to report about how they navigate the various sanctions regimes. This is likely only a partial picture of the whole array of difficulties that humanitarian organizations face when working in states under sanctions regimes. There is generally an issue with *under-reporting* on such matters, for a variety of reasons. Gillard elaborates on the reasons why humanitarian organizations are generally wont to share such information publicly: 'they may simply not be collecting the information or [...] they may fear that sharing information might reveal that they are not fully complying with sanctions and counterterrorism measures' (2017, 25). Furthermore, some organizations are reluctant to share such information with the UNSC, as they feel that may put them in a 'too political' position; something which is often eschewed by humanitarian organizations who prize their neutrality (ibid, 9). This dearth of public reporting by humanitarian organizations on their (negative) experiences of working in states under sanctions regimes is in itself problematic, as such information is needed in order to move towards a change in the system governing international sanctions. Indeed, without this kind of information the findings of systematic studies (such as the present one) will be inherently tentative, for we cannot know for sure whether the findings speak to the totality of issues faced by humanitarian actors, or whether only a small fraction thereof is represented due to a sort of self-censorship on the part of humanitarian organizations.

## 7. Conclusions and Key Takeaways

In this report we have sought to: (a) provide an overview of the academic literature on how sanctions impact civilian well-being and humanitarian activity; (b) analyse this problem in the context of three in-depth case studies – Sudan, Syria, and Somalia – and (c), analyse the cases comparatively with an eye to how their respective sanctions regimes include varying degrees of humanitarian exemptions. With regards to (a) we have found that the sanctions literature is rather divided on whether targeted sanctions are the way forward or not. Given this division, there is a need for further contextualised qualitative studies on the matter, which this report aims to bring to the table through its in-depth case studies (b). Here, we describe the specific political context in which our three cases are enmeshed, and furthermore analyse how humanitarian work and civilian welfare has been impacted by international sanctions. In the subsequent comparative analysis (c) we read the three cases side by side in an attempt to determine the extent to which humanitarian action and civilian well-being has been shaped by the respective sanctions regimes' humanitarian exemptions.

Overall, we find that Sudan has the weakest humanitarian exemptions, whereas Syria occupies a comparative middle ground, and Somalia has the strongest humanitarian exemptions of the three cases. In Sudan, intervention by the state government is identified as one of the primary obstacles to humanitarian action. Here, we suggest that the existence of a UNSC-mandated general humanitarian exemption might have ameliorated the situation somewhat, as the Sudanese state would then arguably have abided by the normative power of the international community and thus refrained from meddling in humanitarian activity. In Syria, we find that humanitarian actors have struggled from having to apply for derogations in order to carry out some of their activities. This has hampered their ability to operate in the country, and it has therefore taken a severe toll on the myriad civilians who are in need. Hence, Syria too could have benefited from a general humanitarian exemption, so as to avoid the often time consuming and uncertain procedures of having to apply for derogations. While these two cases both illustrate the potential gains of a UNSC-mandated general humanitarian exemption, the case of Somalia also demonstrates some limitations. Here, rather than finding state intervention or obtuse derogations procedures as the main problems for humanitarian actors, instead we see how non-state armed groups and the exclusion of local humanitarian organizations complicate matters. Thus, we stress that while the Somalian general humanitarian exemption is rightly heralded as the gold standard for humanitarian activities, it is by no means perfect.

These findings raise some questions as well as some calls for action. First, while we stand by the analysis of this report, we also acknowledge that it should be treated as preliminary. In order to substantiate these findings even further, on-site case studies should be undertaken, which delve deeper into the causal dynamics in play. Here, humanitarian organizations can be instrumental by sharing their own experiences of working in states under sanctions regimes. Therefore, it is imperative that the 'sharing taboo' often felt by humanitarian actors (as discussed above in chapter 6) is overcome.

Second – by way of paraphrasing – we would like to raise the question of how we may go about 'getting to Somalia'? In other words: how may humanitarian actors work towards the end of establishing a UNSC-mandated general humanitarian exemption as a new standard in international sanctions regimes? While agreeing with Schaar that 'shifting the responsibility

from humanitarian organizations to states imposing sanctions' (2021, 21) is an important way forward, we would also like to emphasize humanitarian organizations' collective agency. It is important to remember that the Somalian exemption came about as a concerted lobbying effort on the part of the international humanitarian community. Thus, similar collective lobbying campaigns in the future may yield similar results. This kind of lobbying is dearly needed in the face of the inherently conservative – and often geopolitically stifled – UNSC. For, as noted by Gillard 'the Security Council is an extremely cautious body, and will not adopt an exemption of its own accord. It needs to be actively pushed into doing so' (2017,7).

Third and finally, once we have eventually 'gotten to Somalia' it should be born in mind that this is not the end of the road, and that there are also problems to be overcome here; including how to get non-state armed groups to abide by the general humanitarian exemption and how to ensure that local and minor humanitarian actors are also included. These are issues which need to be continuously scrutinized as we move forward – preferably as a joint effort including both researchers and humanitarian actors.

In summation, the key messages to stakeholders from this report are:

- Individual sanctions are designed to target people in power and have a limited impact on the civilian population. However, they are often combined with other forms of sanctions that have more immediate implications for the wider society. To overcome the negative humanitarian consequences of sanctions, *sanctioning states and organizations* must therefore consider how the combination of various sanctions impacts civilians.
- *Sanctions committees* should invite humanitarian expertise to continuously assess how the sanctions regime affects civilians and humanitarian outcomes and communicate the insights to policy makers responsible for imposing the sanctions.
- Further analysis is needed in order to better understand the causal mechanisms of how international sanctions impact civilian well-being and humanitarian action. To the extent possible without violating humanitarian principles and endangering operations, *humanitarian actors* should provide researchers with information on their experiences of working in states facing international sanctions.
- The general humanitarian exemption in the Somalian sanctions regime remains a gold standard towards which states should strive. *Sanctioning states and organizations* should provide general exemptions for humanitarian actors as a default.
- *Humanitarian actors* could come together in concerted lobbying efforts vis-a-vis the United Nations Security Council and other sanctioning states and organizations to achieve this end.
- To further facilitate humanitarian relief in these complex situations, *sanctioning states and organizations* need to extend humanitarian exemptions to encompass local humanitarian actors.

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