

EU sanctions: A key foreign and security policy instrument

SUMMARY

Sanctions have become an increasingly central element of the EU's common and foreign security policy. At present, the EU has over 50 sanctions programmes in place, concerning nearly 40 countries. Unlike the comprehensive trade embargoes used in the past, the EU has moved towards asset freezes and visa bans targeting individual persons and companies, aiming to influence foreign governments while avoiding humanitarian costs for the general population. Other measures in the sanctions 'toolkit' include arms embargoes, sectoral trade and investment restrictions, and suspensions of development aid and trade preferences.

The declared purpose of EU sanctions is to uphold the international security order, while also defending human rights and democracy standards by encouraging targeted countries to change their behaviour. Measuring sanctions' effectiveness is difficult, as sanctions alone rarely achieve all their aims, and usually there are other causes to which changes can also be attributed. However, even when this primary purpose is not achieved, sanctions may have useful secondary effects, for example by deterring other actors from similar behaviour.

The broader the international support for EU sanctions and the closer the relationship between the EU and the targeted country are, the stronger the prospects for success will be. On the other hand, effectiveness can be undermined by inconsistent application of sanctions standards and by the difficulty of coordinating implementation between multiple stakeholders.

The unprecedented scale and scope of sanctions imposed against Russia has put the spotlight on new implementation challenges, including inside the EU's borders. In response, the Council adopted a decision to add the violation of restrictive measures to the list of particularly serious crimes ('EU crimes') under Article 83(1) of the Treaty on the Functioning of the European Union.

This is an update of an [earlier briefing](#).



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History of EU sanctions policy

Until the 1980s, the European Community did not adopt its own sanctions; instead, Member States took measures at national level to implement United Nations Security Council (UNSC) [sanctions](#) (which they, as UN members, were – and still are – obliged to follow). Until 1980, UN sanctions were only adopted against two countries, [Rhodesia](#) (1965) and [South Africa](#) (1977). However, the end of the Cold War made it easier to reach consensus at UN level, ushering in a '[sanctions decade](#)' during the 1990s.

Community sanctions in 1980 against the Soviet Union over its invasion of Afghanistan marked the beginning of a coordinated European sanctions policy independent of the UN. The common foreign and security policy (CFSP), established in 1992 by the Maastricht Treaty, further strengthened coordination. Sanctions are becoming an increasingly central element of the CFSP, with a steady increase in the number of countries under sanctions, from just [six](#) in 1991, to [38](#)¹ at present.

Principles of EU sanctions policy

Definition of sanctions

At UN level, sanctions are defined as 'measures not involving the use of armed force ... employed to give effect to [UN Security Council] decisions' ([Article 41 of the UN Charter](#)). EU-level sanctions are not explicitly defined in European law, but they serve a similar purpose in implementing the decisions either of the UN Security Council or the Council of the EU.

When are sanctions used and against whom?

According to the Council's 2004 [Basic Principles on the Use of Restrictive Measures](#), sanctions aim to 'maintain and restore international peace and security in accordance with the principles of the UN Charter and of our common foreign and security policy'. UN [principles and purposes](#) include maintaining international peace and security, preventing threats to peace, refraining from threats to the territorial integrity of any state, and promoting human rights (Articles 1 and 2 of the UN Charter). Article 21 of the [Treaty on European Union](#) (TEU) on the principles of the common foreign and security policy includes a similar list, with the addition of supporting democracy.

Implicit in the UN's commitment to preventing threats to international peace is non-proliferation of weapons of mass destruction, the basis for UN and EU sanctions against Iran's and North Korea's nuclear programmes. Violation of the territorial integrity of Ukraine is the basis for sanctions against Russia adopted by the EU (but not the UN, due to Russia's Security Council veto). Recognising that threats to peace and security come not only from governments, sanctions also target non-state actors, such as: [Hamas](#), al-Qaeda, ISIL/Da'esh, the Taliban in Afghanistan,² the [Wagner Group](#), and rebel groups in Mali, Somalia and Yemen.

Despite the UN's commitment to human rights in its charter, it rarely adopts sanctions over violations of human rights, not least due to opposition from Security Council members Russia and China, which consider such issues '[domestic affairs](#)'. However, human rights and democracy are the dominant theme of most autonomous EU sanctions, for example against Belarus, Burundi, China, Guatemala, Guinea and Venezuela. The EU has also adopted sanctions against former regime leaders accused of misappropriating state funds, such as Tunisia's Ben Ali. The EU has also set up a separate [Global Human Rights Sanctions Regime](#), one of the EU's four horizontal sanctions regimes (see below).

Targeted sanctions

Early European sanctions often included very wide-ranging measures, for example an [embargo](#) on Argentine imports in 1982 following the country's occupation of the Falkland Islands. However, [concerns](#) about the humanitarian impact of the 1990-2003 UN trade embargo on Iraq have resulted

in a shift by the EU and the UN to a more [targeted approach](#). EU sanctions therefore aim to have [maximum impact](#) on the persons and entities responsible for the behaviour concerned – typically, the political and military leaders of a regime – while minimising adverse humanitarian effects, where possible.

For this reason, the most commonly used EU sanctions are visa bans, asset freezes and arms embargoes; such measures can cause considerable inconvenience to targeted individuals and entities without affecting the general population. Economic sanctions are rarer; where they exist, they typically target one or two strategic activities, rather than the economy as a whole. Until recently, the two exceptions to the principle of targeted sanctions were North Korea and Syria. EU sanctions against these countries are less comprehensive than those against Iraq in the 1990s, allowing humanitarian [aid](#) and limited trade. Even so, [UN officials](#), experts and [Members of the European Parliament](#) have expressed concerns about the humanitarian impact of wide-ranging international (EU, US and in North Korea, UN) sanctions. However, following Russia's unjustified and unprovoked attack on Ukraine that began on 24 February 2022, the EU has imposed an unparalleled set of measures targeting the Russian economy (and political elites). In what has been coined a '[sanctions revolution](#)', unprecedentedly [wide-ranging sanctions](#) are explicitly intended to curtail the country's ability to wage war on Ukraine by curbing its revenue sources, denying access to sophisticated military technology and imposing a high economic cost on Russian military production.

Terrorism: humanitarian exception

On 19 February 2024, the Council [introduced](#) a humanitarian exception to the asset freeze measures targeting terrorists. Certain categories of humanitarian actors, and organisations and agencies certified as humanitarian partners of the EU or its Member States, as well as Member States' specialised agencies, can engage in transactions with listed individuals and entities without any prior authorisation, if the purpose is to deliver humanitarian assistance or to support other activities that support basic human needs of people in need.

Renewal procedures

EU sanctions (at least those based on a CFSP decision) are adopted for a limited period not longer than a year, but sometimes only six or even three months. Towards the end of that period, the EU reviews the situation and decides whether or not to extend sanctions.

Multilateralism

Even when UN-level sanctions are not possible, the EU aims for maximum impact by coordinating with the widest possible range of partners. The EU has adopted most of its autonomous sanctions in tandem with similar measures by the US and allied countries. For example, sanctions against Russia were adopted in close cooperation with partners including the United States, the United Kingdom, Canada, Australia and Japan, especially in the G7 format.

Differences between EU and US sanctions policy

Although the EU and the US often closely align their sanctions, there are several important differences in their general approaches. Unlike those of the EU, most US sanctions are open-ended and stay in force until a decision is taken to lift them. Partly as a result, the EU is often quicker to respond to positive developments than the US; for example, in December 2016 the US [eased](#) some restrictions against Myanmar/Burma, four years after the EU had lifted all of its sanctions except an arms embargo.³

US sanctions are generally broader in scope than EU ones. For example, US trade sanctions against Syria restrict a much wider range of goods. In relation to Russia, the US placed an outright ban on all new investment in Russia, whereas the EU ban in this respect only covers the mining, quarrying – with some exemptions – and energy sectors. The US has also prohibited all coal, LNG, and oil imports, while the EU still [imports](#) Russian pipeline gas and LNG (the share of Russia's [pipeline gas](#)

in EU imports dropped from over 40 % in 2021 to about 8 % in 2023; for pipeline gas and LNG combined, Russia accounted for less than 15 % of total EU gas imports in 2023). While the export controls and sectoral sanctions overlap significantly, targeting technologies and key companies in the financial, defence, and energy sectors, the EU and the US lists of designated individuals and entities are not identical.

In addition, some US sanctions are extra-territorial in scope, meaning that non-US citizens and companies are also expected to comply with them. For example, in 2015 French bank BNP Paribas was fined [US\\$9 billion](#) for violating US sanctions against Cuba, Iran and Sudan. For its part, the EU [opposes](#) such extra-territorial application of US and other third-country laws. In 1996, it adopted [legislation](#) allowing Member States to take measures to protect citizens and companies from the effects of such laws; however, this legislation has proven to be of very limited use in practice.

This difference of views on extra-territorial scope has sometimes led to EU-US tensions; the French government [criticised](#) the fine levied on BNP Paribas as 'unreasonable'. Following the US withdrawal from the nuclear agreement with Iran, the Joint Comprehensive Plan of Action (JCPOA), in 2018, the [extraterritorial effects](#) of US sanctions on Iran made it very difficult for the EU to maintain an independent foreign policy vis-à-vis Iran. According to observers, as a result the EU has forfeited its leadership role on the JCPOA and '[lost any relevance in the eyes of Iranian officials](#)' in relation to the accord.

The EU sanctions toolkit

Types of common foreign and security policy sanctions

As of February 2024, the EU has eight sanctions programmes implementing UN measures (for example, against the Central African Republic, Iraq, Somalia and Yemen). In a further 12 cases (including Iran and North Korea), the EU applies its own additional sanctions in parallel to UN sanctions. Finally, the EU has 32 autonomous sanctions programmes, in situations where no UN sanctions exist (such as Russia, Ukraine, and Venezuela). Most sanctions programmes are geographically circumscribed, and either apply to state or non-state actors in a specific country. However, the EU has also put in place four thematic (or horizontal) sanctions regimes, allowing it to designate individuals or entities involved in [terrorist activities](#), [human rights violations or abuses](#), [cyber-attacks](#) threatening the EU or its Member States, or the use and proliferation of [chemical weapons](#). [Moves](#) are under way to set up a new dedicated global sanctions regime for [corruption](#).

The most widely used measures are asset freezes, blocking individuals and organisations from accessing bank accounts and investments held in the EU. Usually they are combined with visa bans, barring individuals from EU territory.

Arms embargoes prohibiting weapons exports to countries such as China, Sudan and Yemen are very common. In some cases there are also restrictions on exports of dual-use goods (goods that can be used for both civilian and military purposes – Russia, Iran), or equipment that can be used for internal repression (Belarus, Myanmar/Burma). Examples of **financial measures** include bans on bank transfers to and from North Korea, and on transactions with the National Central Bank of Russia. The Central Bank of Russia has been blocked from accessing €300 billion in foreign-exchange reserves held abroad. **Investments** in Crimea, North Korea, Russia and the Syrian oil sector are similarly banned.

Figure 1 – EU restrictive measures, 2024



Source: [EU sanctions map](#), February 2024.

Flight and shipping bans bar access to European airspace and ports to aircraft and ships from North Korea and Syria. **Trade measures** limit exports of oil to North Korea, and of certain equipment and technology to Russian oil companies. Oil imports from Russia and Syria are banned.

Figure 2 – EU sanctions programmes



Source: [EU sanctions map](#), February 2024.

How are CFSP sanctions adopted?

Most CFSP sanctions are adopted in a two-step [procedure](#):

- 1 based on a proposal from the EU's High Representative, the Council of the EU adopts a decision under [Article 29](#) TEU, which, like other CFSP decisions, must be unanimous ([Article 31](#) TEU);
- 2 the Council simultaneously adopts, by a qualified majority ([Article 215](#) TFEU), a regulation with detailed provisions for implementation of the economic and financial aspects of such decisions (e.g. import/export restrictions and freezing of assets), this time based on a joint proposal from the High Representative and the European Commission. In addition, Member States have to adopt their own national rules implementing arms embargoes and visa bans, as these areas are not EU competences.

In practice, these two steps are simultaneous, with the Council adopting both the CFSP decision and regulation at the same time. The involvement of the High Representative and the Commission in preparing the proposals, and of the Council in adopting them, mean that the Council, the Commission and the European External Action Service are the three institutions most involved in sanctions. The European Parliament is informed of CFSP decisions on sanctions, but has no formal role in taking them.

Sanction-like measures

The EU toolkit includes measures which, though not officially referred to as sanctions, play a similar role:

Cutting off bilateral negotiations

The EU responded to civil war in [Syria](#) and human rights abuses in [Turkmenistan](#) by putting bilateral agreements it had negotiated with the two countries (in 2008 and 1998 respectively) on hold. In 2014 it also [suspended](#) negotiations on a new partnership agreement with Russia.

Suspending development aid and loans

African, Caribbean and Pacific (ACP) countries covered by the 2000-2023 [Cotonou Agreement](#) (the majority of aid recipients) committed to upholding human rights and democratic principles. In the event of a country violating those commitments, [Article 96](#) of the agreement provided for consultations with the country concerned; if these failed to produce a satisfactory resolution, 'appropriate measures', including suspending or restricting aid, were taken by a unanimous decision of the Council. Such measures have been applied to [countries](#) including Fiji (2000, 2007), Zimbabwe (2002), Togo (2004), Guinea-Bissau (2004, 2011) and, in 2016, [Burundi](#) (lifted in [2022](#)), and [Ethiopia](#) (postponement of budget support disbursements in 2020). In the [Samoa Agreement](#), which replaced the Cotonou Agreement in January 2024, Article 96 has been replaced by [Article 101](#) on 'dispute settlement and fulfilment of obligations'.

European Bank for Reconstruction and Development and European Investment Bank

Respect for international law and human rights is also a condition for preferential European Bank for Reconstruction and Development (EBRD) loans. Following the 2005 Andijan massacre, the Bank [pulled out](#) of Uzbekistan, only returning 10 years later. In 2014, the Bank [stopped](#) issuing new loans in Russia after the latter's aggression in Ukraine; in April 2022, the EBRD [suspended](#) access to the Bank's resources by Russia – and Belarus – in response to the invasion of Ukraine. The Bank has also made no new investments in Belarus since 2021 on account of human rights concerns. In July 2014, EU leaders asked the [European Investment Bank](#) (EIB) to suspend the signing of new financing operations in Russia.

Withdrawing trade preferences

The EU's Generalised Scheme of Preferences (GSP) [Regulation](#) gives developing countries [preferential access](#) to EU markets, allowing them to export more easily. That access is [conditional](#) on [compliance](#) with human rights and labour rights conventions. Countries with additional privileges under the GSP+ scheme also have to comply with environmental and good governance standards. 'Serious and systematic violation' of those principles may lead to dialogue with the country concerned, and if that fails to reach a satisfactory conclusion, a temporary withdrawal of trade privileges. To date, that has happened four [times](#): in 1997 (Myanmar/Burma, re-admitted to the GSP in 2017), in 2007 (Belarus), in 2010 (Sri Lanka, re-admitted to the GSP in 2017) and in 2020 ([Cambodia](#), partial withdrawal).

Based on environmental rather than human rights concerns, the EU can also ban fisheries imports from countries having serious problems with [illegal fishing](#). This ban ('red card') currently applies to the following [four countries](#): Cambodia, Cameroon, the Comoros, and [Trinidad and Tobago](#). Several others, including Ecuador, Ghana, Liberia, Panama, Sierra Leone and Vietnam, have received a warning. The decision to ban fisheries imports from a given country is proposed by the Commission and confirmed by a qualified-majority decision of the Council.

The current GSP Regulation was set to expire at the end of 2023. However, when the Commission submitted its proposal for an [update of the GSP Regulation](#), the Council insisted on including a link between the tariff preferences and the obligation of beneficiary countries to readmit their own nationals. The [European Parliament](#) has consistently been against this conditionality and the inclusion of this type of migration policy measure in the new regulation. As a result, negotiations between the Council and Parliament to agree on new rules have been [paused](#). In the meantime, the validity of the current GSP Regulation has been extended until 31 December 2027.

Possible suspension of the EU's association agreement with Israel

Some Member States (and a large number of [civil society organisations](#)) have called for a review of the [EU-Israel Association Agreement](#) on the basis that Israel may be breaching the agreement's human rights clause (Article 2) with its military campaign against Hamas. The main mechanism for incorporating human rights into the EU's bilateral agreements is an '[essential elements](#)' human rights clause that enables one party to unilaterally suspend trade commitments.

Procedures for adopting sanctions-like measures

Adoption procedures vary according to the type of measure: bilateral talks with a third country can be cut off by an informal Council or European Council decision; development aid can be suspended by the Council of the EU, voting by [qualified majority](#); trade preferences can be withdrawn or restored by a European Commission decision. As with CFSP sanctions, the Parliament is informed of decisions, but takes no part in them.

What impact do EU sanctions have?

Economic impact of sanctions on targeted countries

As mentioned above, most EU sanctions programmes focus on visa bans, asset freezes and arms embargoes – measures that have little overall economic effect. However, as the EU is the world's [biggest](#) trading power, when it does adopt economic sanctions, they can have a considerable effect. In most cases, that impact is hard to quantify, given that sanctions are only one of many factors influencing a country's economy.

Russia: In response to Russia's illegal and unprovoked invasion of Ukraine in February 2022, the EU has adopted [unprecedentedly](#) tough and widespread sanctions, in close cooperation with partners including the United States, the United Kingdom, Canada, Australia and Japan, [targeting key sectors](#) of the Russian economy. Export and import restrictions cover more than 50 % of EU-Russia pre-war trade. The introduction of the EU oil embargo and the [G7 oil cap](#) initially led to a decline in Russia's earnings from fossil fuel exports, but Russia has since significantly increased sales to Asia. A June 2023 [outlook](#) for the Russian economy concluded that it had outperformed earlier negative forecasts, and a more [recent analysis](#) essentially confirms these findings, but cautions that there are signs that the Russian economy is overheating. The latest figures suggest that the Russian economy grew faster in 2023 than the global economy, by 3.5 % as opposed to 3 %, thanks to 'record state spending'. The country has shifted to a wartime economy, imposing capital controls, dropping fiscal prudence and increasing public spending. Moreover, even though sanctions have isolated Russia from the world economy, certain foreign partners are helping the country circumvent sanctions by [purchasing Russian oil](#) and supplying [goods and technologies](#) that Western countries have blocked. Even though Russia's current economic policy may be unsustainable in the long run, earlier expectations that sanctions would quickly bring Russia down and stop the war have proven to be misplaced.

Iran: Starting in 2005, EU, UN, and US [sanctions targeted](#) Iran for pursuing a nuclear programme in violation of international treaties. These sanctions had what experts have referred to as a '

[devastating impact](#) on Iran's oil exports and revenues, the value of its currency, and the stability of its economy'. The signing of the [JCPOA](#), and the lifting of all nuclear-related sanctions on Iran in 2016, led to a significant expansion of bilateral trade between the EU and Iran. However, following the [re-imposition of US sanctions](#) on Iran in 2018, and in particular the effect of US secondary sanctions, EU trade with Iran has collapsed, with imports down 89 % and exports down 48 % ([2022 figures](#)), followed by a further decline in [2023](#). Overall, the multilateral (2006-2015) and unilateral (2018-present) US sanctions have had a very negative effect on Iran's economic performance. Prior to [Russia's](#) invasion of Ukraine in 2022, the sanctions imposed on Iran were the most [stringent](#) in the world and have caused or aggravated a wide range of macroeconomic problems, including currency devaluation, large trade and fiscal deficits, high inflation, and a rise in poverty rates. According to the World Bank, the [impact of sanctions](#) means that Iran's predicted GDP growth (2.1 % in 2023/24 to 2025/26) will be lower than could be expected from a major oil exporter; however, slowing global demand, energy shortages and years of underinvestment also contribute to the economic outlook.

Syria: In 2010, the EU accounted for [95 %](#) of Syrian oil exports and one-third of its foreign trade. However, [bilateral trade](#) and trade relations between the EU and Syria have been substantially [impacted](#) by the war in Syria. Syria's loss of oil export revenue, combined with other trade and investment [restrictions](#) imposed by the EU and the US, has undoubtedly hurt the country. However, any economic impact is tiny compared to the effects of the [devastating civil war](#). The [World Bank](#) estimates that, as a result of the destruction of physical capital, casualties, forced displacement, and the breakup of economic networks, [Syria's GDP](#) shrank by more than a half between 2010 and 2020. The civil war also destroyed much of Syria's domestic oil production.

North Korea: The lack of data from the reclusive country makes it impossible to quantify the impact of international sanctions; nevertheless, experts [believe](#) that sanctions have exacted a heavy toll on North Korea's economy. Admittedly, the EU's contribution to this is limited, given that, even before sanctions, the EU was not a major trade partner.

Belarus: The EU first imposed targeted economic sanctions on Belarus in June 2021, following the unlawful forced landing of an intra-EU Ryanair flight in Minsk on 23 May 2021. In response to Belarus' involvement in Russia's aggression against Ukraine, the EU imposed further economic and financial sanctions on Belarus starting in February 2022. According to [some estimates](#), 'these sanctions have caused the steepest economic downturn since 1995 and an annual decline in real GDP of 4.7 %.' Trade volumes with the EU, Belarus' second largest trading partner prior to the Russian invasion, have more than halved.

Sanctions: Successes and failures in bringing about change

One of the most obvious sanctions success stories is the **Iran** nuclear [deal](#), the JCPOA, signed in 2015. After nine years of UN sanctions and three years of an EU oil embargo, Iran agreed to safeguards ensuring that its nuclear programme would not be used to develop weapons; in exchange, many sanctions were lifted. In the country's 2013 presidential election, an economic crisis triggered by sanctions swayed voters in favour of [Hassan Rouhani](#), who had promised to work towards getting restrictive measures lifted. Following the US withdrawal from the JCPOA, the agreement is now effectively dead, but sanctions did at least succeed in their purpose of persuading the Iranians to sign up to it in 2015.

Sanctions do not usually succeed as unambiguously as this; where changes happen, they tend to only partially match the demands expressed by sanctions, and in many cases sanctions are only one of several likely causes. A case in point is **Zimbabwe**, under EU sanctions since 2002. Despite brutal repression, the opposition won the 2008 election, but the late Robert Mugabe, President at the time, refused to step down. After holding out for several months, Mugabe eventually agreed to form a government of national unity including opposition politicians. Though this arrangement did not fully meet the EU's [demand](#) for Mugabe to resign, it was at least a step forward. There is [evidence](#) to suggest that pressure on Mugabe to compromise came from regime leaders, eager to get EU and

US freezes of their personal assets lifted; on the other hand, an equally important factor may have been the country's catastrophic economic situation, the result not of targeted sanctions but of misguided domestic policies.

Indirectly, EU and US sanctions may also have helped to bring about change in **Myanmar/Burma**, at least temporarily. During their first 17 years, sanctions appeared to have very little effect on the country's military junta. However, in 2008 the junta adopted a new constitution envisaging a handover of power to a democratically elected civilian government. Progress was sufficient to persuade the EU to lift all sanctions except for an arms embargo in 2012. The junta's willingness, at the time, to embrace reform [appears](#) to have sprung from its fears of over-dependence on China; in order to break that dependence, Myanmar needed to reach out to Western countries, which it could only do by responding to sanctions. However, in 2018 the EU imposed asset freezes and visa bans on senior military officers involved in alleged ethnic cleansing of the [Rohingya](#) minority in 2017. In 2022, the EU [broadened](#) sanctions further. Some development projects have also been [suspended](#).

By contrast, it is obvious that 17 years of EU and other international sanctions have not persuaded **North Korea** to abandon its [nuclear weapons](#). The exact size of North Korea's nuclear arsenal is unknown, but the country is believed to have tested nuclear weapons six times and to own some 30 nuclear weapons. Pyongyang has developed nuclear-capable ballistic missiles that can reach the US and its allies, Japan and South Korea. Experts are concerned that North Korea is continuing to pursue plans to expand the quality and quantity of the threat posed by its nuclear forces.

At first sight, sanctions against **Russia** have also failed to bring about the expected degree of change. A July 2023 [paper](#) from the Kyiv School of Economics (KSE) found that Russia's economy had not been impacted in a way that would force it to stop its war of aggression against Ukraine in the near term. [Sanctions](#) imposed on Russia following its invasion of Ukraine have, nevertheless, limited its access to certain [technologies](#) and critical components. The [focus](#) on military production has also accentuated chronic [underinvestment](#) in other industries. The above, coupled with the departure of [large numbers](#) of mainly younger and higher-educated Russians from the country in 2022, has removed Russia as a serious player in the race towards artificial intelligence and quantum computing. As a result, Russia is not expected to have any comparative advantage in industry, services or energy projects in the foreseeable future.

Despite encouraging signs in 2023, sanctions – or rather the prospect of [sanctions relief](#) – have not persuaded the government in **Venezuela** to make political concessions. In 2023, the Venezuelan government [agreed](#) with opposition figures to hold elections in 2024, but the Supreme Court subsequently banned leading opposition candidates from running in the presidential elections. The US has imposed sanctions on **Venezuela** for 17 years and expanded [economic sanctions](#) on the country since 2017, with the aim of pressing the government of President Nicolas Maduro to change its policies and restore democracy. The EU also imposed sanctions on Venezuela in 2017, including asset freezes and visa bans, and an embargo on arms and equipment that could be used for internal repression.

Sanctions: Success factors and challenges

Broad international support is a key success factor

The more countries support sanctions, the harder it is for targets to get round them. Sanctions against Iran prior to 2015 were more effective because they were supported by most of the international community. By contrast, the sanctions on Iran that the US reintroduced in 2018, including on the trade in petroleum and petrochemical products, were less effective, due to [China's](#) and [Russia's](#) help with the evasion and circumvention of those sanctions.

Myanmar/Burma was able to hold out against EU and US sanctions for decades, thanks to uninterrupted economic cooperation with China and other neighbouring countries. Western arms embargoes have little effect on countries such as Myanmar and Syria, since they can easily buy from

alternative suppliers, such as [China](#) and Russia. Despite officially backing the UN's position on North Korea, China and Russia are also suspected of undermining sanctions against the country, for example through secret oil sales.

In December 2022, the EU appointed a [special envoy for the implementation of sanctions](#), whose mission is to lead discussions with third countries to avoid the evasion or circumvention of the restrictive measures that have been imposed on Russia since the start of its war against Ukraine. He has travelled intensively, visiting, in particular, countries suspected of helping Russia circumvent sanctions imposed since February 2022 (including [Turkey](#), [Uzbekistan](#), [Kazakhstan](#), [Armenia](#) and [Georgia](#), among others).

Targeted versus general sanctions – which work better?

As explained above, EU sanctions policy has generally shifted since the 1990s from more comprehensive economic sanctions to targeted measures, such as visa bans and asset freezes, often aimed at a country's elite (the sanctions on Russia and, to some extent, on Syria, are an exception to this overall trend). Sanctions experts are [divided](#) on the question of which approach works best. The case of Iran, where the effect of sanctions on living standards helped to bring success, suggests that the greater the economic impact of sanctions is, the more likely they are to get results. A counter-example is Zimbabwe, where targeted sanctions worked by causing personal inconvenience to regime leaders. The choice between broad and narrowly targeted sanctions partly depends on conditions in the country concerned. For example, economic sanctions against vulnerable developing countries could come at an unacceptable humanitarian cost. This has been a main criticism of the sanctions imposed on Syria. Another consideration is the nature of the behaviour that sanctions are intended to address. It could be argued that the seriousness of North Korea's nuclear threat justifies the humanitarian impact of sanctions on the country's population.

Sanctions are also favoured by close ties with the targeted country

The closer the economic and political ties between the countries targeted and those imposing sanctions, the greater the leverage that sanctions can have. There is a strong [correlation](#) between the level of pre-sanctions trade as a [percentage](#) of the targeted country's GDP and the probability of a successful outcome. This factor is another explanation why international sanctions against North Korea have not worked; after decades of isolation, the country has become [resilient](#) to external influences.

Challenges faced by EU sanctions policy

Coordinating sanctions between multiple players

EU sanctions decisions require unanimity between 27 countries with often disparate interests. Adoption procedures are potentially cumbersome, involving the European Commission, the Council of the EU and the European External Action Service. Again, [sanctions against Russia](#) are a positive example of how such challenges can be overcome. A [proposal](#) to impose EU sanctions on extremist Israeli settlers in the West Bank who have attacked Palestinians was first made in December 2023, but initially stalled due to the [opposition](#) of a small number of Member States. However, the Foreign Affairs Council of 18 March 2024 reached a [compromise](#) on a [political agreement](#) to sanction extremist settlers. The [European Council](#) of 21-22 March 2024 called on the Council to accelerate work on the adoption of relevant targeted restrictive measures. On 1 February 2024, President Biden imposed financial sanctions on four extremist Israeli settlers by [executive order](#), bypassing a divided Congress. The order can apply to any individual deemed to have directed or participated in violence against Palestinian civilians, including intimidation, terror, and property damage and seizure. On 14 March 2024, the US announced [new sanctions](#) against occupied West Bank settler outposts and two settlers. The UK has also imposed [sanctions](#) on extremist settlers in the West Bank.

Ensuring effective sanctions implementation

Once adopted, sanctions face numerous challenges. Targets often contest restrictive measures in court, sometimes successfully. Another challenge is circumvention. For example, in its 11th package of sanctions on Russia, adopted in June 2023, the EU included a [specific anti-circumvention tool](#) that will allow the EU to restrict the sale, supply, transfer or export of specified sanctioned goods and technology to certain third countries at high risk of circumvention. Successive sanctions packages – the 12th and 13th – have fine-tuned anti-circumvention measures. The [13th sanctions package](#), in particular, targets further companies in third countries that support Russia's military and industrial complex. They will be subject to tighter export restrictions concerning dual-use goods and technologies.

However, the unprecedented scale and scope of sanctions imposed against Russia since 2022 has also put the spotlight on new implementation challenges, including inside the EU's borders. A [recent study](#) found that the EU's reliance on a decentralised system for the implementation of sanctions resulted in a 'mosaic of practices across the EU, involving more than 160 designated competent authorities within Member States', which 'poses a risk to the internal market's equity by triggering practical confusion and contradictory legal interpretations of key sanctions provisions among Member States'. In November 2022, the Council adopted a [decision](#) to add the violation of restrictive measures (sanctions) to the list of particularly serious crimes ('EU crimes') under [Article 83\(1\) of the Treaty on the Functioning of the European Union](#). In order to implement this decision, the Commission shortly afterwards presented a [proposal for a directive](#) 'on the definition of criminal offences and penalties for the violation of Union restrictive measures', establishing harmonised minimum rules across the EU. On 12 December 2023, the European Parliament and the Council reached a [provisional agreement](#) on the proposal. On 12 March 2024, Parliament [adopted](#) a legislative resolution on its position on the proposal at first reading.

The economic costs of sanctions

In July 2014, the EU and the US decided to adopt economic [sanctions](#) against Russia, regardless of the cost, [estimated](#) by a 2017 study commissioned by the European Parliament at US\$35 billion in lost exports between 2014 and 2016. Since 2022, and the new round of sanctions on Russia, the total estimated value of [export restrictions](#) and bans on goods and technologies is €48 billion. This represents 54 % of the EU's exports before the invasion.

European Parliament

In its current term (2019-2024), Parliament has adopted numerous resolutions mentioning sanctions. As is to be expected under the current circumstances, the largest number concern [sanctions](#) imposed on Russia and Belarus in connection with Russia's [war of aggression](#) against Ukraine. Parliament has been a [vocal advocate](#) of sanctioning Russia since the country's illegal annexation of Crimea and Sevastopol in 2014. Since Russia's full-scale invasion of Ukraine in February 2022, unequivocally condemned by the Parliament in its 1 March 2022 [resolution](#), Parliament has demanded broader, strategic and better-enforced sanctions in numerous [resolutions](#). Parliament has [welcomed](#) the Commission's intention to extend the scope of the EU Global Human Rights Sanctions Regime to include acts of corruption, has called for an enhanced role for the European Parliament in proposing cases of serious human rights violations, and has reiterated its call for the Council to introduce qualified majority voting for the adoption of restrictive measures imposed under the EU Global Human Rights Sanctions Regime. Parliament has also [called](#) for restrictive measures to be imposed on extremist Israeli settlers who violate human rights and international law, and for Hamas' senior political leadership to be added to the EU terrorist list.

ENDNOTES

- ¹ According to the [EU sanctions map](#), as of September 2023 the EU has 53 sanctions programmes concerning 38 countries. Several countries (such as Iran, Syria and Ukraine) are the targets of multiple EU sanctions programmes. Some of the items on this list are not sanctions programmes as such – for example, those concerning Haiti, Serbia and Montenegro (bans on satisfying claims arising from former sanctions against these three countries), as well as the United States (measures restricting extra-territorial effects of US law).
- ² The Taliban have controlled Afghanistan since August 2021, but the UN has not officially recognised the Afghan Taliban administration as the government of Afghanistan, and nor has [any state](#). In June 2023, the UN [warned](#) the Taliban that restrictions on Afghan women and girls made official recognition 'nearly impossible'.
- ³ However, reacting to the systematic human rights abuses perpetrated by Myanmar/Burma military and security forces, particularly in Kachin, Rakhine and Shan states, in February 2018 the EU Foreign Ministers called for strengthened restrictive measures. Accordingly, in the course of 2018, the Council of the EU adopted additional measures that included an extension of the embargo on arms and equipment which might be used for internal repression, as well as targeted restrictive measures against senior military officers of the Myanmar/Burma armed forces.

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