

STUDY

Requested by the DROI subcommittee



Effectiveness of the EU global human rights sanctions regime



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STUDY

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ABSTRACT

Following more than twelve months' discussion in the Council, the European Union's Global Human Rights Sanctions Regime was adopted in December 2020 – a cause for celebration in the human rights community. Having been designed to address human rights violations as well as abuses and corruption worldwide, its adoption followed enactment of the Global Magnitsky legislation in the United States of America. This was part of a wave towards similar legislation being enacted in the Western world. Yet even though the list of designations under this regime has grown, little is known about its impact and effectiveness. Hence, this paper analyses trends in the regime's designations and implementation, evaluating its efficacy in the achievement of goals.

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List of abbreviations

CAR	Central African Republic
CFSP	Common Foreign and Security Policy
DPRK	Democratic People's Republic of Korea
EEAS	European External Action Service
EU	European Union
EU GHRSR	European Union's Global Human Rights Sanctions Regime
HR/VP	High Representative for Foreign Affairs and Security Policy/ Vice-President of the European Commission
ICC	International Criminal Court
MEP	Member of the European Parliament
NGO	Non-Governmental Organisation
OFAC	Office of Foreign Assets Control
S/GBV	Sexual and Gender-Based Violence
UK	United Kingdom
UNSC	United Nations Security Council
US or USA	United States of America

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Executive summary

The European Union (EU)'s Global Human Rights Sanctions Regime (EU GHRSR), established by Council Decision (CFSP) 2020/1999, has been in operation since December 2020. This regime imposes asset freezes, travel bans and the prohibition of making funds available to listed individuals and entities that are responsible for, involved in or associated with serious human rights violations. To date, there are 149 entries (116 individuals and 33 entities) designated under the regime, with two individuals having been removed from the list upon their deaths in 2021 and 2024.

Data of implementation in terms of the size of frozen assets and number of travel bans effected is maintained by the European Commission and EU Member States, respectively. While raw data is not readily shared with the European Parliament due to data protection rules, it has been revealed in a nutshell that the EU GHRSR has not resulted in significant frozen assets. This is largely attributed to the fact that the regime targets mostly low-level governmental actors that would not have assets within the EU financial system.

The most obvious aspect of designations so far is their lopsided geographical distribution. Most EU GHRSR listings relate to state and non-state Russian actors. Furthermore, with the exception of certain Israeli nationals and entities, these listings, in general, do not cover serious human rights violations in any third states that are EU (security) partners. These geographic and geopolitical orientations could give the impression that the EU GHRSR is effectively being used as a country-based foreign policy sanctions regime targeting adversaries only.

Designations to date reflect a focus on physical integrity rights (e.g., freedom from torture, enforced disappearance and arbitrary arrest) and civic rights related to political change (e.g., freedom of expression and assembly). These designations often relate to rights violations involving high-profile individuals engaged in political opposition and human rights defenders, such as investigative journalists. While such high-profile incidents may command popular and political attention within Europe, the sanctions regime should also be used to respond to the most universally condemned violations, such as genocide and crimes against humanity, as well as socio-economic human rights violations that have resonance in the global majority such as cultural persecution or systematic discrimination against migrant workers.

The listings extensively cover legalised systems of oppression, such as judicial procedures, laws and correctional facilities. This approach is aligned with the changing modalities of authoritarianism, where the rule of law formalities are deployed instead of, or together with, traditional blunt power to effect repression. Contemporary authoritarians have 'climbed the learning curve' (Dobson, 2013), recognising that in a globalised world, legalistic instruments and softer forms of coercion, such as technological surveillance, can be effectively deployed to destroy democratic systems or entrench repressive regimes (Scheppele, 2018).

Providing technical and material support to designated individuals and entities is justification for listing under the EU GHRSR. Conversely, while 'making financial or economic resources available' to designated persons is prohibited for all EU operators, this provision is not technically prohibited. Although it can logically be inferred that the provision of such support is prohibited for all EU operators, this obligation is not adequately reflected in the relevant guidance documents. To this end, the European Parliament can consider making a call for the European Commission to provide

further clarification or guidance on the matter. Similarly, the European Parliament can also consider expanding its call in Resolution 2021/2563(RSP) of 08 July 2021 for targeting ‘economic and financial enablers’ of human rights violations and include ‘technical and material’ enablers (European Parliament, 2021).

There is a particular circumvention involving a derogation clause that could be more tightly regulated. The relevant clause permits any provision of assets to designated individuals and entities when such transfer is in fulfilment of a contract concluded before the listing comes into effect. It is conceivable that when actors have knowledge of their imminent designation, they could pre-empt such measures by devising divestiture contracts. The European Parliament could recommend the adoption of guidance by the Commission and an amendment to the EU GHRSR by the Council if necessary, establishing that the prior contract’s derogation must exclude contracts that benefit not only the designated persons – under the current law – but also their family members, associates and entities belonging to, owned, held, or controlled by any of these.

The EU has country-based (so-called geographic) human rights sanctions regimes with respect to some of the countries whose nationals and entities are also listed under the EU GHRSR. While the EU GHRSR mandates asset freezes and travel bans only, geographic regimes also include restrictions on equipment, technology and software used for internal repression. To date, there is little overlapping of individual listings within these two regimes, which could be said to reflect efficient complementarity. However, some advantages of double-listing are also foregone by having the regimes fully compartmentalised. It may be helpful to list certain entities under both relevant geographic sanctions regimes, as they can obtain and use repressive equipment, technology and software. Furthermore, the European Parliament could consider making recommendations for future amendments to the EU GHRSR by the Council to include provisions restricting access to such repressive material.

In keeping with the anti-impunity spirit of its genesis, the EU GHRSR could be utilised more strategically to complement and strengthen international criminal justice processes by targeting both actors wanted by such mechanisms and those frustrating their work. Cooperation with accountability systems should also be given weight as a de-listing factor, thereby incentivising the relevant audience to cooperate with justice mechanisms.

To enhance the EU GHRSR’s global legitimacy, the EU should strive to have its listings taken up by the United Nations Security Council (UNSC). Admittedly, this would be possible only in situations involving threats to international peace and security or in areas that cannot be vetoed by the five permanent members of the UNSC. Nonetheless, the impact and legitimacy dividends could prove to be greater even in the few instances that successfully become UNSC listings.

The list so far loosely reflects a criminal law understanding of culpability, targeting actors with some degree of involvement in human rights violations. That is, the list covers actors that are actively involved in the perpetration of human rights violations (such as by executing, ordering, or facilitating a violation) and not a broad set of targets the EU could instrumentalise to put pressure on political decision-makers (such as financial institutions, or major businesses). This approach restricts the range of actors to be considered for listing, but it could also potentially endow the EU GHRSR with an international criminal justice/legal branding (as opposed to a self-interested foreign policy tool) that enhances its legitimacy. The cultivation of a restrained, culpability-based listing

practice would lend credence to the idea that human rights sanctions, unlike most other sanctions, are not deployed for geopolitical competition purposes or for furthering non-universal interests.

Lastly, the participation of civil society actors in proposing names for designation currently takes place informally, with said actors directly approaching the European External Action Service, EU Member States, or Members of the European Parliament. The EU also does not have a publicly accessible contact point for the sanctions regime or a formal solicitation of input from civil society, largely due to logistical concerns. A more systematic survey of civil society actors is needed to determine whether the current informal arrangement is sufficient or a more open and formal channel would be necessary. If the latter is preferred, the European Parliament may consider budgetary or administrative responses towards either expanding the European External Action Service's logistical capacity or setting up a separate civil society contact facility.

1 Introduction

The European Union (EU)'s Global Human Rights Sanctions Regime (EU GHRSR), adopted in December 2020 (Council, 2020a and 2020b), established an assets freeze and travel ban sanctions regime for individuals and entities involved in a specifically enumerated, but non-exhaustive, list of grave human rights violations globally¹. Most of these violations are also recognised as core international crimes under the Statute of the International Criminal Court (ICC) (ICC, 2021). Others that do not currently constitute core international crimes are also included, such as violations of freedom of expression or freedom of assembly and association, if those violations are committed in a systematic or widespread manner or are in any way of serious concern to the EU's Common Foreign and Security Policy (CFSP), as defined under Article 21 of the (consolidated) Treaty on European Union (European Union, 2012).

The EU GHRSR is just one component within the EU Council's broader toolbox for implementing the CFSP objectives of democracy, the rule of law and human rights – as also encapsulated in the EU Action Plan for Human Rights and Democracy (Council, 2020c). The European Parliament has taken a widely recognised active role in leading the conversation on the use of sanctions to promote human rights globally and in prompting action by the Council and Commission (Nivet, 2015; Smith, 2014). It has also buttressed the work on the EU GHRSR by including it in the European Parliament's annual report on human rights and democracy, the latest being the annual report 2024 (European Parliament, 2025), and by adopting a Resolution in 2021 (2021/2563(RSP)) (European Parliament, 2021) pointing to future developments once a sanctions regime has come into effect. Furthermore, the European Parliament has consistently called for the inclusion of corruption as grounds for the EU GHRSR's application.

The EU GHRSR belongs to a distinct category, namely horizontal sanctions regimes, which differ from standard sanctions regimes in their lack of geographic focus (Portela, 2021; Tilahun, 2021). The EU GHRSR is the fourth horizontal sanctions regime adopted by the EU, following similar regimes combating terrorism (Council, 2001), chemical weapons use and proliferation (Council, 2018), as well as cyberattacks (Council, 2019). It is important to note that various other EU sanctions respond to human rights violations or abuses worldwide². For instance, a survey of EU sanctions between 1980 and 2017 found that more than 40 % include human rights as either primary or complementary objectives (Portela, 2018: 14). As a key advantage, it was envisaged that once the framework was established, the horizontal EU GHRSR regime would make designating names relatively straightforward within the Council as there would be no need to set up country sanctions regimes for each designated actor (Tilahun, 2021: 480-481). Hence, using the EU GHRSR was intended to serve as a response to serious human rights violations regardless of perpetrators' nationalities rather than a diplomatic singling out of any specific third country. It was indeed in this spirit that the common terminology of so-called Magnitsky sanctions was dropped from its title (Rettmann, 2018; Barigazzi, 2019).

¹ All information is current at the point of writing in April 2025.

² While the term 'violations' refers to conduct by state actors, which bear direct international human rights obligations, 'abuse' is a term used to refer to conduct by non-state actors. For brevity, the term 'violation' will be used in this briefing to encompass both scenarios.

The EU GHRSR's adoption contributed to a wave of similar sanctions regimes in many democracies inspired by the Global Magnitsky Act, which the United States of America (USA) adopted in 2016 (US Congress, 2016). The emergence of similar legislation in Canada and the EU, followed by the United Kingdom (UK) and Australia, constituted a concerted policy of establishing a like-minded Western sanctioning block capable of responding to grave human rights violations worldwide (Portela, 2018; Charron and Portela, 2022). Furthermore, the EU GHRSR's international legal framing was distinct from other types of sanctions regimes in being designed as a tool for enforcing obligations arising from concrete international human rights treaties and universally recognised customary norms, thereby not merely representing the EU's self-interest or foreign policy and security imperatives (Tilahun, 2023). In this sense, it is distinctly infused with the legal notions of accountability and criminal justice, unlike the majority of sanctions regimes that focus on political changes of behaviour.

Four years into its implementation, the time is ripe for taking stock of the EU GHRSR record. Has its design and implementation delivered effective responses to gross human rights violation incidents? Recent research has already identified certain shortcomings in EU GHRSR practice, pointing at areas requiring improvement, *inter alia*: civil society engagement, balanced geographical reach and gender lens, targeting of high-ranking officials, effective enforcement and double standards in the application of sanctions (Tsertsvadze, 2024 and 2023). Previous research by authors also shows that documenting the actual behavioural impact of designations and coordination with allies are important areas requiring examination in evaluating EU sanctions effectiveness (Portela and Olsen, 2023).

This paper provides an overview of existing knowledge and research on sanctions effectiveness and applies it to the EU GHRSR, supported by relevant available data. The authors used two open-source databases to compile the tables and figures in this paper³. For this paper, they also conducted a series of interviews between April and May 2025 with the representatives from EU Member States, the European External Action Service (EEAS), the European Commission and a civil society organisation. The discussion follows a three-pronged analytical framework that looks into: (a) the legal design and application; (b) the impact; and (c) practical collaboration with third states and civil society actors. In addition, it covers the EU GHRSR's goals and proposes a framework for evaluation, identifying any methodological difficulties in measuring its effectiveness.

2 The state of play: Evolution, application and challenges

There are currently 116 individuals and 33 entities (a total of 149 entries) listed under the EU GHRSR. The listings are reviewed every 12 months, and the Council has prolonged the current list until 8 December 2026 (Council, 2023a). The geographic distribution of targeted actors is lopsided, as individuals and entities from Russia constitute the vast majority. Figures 1 and 2 below show that 74.4 % of individuals and 48.5 % of entities on the EU GHRSR list are Russian. Russians have been sanctioned for various human rights violations, including involvement in the invasion of Ukraine, the

³ Council, [Consolidated text: Council Regulation \(EU\) 2020/1998 of 7 December 2020 concerning restrictive measures against serious human rights violations and abuses](#), Official Journal of the European Union, L 410I, 13 September 2024 and [OpenSanctions](#) (license: Creative Commons 4.0 Attribution NonCommercial).

repression of domestic dissidents such as Alexei Navalny and Vladimir Kara-Murza, as well as involvement with the Wagner Group in Africa. The remaining minority listings are spread among actors from 14 other countries⁴, with the highest figures being 7.7 % individual and 15.2 % entity listings from Israel and the lowest 0.9 % individual and 3 % entity listings from Libya and Syria, respectively.

Notwithstanding the global reach of any sanctions regime, four main clusters of designations can be distinguished. Out of the 118 individuals designated under the current version of the list, 83 are Russian nationals, which makes Russia the largest cluster on the designation list. Yet, these individuals were included on the list for different reasons, in four waves of designations, three of which concern the treatment of Alexei Navalny, Russian opposition leader, anti-corruption activist and political prisoner. After coming second in the Moscow mayoral elections of 2013, he was subsequently barred from running in the 2018 presidential elections. The first wave of sanctions was triggered by the poisoning of Navalny in August 2020 by means of a chemical nerve agent belonging to the Novichok family of agents.

The EU responded with its first package of designations to Russian individuals, stressing that such use of chemical weapons was contrary to international law. In this case, the designations targeted officials who worked directly for President Putin's executive office along with his representative in Siberia, Aleksander Bortnikov, director of the Federal Security Service and two Ministry of Defence deputies in charge of weapons and military research, Pavel Popov and Alexei Krivoruchko, as well as the Russian State Research Institute of Organic Chemistry and Technology (National Public Radio, 2020). A second wave of sanctions was applied following Navalny's detention in January 2021, allegedly for violating his probation by leaving Russia (The Moswo Times, 2021). In February 2021, a Moscow court replaced his three and a half years' suspended sentence with a prison sentence. In response, the European Court of Human Rights ruled that the Russian government had to release Navalny (Deutsche Welle, 2021). This led to the second wave of designations, which included prison officials such as Wadim Kalinin as well as judicial figures such as Andrey Suvorov, Kirill Nikiforov and Evgenia Nikolaeva. A third wave followed the death of Navalny in prison, announced in February 2024 (The Guardian, 2024), and some of his lawyers' detention under charges of 'participation in an extremist community' for passing on his messages from the penal colony to the outside world.

A separate wave of designations concerned the Wagner Group's overseas activities. In December 2021, the EU applied a series of sanctions to the Wagner Group itself, 8 individuals and 3 linked entities. According to the EU, the Group had trained and sent private operatives to conflict zones around the world to fuel violence and exploit natural resources, constituting violations of international human rights law. In February 2023, new sanctions were imposed on two commanders of the Wagner Group forces involved in an attack in Ukraine in January 2023 and the head of the Wagner Group in Mali, where their mercenaries, *inter alia*, had been involved in various acts of violence.

A second cluster concerns China. Chinese officials were included in the EU Global Human Rights Sanctions Regime on account of their policies towards the Uyghur community and human rights

⁴ These are Afghanistan, Central African Republic (CAR), China, Eritrea, Haiti, Iran, Israel, Lebanon, Libya, Myanmar (Burma), Democratic People's Republic of Korea (DPRK), Palestine, South Sudan and Syria.

abuses committed in the region of Xinjiang (European Criminal Law Associations' Forum, 2021). In March 2021, the EU sanctioned four Chinese individuals and one entity for the mass detention and prosecution of Uyghurs in the Xinjiang region. Some of those sanctioned include Zhu Hailun, Wang Junzheng, Wang Mingshan and Chen Mingguo. China publicly responded to these designations by releasing its own list of sanctions as a countermeasure in response to EU designations (European Parliamentary Research Service, 2021). China's countersanctions targeted the European Parliament's Subcommittee on Human Rights, MEPs Reinhard Bütikofer (Greens/EFA, Germany), Michael Gahler (EPP, Germany), Raphaël Glucksmann (S&D, France), Ilhan Kyuchuk (Renew, Bulgaria) and Miriam Lexmann (EPP, Slovakia) as well as the Council's Political and Security Committee, a number of Members of Parliament in EU Member States, think-tank researchers and academics. In a recent turn of events, China lifted the sanctions on five current and former MEPs (Griera, 2025).

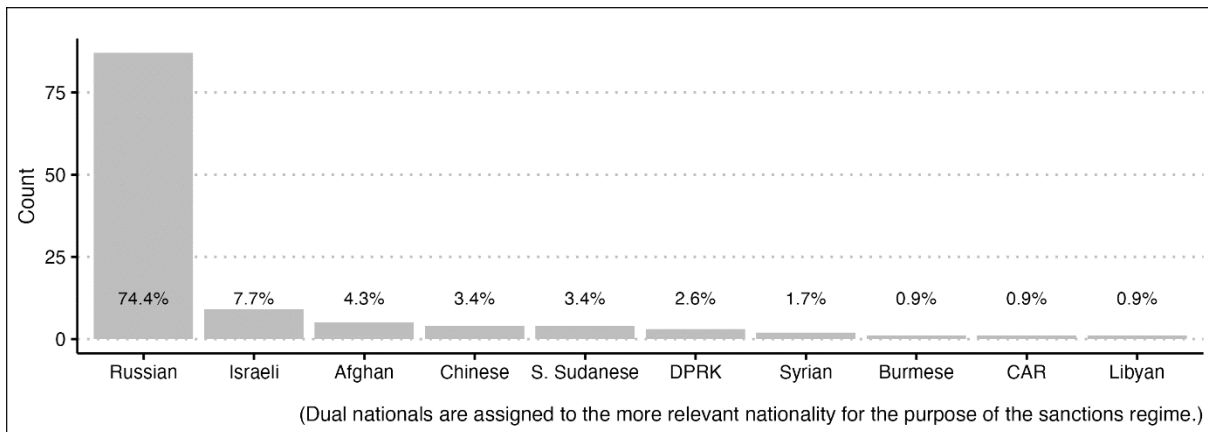
Designations regarding Israel and the Occupied Territories constitute a third cluster of sanctions. In June 2024, the European Council condemned the actions of violent settlers in the West Bank and the Israeli government for allowing further expansion of illegal settlements across this territory (Council, 2024a). The following month, the Council approved restrictive measures against various individuals and entities including: Israeli settler Moshe Sharvit and his 'Moshe's Farm', which engaged in harassment and acts of violence towards Palestinian communities; Zvi Bar Yosef and his unauthorised outpost known as 'Zvi's Farm' for similar actions; the Tzav 9 group, comprising Israeli activists regularly blocking humanitarian aid trucks delivering food, water and fuel to Gaza, Baruch Mazel, Ben-Zion 'Bentzi' Gopstein and Isaschar Manne, founder of the unauthorised Manne Farm (Council, 2024b). These designations followed the issuing in January 2024 of listings to hold accountable individuals or entities supporting, facilitating or enabling violent actions carried out by Hamas and the Palestinian Islamic Jihad⁵. Designees included six individuals responsible for the provision of financial support to Hamas; Sudan-based financier Abdelbasit Hamza Elhassan Mohamed Khair, Nabil Chouman, senior Hamas financier Rida Ali Khamis, senior Hamas operative Musa Dudin and Algeria-based financier Aiman Ahmad Al Duwaik (Council, 2024c). No designations affected members of the judiciary, legislative and executive branches of the Israeli government despite calls to sanction Israel for the ongoing conflict in Gaza (Brussels Times, 2023), including a suggestion by former HR/VP Josep Borrell to consider the listing of two cabinet members: Security Minister Itamar Ben-Gvir and Finance Minister Bezalel (Reuters, 2024).

A fourth cluster concerns a wave of designations focused on individuals involved in sexual violence and gender discrimination across the globe. This cluster is thematic rather than focused on individuals from specific countries and shows the Council's commitment to tackling sexual violence and gender discrimination by sanctioning specific individuals involved. Individuals from various countries feature on the list for these reasons. The Afghan Minister of Higher Education, Neda Mohammad Nadim, as well as the Minister of Propagation of Virtue and the Prevention of Vice, Mohammad Khalid Hanafi, were included in the list of designations for being 'behind the decrees banning women from higher education and gender-segregated practices in public spaces' (TOLONews, 2023). Other Afghan individuals designated for gender-based reasons include: Abdul Hakim Haqqani, Chief of Justice of the Taliban Supreme Court, designated for his role in the

⁵ Global sanctions, '[Hamas and PIJ](#)', January 2025.

institutionalisation of gender-based repression through the exclusion of female judges and limiting the access of women to justice (El País, 2025); and Abdul Hakim Sharei, former Minister of Justice, who obstructed the licensing of female lawyers and dismantled the Law on the Elimination of Violence against Women (Tarz Press, 2025). Ramil Rakhmatulovich Ibatullin was listed in March 2023 because, while serving as Commander of the 90th Guards Tank Division of the Russian Armed Force, members of his unit committed acts of sexual and gender violence towards civilians during the 2022 offensive towards Chernihiv and Kyiv (Liboreiro, 2023). Other individuals designated include Igor Koleda, listed for acts of sexual violence towards civilians (including minors) perpetrated by the members of the Brigade he commanded during the Russian-Ukraine conflict⁶, Valery Zakharov, listed for sexual trafficking (Robert Lansing Institute, 2021) and Evgeniy Sobolev, former Head of the Penitentiary Service of the Russian Occupation Authorities in the Kherson Region, where widespread torture and sexual violence in detention centres was reported. Two Syrian individuals are designated for reasons of gender discrimination and sexual violence. Listed in July 2024, while serving as Minister of Defence of Syria and Deputy Commander-in-Chief of the Syrian Army, Ali Mahmoud Abbas oversaw armed forces that committed systematic torture and gender-based violence (Middle East Monitor, 2024). Abdul Karim Mahmoud Ibrahim, Chief of Staff of the Syrian Army, also listed in July 2024, was included as responsible for the committing of systematic torture, rape and sexual violence against civilians. Both were replaced with the fall of the Assad regime (Al Jazeera, 2025). Gordon Koang Biel is the only Sudanese individual listed for this type of act in South Sudan, while Mahamat Salleh Adoum Kette is the only designee from the Central African Republic for acts of sexual violence in the country.

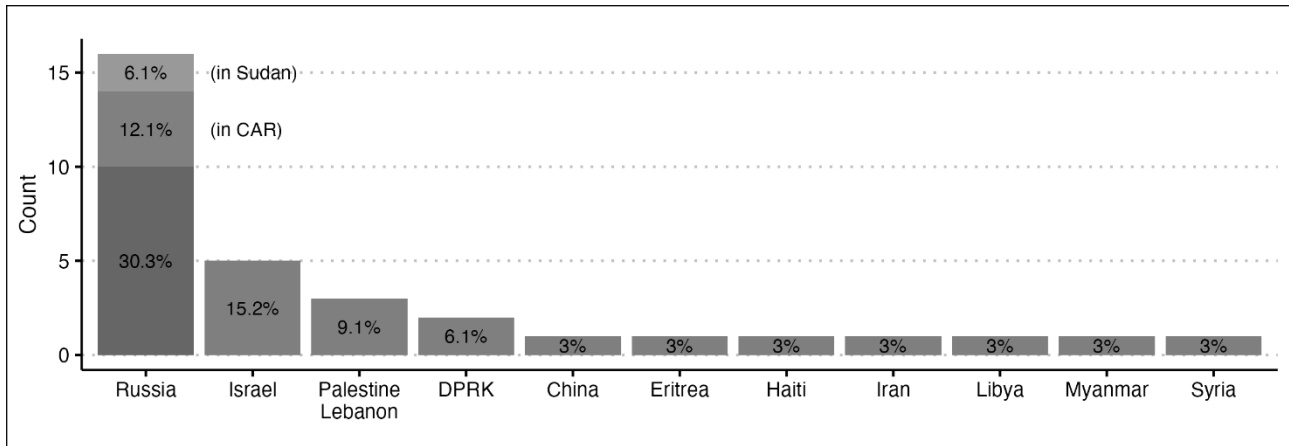
Figure 1: Nationality of targets (individuals)



Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

⁶ Official Kremlin website, '[30th Separate Motor Rifle Brigade awarded honorary Guards designation](#)', 31 July 2024.

Figure 2: State of targets' incorporation/ownership (entities)

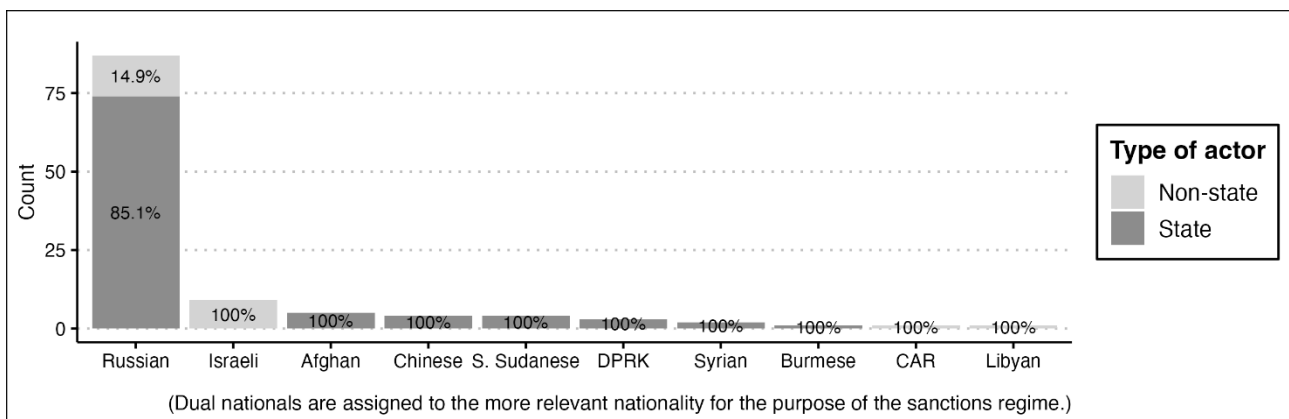


Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

In terms of overall geographic spread, similar to the other Western practices of human rights sanctions, the EU GHRSR practice can be criticised as reflecting a general blind spot for gross human rights violations that occur in the territories of allies and security partners of the EU (Human Rights First, 2022a and 2022b). EU sanctions against five Israeli settlers in the occupied West Bank and three entities associated with them create an exception in this regard (Council, 2024a). Utilising the EU GHRSR against legitimate targets in ally or security partner third states enhances the EU's credibility when it declares that this sanctions regime is not merely a geopolitical instrument against adversaries.

This survey also shows that, to date, the vast majority of listings involve state actors, with non-state actors such as private businesses or individuals constituting only a small minority. Figure 3 below breaks down EU GHRSR targets by nationality and whether they are state or non-state actors. This shows that the EU largely targets state officials and agents, together with actors exercising effective governmental control over a territory, such as rebel groups in parts of Libya. A notable exception is the Israel case, where violent Israeli settlers in the West Bank – non-state actors – constitute the only targets.

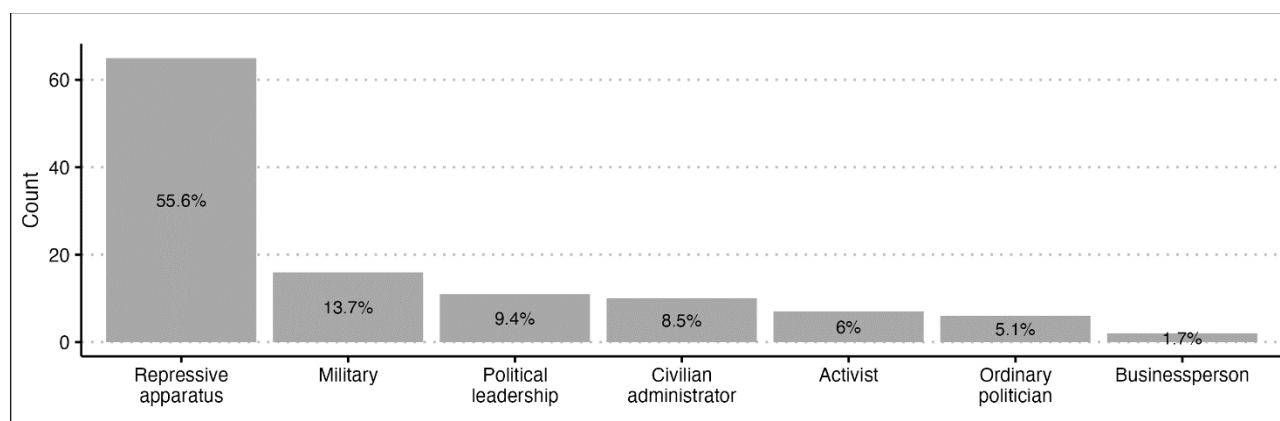
Figure 3: State and non-state targets



Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

Figure 4 below examines targeted persons' formal affiliations. This shows that most EU GHRSR targets are directly linked to repressive apparatuses. This includes officers at penal colonies, state prosecutors and judges in repressive states. The Figure 4 and Table 1 categories are inspired by those developed by Peter Wallensteen and Helena Grusell (2012), as discussed below. They are also similar to the classification undertaken by the consortium of non-governmental organisations (NGOs) active in the human rights field: Redress.

Figure 4: Role distribution of sanctioned persons



Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

Table 1 presents a cross-tabulation of these roles by nationality, showing that a focus of Russia listings, in particular, has been the repressive apparatus. Meanwhile, sanctions on Israel target violent settler activists, while the Afghanistan sanctions target high-ranking political leadership, such as government ministers.

Table 1: Sanctioned persons (EU GHRSR) by nationality and role

	Activist	Business- person	Civilian administrator	Political leadership	Member of military/paramilitary or rebel group	Ordinary Politician	Member of repressive apparatus	Total
Afghan	0	0	1	4	0	0	0	5
Burmese	0	0	0	1	0	0	0	1
CAR	0	0	0	1	0	0	0	1
Chinese	0	0	1	0	0	3	0	4
DPRK	0	0	0	1	1	1	0	3
Israeli	7	0	0	0	0	2	0	9
Libyan	0	0	0	1	0	0	0	1
Russian	0	2	6	2	12	0	65	87
South Sudanese	0	0	2	0	2	0	0	4

	Activist	Business- person	Civilian administrator	Political leadership	Member of military/paramilitary or rebel group	Ordinary Politician	Member of repressive apparatus	Total
Syrian	0	0	0	1	1	0	0	2
Total	7	2	10	11	16	6	65	117

Source: Authors' own compilation based on EU GHR SR listings (as of 01 March 2025).

3 Legal Analysis of the EU GHR SR's Effectiveness

3.1 Targeting

3.1.1 Types of actors targeted

The EU has targeted a range of state and non-state actors through the EU GHR SR. The various listed actors under this regime can be broadly categorised into five groups of state and non-state actors. The former includes persons or entities from policy-making, law enforcement, judiciary as well as army and para-statal organisations. The latter includes business enterprises, armed groups, advocacy/political entities, professional services and private individuals.

Figure 4 above shows that most targeting (55.6 %) focuses on states' internal repressive apparatus, within which it is clear from the initial four years of listing that particular attention is being paid to the utilisation of national legal and criminal justice machinery for human rights violations. Another point of focus is the use of penitentiary systems in human rights violations – almost 20 % of the listings involve prisons or prison officers. In this regard, EU listings seem to focus not merely on promoting the fair treatment of inmates in third countries broadly but rather on highlighting brutal prison conditions' selective deployment to attack and make an example out of political prisoners and civilian dissidents. In this sense, the whole penitentiary system can be regarded as part and parcel of the repressive legal machinery.

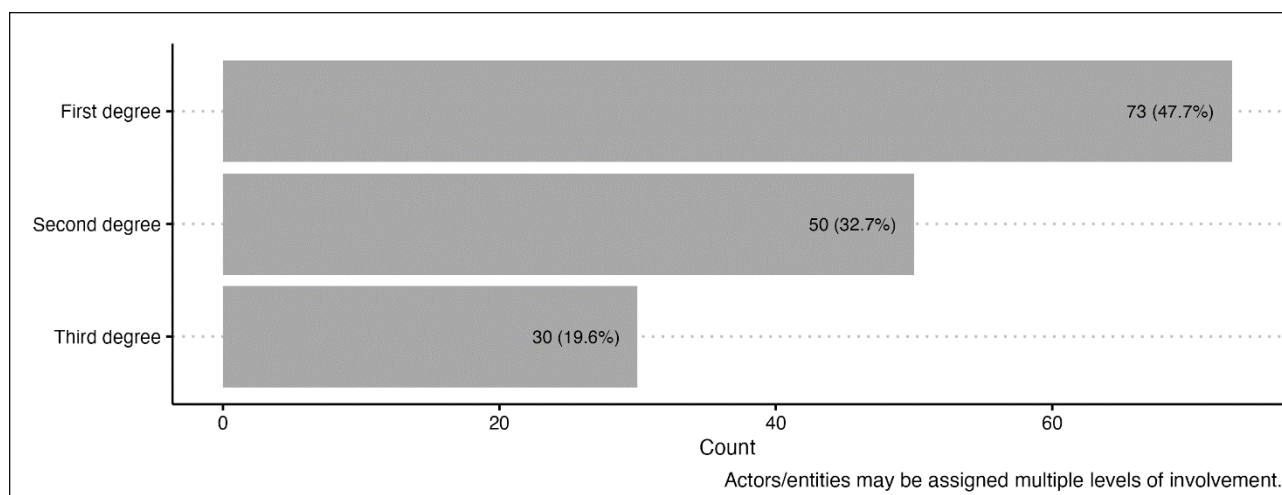
This focus on the legal and penal ecosystem of repression is in keeping with contemporary shifts in global practices whereby dictatorial regimes increasingly adopt the vernacular and procedural facade of the rule of law instead of, or in addition to blunt power, in achieving repressive ends.

By contrast, the softer dimensions of repressive systems are only marginally addressed. These include utilising media and intellectual outlets that enable authoritarians to manufacture the informational and public discourse cushion for repressive measures. Only 5.3 % of the listings target soft actors such as activists, media outlets, public relations agents and think tanks.

Furthermore, although a key motivation behind the EU GHR SR's establishment was the possibility of horizontally designating human rights violators globally regardless of their official status, listings to date exhibit an overwhelming focus on state actors (Figure 3 above). This would give the impression that the EU GHR SR is effectively a geographic sanctions regime by another name, thereby leading to the loss of any diplomatic gain that was supposed to be obtained by not framing EU GHR SR listings in a state-centric way (Tilahun, 2021; Russel, 2019).

In keeping with the EU GHR SR's distinctively legal character and its corresponding objective of ensuring accountability, most listings also target actors closely involved in specific human rights

violations. Listings largely target the direct perpetrators of violations (first-degree involvement) and then those who bear imputed responsibility for the violation through command responsibility or by being 'associated with' perpetrators (second-degree involvement). This pattern seems to reflect a criminal law understanding of culpability. Targeted less often are actors within a broader set who may not be captured by criminal law notions yet indirectly facilitate the committal of human rights violations by providing the underlying material, technical or another kind of support (third-degree involvement).

Figure 5: Target involvement

Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

3.1.2 Types of rights violations

Regarding the types of human rights violations, EU practice has so far concentrated on two important dimensions: protecting physical integrity rights, as well as civil and political rights related to political advocacy. The most frequently addressed physical integrity violations are: torture and degrading treatment (50 % of listings); arbitrary arrest (46 % of listings); and extrajudicial killings (17 % of listings) (Table 2 below). In the vast majority of instances where these violations are invoked, the cases concern political dissidents or individual human rights defenders. Political advocacy rights constitute another area of focus, with 38 % of listings mentioning freedom of opinion and expression, along with 8 % mentioning freedom of assembly and association.

Sexual and gender-based violence is given attention in 16 % of listings. There is comparatively less attention devoted to socio-economic rights or rights violations that lead to mass casualties. Notable exceptions in this regard are the targeting of Taliban officials for discriminatory educational, religious and broader policies that systematically disadvantage young girls and women in Afghanistan. Given that 'social, economic and environmental development' in developing countries is one of the EU's core CFSP objectives under Article 21 of the Treaty on EU, the EU GHRSR could be utilised more in response to the most serious violations of socio-economic rights such as cultural persecution or systematic discrimination against migrant workers.

Although about 20 % of listings explicitly mention gender-based violence, EU GHRSR listings rarely seem to be triggered by the persecution of prominent female politicians or journalists, as opposed to male opposition figures such as Alexei Navalny or Vladimir Kara-Murza. The listings of Roman Vidyukov, Evgenia Nikolaeva and Natalia Dudar, all of them related to the Navalny case, mention the persecution of Lilia Chanysheva, former head of Navalny's headquarters in Ufa. The designation of Viktor Zolotov mentions two female journalists who were beaten while reporting on a protest, Kristina Safronova and Yelizaveta Kirpanova. In the remaining cases, victims are not named. The listings of Alexander Fedorinov and Ivan Ryabov alluded to 'female anti-war protestors', albeit not by name. The listing of Ramil Ibaullin refers to female victims, that of Ri Chang Dae mentions 'women and girls showing opposition to the regime', and that of the Qarchak Prison in Iran alludes to 'pregnant women and mothers with children'.

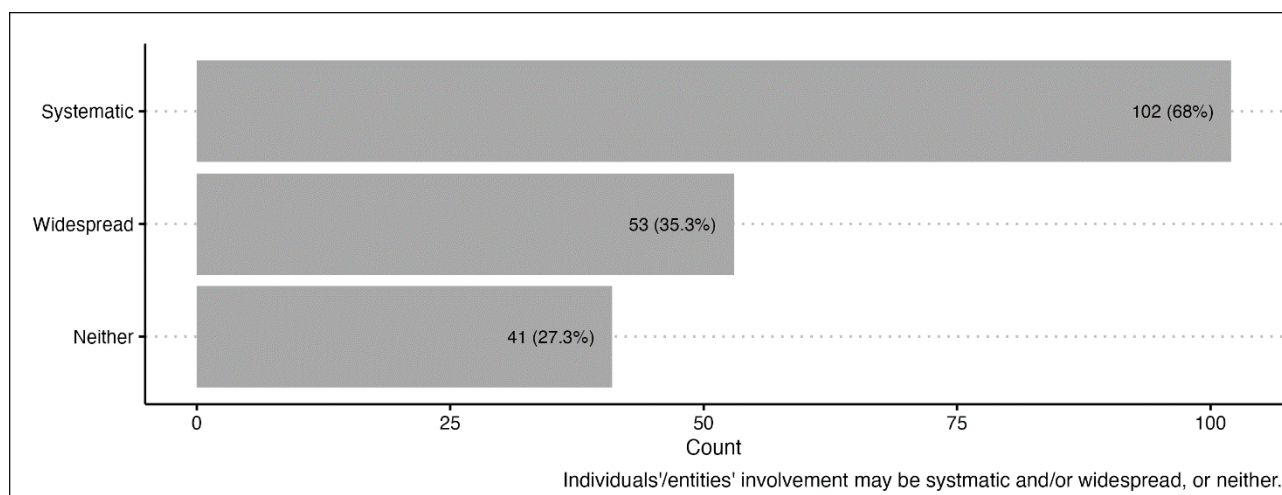
Table 2: Types of rights violation

Violation category	N	Share (%)
Torture	75	50.0
Arbitrary arrests	70	46.7
Freedom of opinion/expression	58	38.7
Extrajudicial killings	26	17.3
Sexual and Gender-based Violence	24	16.0
Freedom of association/assembly	7	4.7
Right to private/family life	7	4.7
Right to property	7	4.7
Enforced disappearances	6	4.0
Right to physical/mental integrity	6	4.0
Degrading treatment	5	3.3
Freedom of association/association	5	3.3
Forced labour	4	2.7
Freedom of religion/belief	4	2.7
Gender equality	3	2.0
Incitement to hate crime	3	2.0
Women's access to justice	2	1.3
Women's right to education	2	1.3
Human rights violations (not specified)	1	0.7
Incitement to discrimination	1	0.7
Right to education	1	0.7
Women's right to equality	1	0.7

Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

Note: Persons or entities may be assigned more than one type of violation.

Figure 6 illustrates that most violations addressed are systematic, with about one-third being widespread. However, another third of violations are neither systematic nor widespread, namely isolated or relatively limited incidents, but deemed to be of serious concern to the EU's CFSP objectives. Striking a balance in responding to isolated high-profile incidents that may attract particular visibility within the EU (involving a popular politician, say) and systematic/widespread violations that garner broader condemnation from the rest of the world is an area that requires continual attention. In particular, it is notable that the EU GHRSR listings to date do not target any actors responsible for violating the most universally recognised prohibitions of genocide and crimes against humanity despite these being the first items on the list of criteria. Given that these prohibitions are peremptory norms of international law – the highest attainable normative status in international law – it is legitimate to expect that a sanctions regime dedicated to human rights violations will be prioritised accordingly.

Figure 6: Type of violations (systematic and widespread) – April 2025

Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

3.1.3 Suppressing technical and material support

Contemporary systems of human rights violations increasingly involve a network of technical and technological support infrastructure beyond the state's legal machinery. As such, the EU GHRSR listing criteria concerning delivery of 'financial, technical, or material support' to perpetrators of human rights violations and being 'otherwise involved' (Council, 2020b: Article 3(3)(b)) provide broad enough grounds to target a wider network of support that enables, justifies and sustains systems of human rights violations. The listings so far also reflect some attention paid to violations undertaken using such technical and technological support. For instance, there are eight listings involving the use of facial recognition technology for repressive purposes. However, targeting private sector providers of repressive products is rare, with 'technical or material support' as grounds for listing invoked only three times concerning information communication and facial recognition technology providers in Russia. This could be explained by the fact that only a few dominant providers supply this technology. However, the question remains as to whether such providers in other jurisdictions with serious human rights violations should have been targeted.

The concept of technical or material support is a valuable category, not only as grounds for listing but also with regard to setting EU operators' responsibilities. Unlike the criterion of 'making financial or economic resources available', which is directly prohibited under the EU GHRSR, technical or material support is not correspondingly reflected in the obligations of EU operators when dealing with listed persons and entities. The concept of 'economic resources' is indeed a broad concept that encompasses goods and services (European Commission, 2021: 2). However, it is by definition tied to the concept of 'assets' that can 'be used to obtain funds, goods, and services' as defined in the EU GHRSR (Council, 2020b: Article 1(d)). Deploying the concept of 'technical or material support' decidedly broadens this category to non-economic or non-asset forms of support to listed persons and entities. In this regard, recognising it explicitly as a compliance expectation from EU operators is logical. To this end, the European Parliament could consider calling on the European Commission to provide further clarification or guidance on the matter. Similarly, the European Parliament could also consider expanding its call in the 2021 Resolution to target 'economic and financial enablers' of human rights violations to include 'technical and material' enablers.

3.1.4 Civil society participation

The EU GHRSR is one of the EU sanctions areas where there is active civil society participation in drawing up names for listing. The process of participation is largely informal as civil society does not have a formal role in the EU GHRSR's operation – only EU Member States and the High Representative of the Union for Foreign and Security Policy, which is supported by the EEAS, are formally granted the role of proposing names for listing. The Council has no official obligation to consider proposals from civil society actors.

In practice, civil society actors and even private members of the public submit proposals for listing directly to the EEAS or indirectly through Member States or Members of the European Parliament (MEPs). The EEAS does not provide publicly available information on how civil society actors can establish contact to propose names or how to improve the quality of information in such proposals. However, interested civil society actors can contact the EEAS and sometimes, more specifically, its sanctions and human rights units or the Council's sanctions working party (i.e. the Working Party on Human Rights). The choice of mechanism seems to depend on the ability of civil society actors to navigate and make effective connections in the Brussels EU landscape. To this end, civil society's current contact with the EEAS mostly takes place through a loosely coordinated coalition, namely a small consortium of civil society organisations actively working in the area of sanctions advocacy, which tries to coordinate communications with the EU.

The authors' interview with an EEAS representative has revealed that the key considerations against a more public and formal solicitation of civil society input are mainly logistical rather than political. That is, despite the requirements of its working procedure, the EEAS is wary that it does not have sufficient resources to entertain and respond to the high volume of civil society contacts that a formal solicitation may invite. Furthermore, the EEAS also raises a concern regarding the quality of input. When interaction involves a manageable set of actors, the EEAS can provide feedback and training on improving the quality of submissions, but such engagement will not be possible at scale. As such, there is a preference for quality of information over quantity. If at any time the European Parliament desires a more open and public solicitation of civil society input, these logistical issues could perhaps be considered from a budgetary or administrative angle. This could be either in terms of providing more resources for the EEAS or possibly the European Parliament to assume the administrative task of running a civil society contact facility, which then relays only filtered, quality listing information to the EEAS for consideration.

Another avenue of engagement is through Member States. What is interesting in this regard is that, at times, civil society actors strategically use engagement with non-EU states to stimulate EU action. Derived from the view that the Western Magnitsky-style sanctions are expected to operate simultaneously for effectiveness, civil society actors, for example, approach a non-EU sanctioning state that has a particular link with a case (e.g., their citizen was a victim of the human rights violation) to take the first listing action as a way of nudging or even embarrassing the EU into action⁷.

⁷ See, for example, the case of alleged human rights violations in connection with [Ryan Cornelius](#), in which civil society actors are actively working towards designation by the victim's country of nationality (UK).

Civil society actors also utilise MEPs in building political momentum towards proposed listings. While the European Parliament itself does not have a formal role in the listing process, the authors' interview with civil society actors has revealed that political support through MEPs has been one of the more successful avenues in putting proposed designations onto the Council's agenda.

3.2 Implementation: Synergy with human rights policy

3.2.1 Synergy with geographic human rights sanctions

The EU GHRSR's effectiveness is enhanced when used in complementarity with other geographic human rights sanctions regimes and the EU's broader rule of law and human rights policies. The EU has a geographic human rights sanctions regime (or a sanctions regime with human rights as one of its listing criteria) regarding four of the ten countries whose nationals or entities are listed under the EU GHRSR – Iran (Council, 2011), Myanmar (Council, 2024d), Russia (Council, 2024e) and South Sudan (Council, 2015a and 2015b). Geographic human rights sanctions generally provide broader restrictions on material, technological and other means used in internal repression, while the EU GHRSR focuses only on asset restrictions and travel bans. To the extent that the institutional actors listed under the EU GHRSR are not covered under another sanctions regime that denies them access to such material, double-listing them under the relevant geographic human rights sanctions regimes would prove useful in restricting their access to such means.

Listings under the geographic human rights sanctions regimes and the EU GHRSR are almost entirely non-overlapping, with the exception of one Russian entry: Kirill Nikiforov, a judge in the Kovrov City Court of Russia who repeatedly rejected Alexei Navalny's claims of inhumane treatment at the IK-6 penal colony⁸. It is not readily clear what the double listing of Nikiforov under both regimes achieves, as the financial and travel restrictions under both regimes are similar. As mentioned earlier, the key distinction between the two regimes is that geographic sanctions include restrictions on particular equipment, technology and software acquisition as well as associated services (brokering, technical, financial and insurance). However, these restrictions mainly concern institutional actors involved in internal repression. To the extent that these prohibitions are relevant to restrict the negative role played by Judge Nikiforov, the effective manner of targeting would have been to list the judicial organ that could potentially use that equipment, technology and software for repressive ends. Targeting only the particular judge enables the culprit institutions to evade such listing by acquiring these materials through agents other than Nikiforov.

The United Nations Security Council (UNSC) is another source of human rights-related sanctions regimes, which are then transposed into the EU legal system. The South Sudan sanctions regime mentioned above is an example in this regard. Given UNSC sanctions' global coverage, the EU should be working towards ensuring that important EU GHRSR listings also become adopted at the United Nations (UN) level. This might mean that only those human rights violations that occur in the context of peace and security crises have a chance of being picked up by the UNSC – although, in some cases, the UNSC construes peace and security as being broadly enough to deal with systematic and widespread rights violations occurring outside active violence. Moreover, it would not be imaginable that the UNSC could adopt sanctions against actors from one of its permanent

⁸ European Commission, [Kirill Sergeevich NIKIFOROV](#), N/D.

members. Nonetheless, for cases that arise within peace and security crises and from countries or situations that generate relative consensus of action among the permanent members, adoption by the UNSC should be sought as multilateral action is an important legitimacy signifier on the global stage, particularly in the global South, which remains deeply distrustful of unilateral sanctions (Palestini and Portela, 2025.)

3.2.2 Synergy with accountability mechanisms

In its 2021 Resolution, the European Parliament underlined that the EU's primary objective in tackling impunity should be supporting domestic or international criminal prosecution of human rights violations (European Parliament, 2021: Article 19). Hence, the EU GHRSR could be utilised in a manner that complements the work of national and international criminal justice and human rights investigative bodies while adhering to the principle of subsidiarity – namely, whenever ability and genuine willingness exist, violations of human rights need to be handled by local institutions, followed by regional, then international bodies.

One mode of complementing such accountability mechanisms could be imposing sanctions against targets indicted by credible judicial bodies (i.e. the ICC or regional and local bodies) or against actors that frustrate such accountability processes. The use of sanctions in such a way produces 'norm reinforcement' as it rides on the political and legal legitimacy carried by courts of law (Doxey, 1975). The UK human rights sanctions regime has adopted this path by including responsibility for the investigation or prosecution of human rights violations as one of the explicit listing grounds (UK Congress, 2020: section 6(3)(g)). The EU already has a practice of adopting sanctions to uphold work being undertaken by the International Criminal Tribunal for the Former Yugoslavia (Council, 2003 and 2004), imposing travel bans and asset freezes against actors involved in helping suspects evade justice (Shyrokyh, 2019). Naturally, in authoritarian regimes that do not have independent judicial or prosecutorial services, it is likely that the targeted personnel would never be held accountable domestically. However, in some cases, such actors could be prosecuted before international(-ised) tribunals, such as the proposed special international tribunal, which would deal with cases connected with Russia's war of aggression against Ukraine.

Another complementary approach is to use the decisions and findings of such human rights bodies as a basis for de-listing. These bodies could be criminal courts where domestic accountability is feasible or international tribunals and human rights monitoring bodies. Given that certain targets are based in countries which lack independent judiciary or prosecutorial services, it should be recognised that the accountability pathway for de-listing is applicable only in limited circumstances. Where it *is* feasible, signalling a de-listing pathway could incentivise targeted actors to cooperate with credible criminal justice and investigative bodies. To date, there is no practice of de-listing under the EU GHRSR, except for two individuals whose names were removed following their deaths: Mohammed Khalifa al-Kani, former leader of the Kaniyat militia in Libya (Council, 2021) and Dimitriy Valerievich Utkin, co-founder of the Wagner Group (Council, 2024f).

One challenge when collaborating with judicial accountability systems is that they are often too slow to react in crises; by contrast, sanctions' added value is the very aspect that enables a nimbler response to developing crises. The purpose of autonomous sanctions could be defeated if, in practice, they are made to operate only at the speed of multilateral consensus.

3.3 Tackling circumvention

The legal framework regarding the enforcement of EU sanctions has undergone considerable development in the post-Russian invasion period, in particular with the adoption of Decision 2022/2332 that established sanctions-violation as an EU crime and Directive 2024/1226 that harmonised across Member States the definitions of sanctions-violation offences and penalties attaching to them. The EU GHRSR, as part of the EU sanctions arsenal, benefits from this enforcement harmonisation. An interview with an official from the European Commission (DG FISMA) has also revealed that the overall level of implementation and cooperation by Member States has considerably improved as a result of momentum created by the Russia sanctions. Member States now actively utilise a dedicated communications platform – the Sanctions Information Exchange Repository – both horizontally and with the Commission to exchange information and best practices in a more informal and dynamic manner. Economic operators also occasionally communicate with the European Commission on complex implementation matters and submit suspected circumvention information through the EU whistle-blower tool. Other significant enforcement improvements undertaken by the EU recently mainly concern sanctions against Russia and do not necessarily impact on enforcement of the EU GHRSR. For example, a key development is the prohibition of certain high-risk goods and technology exports to third countries that are used to circumvent sanctions contained only in the EU's 11th package of Russia sanctions (European Commission, 2023; Council, 2023b).

Nevertheless, there are at least two other important areas of legal debate concerning circumvention that the European Parliament could help move forward concerning both the EU GHRSR and the broader EU sanctions landscape.

Closing the derogation gap

The first area concerns tightening the circumvention possibilities that can be exploited by families and associates of listed persons. EU case law tells us that targeting family members based on their relationship only would not constitute a proportional measure (Butler, 2023). Moreover, the EU GHRSR designation criteria would not allow such a listing. However, families (and associates) could be included in certain circumvention-relevant EU GHRSR provisions.

To take one example, EU GHRSR financial restrictions provide derogation clauses, one of which is allowing funds transfers benefiting designated persons for the fulfilment of contracts concluded before the designation. It is conceivable that a listed person could seek to circumvent the application of a financial freeze on their assets by concluding contracts (dated) before the designation of their name, providing for the transfer of funds to persons or entities of their choosing. This would be particularly so in cases where EU designation is predictably imminent. To prevent such an eventuality, the EU could consider either amending the sanctions instruments or providing guidance to the effect that the prior contracts derogation must exclude contracts that benefit not only the designated persons – as the law currently states – but also their family members, associates and entities belonging to, owned, held, or controlled by any of these as the most logical circumvention routes.

Sanctions due diligence

Another anti-circumvention intervention is importing the concept of due diligence that the EU Council introduced in the context of a specific set of Russia (Council, 2014: Article 8a) and Belarus (Council, 2006: Article 8i) sanctions and which the Commission elaborated on as part of its FAQ (European Commission, 2025). The due diligence requirement obliges EU operators to exert their best efforts to ensure that entities under their ownership or control, albeit established outside the EU (hence normally not covered by EU sanctions scope), do not participate in activities that circumvent or undermine EU sanctions. The EU GHRSR, as with various other EU sanctions regimes, currently applies only to operations established in the EU or business conducted within the EU. Furthermore, as noted in a November 2024 Netherlands non-paper (Tweede Kamer, 2024), the Russia sanctions due diligence requirements are also not complemented by a corresponding enforcement obligation on Member States, which is normally the case regarding risk-based approach due diligence requirements in the EU anti-money laundering and countering terrorism financing legal framework. The European Parliament can stimulate further work in transposing due diligence provisions to the EU GHRSR by clearly articulating a corresponding member state enforcement obligation.

An even stronger formulation of this preventive approach – but one unlikely to be adopted by the EU in the near term – could be criminalisation of the ‘failure to prevent’, as was introduced in the context of fraud under the UK Economic Crime and Corporate Transparency Act 2023 (UK Parliament, 2023). This obligation would theoretically hold EU economic operators responsible for offences (in this case, sanctions circumvention) committed not only by their employees and agents but also by subsidiaries and any ‘associated persons’ that provide services for or on behalf of the economic operator. The precise scope of applying such onerous obligations might require further serious consideration, such as: how widely or narrowly to define the ‘associated person’ category; where to delimit the territorial reach of the underlying offence (namely, sanctions circumvention occurring within the EU territory only or also outside); and from what size of economic operators it would be reasonable to impose this requirement (for instance, UK law limits the application of this offence to large organisations that meet two of the following thresholds: having more than 250 employees, more than GBP 36 million turnover, or GBP 18 million in total assets). It would be possible for EU operators to defend against a failure to prevent allegations by successfully invoking a procedural defence by proving that the operator had put in place reasonable prevention measures, regardless of the offence’s actual occurrence. This, in turn, provides a strong incentive to EU economic operators to put in place effective circumvention-prevention policies, controls and procedures, possibly integrated within their broader anti-financial crime ecosystem.

4 The impacts of the EU GHRSR

Given the EU GHRSR’s relatively recent adoption as well as the shift in public and political attention to the sanctions packages adopted in response to Russia’s invasion of Ukraine, only fourteen months after the regime was launched, very few studies have as yet been conducted on its implementation. Hence, the following sections review how sanctions effectiveness is evaluated and propose a framework for assessing the EU GHRSR’s impact.

4.1 The evaluation of sanctions' effectiveness

The methodology for evaluating sanctions has traditionally focused on examining one single function, namely, eliciting target compliance with the initiator or 'sender' demands (Jones and Portela, 2020), in this case, the EU. The degree to which this goal has been achieved and, to some extent, the role that sanctions have played in promoting such an outcome constitutes the central criterion for determining whether sanctions can be considered to have fulfilled their aims or otherwise. Adopting this approach is motivated by the release of the first longitudinal, large-N study, which claimed that imposing sanctions is indeed successful to some extent (Hufbauer et al., 1985), significantly breaking with a tradition of analyses which have portrayed sanctions as invariably ineffective, if not flawed in their design. This first large-N study, conducted by economists, carried a dataset featuring over 100 sanctions episodes, including a variable with their success score. Both the assessment methodology proposed and the dataset were adopted verbatim by subsequent generations of researchers, rendering this work enormously influential. Moreover, the dataset's availability gave rise to a body of quantitative research which adopted Gary C. Hufbauer's evaluative framework with minimal or no alteration (Portela and Charron, 2023).

Hufbauer and his team, examining a range of economic and political factors influencing the effectiveness of sanctions, concluded that sanctions are more likely to succeed not only when they target states marked by instability and strong ties to the sender but also when they aim for modest objectives and impose substantial costs on the target while causing minimal harm to the sender. Drawing on historians' assessments, the study 'credits sanctions with success in roughly one-third of the episodes, when sanctions 'appeared to contribute to the achievement of stated policy goals' (Portela, 2023). A successful sanctions regime is measured by an 'observable change in behaviour', with policy outcomes assessed by comparing results against the 'stated policy goal of the sender country' (Hufbauer et al., 1985). Standard evaluations of sanctions effectiveness remain characterised by two limitations: (i) a tendency to consider economic sanctions only, while contemporary sanctions practice includes a diverse set of measures such as visa bans and diplomatic sanctions (Portela and Charron, 2023); and (ii) analyses are invariably premised on the assumption that sanctions aim at promoting a change in the target's behaviour (Portela, 2023a).

Drawing on existing scholarship and expanding on a tripartite model that has gained traction in recent years (Elliott, 2010), Francesco Giumelli (2016) proposes a classification of sanctions objectives into three types, each reflecting a different facet of power in international relations: coercion ('win conflicts'), constraint ('limit alternatives') and signal ('shape normality'). Biersteker, Eckert and Tourinho apply these dimensions as overlapping rather than mutually exclusive (2016). While this expansion of sanctions goals improves previous evaluative practice in that an exclusive concentration on compliance is overcome, assessments following this approach remain rare (Moret et al., 2016). Moreover, the relative novelty implied in this trichotomy's popularisation has detracted from the possible presence of other goals, roles or functions outside the three dimensions identified.

4.2 Assessing the effectiveness of the EU GHRSR

A departure point for evaluating sanctions is the determination of goals that they are designed to achieve, the standard approach used in public policy evaluation methodology. For analytical

purposes, foreign policy can be considered as public policy. Sanction goals can be manifold, even though some are likely to be more important than others (Elliott, 2010). Following this logic, the first step in evaluation is to establish for which goals sanctions were intended and how central such an objective was in the sanctions package's design. Similarly, it should be considered whether just the addressee was targeted by the sanctions or were any third parties also included, who observed or facilitated the condemned action.

4.2.1 Distinguishing roles and closeness to power

For analysing UN sanctions designations, a valuable distinction was developed by peace researchers Peter Wallensteen and Helena Grusell (2012). According to these authors, targeted persons can be categorised in line with their closeness to the policy-making power in a bid to gauge whether they themselves have power and influence in society. It is reasonable to expect that those responsible would have different reaction patterns than those without much influence on chosen policies, as the theory underlying targeted sanctions assumes that leadership is a determining factor. In this vein, the authors develop four target categories regarding closeness to ultimate decision-making:

- **Leaders:** those directly responsible for actions to which the international community objects.
- **Administrators:** a group indispensable for the execution of policy but less capable of actually formulating or changing such policies.
- **Supporters of the leadership:** ranging from family members to party members and local decision-makers, all valued by the leadership, albeit without influence on decisions.
- **Traders:** agents that deal with the actual international transactions that the sanctions aim to reduce (e.g., individuals involved in commerce, transportation, banking, or smuggling). They are likely to be significant for the conduct of policy but probably have little direct impact on the formulation of such policies.

On the assumption that each of these groups is distinct and stands in a different relationship to the ultimate policy-makers, the logical order of influence would be maximal for leaders but gradually decreasing in the case of administrators, supporters and traders in this order.

Inspired by this classification, we develop similar categories, which allocate targets to different groups according to occupation. Our categories include:

- **Political leadership:** a category that refers to members of government and coincides with the category of 'leaders' in Wallensteen and Grusell's classification.
- **Civilian administrators:** overlapping with the category of 'administrators', albeit this grouping excludes two subcategories, which are disaggregated as follows:
 - **Members of the repressive apparatus:** namely executors of repression, including a range of professions, from prosecutors to heads of the police or penitentiary services.
 - **Military officers:** or members of paramilitary groups and militias.
- **Ordinary politicians:** members of political parties who are not involved in the sitting government.

- **Business-persons:** those without political responsibilities or leadership positions in political parties.
- **Activists:** members of civil society who lack leadership positions in major companies or political parties.

The first four categories – leadership, administrator, member of the repressive apparatus and the military – have a non-state *pendant*, while the last three are not formally associated with political power and fall under the non-state actor category.

Table 3: State actor targets and their non-state pendants

State actor	Non-state actor
Government	Leadership of militia, rebel or mercenary group
Administrators	Non-combatant members of militia or group
Armed forces	Combatants

Source: Authors' own compilation.

Replicating the classification of Wallensteen and Grusell (2012), this 'decreasing' order represents the proximity to power or political influence of each group, although it is assumed that informal channels can magnify the weight that actors from certain groups, such as wealthy businessmen, may exert on political power.

As shown in Figure 4 earlier, most targets are involved in the state's repressive apparatus. Their predominance is hardly surprising given the focus of the sanctions regime on human rights violations. By contrast, the core argument of Wallensteen and Grusell (2012) is that targeting policies which emphasise policy executors – in this case, of repression – is misguided, given that these actors are agents of political leadership and remain peripheral to political power. Even though they are directly involved in the perpetration of human rights violations, it is difficult to discern the extent to which such actions respond to their personal choice or are instructed by the political leadership. In any case, the sanctions designers' emphasis is manifestly on the individual responsibility of those in the state apparatus involved in violations, irrespective of whether their origin can be located in the upper echelons of power. Most targets are those involved in the execution of central policies, including state and military repressive apparatus, followed by decision-makers and administrators.

Nevertheless, if we pay attention to the fundamental division between these categories endowed with the power of decision and implementation when compared with those deprived of such powers, the former precedes the latter. Thus, those furthest removed from state power as well as political leadership and implementation competencies are the groups less targeted, namely violent activists, ordinary politicians and businessmen, amongst whom violent activists take priority.

Overall, the pattern is that those most directly involved in perpetration are more targeted than those providing political direction or instigating such acts, whilst those linked to the state apparatus are more targeted than those lacking formal affiliation to political power.

4.2.2 An assessment framework

Determining the EU GHRSR's goal is no easy task. Foreign ministries' bureaucrats typically assess sanctions regimes' effectiveness by referring to: the implementation of sanctions by domestic actors; the number of court cases initiated at the Court of Justice of the EU, and the target's calls for lifting the ban, according to interviews with Member States representatives. Although information on these metrics is within bureaucrats' remit, this is peripheral to any of the sanctions regimes' political goals. As with country-based sanctions regimes and in line with other EU thematic sanctions regimes, imposing documents refrain from specifying what actions are required to delist designees, aside from bringing about behavioural change, a classic objective of sanctions.

The US Global Magnitsky Human Rights Accountability Act of 2015 makes de-listing possible when a designee has 'credibly demonstrated' 'significant change in behaviour' and 'credibly committed' not to engage similarly in the future. Likewise, legislation regarding the successful prosecution of a designee for an activity that led to the enactment of sanctions provides grounds for de-listing (Zamora and Marullo, 2019). By contrast, the EU follows a different approach: the only grounds for de-listing, other than confusion about the target's identity, consists of winning a case at the EU's Court of Justice.

Occasionally, de-listings have occurred in the context of country-based sanctions regimes when targets have manifested a change in their political positioning *vis-à-vis* the political circumstances when the sanctions were initiated. A case in point is the designation and de-listing of technology entrepreneur Mr Arkady Volozh, former Chief Executive Officer of the Russian company Yandex. Mr Volozh came under EU sanctions following the 2022 full-scale Russian invasion of Ukraine amidst allegations that Yandex was directly involved in spreading Russian military propaganda. After publicly condemning the war, Mr Volozh called for his de-listing. His request came after he became (only) the second prominent Russian billionaire (after banker Mr Oleg Tinkov) to denounce the war in Ukraine unequivocally, triggering calls from diplomats, officials and other sanctioned individuals for the EU to reconsider its position. His name was eventually removed from the blacklist in March 2024 (Baczynska and Payne, 2024; Foy and Seddon, 2023). In this context, the Commission confirmed that EU sanctions could be lifted in accordance with court rulings or if the person or entity no longer fulfils the listing criteria (Foy and Seddon, 2023). In rulings on country-based designations, the EU's Court of Justice has so far held that the listing shall cease once the designee abandons active duty, given that designation criteria are no longer met. However, this reasoning hardly seems applicable to the EU GHRS. Once an individual has been designated for responsibility in the perpetrating of human rights abuses, it is difficult to conceive how he or she may cease to meet the listing criteria. From that perspective, horizontal blacklists lack the flexibility enjoyed by country-based sanctions regimes due to their explicit connection to the resolution of an at least theoretical and temporary political crisis (Portela, 2021). In any case, it will be up to future jurisprudence to confirm or refute this assumption. Lastly, it has been posited that Magnitsky-style sanctions regimes pursue various functions in addition to behavioural change, including punishing perpetrators, providing compensation to victims and deterring violations (Jia, 2024).

The initial round of designations in the US Magnitsky Act featured eight individuals designated for involvement in corruption, three having faced charges (Moiseienko, 2019). Dutch Foreign Minister Stef Blok referred to the EU GHRSR as an instrument 'to supplement the criminal law' (Blok, 2018). This judicialisation has been decried by some who equate blacklists with quasi-permanent 'policing mechanism[s]' (Tourinho, 2016), 'criminal procedures' (Wallenstein and Grusell, 2012) or a '*mélange* of politics and criminal justice' (Moiseienko, 2019). It has even been subject to accusations of reversing the presumption of innocence (Al-Nassar et al., 2021). Since thematic sanctions regimes are dissociated from time-bound political crises, listings run the risk of acquiring an open-ended character that turns temporary freezes into *de facto* confiscations and semi-permanent bans. This phenomenon reflects the experience with UNSC Resolution 1267, which has become a permanent global counterterrorism arrangement (Tourinho, 2016). This circumstance is potentially complicated by multiple listings, given that no mechanism exists for assigning listings to country-based or thematic regimes (Portela, 2021).

Various individuals and entities are concurrently designated under country-based and thematic sanctions regimes for the same wrongdoing. This includes actors implicated in toxic attacks during the Syrian civil war, listed under chemical weapons and the Syria sanctions regime, or the above-mentioned case of Russian judge Mr Kirill Nikiforov, listed under both Russia sanctions and the EU GHRSR. On the one hand, double listings follow the rationale that, in the event of a court sentence ordering the de-listing of the target from a sanctions regime, a second listing would ensure that the designation remained in place, at least until the person is re-listed on amended grounds. On the other hand, double-designations may also have detrimental effects in terms of encouraging the target to change behaviour: if taking corrective action does not promise the removal from all sanctions regimes under which the target is listed, she or he has little incentive for behavioural change.

In sum, the absence of de-listing criteria from relevant documents leaves us without any guidance on what the EU GHRSR aims to achieve. Nevertheless, sanctions research does provide us with some indications concerning the intended effects of targeted sanctions, highlighting that the effects on group dynamics are key to success. By way of illustration, the panel of experts monitoring sanctions on Côte d'Ivoire in 2004 recommended the avoidance of targeting an entire group in order to prevent the emergence of bonding and solidarity in opposition to the sanctions' sender, on this occasion, the UN. According to this logic, initially modest individual listings, which can gradually be escalated, are preferable to group listings. Accordingly, we can expect blacklists to hinder group cohesion only when designations do not apply to entire groups, given that such designations run the danger of strengthening elite cohesion (Portela and Van Laer, 2022). Lending some credence to this fear, various oligarchs under sanctions reported having been put off speaking against the war by the lack of a formal procedure in the USA, UK and EU for lifting the sanctions if they dared to do so (Foy and Seddon, 2023).

Based on the above discussion, different types of addressees can be identified:

- The **designees**: to the extent that a modification of behaviour is expected from them;
- The **domestic or international judicial bodies**: to the extent that they are expected to bring charges against designees;
- The **state authorities exercising jurisdiction over the designated entities and individuals**: to the extent that they are expected to bring them to justice or remove them from service or from positions of responsibility;
- **Third-party audiences**: to the extent that listing is intended to deter the replication of similar behaviour by members of the leadership administration, leader or repressive apparatus in third countries wishing to avoid the stigma and reputational costs of designation.

While all addressees of designations can be equally important to the sender, effects on the first three groups are easier to observe than the deterrence impact on third-party audiences, which are likely to become discernible in the longer term. For this evaluation, the first three categories of addressees are key merely three years after the sanctions regime's first adoption. The impact can be determined by monitoring designees' actions, the existence of judicial processes against them, their career development and the evolution of their links to political power centres.

Importantly, any scale measurement should contemplate negative evolutions in the form of an escalation or an aggravation of the previously condemned behaviour. This ought to correct the

frequent mistake of designing measurement scales where the worst possible scenario is the null effect; in other words, the imposition of sanctions has no impact (Peksen, 2019). Violations becoming more acute after the imposition of sanctions should also form part of the scale. This is particularly relevant in view of extant research suggesting that human rights are more likely to worsen in a country under sanctions, even if these are targeted, compared to countries where sanctions are absent (Carneiro and Apolinario, 2016). Similarly, statements made by some targets suggesting that inclusion on a blacklist represents a 'badge of honour' should also be considered. A Western sanctions designation distinguishes such addressees favourably in the eyes of their leaders, characterised by an adversarial stance towards the EU and the West more generally (Portela, 2018).

Given these considerations, the following benchmarks can be formulated:

- a) One examines whether a targeted individual has modified behaviour, altered a public stance on the respective crisis, moderated policies, changed occupations, or altered position in any other manner that affects a role in the abuses that have given rise to the designation.
- b) Another looks at whether the authorities or the hierarchically superior level, to which the designee reports, dismiss, reprehend, demote, reward or promote the designee;
- c) A third considers whether judicial authorities, national or supranational, bring proceedings or issue an arrest warrant against the designee;
- d) A further benchmark concerns whether the designee's entourage comes to the aid of or marginalises the designee;
- e) The increase or decrease in the designee's popularity or public approval is an additional benchmark provided she or he is a public figure, and reliable public opinion surveys exist in the country;
- f) Lastly, third-country behaviour can serve as a further benchmark, either in the sense of establishing or reinforcing links with the target or severing them – e.g. in the form of suspension from regional organisations.

Various methodological caveats are in place.

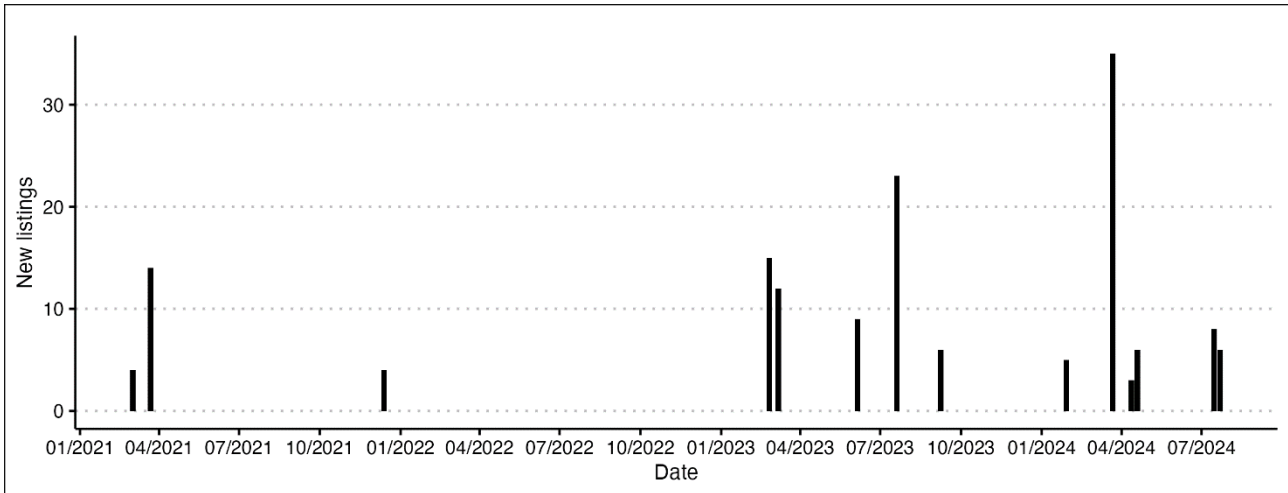
Firstly, information on the targets is scarce, given that they routinely operate in non-democratic regimes where restrictions on media freedom prevail. Data on a large number of designees is completely missing.

Secondly, the listing of an entry does not, *per se*, tell us anything about any background leading to a designee's inclusion on the blacklist. Selecting targets is often dictated by the availability of evidence confirming specific individuals' involvement, thus preventing senders from targeting individuals at a higher level of responsibility in the absence of conclusive evidence. However, it is a matter of policy that the first round of listings includes middle-rank administrators, aimed at pressing the top level to change course and serving as a warning that the sender has the option of targeting the top level at a later stage, provided that the first round fails. Similarly, numerous designees of international sanctions reported not being warned about a possible designation before being listed (Portela and Van Laer, 2022).

Having outlined the methodological limitations of our overview, an analysis of designations under the EU GHRSR now follows. This can be considered only as preliminary, given that information on designees following their listing is often missing. When available, it just points to a continuity of the

target's professional activity. This is partly because most targets were listed only recently. As shown here in Figure 7, most designations started in spring 2023, reaching a peak in 2024, merely one year ago.

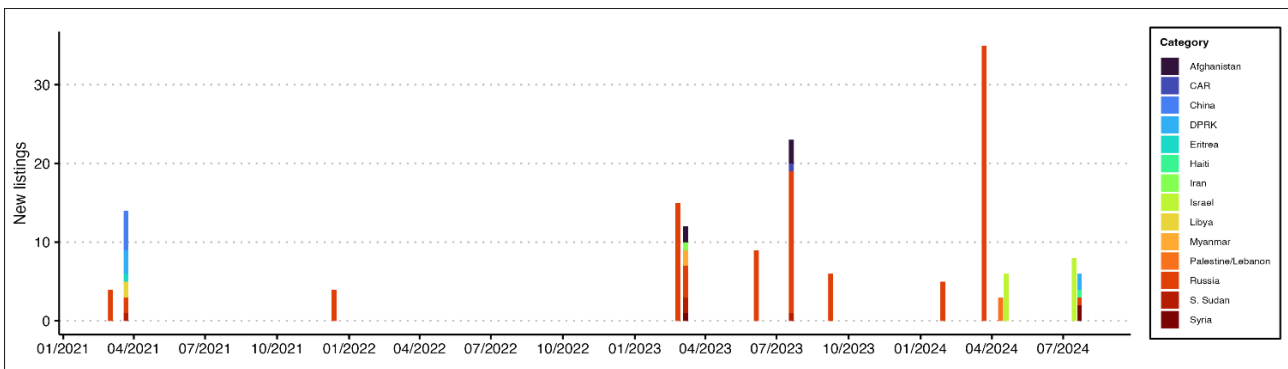
Figure 7: Timeline of sanctions designations



Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

Moreover, the proliferation of designations has mostly been driven by the inclusion of new Russian targets, which were present from the outset but have come to dominate the picture since 2023, as demonstrated by Figure 8. The opacity of target countries makes any monitoring of these targets particularly difficult.

Figure 8: Timeline of sanctions designations



Source: Authors' own compilation based on EU GHRSR listings (as of 01 March 2025).

However, a few scenarios are useful in illustrating the consequences that can be derived from listings:

From a total of 149 designations, for 74 no information on targets could be located following their listings. In at least 46 cases, the information pointed to a situation of continuity where no alterations in the status or professional trajectory of designees could be detected. In certain cases, the development identified could point to some level of effectiveness: 2 designees resigned from their positions; 8 were dismissed from their posts, and 1 was detained. Moreover, the Prosecutor of the ICC has requested the issuing of an arrest warrant against one of the designees, Afghan leader

Haibatulá Ajundzadá, for gender-based crimes against humanity (Ferrer, 2025). Yet another target engaged in new economic activity, a circumstance that could derive from increased difficulty in sourcing funds for the addressee's actions.

By contrast, some opposite effects could also be detected: as many as 7 targets received promotions and 3 were awarded prizes, such as Rosgvardia head Viktor Zolotov, who received the Hero of Russia award in December 2024 (Institute for the Study of War, 2024). Yet another 3 are on record as stating that they are proud of having been listed by the West, such as Xinjiang Secretary of the Political and Legal Affairs Committee Chen Mingguo (Global Times, 2021). The remaining cases include situations that are not unequivocally favourable or unfavourable regarding EU GHRSR goals.

Hence, this brief overview is inconclusive about the effectiveness of sanctions. Trying to establish whether or not the outcomes discussed here result at least partly from the designations requires exhaustive checking, which is outside the scope of this paper. For instance, the resignation of Afghan Minister of Justice Hakim Sharei appears to have been prompted by corruption charges rather than human rights breaches (Tarz Press, 2025). However, it serves to illustrate that, with high probability, designations can affect the status and professional path of targets in different and even opposite directions.

5 International collaborations

The adoption of the US Global Magnitsky Accountability Sanctions Act in 2016 preceded the enactment of similar legislation by Washington's closest allies, following an official US campaign to encourage replication. This promotion campaign was aimed at legally enabling partners to adopt designations easily, allowing for a quick enactment of homogeneous bans on the same actor throughout the West to enhance joint effectiveness (Ciampi, 2024; Lilly and Arabi, 2020). This pioneering US legislation was first replicated by Canada, which passed the Justice for Victims of Corrupt Foreign Officials Act in 2017. However, adoption in Europe did not occur until late 2020, given that the EU's internal negotiations took almost two years to complete after the Netherlands had officially launched the initiative in November 2018. For its part, the UK passed legislation in 2021, one year after officially leaving the EU.

A significant similarity between the original US Magnitsky Accountability Act and the EU GHRSR is the role reserved for civil society in promoting listings. After the EU had granted civil society actors the possibility of triggering sanctions under certain conditionality regimes, notably in the suspension mechanisms in initial iterations of the General Scheme of Preferences (Lerch, 2004; Portela and Orbie, 2014), the EU GHRSR foresaw the possibility of submitting proposals for designation by civil society organisations for consideration by the Council but left adoption of listings subject to its future discretion. It is estimated that around 13 % of EU GHRSR designations emanate from civil society, while 34 % of USA listings follow NGO recommendations (Redress, 2022: 11).

By contrast, an anecdotal difference between Washington's and Brussels' sanctions practice is that the US often adopts Magnitsky designations around International Anti-Corruption Day, 9 December, and International Human Rights Day, 10 December. The EU does not follow a particular pattern, albeit the adoption of the initial sanctions' framework, still with an empty list, was timed to

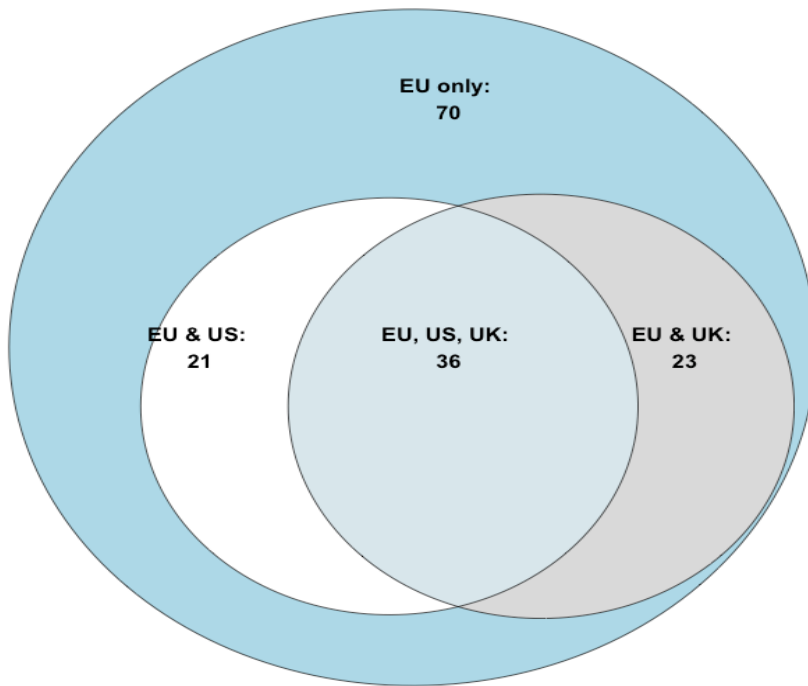
coincide with Human Rights Day in 2020. Successive designation rounds have occurred in various months of the year.

Even though the design of legislation is comparable, a fundamental difference sets the EU version apart from its Anglo-Saxon counterparts: it is the only legislation that lacks involvement in corruption schemes as a criterion for designations, restricting its scope to human rights violations. The possibility of instituting an EU sanctions regime to address grand corruption schemes overseas was left for later consideration on account of the weaker tradition of addressing corruption concerns in third countries in the context of the CFSP. The only CFSP sanctions regimes imposed for the misappropriation of state assets proved problematic in their implementation, leaving little appetite for expanding their use (Boogaerts, 2020; Portela, 2019). These involved deposed leaders of Tunisia and Egypt in 2011 and Ukraine in 2014, along with respective entourages following their ousting.

Coordination between the four partners on sanctions matters, including the human rights sanctions regime, is intensive and takes place continually. Contrary to cooperation on Russia sanctions, which takes place via separate channels – chancelleries and the cabinet of the President of the European Commission – (Lepeu, 2025), proposals for listings under the GHRSR are circulated via regular channels, which include foreign ministry bureaucracies of EU Member States as well as the EEAS. Yet, the level of coincidence between the targets is not particularly high for a set of sanctions regimes designed to operate similarly across jurisdictions. In a study conducted in 2022, the NGO consortium Redress identified stark discrepancies in numbers. The USA had issued 423 designations by then, while the EU had not listed more than 23. From a cumulative 455 perpetrators of human rights violations listed by the four jurisdictions endowed with Magnitsky-style legislation, only 15 % were under sanctions by more than one jurisdiction (Redress, 2022: 15). The EU stands out as one actor whose designation practice is the most ‘multilateralised’: 52 % of its listings under the EU GHRSR were under sanctions elsewhere, while the remaining 48 % were EU-only sanctions. By comparison, Canada-only designations constitute 81 % of Ottawa’s human rights listings, while USA-only designations make up 77 % of Washington’s human rights listings (Redress, 2022: 18–24). A similar pattern was observable in another study by the current authors from August 2021 (Tilahun and Charron, 2021). While only about 3 % of Canada’s human rights and corruption designations (9 out of 296 names) were cross-listed under the EU GHRSR, nearly half (47 %) of designations under the latter were cross-listed in the Canadian regime. Part of the reason for the relative weakness of overlap resides with the informality of coordination methods: EEAS does not meet with partners before the Council has decided on designations following its regular procedure, according to interviews with Member States representatives. Thus, the only way partner countries can influence Council decisions in the course of the decision-making procedure is by lobbying individual EU Member States so that capitals table designation proposals as their own.

Considering current data of the EU, USA, and UK Magnitsky-style sanctions regimes from 2025, when the EU GHRSR had significantly expanded its listings, rising from 23 in the Redress study to 149 as of April 2025, we analyse anew the level of overlap.

Figure 9: Overlap between EU GHRSR and other Magnitsky-style lists



Source: Authors' own compilation based on the EU GHRSR listings and [OpenSanctions](#) data (as of 01 March 2025).

Despite a significant numerical increase, the emerging picture is one of continuity regarding the balance between EU-only designations and listings shared by other senders. Figure 9 above shows that a minority of 70 designations are being imposed only by the EU, while a total of 80 are shared with other partners. From these, 36 entries are shared with both the US and UK jurisdictions, while the rest are shared only with one partner. The main reasons for discrepancies are to be found in the divergence of both administrative capacity and the due process rights of designees. The USA relies on a Treasury agency, the Office of Foreign Assets Control (OFAC), specialised in sanctions matters, including the issuing of designations. On the EU's side, capacities are considerably smaller and not capable of handling a similar volume of designations. However, the most consequential difference is the human rights protection of designees. Since the protection of designees is better guaranteed in the EU, the Council faces stronger incentives to exercise circumspection and restraint when issuing listings, aware that designations which are not based on solid justifications but on open access information are vulnerable to legal challenges in front of the EU's Court of Justice. Indeed, over the past decade, several designees successfully challenged their listings at the Luxembourg Court, which mandated their annulment. Lastly, in the absence of de-listing criteria in EU GHRSR legislation, a successful court case is the only way in which designations can be removed, thus affording listed individuals an additional incentive to litigate. In the case of the US Global Magnitsky Act, by contrast, listings can be removed for a larger list of reasons (Zamora and Marullo, 2019).

6 Conclusions and recommendations

Four years into the EU GHRSR's establishment, the sanctions regime has targeted 116 individuals and 33 entities involved in serious human rights violations worldwide. An assessment of the regime's design and implementation track record reveals some significant gaps, as well as commendable patterns. Its strengths include the design to cover a wide variety of important human rights violations, particularly those that are universally recognised as involving international criminal responsibility. In this sense, the sanction regime is well poised to complement human rights, accountability and justice mechanisms. The listing also covers direct perpetrators as well as indirect supporters and enablers of human rights violations, including third-party providers of expertise and material to repressive endeavours.

Moreover, the listing reflects an approach that recognises contemporary forms of legalised repression prevalent today. In this sense, it innovatively targets softer systems of repression, including prosecutorial, judicial and legislative *machineries* that authoritarians increasingly deploy instead of – or alongside – traditional blunt power.

Our exploration of the EU GHRSR, though, also reveals certain gaps. For example, the main difficulty hampering an assessment of its effectiveness is the lack of defined goals. In the absence of declared objectives, other than highlighting severe breaches, the regime's effectiveness remains a matter of interpretation. Hence, it would be of great value not only to spell out the regime's goals publicly but also to specify de-listing criteria.

The listing so far also exhibits distorted geographic and thematic balance. Geographically, the vast majority of listings target Russian actors, presenting the appearance of country-based sanctions deployed against an adversarial regime. Thematically, the listings focus on physical integrity and political participation rights, particularly concerning political dissidents and defenders of human rights. While these are commendable in themselves, what is missing from the picture are listings targeting 'big-ticket items' amongst the listing criteria, such as genocide and crimes against humanity, which command supreme international normative convergence. Moreover, attention also needs to be paid to serious socio-economic rights violations that impact large swathes of populations in the global majority.

In terms of tackling circumvention, the EU sanctions architecture has, in general, undergone some important transformations in recent years, particularly spurred by Russia sanctions. There are some areas where the European Parliament can help push the discussion further in tightening gaps that enable circumvention. Two in particular are discussed in this paper: (1) tightening the derogation clauses that exempt financial transactions by/for designated actors in fulfilment of contracts concluded prior to designation; and (2) possible introduction of sanctions due diligence requirements for EU operators, which currently applies with respect only to a narrow set of sanctions on Russia.

Lastly, it remains unclear why the scheme features only visa bans and asset freezes. Given the nature of the targets, most of which are involved in their countries' repressive apparatus, it would be advisable to include a prohibition on supplies to relevant authorities of equipment, technology and software that can be used for internal repression.

In light of this analysis, the authors propose the following concrete recommendations:

- The specific goals of the EU GHRSR, as well as de-listing criteria, ought to be publicly spelt out.
- The listing practice needs to reflect more geographic and thematic balance by actively targeting violations beyond Russia and giving due focus to allegations of genocide, crimes against humanity, as well as important socio-economic rights violations worldwide.
- The European Parliament should consider making a call on the European Commission to provide further clarification or guidance on the prohibition of providing technical and material supplies to designated actors beyond economic and financial support.
- The European Parliament could recommend adoption of guidance by the European Commission and amendment to the EU GHRSR by the Council if necessary, establishing that the prior contracts derogation clause must exclude contracts that benefit not only the designated persons as the law currently stands but also their family members, associates and entities belonging to, owned, held, or controlled by any of these actors.
- The European Parliament should also advocate the gradual inclusion of such prohibition on the supply of equipment, technology and software in the EU GHRSR itself.
- Meanwhile, the European Parliament could encourage the Council to double-list entities listed under the EU GHRSR in geographic human rights sanctions regimes that include restrictions on the supply of equipment, technology and software used for repression. At the same time, for clarity, de-listing criteria should be spelt out for each of the regimes.
- The EU GHRSR could be applied more strategically to complement and strengthen international criminal justice processes by targeting actors wanted by such mechanisms and those frustrating their work. Cooperation with accountability mechanisms could also be considered part of the de-listing criteria.
- To enhance the EU GHRSR's global legitimacy, the EU should strive to have its listings taken up by the UNSC.
- To monitor EU GHRSR effectiveness more efficiently, the European Parliament could request the Council or the EEAS to report annually on its impact on designees, making use of (non-sensitive) information available to them.
- To determine the efficacy of existing informal arrangements for civil society input in EU GHRSR listing considerations, the European Parliament could commission a more systematised study into the views and preferences held by a wider range of civil society actors.

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