



**Advancing Humanitarianism**  
through Sanctions Refinement

# A MODEL HUMANITARIAN CHECKLIST FOR SANCTIONS UNITS

October 2024



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## Acronyms

AHSR	Advancing Humanitarianism through Sanctions Refinement
AI	artificial intelligence
AML/CFT	anti-money laundering and countering the financing of terrorism
CBDCs	Central Bank Digital Currencies
CBRs	correspondent banking relationships
CT	counterterrorism
EU	European Union
FAQs	frequently asked questions
FATF	Financial Action Task Force
FCDO	Foreign, Commonwealth & Development Office (UK)
fintech	financial technology
GDP	gross domestic product
ICRC	International Committee of the Red Cross
IHL	international humanitarian law
IHRL	international human rights law
IL	international law
IRL	international refugee law
MVTs	money value transfer systems
NGO	non-governmental organization
OFSI	Office of Financial Sanctions Implementation (UK)
RBA	risk-based approach
UK	United Kingdom
UN	United Nations
UNSCR	United Nations Security Council Resolution
UN SDG	United Nations Sustainable Development Goal

# Glossary

**asset freeze:** a sanction that prohibits and/or directly prevents a target from easy and unconstrained access to and use of owned monies and other valuable financial resources

**chilling effect:** refers to the reluctance of national and private sector actors in finance and trade to engage in these activities with a sanctioned country, even when a particular transaction or product is not prohibited by sanctions

**coercive unilateral measures:** generally defined as the imposition of a set of sanctions by one nation against another to force a policy change in the targeted nation

**correspondent banking relationship:** involves a financial institution (the **correspondent**) providing banking services to another financial institution (the **respondent**) in another country

**de-risking:** when banks and related financial institutions avoid the risk of running afoul of sanctions by restricting or terminating their business ties with counterparts in targeted nations

**economic sanctions:** the wide array of coercive measures that may include restrictions on trade generally, or on specified goods and services including aid, banking, financial assets and movement of assets, and arms embargoes as well as travel, cultural, and sports restrictions

**multilateral sanctions:** after 1990 sanctions imposed by the United Nations Security Council, but now including regional organizations, or a coalition of states

**over-compliance:** occurs when an economic actor, out of fear of running afoul of sanctions, voluntarily restricts their trade, travel, air, or investment exchanges, even when the exchange does not violate the sanctions, closely related to de-risking

**sanctions episode:** the time and actions of a set of sanctions, from its original imposition until the sanctions are suspended, terminated, or superseded by a new set of sanctions

**sectoral sanctions:** targeted sanctions that constrain a specific product, commodity, or type of economic activity (such as the service sector or transportation sector)

**sanctions exception:** a temporary sanction suspension due to a policy decision, or often due to a natural disaster or unanticipated humanitarian crisis in a sanctioned environment

**sanctions exemption:** the result of obtaining a license that permits a specified economic engagement to be allowed for specific reasons during a sanctions episode

**sanctions licensing:** the process detailing how a business or other party seeking to engage in economic activity with a sanctioned target may do so through providing documentation, following designated procedures, and agreeing to the monitoring or reporting of these activities

**sanctions process (regime):** the design, adoption, implementation, and enforcement of sanctions, as well as the interaction of sanctions senders and sanctions targets in the sanctions episode

**targeted sanctions:** often referred to as ‘smart sanctions,’ these are more narrowly focused both in the type of coercive measure imposed and in the selection of a distinctive set of targets, often below the level of the full nation-state

**tri-sector group:** the engagement of international NGOs, financial institutions, and governments

# Introduction

## Purpose of a Checklist

This document contains a model checklist for governments and intergovernmental bodies to use as guidance. It is intended as a useful *aide mmoire* for sanctions units that presents a set of factors that could be considered as a menu of options (depending on the context and the sanctioning actor) prior to imposing sanctions and during periodic reviews after their imposition. It is designed to assist sanctions' imposers to identify and, in turn, mitigate unintended humanitarian consequences. It aims to be useable and practical, considering time and resource limitations of those designing sanctions. The model checklist provides a range of humanitarian considerations to busy policymakers working on sanctions' design and implementation, while maintaining and improving sanctions' effectiveness and legitimacy. Considering the growing prominence of sanctions across most parts of the world with impact on diverse types of public and private activities, the checklist also highlights the need for proper resourcing, research, capacity, and knowledge to allow for well-informed decision making. This document concludes with a set of recommendations urging sanctions authorities to consider training and other forms of capacity building to enhance the implementation of the checklist's functionality.

## Background

The [Advancing Humanitarian through Sanctions Refinement](#) (AHSR) project is an international, multi-stakeholder initiative established in 2021 by a group of global experts<sup>1</sup> who have been at the forefront of research and policy engagement in the field of sanctions and humanitarian affairs over recent decades. The engagement represents a global "trisector" grouping on sanctions and humanitarian considerations, including governments, non-governmental organizations, and private and financial sector actors as well as regional and international organizations and academics. The group strives to work constructively on ways to mitigate and minimize unintended humanitarian consequences of sanctions and related regulations while safeguarding the effectiveness and legitimacy of the tool.

*A Model Humanitarian Checklist for Sanctions Units* was proposed at a meeting at Wilton Park in May 2022 that brought together the world's leading experts and practitioners working at the interface of sanctions and humanitarian affairs. Our efforts were further energized and clarified by the remarkable series of progressive global and national actions sharing the same goal. These included the adoption of [UN Security Council Resolution 2664](#) (December 2022), the [U.S. Treasury Sanctions Review of October 2021](#), and the Treasury adoption of [General Licenses \(2022\)](#) across all U.S. autonomous sanctions programs, and in 2023 a [Derisking Strategy](#) of

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<sup>1</sup> This initiative is led by Alistair Millar and Prof. George A. Lopez. The team also included Dr. Erica Moret until May 2024.

banking and private-sector over-compliance. Similar actions to facilitate the delivery of humanitarian aid have been enacted by the [European Council of the European Union](#).

The checklist was designed and implemented by members of the AHSR team<sup>2</sup> and funded by the Government of Canada whose support is gratefully acknowledged.

## Methods

The checklist has been discussed in various rounds of [consultations](#), including at Wilton Park in May 2023 ([report](#) here), as well as via meetings with the humanitarian community and permanent missions in Geneva; UN Missions and humanitarian actors in New York; EU member states and institutions; and the UK's FCDO Sanctions Directorate and OFSI. It also benefits from inputs derived from meetings with the private sector (including banking), youth, and Global South communities, and a gender-focused working meeting on sanctions awareness, sensitivity, and the [Women Peace and Security Agenda](#). It draws on a decade of actionable recommendations generated through academic and [policy](#) studies (including those in the [AHSR working bibliography](#)) as well as [feedback](#) and guidance from national [trisector groups](#) (all of which are represented in the AHSR project).

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<sup>2</sup> The contents of this document are the sole responsibility of AHSR and do not necessarily reflect the views of others.

# The Checklist

## Obligatory international legal compliance

Sanctions<sup>3</sup> regimes can differ, but they all must be designed, implemented, and adapted in compliance with international law (IL), including [international humanitarian law](#) (IHL), [international human rights law](#) (IHRL), and [international refugee law](#) (IRL), where applicable. Domestic laws, decrees, and regulations made by local or regional authorities establishing criminal offenses for sanctions violations must be consistent with obligations under IHL, IHRL, and IRL, as they can otherwise have significant negative impacts on humanitarian operations and other activities supporting basic human needs.

- Ensure compliance with International Humanitarian Law: IHL safeguards humanitarian assistance to all individuals in contexts of armed conflict. As such, [sanctions \(and related regulations\)](#) such as [counterterrorism measures](#)):
  - Must not [place humanitarian actors at odds with the humanitarian principles](#) of humanity, neutrality, impartiality, and independence.
  - Must not require screening of final beneficiaries.
- Ensure compliance with International Human Rights Law: IHRL ensures that the human rights of civilians are not impacted negatively by sanctions and related regulations. As such, [sanctions \(and related regulations\)](#):
  - Must include effective [due process](#) procedures.
  - Must not (including through over-compliance and de-risking associated with sanctions) impede [Economic Social and Cultural Rights](#), including the right to adequate [food](#), housing, education, health, water, and sanitation.
- Ensure compliance with International Refugee Law: [IRL provides a specific definition of refugee, safeguards the right to seek asylum](#), and protects against being forcibly returned to a country where one would face persecution. As such, [sanctions \(and related regulations\)](#):
  - Should be assessed for compatibility with IRL in relevant contexts.

## Effective humanitarian exemptions

Humanitarian exemptions play a [vital role](#) in allowing for humanitarian assistance, as well as in relation to financial and trade flows that may be fundamental to the humanitarian response or

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<sup>3</sup> The same should apply to related regulations such as counterterrorism listings, anti-money-laundering and combatting the financing of terrorism (AML/CFT) measures, export controls, and criminal laws (such as the United States' Material Support Statutes) and other sanctions-type measures such as land, air, and sea blockades, halts to oil and gas supplies, or agricultural controls imposed as political responses to actions taken by a third party and divestments or boycotts.

basic human needs. The creation of exemptions across all UN asset freezes through [UNSCR 2664](#) and subsequent [carve-outs](#) across [some](#) autonomous sanctions regimes marks an important step forward in this area, reflecting years of advocacy and evidence-based studies from humanitarian actors and experts. Ad-hoc exceptions are typically seen as unsuitable, due to the time and resources required in their application and renewal. Furthermore, some humanitarian actors, such as the International Committee of the Red Cross (ICRC), view the application of ad-hoc exceptions as posing insurmountable reputational and security risks to the organization. Others argue that they violate the humanitarian principles of neutrality and impartiality.

### Checklist factors to be considered regarding exemptions include:

- Adopt well-defined, standing, and effective humanitarian exemptions using UNSCR 2664 as a baseline, for impartial humanitarian actors and other actors providing humanitarian goods and services across all sanctions regimes (multilateral, regional, autonomous).
- Adopt humanitarian exemptions at the time that sanctions are designed and not at the point of deterioration of a humanitarian situation.
- Be ready to employ exemptions in the cases of sanctions regimes that do not already include them since their inception, including in relation to natural, human-driven, and conflict-related disasters. This should be enacted within 24 hours, or as soon as possible thereafter, making use of wording from earlier exemptions (e.g. in relation to the [Syria earthquake](#) and UNSCR 2664) to allow for an expedited response that could help to save lives.
- Employ open-ended exemptions, with clear guidance to humanitarian actors and other relevant parties, including international organizations, private sector actors, NGOs with a focus beyond humanitarian areas (e.g. development, gender, minority rights, environment, cultural heritage, education, etc.), and civil society groups.
- Harmonize humanitarian exemptions across competent authorities, wherever possible.
- Evaluate the adequacy of humanitarian exemptions and adapt them, if needed, through regular interactions with relevant stakeholder groups.
- Periodically review sanctions to ensure they are fulfilling their objectives and that unintended humanitarian impacts are mitigated. This should also include regular assessments of the adequacy of humanitarian exemptions, if needed. This should include consideration of academic and policy reports on this area which provide evidence of bottlenecks and challenges.

### Related policy actions include:

- Collaborate with other sanctioning nations to harmonize and coordinate sanctions regimes and exemptions, where distinct sanctions regimes overlap with one another, to

avoid over-compliance linked to the complexity of navigating multiple legislative frameworks.

- Work toward harmonization in the language, scope, and breadth of humanitarian carveouts across competent authorities and global sanctioning actors.
- Consider the amplifying impacts of related regulations (such as CT designations, export controls, FATF listings, AML/CFT measures, land, air, or sea blockades, and criminal laws) and engage with relevant agencies and government departments to lessen unintended humanitarian consequences in sanctioned jurisdictions.
- Launch knowledge-sharing initiatives to allow for capacity and knowledge building on sanctions exemptions to trickle down from capital-based institutions to embassies and other offices at country levels.

## Clear language and up-to-date guidance

### Background

Clear wording and guidance are vital for private, public, and not-for-profit actors operating in sanctioned jurisdictions to provide clarity and reassurance on permissible activities. This category also aims to mitigate the chilling effect linked to sanctions, as well as de-risking and over-compliance practices.

- Provide tailored, timely, and regularly updated public and private guidance to relevant sectors regarding sanctions compliance.
- Ensure key terms are clearly and simply defined, harmonized, and used consistently across legal instruments, including “humanitarian,” “basic needs,” (including other similar terms like “human needs,” “personal needs,” etc.) and “reconstruction” (including other similar terms such as “rehabilitation,” “refurbishment,” etc.).
- Ensure that vital areas like education are incorporated into “humanitarian,” “basic needs,” and other relevant definitions that may otherwise fall out of the scope of exemptions.
- Swiftly adopt and adapt guidance where significant challenges are identified, including in relation to the provision of principled humanitarian assistance or other types of assistance, or where there are bottlenecks or barriers to legitimate trade and financial transactions including in relation to humanitarian payments, household remittances, and supply chains of essential goods.
- Engage with stakeholders on a rolling basis to identify areas where wording in guidance may be unclear, ambiguous, inconsistent, or insufficient, and adapt guidance accordingly.
- Create and properly resource points of contact to allow for real-time and regular communications with stakeholders when emergency or unforeseen challenges arise.

**Related policy actions include:**

- Establish, support, and engage with stakeholders on a regular basis to identify challenges and design and implement solutions and provide reassurance on permissible activities, including:
  - Regional, global, and/or thematic multi-stakeholder dialogues to mitigate unintended humanitarian impacts of sanctions.
  - National or inter-agency trisector groups (composed of governments, NGOs, and banks as a baseline) to allow for regular and trusted discussions on challenges, as well as identifying ways to address any bottlenecks.
  - Ensure that government representation includes the full range of agencies and departments whose work touches on sanctions, as well as related areas such as export controls and criminal laws.
  - Ensure that contact goes beyond humanitarian-focused NGOs and banks to also include international organizations that provide aid; suppliers of goods that meet basic human needs across the wider [private sector](#) (e.g. medical goods, medicine, vaccine and food companies; shipping and transportation; legal services; technology; insurance and reinsurance) and wider civil society groups.
- Encourage NGOs, banks, and other private sector actors to adopt a risk-based approach (RBA) to sanctions, as well as to related AML/CFT programs. This could include focus in the [FAFT's working agenda](#) on a RBA to Sanctions and [Financial Inclusion](#).
- Share examples of best practice, including case studies, to allow stakeholders to understand risks and scope of permissible activities.

## Safeguarding humanitarian banking channels and passage of essential goods

Most targeted sanctions regimes are restricted to asset freezes, travel bans, and arms embargoes. In a growing number of cases, however, broad economic and financial sector measures have been introduced, alongside exemptions and licences, that seek to safeguard the passage of essential goods and fund transfers. Sanctions on key sectors of the targeted country's economy must allow for the passage of basic items and services necessary to ensure the survival and dignity of the civilian population. In particular, unintended negative impacts are being amplified through the worsening, trends of financial sector "de-risking" and wider private sector "over-compliance." These can produce a lingering "chilling effect" which, considering the risks of legal liability for sanctions violations and increased bureaucratic burden and costs, may induce financial institutions to withdraw from high-risk jurisdictions where aid often is most needed. Moves need to be taken to address these problems in parallel to a wider adoption of humanitarian carve-outs.

- Make sanctions listings easily accessible in a standardized format that is harmonized with other sanctioning authorities where possible to avoid over-compliance due to lack of clarity on permissible activities. At present, most sanctions lists are published using archaic formats that cannot be easily scrutinized or compared.
- Harmonize regulations and guidance across competent authorities and across sanctions regimes, wherever possible.
- Avoid requirements that would make sanctions compliance more complex and burdensome, such as reporting requirements for NGOs in relation to humanitarian exemptions.
- Strive to provide clear guidance and FAQs that are based on feedback from stakeholders regarding any areas of confusion in relation to permissible activities.
- Ensure the provision of easy-to-reach points of contact for financial institutions (as well as other private sector firms and NGOs).
- Ensure that humanitarian carveouts adequately cover activities of humanitarian suppliers, financial institutions, and those engaged in trade that meets basic human needs.
- Ensure that private sector actors engaging in trade relating to basic human needs and humanitarian payments have functioning, cost-effective, regulated, and sustainable payment channels available to them, to allow for timely and streamlined delivery of basic goods and services where economic and financial sectoral sanctions risk causing bottlenecks.
- Seek inputs from IL, humanitarian, supply chain, and financial access expertise to improve sanctions' design, adoption, monitoring, and reviews, where they may be significantly impacted by economic or financial sectoral measures.

- Consider ways in which unintended consequences of over-compliance and de-risking may be impacting disproportionately on underrepresented groups, including women and girls.

**Related policy actions should:**

- Design and apply a national or organizational de-risking strategy like the one developed by the [U.S. Treasury](#) in 2023.
- Establish and engage in regular dialogue and open feedback channels with private sector actors involved in the trade and delivery of essential goods to (or from) countries or regions under sectoral and financial sanctions to identify and remedy challenges.
- Provide clarity and reassurances on the scope of permissible activities (including in relation to trade required for basic human needs, as well as payments, including fees and taxes to designated entities and in relation to ownership and control) through sustained and regular outreach to the financial sector.
- Conduct strategic outreach to a broad range of private sector actors to raise awareness about compliance obligations while disincentivizing over-compliance through guidance, reassurance, and support.
- Support efforts to reduce the sending costs of remittance or fund transfer transactions to heavily sanctioned jurisdictions, making use of the formal banking sector and other regulated payment platforms, in line with the United Nations' Sustainable Development Goal ([SDG](#)) 10.
- Identify [banking channels](#) able and willing to support legal trade relating to basic human needs, financial services, and humanitarian assistance to, from, or through the targeted countries where there are marked humanitarian needs and where banking channels are declining at a fast rate.
- Provide tailored support to banks that have already developed strategies to continue operating in high-risk environments suffering from marked humanitarian needs to encourage them not to withdraw their services.
- Monitor the health of humanitarian supply chains and payment channels (including in relation to correspondent banking relationships [CBRs]) to heavily sanctioned jurisdictions and take safeguarding steps to avoid a full collapse of banking channels to a sanctioned country.
- Until sufficient and sustainable humanitarian banking channels can be established in emergency contexts where access to the formal banking sector is severely limited or no longer available, consider supporting [alternative ad-hoc payment mechanisms](#):
  - Explore the use of international or regional public financial institutions able to support ad-hoc safe humanitarian or remittance fund transfer corridors, such as regional financial institutions, development banks, or UN banking facilities.

- Support a publicly backed platform or new international humanitarian financial clearing system to provide clearing services to banks unable to find CBRs to high-risk jurisdictions suffering from humanitarian crises, particularly in areas where the use of SWIFT has been rendered unavailable through de-risking.
- Ensure that other legitimate and legal payment transfers of last resort are available, such as via [Money Value Transfer Systems](#) (MTVS, e.g. *hawala*), cross-border bulk cash transfers, and/or international currency exchange mechanisms. These should be backed by clear regulations and guidance to allow for continued humanitarian assistance, civil society activities, and licit trade.

# Recommendations for Sanctions Authorities

Humanitarian exemptions and supporting policy actions are central in efforts to avoid unintended humanitarian consequences of sanctions but other activities—centered around technology, innovation, capacity, training, and research—also play an important role. In parallel to the criteria listed above, training, capacity building, awareness-raising, innovation, digital technologies, and research tools are recommended to support the sanctions design and implementation process in a way that heightens sanctions' effectiveness while mitigating unintended humanitarian consequences or negative impacts on humanitarian assistance. It is essential to engage in consultations and dialogue with [women](#) and women-led NGOs, alongside other vulnerable groups including youths and civil society actors regarding differentiated impacts on minorities. This may require the provision of dedicated capacity and/or a dedicated focal point for gathering and organizing data for these types of tools and studies.

## Training and capacity building

- Support specialist [training](#) and workshops with international [partners](#) on case-specific humanitarian challenges linked to sanctions.
- Ensure that those designing and reviewing sanctions are offered training on IHL and wider humanitarian considerations (including humanitarian fund transfer challenges), which should be: readily available, updated on a regular basis, offered to staff of different levels of seniority across and government departments whose work relates to sanctions, available at regular intervals (e.g. every 6-12 months), and accompanied by training materials such as academic and policy studies, methodologies, and guidance texts.
- Ensure that women and women-led NGOs have access to training and capacity building regarding sanctions, especially in areas where de-risking and over-compliance might be occurring on a significant scale.

## Innovation

- Support the piloting of financial technology ([fintech](#)) tools for due diligence in the financial, private, and humanitarian sectors that lessen the compliance burden so that humanitarian fund transfers and the financial inclusion of vulnerable communities are not impaired. This could include AI, machine learning, biometrics, and Digital Ledger Technologies (e.g. Blockchain or Web3).
- Support efforts to explore and test whether [fintech](#) could be better harnessed to play a positive role in helping to safeguard banking channels and other humanitarian cross-border fund transfer modalities to high-risk jurisdictions with marked humanitarian

needs, including via pilots and regulatory sandboxes. This could include [cryptocurrencies](#), Web3 or Blockchain, Central Bank Digital Currencies (CBDCs), and further improvements to the use of SWIFT (beyond ISO 20022).

## Mapping tools

Broad sectoral economic and financial sanctions can sometimes impart unintended consequences beyond humanitarian assistance, in relation to several socio-economic [areas](#), especially in instances where they drive a sudden decline in available capital or impact a country's GDP. These impacts can be of particular concern in countries already suffering from marked humanitarian needs, e.g. in relation to armed conflict or natural disasters.

To avoid such impacts, the following further research and tools could be considered:

- Develop and use [tools](#) to assess whether sectoral sanctions are obstructing financial transactions necessary for the delivery of humanitarian aid, related economic activities (including the delivery of essential goods), and household remittances.
- Develop tools to assess which CBRs remain to, or from, the target country and whether they will be sufficient in meeting humanitarian needs (either in the target country or wider region).
- Support the design and testing of new digital tools to allow for regular and responsive shifts in policy approaches should a rise in unintended humanitarian consequences be documented, including through [de-risking](#) and over-compliance (such as via a [CBR tracker](#) and AI).
- Develop tools such as analytical matrices and economic impact assessments to evaluate unintended humanitarian consequences of sectoral economic measures for civilians and for broader activities. This is particularly important when multiple (autonomous, regional, and multilateral) sanctions regimes overlap with one another with poorly understood cumulative impacts. It is also important in contexts where over-compliance and de-risking lead to fragmentation in international trade and finance.
- Design the tools that are: anticipatory and responsive in order to estimate intended and unintended impacts on the targeted country's economy. They could include the following areas, where relevant, including:
  - [inflation](#), currency devaluation, purchasing power, affordability of basic goods;

- social spending, employment, household [remittance](#) flows, barriers to supply chains of essential goods required to support basic human needs, hindered payment channels, food security<sup>4</sup> (including in relation to import and export trade flows); and
- Humanitarian consequences relating to sanctions-related access constraints, resulting in inability to deliver aid.

## Adaptation to national and regional sanctions units

Consider adapting this model checklist so that it can guide desk officers within national governments or a supranational body, such as the European Union. Take stock of the existing sanctions design and implementation processes and consider how this checklist can be applied in order to refine or rationalize those processes by offering systematic guidance as a reference tool.

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<sup>4</sup> In “A New Agenda for Peace,” proposed by the UN Secretary-General and currently being discussed by Member States ahead of the upcoming Summit of the Future (September 2024), one of the proposals is to use the UN Secretary-General’s good offices and diplomatic engagement in the context of critical supply chains, learning from the experience of the Black Sea Initiative and the Memorandum of Understanding.