



Executive Summary: Impact of Sanctions and Counterterrorism Measures on Humanitarian Operations

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At a glance

This guidance explores the multifaceted impact of sanctions and counterterrorism measures on humanitarian operations and activities; it does not address their potential socioeconomic impact. It provides: 1) key elements for a basic understanding of the issue; 2) advice on how to acquire visibility on the overall impact and the main types of impact experienced in specific contexts; and, 3) advice for engagement towards mitigating measures, ensuring coherent approaches across contexts. Humanitarian Country Teams (HCTs) should provide the humanitarian leadership with pertinent information and analysis. Where the operational impact is significant, Humanitarian Coordinators (HCs) have a responsibility to engage with key interlocutors in-country to address it, with the support of OCHA at field and headquarters levels. HCs also have a responsibility to ensure that humanitarian action remains clearly distinct from sanctions implementation and the counterterrorism agenda.

Five key pieces of guidance for field leaders

1. A range of measures adopted by various actors to prevent resources from being made available to sanctioned individuals, regimes, or armed groups, can generate impediments for humanitarian operations. This includes restrictions on transfers of funds and goods, the intimidation of humanitarian staff and organisations upon accusations of support to 'terrorism', the potential criminalization of humanitarian activities as forms of support to sanctioned entities or individuals, and restrictive donor and bank policies.
2. HCs should encourage HCTs to identify, monitor, and document impediments that sanctions and counterterrorism measures generate. The guidance provides tools and advice to HCTs to that end.
3. Where sanctions and counterterrorism measures generate significant impediments, HCs have a lead role to play in advocating for mitigating measures, seeking support from OCHA at field and headquarters levels.
4. Some governments, donors and other stakeholders consider that humanitarian organisations and programmes should actively contribute to the implementation of sanctions and counterterrorism measures. HCs have a lead role to play in ensuring both strategic coherence across UN pillars in-country and respect for the impartiality and non-politicization of humanitarian assistance.
5. HCT members have a responsibility to ensure that humanitarian assistance goes to those in need and minimize potential diversion of funds or aid in the process and that strong risk mitigation systems are in place and dialogue is welcome on how to improve those. At the same time, sanctions and counterterrorism measures should not directly or indirectly prevent assistance from reaching all those in need in a timely manner.

What does the full guidance offer?

The guidance clarifies the applicability of various types of measures and their differentiated impact on humanitarian organisations and staff based on relevant criteria (UN vs. non-UN, nationality, etc.). To facilitate engagement towards mitigating measures, it identifies the most common issues that have arisen in different contexts, suggests a possible course of action, and provides examples where issues were successfully addressed. An annex contains references for HCs willing to delve deeper into the topic, as well as and generic key messages for engagement with various stakeholders.

The full IASC product is available at <https://iasc.ch/sanctions-coter-impact-2021>

For support using this product, or to provide feedback on the product or this summary, contact OCHA-PAPS (piacibello@un.org) or the IASC secretariat at: iasccorrespondence@un.org.

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