



Operational 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 operational humanitarians

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. HCT members should discuss the issue in existing coordination platforms to 1) determine if some organisations are confronted by impediments generated by sanctions or counterterrorism measures, starting with the types of impediments already identified across several contexts, and 2) determine whether it is a significant issue for the humanitarian response overall.
3. If so, HCT members should: 1) identify, monitor, and document the impediments that sanctions and counterterrorism measures generate, 2) share this information in existing coordination platforms, 3) consolidate and analyse this information under OCHA's leadership, and 4) alert the HC through the OCHA office, as well as OCHA and relevant Agencies' headquarters to inform advocacy and policy discussions.
4. Different HCT members are impacted differently, with local partners being the most vulnerable. They are also often the most reluctant to share information as they may be reliant on a single grant or donor and more exposed to security risks. It is critical to engage with all HCT members, demonstrate the added value of information sharing, and offer guarantees in terms of confidentiality.
5. Regular information and analysis sharing with HCs – though and under the leadership of OCHA – is essential to enable common messaging and positioning and to support high-level advocacy with donors and government authorities in-country, Member States' capitals, and the Security Council.

What does the full guidance offer?

To help monitor and document impact, the guidance briefly describes various forms of impact already identified. It also offers examples of lessons learned and best practices from specific contexts. An annex contains references for those who wish to delve deeper into the topic and an impact monitoring template.

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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