
COVID-19 and the Policy of Sanctions: An Event Analysis

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STATEMENT OF THE PROBLEM

The COVID-19 pandemic has had a serious impact on international relations. It would have been simply inconceivable to imagine such a massive sea change at the beginning of 2020. The coronavirus has also influenced international sanctions policy. We have witnessed an unwitting experiment that has been prompted by the present emergency situation. On the one hand, sanctions represent an instrument of coercion and a pressure tactic to achieve political goals. This is a 'zero-sum' game, in which one of the parties stands to lose more than the other. On the other hand, any extreme catastrophe that unfolds on a global scale, such as the coronavirus pandemic, cries out for solidarity and mutual assistance. The lives of people, regardless of their nationality, become the focus of attention. In such cases, we face a dilemma between political needs and moral imperatives. Political leaders and other actors must choose between one of two

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extremes: to continue to apply pressure in spite of everything, or at the very least temporarily relax restrictions in the name of saving people's lives.

No similar situation has ever arisen before over the last century of sanctions policy. The closest point of comparison is the Spanish flu pandemic of 1918–1920. During this time, at the end of World War I, there were comprehensive trade embargoes in place between the warring parties. In 1919, severe restrictions and a complete economic blockade were introduced against Soviet Russia. Given all of the disasters that the country lived through, including famine, devastation, and war, the Spanish flu was simply one more calamity. The Spanish flu pandemic was less marked in light of the global catastrophe of the preceding decade. The eventual lifting of the economic blockade against Russia in 1920 was most likely done due to the victory of the Soviet regime and out of a desire to reap the possible benefits of expansion into the Russian market rather than out of any moral considerations of the initiators of the sanctions.¹

The geopolitical reality of 2020 is totally different. Today, the world is not convulsed by global military conflict. Global institutions are now much more developed than they were at the dawn of the twentieth century, when organizations like the UN were still just dreams. The current sanctions policy is more nuanced: instead of comprehensive embargoes and blockades, mostly 'smart' or 'targeted' sanctions have been imposed against individuals, organizations, or economic sectors. The only serious total economic blockade in force at the moment is against North Korea. Nevertheless, certain 'smart' sanctions have been in effect for many years, and in some cases decades. They still erode the resources of targeted countries, and in an emergency the resulting resource scarcity will inevitably affect the ability of the country to counter the threat of a pandemic.

The question arises: how has the COVID-19 pandemic influenced the policies of the countries that initiate sanctions? How seriously have restrictive sanctions regimes been transformed? In what way did COVID-19 influence the sanctions agenda? What has been the position of the UN as a key institution of global governance, and what has been the reaction of the key countries that have initiated sanctions? How has the role that COVID-19 has played within sanctions policy changed over the course of the pandemic?

Our main hypothesis is that COVID-19 has not fundamentally changed the existing sanctions regimes. The countries that have imposed sanctions have not backed down from their programs. They have only agreed to certain humanitarian exceptions of a limited nature. In a number of areas, COVID-19 has even exacerbated the political differences between certain states, increasing the risks of applying sanctions against each other.

We will test our hypothesis using the event analysis method. This article analyzes an array of data on developments in the field of sanctions policy around the world during the COVID-19 pandemic from March to June 2020, inclusive. We will study the nature of the events, how they are distributed between initiator and target countries, the proportion of events that are related to COVID-19, as well as the content of these events.

BASIC CONCEPTS

When we use the term “sanctions,” we mean a set of restrictive measures that an initiating country, group of such countries, or international organization applies against a target country, a group of countries, individuals, or organizations. Sanctions seek to change the foreign or domestic policy of the target country. Together with diplomacy and the use of force, they can be considered as one of the tools available for conducting foreign policy. For example, the 2017 US National Security Strategy defines sanctions as a mechanism for deterring and limiting the potential of rivals in the international arena.²

The restrictive measures referenced in the definition mainly include economic and financial restrictions. They include bans on the export and import of certain products, restrictions on banking services, technology transfers, investments, participation in infrastructure projects, etc. There are also non-economic restrictions. The most common is the restriction on the entry of specific individuals or categories of people, such as visa restrictions. The now classic study by Gary Hufbauer et al. noted that the initiator of sanctions creates conditions under which economic damage, lost profits, and the resulting ramifications for society and the political system make it unprofitable to maintain a political course of action or behavior, and thereby force the target country to make concessions to the initiator’s demands.³ The political goals of sanctions can be reduced to three components: coercion, constraining the potential of the target country, and sending a political signal.⁴

From the point of view of the United Nations, the UN Security Council is the only authorized body that may impose legitimate sanctions.⁵ The official UN terminology does not include a concept for sanctions, although the term is widely used unofficially. Article 41 Chapter 7 of the UN Charter empowers the Security Council, in the event of threats to peace, violations of the peace, and acts of aggression, to decide to adopt measures that fall short of armed force. They include “completely or partially breaking off economic relations... channels of communication, as well as

severing diplomatic relations.”⁶ The Security Council may decide on such measures by adopting resolutions, which all member countries are bound to carry out. However, the General Assembly may make recommendations concerning sanctions policy. These may be made by the Secretary General, the heads of UN organizations, special rapporteurs, experts, etc. The UN has extensive experience in the use of restrictive policies: it currently has fourteen such programs in place.⁷

Outside of UN restrictive measures, individual states or groups or temporary coalitions of initiating countries commonly impose their own unilateral sanctions. These unilateral measures bypass the UN Security Council. The most active initiator of unilateral measures is the United States. During the twentieth and early twenty-first centuries, the United States has used sanctions more often than all other states and international organizations combined.⁸ U.S. national law enshrines a concept of sanctions, and states that they can be imposed either by presidential executive orders or by legislative acts passed by Congress. The European Union is also making increasing use of unilateral restrictive measures. Its legal regulations also recognize a concept of sanctions. China and Russia usually oppose unilateral sanctions that bypass the UN Security Council, but they will apply them either in response to sanctions by third countries against them (counter-sanctions) or to address sensitive national security issues (for example, China’s sanctions that seek to resolve the Taiwan problem in its favor).⁹ U.S. and EU sanctions, as a rule, are made public and legally recorded in official documents, whereas China’s sanctions are often unofficial.¹⁰

Sanctions are not the same as trade wars.¹¹ Sanctions are initiated by government agencies to achieve foreign policy goals. They rely on a specific set of tools (embargo, blockades, bans, etc.). Businesses rarely lobby for sanctions and often suffer as a result of them. Trade wars, on the other hand, are conducted in order to achieve economic goals. The toolset used to conduct them is different from the one used to advance a sanctions policy, as it includes tariffs and customs duties. In contrast to sanctions, businesses often lobby in favor of these policies. However, there is a relationship between these two concepts of sanctions and trade wars. In some cases, sanctions can be used to achieve market advantages. The dual use of these concepts can be seen in the rivalry between China and the United States.¹² Russian researchers have characterized this trend using the concept of “new protectionism.”¹³

Any discussion of sanctions must necessarily touch on the topics of “enforcement” or “enforcement measures.” These terms are understood to

stand for a set of actions by the state authorities of the initiating country that seek compliance with the sanctions regimes. These measures include, for example, penalizing violators of sanctions using the same punitive measures that are applied to the target countries or actors. Both these and other actors may, for example, be entered on a Specially Designated Nationals and Blocked Persons List (SDN List). In one recent case, the U.S. Treasury Department blocked (“blocked” here meaning that it imposed a ban on any economic transactions with) the Chinese company COSCO Shipping Tanker, for allegedly transporting Iranian oil.¹⁴ Other coercive measures to force sanctions compliance may include monetary fines and even criminal prosecution.

STUDY METHODOLOGY

A sanctions policy, like many other phenomena, can be broken down into its component events. The process of identifying such events, encoding them as variables, and then analyzing them is usually called “event analysis.” This methodology has been widely used in the social sciences for a long time. For example, in economics, we can propose analyzing events by viewing them in relation to market trends,¹⁵ and we can also study a number of other problems.¹⁶ The largest group of questions has been studied through an analysis of the “event history,” which is a method proposed by sociologists. There are also various ways of encoding events as well as of analyzing the results.¹⁷ Political scientists have studied chains of events, for example, to test the connection between economic crisis and the transformation of the political regime.¹⁸ In international relations, scholars have both analyzed “rare phenomena”¹⁹ and proposed extremely nuanced analyses of everyday recurring events.²⁰ Published articles and media data are typical sources used for event detection.²¹ In general, event analysis has established itself as an interdisciplinary empirical method that is used by scholars from a wide range of disciplines in the social sciences.

At the same time, event analysis has been used relatively rarely or only applied very narrowly in previous sanctions research. It has been most often used as part of two approaches. The first is to analyze major events. The aforementioned study by Gary Hufbauer et al. is organized in a similar way. The fundamental unit of analysis in their study is the “sanctions episode,” that is, the moment when the sanctions regime is introduced, lifted, or changed. This approach is suitable for the goal of our study—to determine whether the behavior of the target country has changed after the introduction or lifting of sanctions.²² Hufbauer’s approach, which we can term

“macroanalysis,” is a common research strategy that has spawned a number of other interesting studies.²³ It makes it possible to uncover “big trends” in a sanctions regime, but misses a lot of the finer details of day-to-day sanctions policy. The shortcomings of macroanalysis have been compensated for by a large number of studies that use the case study method, which is used when the subject is a specific case country where sanctions have been imposed.²⁴ The disadvantage of the case study is that it focuses in-depth on a specific case, to the detriment of being able to make generalizations about a larger sample. Strictly speaking, both approaches deal with events, but neither of them can be called event analysis. A number of applied analytical studies enumerate particular events related to the lifting or imposition of sanctions, such as *Sanctions on Russia: Impacts and Economic Costs on the United States*.²⁵ However, these studies do not encode the events, which complicates their subsequent analysis.

To fill this gap, the Russian International Affairs Council (RIAC) launched work on a new event database in the field of sanctions policy (“Database of Sanctions Events” or “DSE”). This database promises to provide detailed information about events that is updated on a daily basis (that is, to offer a micro-level overview), while at the same time transcending the boundaries of specific cases. Users will be able to take the various cases and make generalizations from them to gain a macro-level perspective. The present study is based on factual information that was collected as part of the work on the DSE.

The unit of analysis of the DSE is the individual sanctions event. Such events include: the imposition of sanctions; the cancellation or extension of sanctions; the use of enforcement measures in one form or another; the granting of exemptions from sanctions regimes, including humanitarian ones; declarations adopting sanctions or canceling such sanctions; and the acts of joining the sanctions regimes of other countries.

The database records the following variables of each event: the country or international organization that is the initiator of the event; the agency or institution that is the immediate source of the event (there may in fact be several such institutions); the target country or topic of concern (for example, human rights, non-proliferation, terrorism, etc.) related to the event (there may also be several such countries or problems); the problem cited as the reason for the imposition of sanctions; the law or regulation that was cited as the basis for the decision. All of these variables have a nominal or ratio scale with equal units, which cannot be ranked. However, the scales make it possible to identify the typical characteristics of events and assess how various attributes are distributed between them.

The DSE database specifies the number of individuals and legal entities as well as aircraft and ships that have come under the sanctions. The event score is an important variable. It is calculated on an ordinal scale, where “1” means that the event has a positive effect on the target country, its organizations, or citizens with regard to sanctions. Such events include the lifting or reduction of sanctions, humanitarian or other exceptions, or favorable court rulings and decisions to lift sanctions. By contrast, “-1” means that the event has a negative impact. Such negative events include introducing or toughening sanctions, extending sanctions, filing criminal charges or civil lawsuits, levying fines, etc. Finally, “0” means that the event does not pose any immediate harm or benefit to the target country. Such events include declarations, statements, draft laws (that have not been enacted), recommendations, etc. These neutral events have the potential for positive or negative outcomes, but they do not represent such outcomes in and of themselves.

The events are ordered by date in the database. The source of information for the database are the announcements of events made by official government agencies, companies, international organizations, and any other institutions with some connection to the event. Naturally, the DSE cannot claim to provide comprehensive coverage of all possible events, but it does include those episodes that have been documented and reflect a policy decision, action, or position.

The following procedure will be used to achieve the objectives established for the database. First, we will analyze the distributions of events based on their main characteristics. We will then highlight the events directly related to the topic of COVID-19, and we will track the change in the proportion of such events during the study period. Next, we will consider the content of such events.

SANCTIONS EVENTS DURING THE COVID-19 PANDEMIC

Basic Characteristics

Our analysis for this piece centers on four months during the COVID-19 pandemic. The period starts with March 2020, which marked a radical jump in the spread of the disease. On March 1, 2020, the total number of cases worldwide was 88,371 people, and by April 1 it was 932,605. In other words, in March the number of infections increased by an order of magnitude, and the number of reported cases jumped into the hundreds of thousands. In March alone, the increase in cases was simply

massive with an equally significant rate of increase. March also marked the beginning of large-scale quarantine measures. The problem also started to be discussed through international institutions in March.

During the winter months, the disease had also spread relatively quickly, but due to the relatively small number of cases and the localization of the pandemic mainly to China, at that time the problem was not yet perceived to be a global one. On January 10, 2020, there were 41 cases, but by February 1, the number had already increased to 12,038. In February, the number of cases increased more than sevenfold, which seems sizable until one considers the more than tenfold increase in March. Thus, by the time of our analysis, the pandemic had finally become a global phenomenon. And the growth rates in the number of cases in many regions significantly exceeded the average rate for the world as a whole. For example, in the European region there were 23 cases by February 1, but 2,220 cases on March 1, and already 511,409 cases on April 1.²⁶

Our analysis period ends in July 2020. As of this writing, the pandemic is still far from over. But with regard to the topic of sanctions, four months provide a sufficient dataset to draw some preliminary conclusions, which we will now explain. During this period, 243 events related to sanctions policy were recorded in the DSE. Of these, 27 events had some connection to COVID-19. In other words, 11.11% of all events connected to restrictive measures were related to the pandemic. However, the events were distributed unevenly over the period: in March, there were seven such events, 14 in April, only six in May, and not a single sanctions event in June related to COVID-19. We propose that the pandemic affected sanctions policy only during the period when the number of cases was exploding at a breakneck pace, but then its significance began to wane. In order to gain more accurate evidence to test this hypothesis, we will, of course, need a longer observation period. This article only presents preliminary findings.

During the period under review, we were able to identify twenty-seven initiators of sanctions events, that is, those actors who introduced or lifted sanctions, applied certain measures to implement already existing regimes, or called for the imposition or lifting of sanctions, etc. The events are distributed unevenly between the initiators. As was expected, the leading initiator was the United States. American government agencies (the U.S. president, executive agencies, Congress, etc.) initiated 131 out of the 243 events. In other words, the United States accounts for 53.9% of all events, or more than the total for the rest of the initiators combined. The European Union was the initiator of thirty-three events (13.58%). We could increase this figure by including seven events related to third

countries joining the EU sanctions regime. The UN was responsible for twenty-six events (10.69%). The United Kingdom was responsible for eleven (4.52%), and Russia imposed four events. And all other initiators were each responsible for three or fewer events.

The actions of the initiators were directed at specific target countries or related to problems of concern. During the four-month pandemic period investigated by the article, we were able to identify forty-one such targets. Some events specified two targets at once. For example, a decision could be taken simultaneously against Iran and also address the problem of nonproliferation. In other words, the number of targets could be greater than the number of events. In the 243 events, various targets were mentioned 266 times. The most popular target was Iran. It accounted for 40 out of the 266 (15.03%) mentioned targets. This is followed by China, in a distant second with 23 references (8.64%), then Russia with 21 references (7.89%), North Korea with 16 references (6.01%). The target of fighting terrorism received 15 references (5.63%), Venezuela 14 (5.26%), and Syria 11 references (4.13%). The package of sanctions that was simultaneously imposed against Russia, China, Venezuela, and a number of other countries accounts for three references. It is worth adding another two references to the Russian case, where sanctions were imposed against Russia in connection with Ukrainian citizens. In a significant proportion of cases, we are talking about all sanctions or sanctions as such. Such cases, for example, include a call to ease sanctions in light of COVID-19. Such declarations do not indicate programs. They are referred to as simply “all sanctions.” They account for 25 out of 266 references, i.e. 9.39%.

The distribution of initiator and target countries (problem-targets) provides an interesting data point. If the first confirms the long-known fact that the United States is the leading initiator of actions, then the second demonstrates certain new trends. The two major powers of Russia and China are becoming notable targets of U.S. sanctions. By contrast, during the preceding post-Cold War period, targets were mainly small countries or regional powers like Iran.

The nature of the actions taken by the initiators during the period of study can be characterized as follows: Of the 243 events, 120 (i.e. 49.38%) have a negative impact on the target country or problem (imposition of sanctions, enforcement of sanctions, listing of entities or persons on “black lists”, etc.). There are ninety neutral events (37.03%). Only thirty-three events can be considered to be positive (13.58%).

Interestingly, the proportion of positive, neutral, and negative events by the initiators has changed over time. For example, out of 131 events

connected to the United States, 69 are negative (52.67%), 42 are neutral (32.02%), and 20 are positive (15.26%). Of the 33 events connected to the EU, 16 are negative (48.48%), 14 are neutral (42.42%) and three are positive (9.09%). Of the 26 events connected to the UN, eight are negative (30.76%), 14 are neutral (53.84%), and four are positive (15.38%). The UN as an institution has a significant bias towards neutral actions (statements, declarations, recommendations, projects, reports, etc.), while the actions associated with the United States and the European Union are closer to the distribution inherent for the entire sample. However, the quality of the negative, neutral, and positive actions can vary. For example, in the United States, criminal prosecutions over sanctions make up a significant number of the negative events. At the same time, these types of events do not occur at all in the practice of the European Union, let alone the UN. A detailed analysis of the different types of events could be the subject of a separate study.

A total of twenty-seven events are associated with the COVID-19 pandemic and the sanctions policy, or 11.11% of the total sample. Ten cases were initiated by the United States, seven by the UN, three by the European Union, two by Russia, two by the United Kingdom, one by South Korea, one by a group of countries including Russia, China, Iran, and a number of others, and one by a group of countries including the United States, Georgia, Ukraine, etc. In terms of their nature, only two of these COVID-19-related events were negative, twenty-one were neutral, and four were positive.

In other words, the events associated with COVID-19 included for the most part declarative or informational actions and a small number of positive actions (lifting or easing of sanctions and granting of humanitarian exceptions). There were almost no negative actions.

It can therefore be concluded that during the pandemic, sanctions policy was conducted in accordance with two realities. The first reality was the status quo, whereby habitual repressive actions were largely continued. The second reality was tied to COVID-19. This one prompted many fewer repressive actions, but it was also not characterized by that many positive actions, either—mainly neutral ones. In addition, the share of such events out of the total dataset was quite small. In the next section, we will take a closer look at the events directly related to the COVID-19 pandemic.

COVID-19 AND SANCTIONS POLICY: KEY EVENTS

The problem that COVID-19 posed for sanctions policy began to show itself even in the relatively early stages of the pandemic. For example, on March 9, 2020, the Office of Foreign Assets Control (OFAC) of the

U.S. Treasury Department updated the list of frequently asked questions about sanctions. One of these questions was about whether humanitarian aid packages to fight COVID-19 would be allowed to be shipped to Iran. In response to this question, OFAC officials provided a complete list of regulations that govern allowed humanitarian exceptions for Iran.²⁷ However, American officials did not propose or consider canceling or modifying the sanctions regime against Iran.

Globally, the question of the relationship between sanctions and the COVID-19 pandemic was also raised at the UN. On March 25, UN Secretary General António Guterres appealed to the leaders of the G20 countries with a proposal for concerted action to combat the pandemic. His idea was that developing countries, which lacked the resources to effectively respond to the pandemic, are and were more vulnerable to COVID-19. To provide such countries with an equal opportunity to fight the disease, Mr. Guterres called for, among other things, the lifting of tariffs and trade restrictions that affect the supply of medical goods and other vital products, as well as for the waiving of sanctions to ensure supplies of food and medicine.²⁸

Russian President Vladimir Putin responded to the appeal of the UN Secretary General directly at the emergency summit of the G20, which took place on March 26, 2020. He proposed the idea of “green corridors” that would be exempt from sanctions and trade wars and could be used for the exchange of mutual aid in the form of medicines, food, equipment, and technology.²⁹ On the same day, a letter addressed to Mr. Guterres was published on behalf of eight countries that are the target of unilateral restrictive measures: North Korea, Cuba, Iran, Nicaragua, Syria, Venezuela, as well as Russia and China. Moscow and Beijing have traditionally opposed the use of sanctions that bypass the UN Security Council. Therefore, the fact that they joined the appeal to Mr. Guterres can simply be viewed as a continuation of their established position rather than as an opportunistic move. The letter requested the Secretary General to demand that UN member countries completely and immediately lift unilateral sanctions.³⁰ On the same day, Russia submitted a draft resolution to the UN General Assembly to adopt an UN General Assembly Declaration on Solidarity in the Fight Against Coronavirus. The draft also contained an appeal to abandon the use of unilateral sanctions.³¹ The Declaration was co-sponsored by twenty-eight UN member states. However, the Russian draft resolution was blocked by Ukraine, Georgia, the United Kingdom, the United States, and the European Union.³² The final text of the resolution dropped all mention of sanctions.³³

Senior UN officials themselves have also issued calls for member countries to lift or suspend sanctions. Shortly before Mr. Guterres made his appeal to the leaders of the G20, the UN High Commissioner for Human Rights Michelle Bachelet had already adopted a special statement on sanctions. On March 24, she called for an easing of sanctions against countries that are fighting COVID-19. Sanctions can hinder an effective response to the pandemic, which will inevitably impact other countries. In issuing her statement, Ms. Bachelet primarily had Iran in mind. At that time, the pandemic situation in that country had already worsened: 1,800 people had died, including 50 doctors. The sanctions had hampered access to essential equipment such as respirators and personal protective equipment for doctors. In addition to Iran, Cuba, North Korea, Venezuela, and Zimbabwe were also mentioned.³⁴ On April 28, Ms. Bachelet issued a separate statement about Sudan, indicating her desire to lift sanctions during the pandemic.³⁵

On March 30, Hilal Elver, Special Rapporteur on the Right to Food, also made a similar appeal. She noted that sanctions undermine the right to food, especially in such countries as Syria, Venezuela, Iran, Cuba, and Zimbabwe. They must be lifted in order to prevent a food crisis in the affected states.³⁶ On April 3, Alena Douhan, Special Rapporteur on the negative impact of the unilateral coercive measures on the enjoyment of human rights, also called for the lifting of sanctions due to the COVID-19 crisis. In particular, she pointed out that in countries that are under sanctions, medical equipment is often old and worn out, and these countries often face a shortage of medicines and personal protective equipment. She also noted the findings of the work of her predecessor as Special Rapporteur, Idris Jazairi (who died in February 2020), which also documented the negative impact of sanctions on the exercise of human rights.³⁷ On April 30, Alena Douhan and a group of experts called on the United States to lift the embargo against Cuba in the interests of fighting the pandemic.³⁸

Given that the US is the most active initiator of sanctions, the question of whether the recommendations of UN officials would be carried out in reality largely depended on its actions. However, no officials in Washington have proposed changing America's unilateral sanctions measures. However, the U.S. authorities did adopt a number of other measures. On April 9, 2020, the U.S. Treasury released a statement concerning COVID-19. It reaffirmed the commitment of the United States to provide all necessary humanitarian aid to countries that are affected by the crisis. According to the statement, Treasury sanctions do not prohibit the granting of legal humanitarian aid, and they allow for the supply of medicines, medical

equipment, and food at any time. At the same time, there is a risk that such aid could fall into the wrong hands and thereby benefit terrorists, corrupt officials, and other bad actors. Therefore, the process of providing legal humanitarian aid would require maximum transparency, verification of the counterparties, and measures to comply with legal requirements, including even in a crisis.³⁹

On April 16, the U.S. Treasury published a fact sheet, “On the provision of humanitarian aid and support of trade to fight COVID-19.” It detailed humanitarian exceptions to the sanctions regimes against Iran, Venezuela, North Korea, Syria, Cuba, and Russia. The underlying message of the fact sheet is that these exceptions are designed to “help people” while simultaneously putting pressure on the “ruling authorities.” The “Russian” part of the document dealt exclusively with sanctions in relation to Crimea region. The fact sheet essentially did hardly change the sanctions regime. Rather, it provided stakeholders with a detailed single-source overview of what existing rules say about the COVID-19 problem.⁴⁰ In addition, on April 20, the Treasury recommended that any persons experiencing *force majeure* circumstances in connection with COVID-19 report them in case it experiences difficulties complying with the requirements of sanctions imposed by the government agency.⁴¹ The Treasury was quick to grant sanctions exemptions for the shipment of humanitarian supplies to the United States itself. For example, take the shipment of Russian aid packages of ventilators manufactured by KRET back in early April 2020. The company is under American blocking sanctions, but exceptions were made to allow supplies of these aid packages. American experts voiced criticism of how the humanitarian exemptions were handled, including the limited nature of such exemptions, their inadequacy, and the delays experienced in obtaining authorizations from authorities.⁴² However, it would also be incorrect to say that the American exemption system was a total failure. For example, on April 17, the South Korean Foreign Ministry announced a business briefing on humanitarian supplies to Iran after the country “received approval from the United States to have humanitarian trade relations with this Middle Eastern country.”⁴³

In addition to the humanitarian considerations, the U.S. sanctions policy considered in relation to COVID-19 is interesting in light of two other topics. The first has to do with the status of foreign citizens in the United States. On April 10, President Donald Trump issued a memorandum to the Secretary of State and the Secretary of Homeland Security. Due to the pandemic, the memorandum allowed visa sanctions against citizens of foreign states staying in the United States if these foreign states

refused to accept their citizens back or delayed this process. In other words, the memorandum articulated a policy of applying visa restrictions for the purpose of repatriating foreigners.⁴⁴

The second topic is related to the threats of U.S. sanctions against China due to COVID-19. The United States is the only country in the world that has unequivocally accused China of being responsible for spreading the pandemic. Republican members of Congress have introduced three bills proposing COVID-19 sanctions against China. Republican Senator Ted Cruz introduced the first such bill.⁴⁵ It proposed asset freezes (blocking sanctions) and visa restrictions against Chinese officials responsible for censoring information, including on health issues. The second such bill was introduced by Republican Senator Tom Cotton and a group of his fellow party members.⁴⁶ This bill also proposed similar blocking and visa sanctions. Finally, the third bill was introduced by Republican Senator Lindsey Graham, who was joined by a number of his associates.⁴⁷ This bill proposed requiring the president to issue a report to Congress answering the following questions: has China issued a complete and comprehensive response to any investigation of COVID-19 initiated by the United States, its allies, and the UN; has China closed all livestock markets that could pose a risk of new diseases; and has China released all of the “democracy supporters” in Hong Kong who have been arrested since the beginning of the COVID-19 pandemic? None of these three bills have been passed into law. Their appearance should be understood within the context of the growing pressure that the United States has been exerting against China on a wide range of issues.

The European Union expressed its support for the ideas of the UN Secretary General, but it did not make any radical changes to its sanctions regime. On April 3, 2020, Josep Borrell, High Representative of the European Union for Foreign Affairs and Security Policy, announced that sanctions should not be used to undermine the shipment of products that were needed to fight COVID-19. On the whole, the EU position is close to the American one: Humanitarian exceptions to the EU sanctions system have been granted. Sanctions should not interfere with the fight against the pandemic, but COVID-19 is not a reason in itself to abandon sanctions in cases of violation of international law, the proliferation of weapons of mass destruction, arms trafficking to conflict regions, human rights violations, and violations of peace.⁴⁸ The chief diplomat of the European Union reaffirmed his support for the ideas of Mr. Guterres and Ms. Bachelet on April 20. He said that many are afraid to offer assistance to Iran and Venezuela, fearing U.S. sanctions. The situation in these countries is appalling (“out

of any human consideration”), and therefore the EU again intends to call for an easing of the sanctions regime.⁴⁹ As in the case of the United States, the publication of explanatory statements provided a practical basis for how to act in accordance with the declarations. On May 11, the European Commission published the “Commission Guidance Note on the Provision of Humanitarian Aid to Fight the COVID-19 Pandemic in Certain Environments Subject to EU Restriction Measures.” The first document was dedicated to Syria.⁵⁰

Some measures easing sanctions have been adopted by individual countries. For example, on March 13, 2020 the United Kingdom government promulgated the “Trade Sanctions on Syria,” which outlined exemptions for the supply of oil for humanitarian purposes. However, the exceptions were not tied to COVID-19, despite their timing.⁵¹ The House of Commons of the UK Parliament also prepared a report on the global experience of humanitarian exemptions for COVID-19.⁵²

As far as Russia is concerned, we should note that in addition to its efforts to ease sanctions by working through the UN, Russian Senators K. I. Kosachev and S.I. Kislyak have proposed amending Federal Law No. 127 FZ. According to the law, Russian restrictive measures should not be applied to vital goods that cannot be substituted with similar products made in Russia. The intent of this amendment is to provide an exception for products that have become scarce in Russia due to emergency circumstances like the COVID-19 pandemic.⁵³ So far, the amendments have not yet been approved. However, they are hardly critical, since the Government of the Russian Federation already has a legal mechanism for making such exceptions.

CONCLUSIONS

We can draw several conclusions from our analysis. First conclusion: Not a single country has changed its existing unilateral sanctions regimes in 2020. Even at the height of the pandemic, the initiating countries have continued to apply sanctions, and the number of negative actions (introduction, extension, and application of sanctions) clearly continued to predominate over both neutral (declarations, intentions, plans, recommendations, and reviews) and positive actions (lifting or easing of sanctions). The most significant measure that such major initiators as the United States or the European Union took was to conduct a detailed review of existing laws on humanitarian exemptions and to express a willingness to prioritize applications for COVID-19 exemptions. However, the sanctions regimes themselves have not been fundamentally altered.

Second conclusion: The UN has put the problem of the relationship between COVID-19 and sanctions on the global agenda, but it has not been able to achieve much success in persuading its member countries to implement its recommendations. Indeed, the Secretary-General simply has no tools at his disposal to actually implement such UN policy recommendations. This question was not even raised at the Security Council. Any draft resolution would be doomed to failure, given the divergence of positions on sanctions between Russia and China, on the one hand, and the United States, France, and the United Kingdom, on the other. In any case, the United States would also be able to block any Russian proposal at the level of the General Assembly. The final declaration of the UN General Assembly on COVID-19 did not mention sanctions at all.

Third conclusion: The share of events in the area of sanctions policy related to COVID-19 during the period under review was small, and the ones that did occur were fleeting in nature. After a surge of interest about the topic in March and April, the number of connected events began to decline, and by June the topic of the pandemic left the sanctions agenda altogether.

Fourth conclusion: The pandemic became a pretext for initiating discussions in the United States about imposing sanctions against China. However, such events should be viewed in light of the growing confrontation between Washington and Beijing over a wider range of problems. The discussion of sanctions against China quickly dropped the pretext of COVID-19 and returned to the usual topics of human rights violations, information security, etc.

Our analysis has made it possible to test the database of events related to sanctions policy. We have found that this tool has its limitations, but it does allow for the reconstruction of a birds-eye view of sanction events, to identify trends, and to move from an analysis of “microevents” to the level of “macrogeneralizations.” *f*

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