

# U.S. Sanctions and the Global South:

## Navigating Networked Resistance, Competing Narratives, and Unintended Consequences

Policy Brief



December 2024

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## Editor's Note

This policy brief was originally published as a chapter in [Sanctions and the Symphony of Power: Revitalizing American Economic Statecraft](#), a research volume commissioned by the Gates Global Policy Center to inform the Third Gates Forum on Economic Statecraft and Sanctions, held at William & Mary in December 2024. The intent of the Forum is to discuss bipartisan recommendations for action that would advance U.S. international interests and find broad support in the Administration and in Congress.

The opinions in this brief represent the views of the author alone and do not necessarily reflect those of the Gates Global Policy Center, nor that of AidData, the Global Research Institute, William & Mary, or those who provided peer review.

## Acknowledgements

The author owes a debt of gratitude to colleagues in AidData's Policy Analysis Unit who supported the identification, coding, and analysis of a representative sample of relevant scholarly articles from low-, middle-, and high-income countries that made this background article possible. Contributors include Dr. Nara Sritharan, Ms. Kelsey Marshall, Ms. Divya Mathew, Dr. Jonathan Solis, Dr. Eun Young Kim, and Mr. Bryan Burgess. The author acknowledges the helpful peer review comments on an earlier draft from Nara Sritharan and Jonathan Solis (AidData), William & Mary Chancellor Robert M. Gates (Gates Global Policy Center), Dr. Farzan Sabet (Geneva Graduate Institute), among others.<sup>1</sup>

## Citation

Custer, S. (2024). *U.S. Sanctions and the Global South: Navigating Networked Resistance, Competing Narratives, and Unintended Consequences*. In: *Sanctions and the Symphony of Power: Revitalizing American Economic Statecraft*. AidData and William & Mary's Global Research Institute: Williamsburg, VA.

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# Executive Summary

This policy brief explores how U.S. sanctions are perceived and received in low- and middle-income countries versus advanced economies. It analyzes a novel data source of articles written by scholars from 71 sanctioned, sanctioning, and third countries on sanctions. The brief surfaces three challenges and seven opportunities for action as policymakers employ sanctions in an era of heightened competition.

Target countries have evolved from isolated defiance to networked resistance. The U.S. toolkit needs a refresh to undercut the efficacy of retaliatory anti-sanctions that seek to impose hurt on the sender and defensive countermeasures that aim to curb the impact of sanctions on the target economy. The U.S. should play a more proactive role in monitoring and disclosing information about the increasing use of unofficial and explicit sanctions by authoritarian regimes for economic coercion. The White House could convene an advisory committee to propose measures to curb evasion of U.S. sanctions and mitigate risks to America's economic interests from retaliatory sanctions. Congress could publish reports and hold hearings examining the PRC's increasing use of coercive economic tools, including assessing U.S. and allied vulnerabilities to these measures. It could utilize future authorizations related to countering PRC and Russian influence funds to include an emphasis on publishing trustworthy evidence on authoritarian practices of economic coercion and build capacity for using this data among foreign publics.

U.S. sanctions are vulnerable to damaging counter-narratives. U.S. policymakers should implement mechanisms that make removing or reducing sanctions easier for a credible exit ramp, shift from unilateral to multilateral efforts when possible, and mitigate collateral damage to target countries. The White House could mandate that State, Treasury, and Commerce institute regular reviews of active U.S. sanctions and provide evidence-based recommendations for their termination, extension, or modification. The White House could convene a Task Force to recommend how the U.S. will institute transparent monitoring and assessments of the humanitarian impacts of its unilateral sanctions and incorporate trusted civil society voices into the process. State could develop media outreach and educational programming to increase foreign publics'

familiarity with how U.S. sanctions policies operate and steps taken to improve effectiveness, accountability, and transparency.

U.S. sanctions must avoid unintended consequences from isolating target countries.

U.S. policymakers should use the entire suite of tools in their economic statecraft arsenal to apply pressure but avoid complete isolation of target countries and companies, as this merely propels them into the arms of third-country enablers or fans the flames of defiance. A minimum viable level of trade and people-to-people relations are important lifelines that serve as tangible reminders of the benefits to their country of resuming normal economic relations. The White House could commission an interagency review of steps the USG has taken since 2022 to implement UNSC Resolution 2664, whether and how these steps have produced improvements in the ability to ensure delivery of humanitarian assistance in sanctioned contexts, and recommend changes to improve use of these carve-outs in future.

# 1. Introduction

Economic sanctions are long-standing instruments of national power employed by the United States (U.S.) and advanced economies to coerce rogue actors to comply with international norms, deny them access to resources used to finance malign behavior, and deter would-be copycats in the future.<sup>2</sup> When the U.S. imposes sanctions, particularly unilateral ones, political leaders assume that America has sufficient clout to isolate a country (or entity) politically and impose economic costs to incentivize the target to change their behavior. However, the logic of this assumption is increasingly tenuous. In the unipolar moment following the Soviet Union's demise, America was an undisputed economic and political heavyweight. At that time, the U.S. could exert outsized influence over target countries that were typically much smaller economically and less connected politically. However, the geoeconomic landscape has fundamentally changed over the last two decades.

America remains an economically vibrant and politically powerful nation, but it no longer enjoys unrivaled hegemony in either of these domains. The People's Republic of China (PRC) is now the single largest trading partner to more than 70 percent of the world's countries,<sup>3</sup> and its Belt and Road Initiative facilitates economic, cultural, and political connectivity among roughly 150 members to date.<sup>4</sup> Russia has aggressively pursued economic integration with post-Soviet countries via its Eurasian Economic Union and aid to much smaller economies that have been targeted by Western sanctions, such as Syria, North Korea, and Iran, among others.<sup>5</sup> Moreover, the expanded BRICS+ club of 10 emerging markets, which represents "half of the world's population and two-fifths of its trade" volumes, increasingly has the means and will to resist U.S. sanctions and help others do the same.<sup>6</sup> Meanwhile, senior U.S. and UK political leaders have invoked the term "hedging middle" to spotlight the geostrategic importance of middle powers who guard their strategic autonomy and navigate great power competition by playing both sides in pursuit of better deals.<sup>7</sup> In his contribution to this research volume, William Norris argues that these "fence sitters" are an important group for the U.S. to cultivate as strategic partners to ensure the future vitality of America's economic statecraft and, by extension, the efficacy of its use of sanctions.

U.S. economic sanctions, pursued unilaterally or with a small coalition of the willing, must increasingly navigate a more contested marketplace. American policymakers often frame their use of sanctions in normative terms (i.e., advancing human rights, democratic norms, international peace, and the liberal order). Nevertheless, America's frequent use of unilateral sanctions, sometimes in coordination with a coalition of willing allies, and the propensity for sanctions to create collateral damage for target countries opens it up to criticism.<sup>8</sup> In an era of intensified competition, Global South elites are skeptical of the motives of Western-led sanctions or censures of authoritarian rivals. When U.S. sanctions are not carried out in conjunction with the United Nations Security Council, it is easier politically and economically for third countries to express their disapproval by doubling down on non-alignment or targets to actively counter these efforts. Third countries may also attract benefits or incur costs from a sanctions regime in ways that impact U.S. economic, security, and geopolitical interests.

Herein lies what the political scientist Joseph Nye has referred to as the paradox of American power: U.S. economic and military might is insufficient to get the outcomes it wants in the absence of cooperation with other countries.<sup>2</sup> Sanctions are typically thought of as an instrument of "hard power," incentivizing others to change their behavior in response to economic sticks (applying a sanction) or carrots (removing a sanction).<sup>10</sup> Nevertheless, sanctions are constrained or enabled by the extent of America's "soft power," its ability to attract others to willingly accept and participate in a regime even without tangible incentives.<sup>11</sup> An underappreciated challenge for U.S. economic sanctions is that their success relies upon a reservoir of goodwill towards America that their application has the potential to undercut.

Foreign publics and leaders' views of the U.S. sour in the face of policies seen as narrowly self-interested and "hypocritical, arrogant, [and] indifferent" towards others.<sup>12</sup> American policymakers are not well-positioned to combat powerful counternarratives that question the legitimacy of U.S. sanctions and portray its motives as malign. America underinvests in its strategic communications capabilities abroad,<sup>13</sup> overly relies on unilateral sanctions and struggles to mobilize the political will to remove previously imposed sanctions.<sup>14</sup> As the companion piece by Daniel Drezner in this research volume describes, ample research on the unintended consequences of sanctions over three decades has raised the alarm over negative humanitarian spillovers. U.S.



policymakers' embrace of targeted "smart" sanctions (i.e., penalizing key officials or institutions rather than whole societies) has not convinced their many detractors that American sanctions do not harm foreign civilian populations irreparably.<sup>15</sup> Taken together, these conditions create vulnerabilities for the U.S. in building a credible, compelling case with foreign leaders and publics for when, how, and why it uses sanctions.

This policy brief aims to be complementary, not duplicative, to the robust literature that already exists on the use and effectiveness of sanctions. Specifically, it focuses on understanding *how international sanctions (applied by the U.S. and others) are perceived and received in low- and middle-income countries that have traditionally been sanction targets or third-country observers versus the advanced economies that have most often deployed these tools*. Aside from ad hoc anecdotal observations or retrospective case studies, little systematic attention has been paid to whether, how, and in what ways attitudes differ between these groups.

In this analysis, we use the term "Global South" as an imperfect shorthand to describe an incredibly diverse set of roughly 130 low- and middle-income countries with varying political clout, economic prospects, and relationships with the U.S.<sup>16</sup> Some countries project more individual power than others but it is also instructive to consider the Global South as a group that has growing political and economic importance and a history of "banding together" to pressure advanced economies to change international rules, norms, and institutions that they view as being unfair to their collective interests.<sup>17</sup>

Capturing the universe of insights from all foreign publics and leaders across the Global South on this topic is infeasible. Instead, this brief offers an imperfect bellwether: a sample of 366 articles written by scholars from 71 low, middle, and high-income countries on sanctions from Scopus, a multidisciplinary abstract and citation database containing 94 million records of research articles. An initial search of the database yielded 2,014 relevant articles. The final sample includes 100% of the articles with authors from low- and middle-income countries (204), along with a random selection of 20% of the articles from authors to represent two other groups: the U.S. and Russia (93) and other high-income countries (69). A brief methodology note below



provides more information about how this sample of articles was selected and its composition.

There are limitations to the views captured in the Scopus database and as those represented here. In many parts of the world, low levels of media and academic freedom likely skew what local scholars feel comfortable putting into the public domain. The reliance on English language articles likely also colors the sample. Despite these limitations, this brief provides a useful first step forward in helping U.S. policymakers understand how attitudes towards sanctions among sanctioned, sanctioning, and third countries may enable or constrict their efforts. Scholars may not directly control the levers of power in their countries, but their universities can be influential in training the next generation of policy elites and advising incumbent leaders. Scholars are also influenced by the broader policy discourse in their countries when it comes to choosing what questions to answer, interpreting evidence, and formulating preferences. In this respect, understanding how scholars converge or diverge on sanctions is a window into the attitudes of the societies of which they are a part.

The remainder of the brief draws upon this evidence base to speak to three forward-looking challenges that U.S. policymakers must navigate to employ sanctions effectively in an era of heightened competition. Section 2 explores the phenomenon of networked resistance—target countries embracing offensive and defensive strategies as a means of defying pressure from U.S. sanctions. Section 3 examines the power and proliferation of damaging counternarratives visible across target countries, third countries, and high-income countries that risk fraying fragile coalitions of senders. Section 4 looks at how scholars speak to the unintended consequences of sanctions that persist despite the growing pivot to targeted rather than comprehensive sanctions, including the effects on targets and third countries. Section 5 concludes with implications and options for U.S. policymakers to consider as they look to strengthen how they deploy sanctions as part of a robust foreign policy toolkit in an era of heightened competition.

## A Brief Methodology Note

The research team ran queries of the Scopus database in order to identify three lists of relevant articles related to “sanctions AND economic” based on the geographic location of the author’s host institution. Group 1 included authors based at host institutions in the U.S. and Russia (1933 articles). These were treated separately given the volume of articles written that included authors from host institutions in those two countries. Group 2 included articles from other high-income countries (2513 articles). Group 3 included articles from low- and middle-income countries (892 articles). In instances where an article was a collaborative effort across authors from across these three groups (e.g., an article written by scholars from host institutions in France, Morocco, and the U.S.), they appeared in all the relevant lists.

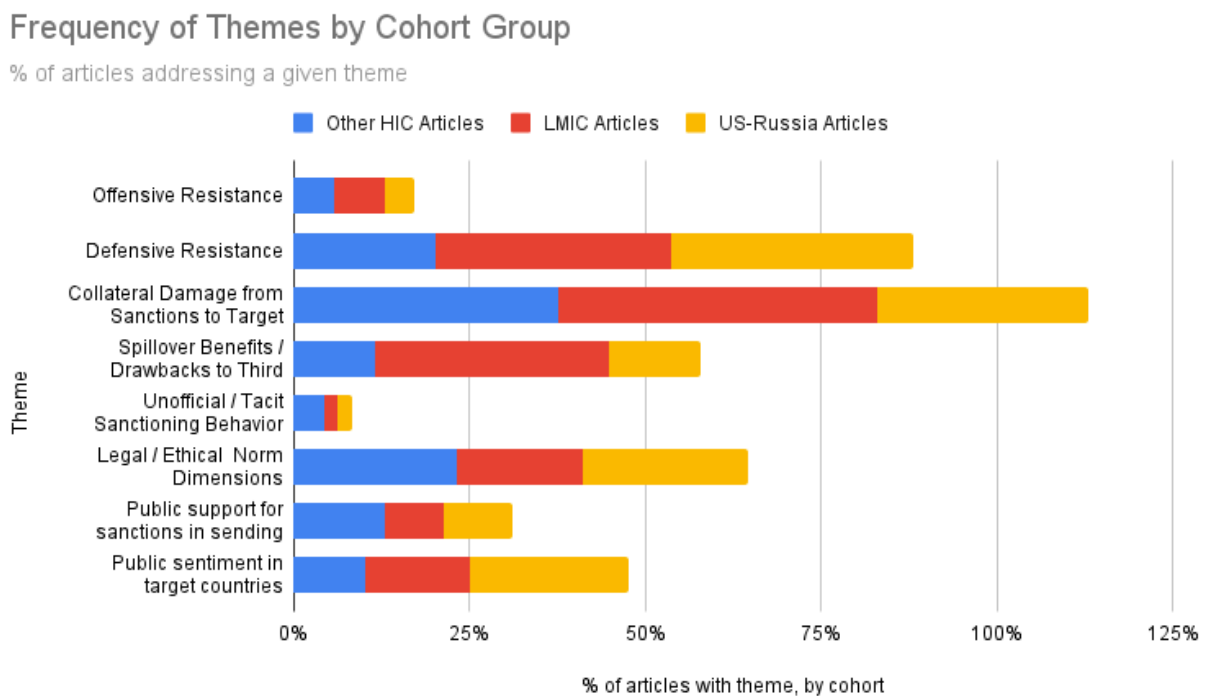
A manual review of the titles and abstracts was conducted to determine the likely relevance of the articles to the topic of this brief, which reduced the list of articles to 2,014: (i) group 1 (467 articles); (ii) group 2 (343 articles); and group 3 (204 articles). A final sample of articles for a more in-depth review was constructed as follows. Given the unique interest of this brief in surfacing Global South perspectives, we overweighted articles from this group by taking 100% of the low- and middle-income country articles (204). We randomly selected 20% of the relevant articles for each of the remaining two groups: 93 U.S. or Russia articles and 69 other high-income country articles. No time period filters were applied, and the final sample includes articles from as early as 1964 through as recent as 2024.

Basic information about each article was documented to summarize the authors’ key findings about the sanctions (e.g., impact, compliance, effectiveness, secondary effects), methods, policy recommendations, perceptions, and scope (e.g., sanction senders, targets, dates, reasons, types). The research team systematically tagged articles as to whether they corresponded to one or more of eight emerging themes: (i) offensive resistance—imposing hurt on the sender; (ii) defensive resistance—curbing damage to the target; (iii) collateral damage for target countries; (iv) spillover benefits or drawbacks to third countries; (v) unofficial or tacit sanctioning behavior by competitors; (vi) legal/ethical norms; (vii) public support for sanctions in sending

countries; and (viii) and public sentiment in target countries regarding sanctions, their senders, and policy change.

Authors were categorized into one of three country cohorts on the basis of their listed organizational affiliation and location. For example, if an author listed their affiliation as the School of Governance and Economics of Rabat in Morocco, the article would be included within the list of authors and articles from low- and middle-income countries. Figure 1 summarizes the frequency of articles mentioning a given theme across the three cohort groups: U.S. or Russian scholars; other high-income country (HIC) scholars; and low- and middle-income country (LMIC) scholars.

Figure 1: Frequency of Themes by Cohort Group



Source: Scopus Database, as categorized by the author and supporting AidData staff. Notes: HIC refers to high-income countries other than the U.S. and Russia (whose income status as defined by the World has fluctuated between high and middle-income).

## 2. Challenge #1. Target Countries Have Evolved From Isolated Defiance to Networked Resistance

Large and small target countries have become emboldened in defying U.S. sanctions using offensive and defensive resistance strategies. With offensive countermeasures, target countries seek to retaliate and impose economic or political harm on the sender to reduce its resolve. Comparatively, defensive countermeasures aim to curb the sender's ability to exact damage on the target's economy and position sanctions as futile in a bid to deter future actions. Some strategies are familiar, long-standing practices, such as the use of retaliatory tariffs or import substitution tactics. Others are relatively newer forms of resistance such as Russia's co-optation of a fleet of "gray" or "shadow" vessels after the Ukraine invasion to "obscure [their] origins and ownership" to facilitate sanctions busting<sup>18</sup> and rumors of a new BRICS currency that may or may not bear fruit.<sup>19</sup>

Who uses these offensive and defensive resistance strategies? Daniel McDowell, a contributor to this research volume, examines efforts by China and Russia to adopt alternative currencies to the U.S. dollar for cross-border payments to mitigate their risks in the event of sanctions, while simultaneously exacting hurt against an adversary. Although larger economies may more easily employ these tactics, they are not necessarily limited to Russia and China. In her book, *Autocracy Inc.*, the American journalist and historian Anne Applebaum, argues that the leaders of autocratic nations have strong incentives to "imitate one another" and forge links with other like-minded players within larger networks to boost their individual and collective bargaining power.<sup>20</sup> In this brief, we analyzed the extent to which and how scholars across 71 low, middle, and high-income countries talk about these passive and active resistance strategies as applied across a wider cross-section of actors.

### 2.1 Offensive Resistance: Imposing Hurt on the Sender

Large economies like the PRC and Russia have ample means to use offensive countermeasures to impose economic costs on the U.S. and other senders in response to direct unilateral or secondary sanctions. The PRC has enacted a series of eight main "anti-sanction" laws, the tempo and scope of which have grown since 2020; the most

ambitious may be the Anti-Sanctions Law of 2021 seen as a “blocking statute, retaliatory regime, and proactive sanctions legislation rolled into one.”<sup>21</sup> Chinese scholars have argued that the PRC should exploit contradictions in sending countries’ policies and actions to their advantage.<sup>22</sup> Russia has employed retaliatory measures from travel and import bans to curbing arms shipments and energy supplies against countries who sanctioned it over the annexation of Crimea, meddling in elections, poisoning of diplomats, and the invasion of Ukraine.<sup>23</sup> The Kremlin has also been opportunistic in using sanctions as an animating issue for the Russian public as to why they should reject European values and instead embrace a unique and distinct Russian identity.<sup>24</sup>

Chinese scholars frame U.S. financial sanctions against Huawei and other state-owned enterprises as a trade war between the nations. America uses economic coercion to slow the pace of the PRC’s growing dominance, blurring the lines between “run-of-the-mill primary sanctions with protectionist tariffs, export controls, and secondary sanctions.”<sup>25</sup> The net result, they say, is a vicious cycle of escalating economic costs for both countries: consumers and businesses pay more to import goods and services from alternative suppliers, while tariffs and restrictions on technology transfers, reduce trading revenues.<sup>26</sup> Nevertheless, Chinese scholars advocate for peer countries to emulate the PRC’s proactive use of anti-sanction measures to stand up for themselves in a world of “chaotic competition.”<sup>27</sup> This strategy of hardening oneself as a target may have a deterrence effect on future sanctions, for one experimental study found that public support waned to support sanctioning the PRC when people were primed to think about the potential economic consequences to their own country of doing so.<sup>28</sup>

Russian scholars tend to view the Kremlin’s use of retaliatory sanctions as justifiable to reduce Western pressure, help companies adapt, and mitigate economic hardship for its population. Some credit Russia’s food embargo against countries that introduced or supported sanctions related to its annexation of Crimea, as “effective in curbing the impact of Western sanctions and prompting economic recovery,”<sup>29</sup> and helpful in producing a reorientation in Russia’s domestic economy, accelerating modernization in the agribusiness sector in ways to increase profits and promote resilience.”<sup>30</sup> Scholars in China argue that “retaliation is Russia’s optimal choice” as the Kremlin’s use of travel

bans and import bans on food, used cars, clothes, and consumer products would impose a higher cost on its adversaries than on Russia.<sup>31</sup>

The Kremlin's perceived success in employing retaliatory countermeasures likely fed into its decision to double down on this strategy, imposing a farther-reaching import ban against countries it deemed "unfriendly" in 2021 and enlarging this list in 2022 to include all who had joined a new wave of sanctions against Russia in the face of its invasion of Ukraine.<sup>32</sup> However, since Russia's trade with Europe was already strained by this point, European scholars found limited economic impact from the additional countersanctions on their economies, aside from specific sectors like the dairy industry.<sup>33</sup>

Although larger economies may be more likely to employ offensive countermeasures at scale, smaller players have also contemplated their ability to employ coercive leverage in other ways to impose costs and reduce resolve in sending countries as to the continued merits of sanctions. Iranian scholars have argued in the past that Iran could consider threatening to cut off oil exports or disrupt the transit of goods through the Strait of Hormuz.<sup>34</sup> South African peers have argued for African nations to reevaluate their economic relations with the U.S. and EU, reduce reliance on the U.S. dollar, and consider a petrodollar system in solidarity with oil-rich nations on the receiving end of Western sanctions.<sup>35</sup>

In a global study of 150 countries in the United Nations over two decades, scholars found evidence to support the idea that target countries use General Assembly sessions to exact political retaliation on sending countries, shifting blame for sanctions on the sending countries and voting in direct opposition to the preferred positions of sanctioners on a number of issues.<sup>36</sup> However, there are also misgivings about the drawbacks of aggressively employing countersanctions to impose hurt on sender countries. For example, Indian scholars saw clear reputational downsides from Russia's policy of ignoring international intellectual property protections to privilege its own domestic firms.<sup>37</sup>

## 2.2 Defensive Resistance: Curbing the Sender's Ability to Exact Damage

One of the immediate priorities for target countries is dealing with macroeconomic volatility in the face of international sanctions: combatting runaway inflation, stabilizing exchange rates, protecting financial reserves, guarding speculative attacks (i.e., short-selling currencies and stocks), and ensuring continued access to capital for the public and private sector. Scholars studying Russia's response to the recent wave of post-Ukraine invasion sanctions credit the Central Bank of Russia's (CBR) rapid introduction of a series of defensive measures—suspending trading on Moscow's stock exchange, increasing the key interest rate, imposing strict capital controls to reduce flight risk—as consequential in reducing the impact of Western sanctions and hastening the economy's recovery.<sup>38</sup> In fact, scholars studying CBR's actions over the last decade posit that the Kremlin likely anticipated that Western nations would sanction Russia over its aggressions towards Ukraine and was able to preemptively harden itself as a target.<sup>39</sup>

In the long term, Global South scholars have written about numerous possibilities for developing “resistive economies” that are more immune to sanctions pressure.<sup>40</sup> One strategy is reducing dependence on the U.S. dollar for financial transactions and exchange reserves through diversifying reserves in gold or alternative currencies, adopting advances in financial technologies (fintech), creating a national payment system, or adopting a competitor's payment system like China's digital renminbi (RMB) or the Russian rouble.<sup>41</sup> Another approach is to invest in domestic intellectual capital to curb dependence on international expertise.<sup>42</sup> Target countries employ import substitution—ramping up domestic production of previously imported goods—with some explicitly citing the PRC's “Made in China 2025” initiative as an inspiration<sup>43</sup> and doubling down on centrally planned economies.<sup>44</sup> Numerous studies examine how such efforts to boost domestic production and demand have increased target country resilience by accelerating underperforming sectors' modernization, liberalizing economies to incentivize innovation in new areas, and positioning domestic firms to displace foreign competitors.<sup>45</sup>

Low- and middle-income countries have been entrepreneurial in exploring and



implementing myriad sanctions-busting tactics to great effect in evading trade restrictions—from old-fashioned smuggling and transshipment of goods via third countries to more sophisticated efforts to set money laundering fronts, special purpose vehicles, and indirect firm ownership.<sup>46</sup> The fact that Iran was able to utilize the Iranian diaspora in the EU and a network of Iranian grocery stores in the Eurozone as an enabler for its sanction-busting activities is a case in point for how the openness of Western economies to immigration and trade can ironically become a vulnerability that is willingly exploited by entrepreneurial target countries.<sup>47</sup> Although sector-specific sanctions can be desirable in curbing the negative economic fallout for target countries, examples from Iran, Russia, and (much earlier) Rhodesia indicate that they are willing to adapt by pursuing secondary industrialization in alternative sectors that do not face similar export bans.<sup>48</sup>

For many Global South scholars, target countries should prioritize survival over gamesmanship, putting proactive policies in place to curb negative spillover effects for the poorest and most vulnerable. Studies argued for stronger social safety nets, food assistance, and other anti-poverty schemes to address common sanction repercussions of unemployment, rising prices, and household economic insecurity.<sup>49</sup> Health system strengthening was a common cry, particularly with regard to the negative impact of sanctions on COVID-19 response and access to essential medicines with studies advocating for exempting pharmaceutical companies and other medical suppliers from customs and tax exemption protections and loan forgiveness or deferment.<sup>50</sup> Others urged target country governments to enact stronger regulations to curb rising carbon emissions, reinvestment strategies to promote production in low-polluting industries, and support the development of renewables and clean energy alternatives.<sup>51</sup>

### 3. Challenge #2. U.S. Sanctions are Vulnerable to Damaging Counternarratives

China and Russia, America's competitors in a fierce fight for global supremacy, frame U.S. unilateral sanctions as desperation and jealousy on the part of a weakened global who wants to curb their rise. For low- and middle-income countries, U.S. unilateral sanctions are thinly veiled neocolonialism or neoimperialism in a bid to keep less

powerful nations under its thumb. Nor is America immune to criticism from its allies in Europe and Asia, where scholars from other high-income countries express growing unease with the ethics and legality of U.S. unilateral sanctions and perceived economic costs to their own societies risk fraying fragile coalitions of senders.

To what degree should U.S. policymakers care about these damaging counternarratives? An isolated leader's propaganda or disinformation campaign to promote alternative narratives about U.S. sanctions may not warrant much attention from American policymakers at all. Citizens within these regimes and foreign publics abroad are likely to discount these narratives, particularly if they see the autocrats as part or wholly to blame for the sanctions in the first place. There are other circumstances, however, when competing narratives are more than an annoyance and can metastasize into something that can achieve far greater damage to America's reputation. When foreign publics view the U.S. as inconsistent in what it says and does, this dissonance provokes doubt about America's intentions that add fuel to grievances in ways that transform one man's conspiracy theory into a much pervasive counternarrative. For example, one recent controversy across the Global South has been contrasting U.S. justifications to sanction Russia over its invasion of Ukraine versus the criticized non-response to Israel's aggressions in Gaza.

### 3.1 Competitive Counternarratives: The U.S. Seeks to Curb Other's Rise

*Are U.S. sanctions merely reinforcing hegemonic narratives or disrupting the rise of competitors?* This question was raised with regard to America's closest competitors for global dominance and commonly characterized the U.S. as weaponizing sanctions to inflict unfair damage against its rivals.<sup>52</sup> For example, in an in-depth study of U.S. secondary sanctions against Huawei and other Chinese state-owned enterprises, Chinese scholars argued that Western media coverage was biased and served to reinforce a racist narrative that promoted the idea that China is a threat to U.S. and Western interests.<sup>53</sup>

Similarly, Malaysian scholars conducting a discourse analysis of Chinese netizen posts on Zhihu (a social question-and-answer website), found that U.S. sanctions against

Chinese companies were associated with a sharp uptick in nationalist sentiment. The study found that the majority of Chinese netizen posts believed the U.S. sanctions to be motivated by the desire to disrupt China's rise (53 percent), was tantamount to outright war (56 percent), and demonstrated anti-U.S. sentiment (62 percent).<sup>54</sup> Relatedly, Russian scholars posited that "anti-Russian sanctions" employed by the West were motivated primarily by competition and jealousy of Russia's economic success. Moreover, Western nations were the real instigators of the Ukrainian crisis and armed conflict through their ill-advised Eastern Partnership Policy.<sup>55</sup>

## 3.2 Imperialist Counternarratives: The U.S. is a Neo-colonial Power

*Are sanctions a form of neo-colonialism?* This is a question that is a recurring theme across scholars that feeds into a broader discourse in the Global South that is skeptical about normative framing of sanctions to justify great powers imposing costs on weaker ones to their own benefit. African scholars have argued that Western sanctions have harmed the lives and livelihoods of households in poorer countries in an "attempt to validate the...quest for perpetual domination of the 'Third World.'"<sup>56</sup> For example, Western sanctions against the ZANU PF-led government in Zimbabwe were portrayed as base retaliation for land reform that disenfranchised the white population in the country, rather than concern for human rights.

This line of thinking is not limited to small economies and extends to emerging powers like the BRICS. Indian scholars saw nuclear non-proliferation sanctions against their country as the failure of the West to practice strategic empathy in acknowledging India's reasonable desire to have a nuclear deterrent to hedge against aggressive neighbors.<sup>57</sup> Russian scholars questioned the use of unilateral sanctions as Western countries seek to undermine their nation's sovereignty<sup>58</sup> and national security.<sup>59</sup> Even U.S. scholars acknowledge the power of a perceived national security threat in deterring a target country's willingness to change its behavior in the face of sanctions<sup>60</sup> and increasing support for the government's continued defiance.<sup>61</sup> Moving from security to economics, South African scholars have made the case that African countries should reevaluate their relationships and dependence upon the West, which makes them more vulnerable to such pressures.<sup>62</sup>

America's defenses against these imperialist counternarratives are weakened by a strong perception in low- and middle-income countries that Western countries are capricious in seeking their own gain at the expense of others. Scholars from Nigeria, Turkey, Serbia, and the U.S. have found evidence that sanctions affect public opinion in target countries in ways that run counter to the sender's intent.<sup>63</sup> Sanctions have been associated with increased public opposition to the U.S., driven by the belief that these economic sticks disproportionately affect those out of power: punishing the middle class and hurting everyday citizens.<sup>64</sup> There have also been instances of declining trust reported between financial and business counterparts in the sender and target countries over follow-through on contractual obligations and respect for intellectual property.<sup>65</sup> Collateral damage from sanctions on the civilian population has the effect of exacerbating grievances towards the sending country for economic hardship,<sup>66</sup> even to the point that local populations may exhibit a greater willingness to support or condone international terrorism.<sup>67</sup>

Lack of certainty or clarity on the sender's true intent for the application of sanctions was associated with lower public support for policy change in the target country,<sup>68</sup> particularly in the presence of a strong counternarrative that it is the sender that benefits at their expense.<sup>69</sup> The fact that sending countries can choose to escalate or de-escalate pressure as they wish, feeds into a narrative that sanctioners are capricious—continuously 'redefining' the rules of the game regarding the goals and required behavior change required for sanctions relief.<sup>70</sup> In this view, the U.S. withdrawal from the Joint Comprehensive Plan of Action for Iran (JCPOA, also known as the Iran nuclear deal) was particularly damning in revealing 'true intentions.' This episode reinforced the perspective that the sanctions regime was always about America's self-interest in winning concessions rather than a serious commitment to helping Iran rebuild its economy and rejoin the international community. Both the target country and America's allies viewed the U.S. withdrawal as a betrayal that exacerbated economic instability in Iran and negatively impacted firms in other countries affected by secondary sanctions.<sup>71</sup>

Regardless of a sender's stated intentions to target those in power, all too often local populations in target countries are the real losers in the face of international sanctions. One of the strongest points of convergence in the discourse of scholars in the Global

North and Global South is the recognition that sanctions created substantial and far-reaching collateral damage on households across every facet of society: health outcomes (e.g., access to medicine, life expectancy, food insecurity, pandemic control);<sup>72</sup> clean energy and the environment (e.g., carbon emissions, climate vulnerability, energy insecurity, green innovation);<sup>73</sup> economic wellbeing (e.g., education mobility, standard of living, livelihoods, economic security, poverty, inflation);<sup>74</sup> industrial productivity (e.g., firm performance, tax revenues, sustainability, innovation, modernization, privatization);<sup>75</sup> and governance (e.g., ethnic violence and discrimination, the militarization of interstate conflicts, corruption prevalence, terrorist group survival, elections, human rights, rule of law).<sup>76</sup>

### 3.3 Law and Order Counternarratives: U.S. Unilateralism is Illegal and Unethical

Given the strong body of evidence on the negative humanitarian spillovers of comprehensive sanctions, there has been a movement to advocate for the use of more targeted “smart” sanctions that have a sharper focus on penalizing key officials or institutions and minimizing harm to civilian populations.<sup>77</sup> This is insufficient for a minority that feels the use of sanctions—whether comprehensive or targeted—should be outlawed on the basis of humanitarian and ethical grounds, with countries instead embracing economic carrots (e.g., trade, aid, investment) rather than sticks to promote peace and development.<sup>78</sup>

More commonly, scholars across countries of all income levels acknowledged that sanctions were valid when they complied with international law.<sup>79</sup> However, they argued for better regulation of sanctions by international organizations such as the United Nations or the World Trade Organization, along with strengthening capacity and frameworks for these institutions to effectively monitor sanction compliance with international laws, enforce internationally imposed limits, and safeguard global progress towards the Sustainable Development Goals.<sup>80</sup> Some scholars advocate for better procedures for how to remove sanctions and the introduction of default sunset clauses which remove the powerful inertia factor in sanction regimes that make them easier to apply than take away.<sup>81</sup>

A number of scholars from the Global North and Global South highlighted the importance of additional measures to mitigate unintended negative consequences of sanctions for target countries.<sup>82</sup> For example, some studies argued for the mainstreaming of intentional human rights impact assessments to be conducted within the process of designing sanctions and for social workers to be more active in monitoring the enforcement of sanctions regimes to mitigate negative outcomes.<sup>83</sup>

Some types of sanctions were viewed as more problematic than others. Unilateral and secondary (extra-territorial) sanctions, such as those frequently employed by the U.S., provoked the most negative reactions with Global North and Global South scholars questioning their legality under the UN Charter and contravention of sovereignty and non-intervention norms.<sup>84</sup> Aid suspensions are another form of sanction that provokes ample debate on ethical and humanitarian grounds. While the presence of development assistance may indeed “shield targeted countries” from economic pressures, the removal of this aid may exacerbate the negative spillover effects for the most vulnerable in society.<sup>85</sup>

## 4. Unintended Consequences: Third Country Enablers, Unofficial Sanctions, Target Country Isolation

Targets of sanctions often view third countries as critical enablers of their ability to decouple from reliance on the West and reroute trade and foreign direct investment flows from sanctioning countries to more sympathetic old allies or new friends.<sup>86</sup> Even when sanctions succeed in isolating a target regime from the prospect of sanction-busting help, there numerous examples in the sample articles of scholars citing evidence that isolation can backfire, making countries more defiant and pushing them into greater dependence on competitors that do not require unpopular behavior change.

Although the U.S. and the EU have traditionally been among the most prolific senders, sanctions are not limited to use by democracies. Over the last two decades, America’s closest competitors in the race for global supremacy, Russia and the PRC, have

demonstrated a growing willingness to experiment with the use of economic coercion, albeit with some uniquely authoritarian characteristics. For example, Audrye Wong, in a companion piece in this research volume, focuses on how Beijing has weaponized the buying power of its large population and growing middle class via nationalistic consumer boycotts to deter countries and companies from engaging in policies it views as counter to its interests. Leveraging the sample of articles from Scopus we can assess how scholars across 71 low, middle, and high-income countries talk about these dynamics as applied across a wider cross-section of actors.

## 4.1 Third Countries: Sanction Spillover Benefits and Drawbacks

Western sanctions have triggered a redistribution in trade and investment to sympathetic destination markets including China, India, Russia, Turkey, United Arab Emirates, Central Asia, and transition economies.<sup>87</sup> Additionally, governments such as Myanmar, Venezuela, Syria, Iran, Zimbabwe, and North Korea rallied sympathetic allies such as Russia or the PRC to provide economic assistance (aid or debt) to withstand sanction pressure or counteract the costs of aid suspensions.<sup>88</sup>

These shifting relationships allow targets to withstand sanction pressures at the moment and undercut future restrictive measures by diluting the economic costs.<sup>89</sup> Third countries can benefit from lucrative trade and investment deals at the expense of the U.S. and its allies. Studies of the relationship between trade flows, sanctions, and third countries indicate that this is not an empty threat but an empirical reality, with gains accruing to China, Russia, UAE, India, and Turkey as they capture economic activity redirected from sending countries such as the U.S. and EU, for example.<sup>90</sup> This support can create new challenges. Zimbabwe is a case in point, where scholars lament the country's Look East Policy (LEP) for opening the door to Chinese investment that hurts the economy and promotes indebtedness.<sup>91</sup>

Of course, third countries must also navigate less rosy side effects from sanction-induced distortions in the global economy. Scholars have cited a number of pitfalls experienced by third countries as a result of sanctions that they did not sign on to including rising prices from shortages in global commodities (e.g., fuel, food, metals);<sup>92</sup> increased uncertainty that affects financial markets (e.g., stock and bond



prices; exchange rate volatility);<sup>93</sup> disruptions in international supply chains and transportation networks;<sup>94</sup> and depressed cross-border economic activity (e.g., tourism, labor migration, economic integration).<sup>95</sup> The extra-territoriality of U.S. secondary sanctions, which penalize firms for engaging in normal financial or trade transactions with sanctioned countries or companies is a source of discontent for third countries over financial losses, inability to diversify trading partners and suppliers, along with slowed growth.<sup>96</sup> Third countries are also wary of non-economic byproducts from sanctions such as the potential for cross-border spillovers of conflict, terrorism, and human insecurity;<sup>97</sup> along with rising geopolitical tensions and threats to regional stability.<sup>98</sup>

## 4.2 Great Power Competition: *Quid Pro Quo* Compliance and the Proliferation of Informal Sanctions

There is an emerging pro-sanction discourse among BRICS+ powers as they become more influential in world politics and see the utility of this tool in their own foreign policy arsenal.<sup>99</sup> According to the Global Sanctions Database, Russia and the PRC stand out as the two non-democracies among the list of top 10 senders of unilateral economic sanctions (e.g., trade, travel, and financial) by frequency between 2013 and 2022.<sup>100</sup> The Kremlin's increased use of retaliatory sanctions to impose hurt on the U.S., EU, and other countries who sanctioned Russia over the last decade was profiled in section 2. The PRC's use of economic coercion is even more prolific. Although its stated policy rhetoric is to oppose official sanctions, a new dataset (the Threat and Imposition of Economic Sanctions, TIES) identifies 135 cases where the PRC was the sender of unilateral economic sanctions between 1949 and 2020.<sup>101</sup>

The majority of cases involving the PRC were examples of tacit or unofficial sanctions (e.g., nationalist boycotts, arbitrary technical requirements, watchlist of unfavorable countries or firms) that allow for plausible deniability regarding the state's involvement. However, some were more explicit bans on certain types of symbolic goods.<sup>102</sup> Examples of PRC target countries include South Korea, Japan, Taiwan, Mongolia, and Norway.<sup>103</sup> Most often these sanctions sought to penalize countries or firms for positions counter to Beijing's objectives or preferred narratives related to Taiwan, Tibet, and Xinjiang or which are seen as undercutting the PRC's aspirations to be the sole

security provider in Asia (e.g., retaliation for South Korea's hosting of Terminal High Altitude Area Defense, THAAD, system).

### 4.3 Target Countries: Perverse Incentives of Isolation to Stoke Defiance

Scholars in the Global North and Global South argue that cultural proximity, historical relationships, and trading relationships between the sender and the target country are associated with the effectiveness of sanctions in bringing about desired policy change.<sup>104</sup> Target countries and companies are more likely to comply when the sender is a major trading partner (or aligned with the intent of the target's major trading partners), has a comparative edge in that trading relationship, and there are few alternatives.<sup>105</sup> In fact, this is one of the main rationales for pursuing multilateral sanctions under the UN framework, as scholars attribute successes in reducing state support for terrorism in Libya and Sudan to the participation of a large number of UN countries that had sufficient economic clout and political legitimacy to break through to local leaders more convincingly than the U.S. could achieve on its own.<sup>106</sup>

Conversely, perceived isolation in the target country from the sanctioning country and the international community reduces their malleability to economic pressure and limits the sending country's knowledge and visibility of the local political economy, inhibiting the design of effective sanctions.<sup>107</sup> There may be long-term consequences that endure after a sanction regime ends in terms of differing policy positions in fora such as the United Nations and a distrust that impedes future cooperation.<sup>108</sup>

Beyond trade, development assistance ('aid') offers another channel to minimize isolation and sustain limited relationships with a target country in ways that can create the right conditions for sanctions to succeed. For example, several studies have found compelling evidence that investing in a robust political opposition, independent civil society, and media freedoms play critical roles in the formation of domestic pressure groups to hold local governments to account for policy change to reduce the costs of sanctions.

Such investments, facilitated by continued aid to non-government actors, may also

have the power of off-setting damaging counternarratives about sanctions, increasing support for the sender, curbing the government's ability to shift blame on foreign actors, and stoking public support for policy change.<sup>109</sup> In the absence of such aid, dictators exploit the lack of domestic pressure groups to deflect blame for the sanctions, ignore the costs borne by households, and even trigger a surge in support for the leader.<sup>110</sup>

The prospect of resuming full economic and political relations with the international community can be a powerful incentive for target countries and companies to change their behavior, but only if they see a realistic path to the phased reduction or removal of sanctions. Unfortunately, the power of damaging counternarratives and the poor track record of senders in removing sanctions create perverse incentives for foreign leaders and publics who do not see a credible 'exit ramp' for sanctions relief as a reward for good behavior, which reduces their incentives to change.<sup>111</sup> In fact, scholars have pointed to the negative repercussions of skepticism regarding whether sanctions can be lifted—from heightened risks of kinetic conflict to greater public pessimism about the possibility of easing international tensions.<sup>112</sup>

## 5. Conclusion

This brief surfaces three forward-looking challenges that U.S. policymakers must navigate to employ sanctions as part of a robust foreign policy toolkit in an era of heightened competition: networked resistance, damaging counternarratives, and unintended consequences. The insights in this brief lend themselves to three areas for policy action by U.S. policymakers in the future, with seven specific opportunities for Gates Forum conferees to consider as they propose a broader menu of reform options.

First, U.S. policymakers must update their strategic calculus to navigate a new reality: target countries are no longer passively defiant in isolation but increasingly networked with other willing partners in their resistance to sanctions. By extension, the U.S. toolkit needs a refresh and expansion to undercut the efficacy of retaliatory anti-sanctions, that seek to impose hurt on the sender, and defensive countermeasures, that aim to curb the impact of sanctions on the target economy. The U.S. could also play a more proactive role in monitoring and disclosing information about the motives, means, and

influence of opaque economic coercion tactics used by Russia, the PRC, and other authoritarian regimes, as well as helping target countries build resilience to these overtures.

Second, to rise to the challenge of combating harmful counternarratives, U.S. policymakers must reinvest in America's strategic communications capabilities and clearly articulate its goals and criteria for applying or removing sanctions. The U.S. should reevaluate its actions to root out inconsistencies between its rhetoric and actions that can unintentionally foster distrust. Moreover, U.S. leaders should put in place mechanisms that make it easier to remove or reduce sanctions (e.g., sunset clauses) for a credible exit ramp, shift from unilateral to multilateral efforts when possible, and mitigate collateral damage to target countries (e.g., humanitarian impact assessments).

Third, U.S. policymakers should use the entire suite of tools in their economic statecraft arsenal to apply pressure but avoid complete isolation of target countries and companies, as this merely propels them into the arms of third-country enablers or fans the flames of defiance. Patient aid in investing in the capacity of local pressure groups (e.g., civil society, political opposition, independent media), ideally before but also after, employing economic sticks could be consequential. Maintaining a minimum viable level of trade linkages and people-to-people relations are important life-lines that serve as tangible reminders of the benefits to their country of resuming normal economic relations.

## Seven Specific Opportunities for Action

- **Opportunity #1:** The White House could convene an advisory committee or panel of respected scholars, practitioners, and policymakers familiar with the tactics employed by Russia, China, and other actors to evade U.S. sanctions, engage in retaliatory measures, and employ explicit or unofficial sanctions with third countries. The advisory committee could investigate, deliberate, and propose new strategies and approaches that U.S. agencies like State, Treasury, and Commerce can use to make it more difficult for target countries to evade

sanctions and help allies build resilience to economic coercion by authoritarian actors.

- **Opportunity #2:** The U.S. China Economic and Security Review Commission could commission and publish an in-depth report examining the motives, tactics, and outcomes of the PRC's increasing use of offensive and defensive countermeasures in response to U.S. sanctions pressure, along with unofficial sanctions on third countries. The report could include an assessment of U.S. and allied vulnerabilities to these measures and recommendations for how the U.S. should respond. The report could be accompanied by a public hearing to raise awareness among U.S. policymakers and the public about these issues and briefings for Congressional leaders on relevant committees to discuss and overcome vulnerabilities. A parallel effort could be pursued looking at similar issues related to Russia's use of these same tools.
- **Opportunity #3:** Congress could utilize future authorizations and appropriations related to renewals of the "Countering the PRC Malign Influence Fund" and "Countering Russian Malign Influence Fund" to include an explicit emphasis on programming that produces trustworthy data and evidence to monitor and publish information opaque economic coercion tactics including the use of unofficial and explicit sanctions used by Russia, the PRC, and other authoritarian regimes, as well as builds the capacity of foreign publics to use this information to mitigate their vulnerabilities and cultivate resilience to these overtures.
- **Opportunity #4:** The White House could mandate the three agencies with dedicated units for implementing sanctions—Treasury's Office of Foreign Assets Control (OFAC), State Department's Office of Economic Sanctions Policy and Implementation (TFS/SPI), and Commerce's Bureau of Industry and Security (BIS)—to institute annual reviews to assess the status, cost, progress, and likelihood of success in achieving their stated objectives for active U.S. sanctions.<sup>113</sup> If reviewing each sanction regime on a yearly basis is untenable given current staffing levels, agencies could propose a rotating review where each sanction is reviewed on at least an every three-year basis. Reviews could be documented and reported to the President, the National Security Council, the

National Economic Council, respective agency leaders, and Congress. They could include clear recommendations for the termination of sanctions where sufficient progress has been made and changes to a sanctions regime where the likelihood of success is unlikely.

- **Opportunity #5:** The White House could convene a Task Force comprised of agency, congressional, private sector, and civil society representatives to propose recommendations for how the U.S. will institute transparent, credible, and rigorous monitoring and assessments of the humanitarian impacts of its unilateral sanctions.<sup>114</sup> The Task Force could deliberate whether and how the U.S. should voluntarily adapt or adopt the humanitarian impact monitoring and assessment methodology proposed in September 2024 by the UN Special Rapporteur on the Negative Impact of Unilateral Coercive Measures on the Enjoyment of Human Rights.<sup>115</sup> The Task Force could also recommend guidance for the best way for U.S. agencies to incorporate trusted civil society voices into the process of assessing, documenting, and mitigating the negative humanitarian impacts of U.S. unilateral sanctions (e.g., joint monitoring efforts, independent third-party evaluations, input in the design of new sanctions to mitigate humanitarian impacts).
- **Opportunity #6:** The State Department’s Bureau of Public Affairs, through its Office of International Media Engagement (which oversees six regional hubs that engage international audiences through traditional media and social media), Foreign Press Centers, among other assets could develop media outreach and educational programming to increase the familiarity of foreign journalists and experts about how U.S. sanctions policies operate. Ideally, these proactive strategic communications efforts could emphasize steps that the U.S. is taking to improve effectiveness, increase accountability and transparency, and curb the negative impacts of its unilateral sanctions.
- **Opportunity #7:** The 2022 passage of UN Security Council Resolution 2664, with support from the Biden Administration, provided legally binding “carve-outs” or exceptions that aim to reduce the impediments to the conduct of humanitarian operations with populations in sanctioned countries, while including protections

against “aid diversion” by terrorist groups or sanctioned individuals.<sup>116</sup> However, the effectiveness of this resolution ultimately hinges upon how well the U.S. implements and communicates changes to its sanctions policies and procedures to incorporate this greater flexibility, across the interagency, Congress, and non-government actors. The White House could commission an interagency review to provide an inventory of steps the U.S. government has taken to implement Resolution 2664 within its sanctions policy to date, whether and how these steps have produced improvements in the ability of U.S. humanitarian agencies are able to deliver life-saving assistance in sanctioned contexts and propose specific recommendations for additional changes needed to improve usage of these carve-outs in future.



## Discussion Questions

- How might the U.S. best engage “hedging middle” or “fence-sitting” countries to support rather than undercut U.S. sanctions, given their outsized influence as third-country enablers or in supporting networked resistance? Who are the most important players to prioritize—and why?
- In what areas is the U.S. most vulnerable to retaliatory sanctions, unofficial sanctions, or other tactics of economic coercion commonly employed by the PRC, Russia, and other authoritarian regimes? How could the U.S. best mitigate its risks in these areas?
- How can the U.S. best provide practical support to other countries to build their own resilience in the face of retaliatory sanctions, unofficial sanctions, or other tactics of economic coercion?
- What are the most persistent and problematic counternarratives about U.S. sanctions that have taken root within low- and middle-income countries? Why and how are they spread?
- What areas of low-hanging fruit might exist for the U.S. to cooperate with like-minded allies to improve how low- and middle-income countries perceive and experience its unilateral sanctions?
- Under what conditions should the U.S. reduce or remove sanctions? What prevents the U.S. from doing so when appropriate? How could the U.S. overcome these blockers to credibly signal that there is an ‘exit ramp’ for sanctioned countries in reward for good behavior?
- How could the U.S. better maintain minimum viable trade, assistance, and people-to-people ties with sanctioned country populations to avoid the unintended consequences of isolation?

# Endnotes

1. The author owes a debt of gratitude to colleagues in AidData's Policy Analysis Unit who supported the identification, coding, and analysis of a representative sample of relevant scholarly articles from low-, middle-, and high-income countries that made this background article possible. Contributors include Dr. Nara Sritharan, Ms. Kelsey Marshall, Ms. Divya Mathew, Dr. Jonathan Solis, Dr. Eun Young Kim, and Mr. Bryan Burgess. The author acknowledges the helpful peer review comments on an earlier draft of this brief from Nara Sritharan and Jonathan Solis (AidData), William & Mary Chancellor Robert M. Gates (Gates Global Policy Center), Dr. Farzan Sabet (Geneva Graduate Institute), among others. The opinions in this brief represent the views of the author alone and do not necessarily reflect those of the Gates Global Policy Center, which commissioned this work, nor that of AidData, the Global Research Institute, William & Mary, or those that provided peer review comments.

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