

*List of Resources Regarding the Impact of Sanctions and Counterterrorism Measures on Humanitarian Action**

* This list, maintained by Sue Eckert of the Humanitarian Agenda at the Center for Strategic & International Studies, attempts to be comprehensive but may not include all relevant information; suggestions for additions, corrections etc. may be sent to sue.e.eckert@gmail.com or humanitarianagenda@csis.org.

Last Updated: 10/31/2022

2022

July

[European Center for Not-for-Profit Law \(ECNL\) "The Tbilisi Principles; Balancing the need to meet urgent humanitarian needs with the need to maintain financial integrity, Recommendations for the public, private and civil society sectors"](#)

June

[European Commission "Commission Guidance Note on the Provision of Humanitarian Aid in Compliance with EU Restrictive Measures \(Sanctions\)"](#)

[International Review of the Red Cross "Counterterrorism, sanctions and war, IRRC No. 916917"](#)

[United Nations Human Rights Special Procedures Working Groups "The Human Rights and Rule of Law Implications of Countering the Financing of Terrorism Measures"](#)

March

[Agathe Sarfati \(International Peace Institute\) An Unfinished Agenda: Carving Out Space for Humanitarian Action in the UN Security Council's Counterterrorism Resolutions and Related Sanctions](#)

February

[Sue Eckert \(ICRC\) "Counterterrorism, Sanctions and Financial Access Challenges: Course Corrections to Safeguard Humanitarian Action"](#)

[Sophie Huvé, Rebecca Brubaker, Adam Day, and Zuzana Hudáková \(United Nations University\) *Enforcing UN Sanctions and Protecting Humanitarian Action: Towards a Coherent and Consistent Approach*](#)

[Lisa van Broekhoven & Sangeeta Goswami \(ICRC\) “Can Stakeholder Dialogues Help Solve Financial Access Restrictions Faced by Non-Profit Organizations That Stem from Countering Terrorism Financing Standards and International Sanctions?”](#)

January

[Norwegian Refugee Council \(NRC\) “Life and Death: NGO Access to Financial Services in Afghanistan”](#)

[UN Security Council Counter-Terrorism Committee Executive Directorate \(CTED\) “The Interrelationship between counter-terrorism frameworks and international humanitarian law”](#)

Publication Date Unknown

[European Center for Not-for-Profit Law \(ECNL\) Learning Center “Security and Counterterrorism; Risk Based Approach: The Need for Collaboration”](#)

[European Center for Not-for-Profit Law \(ECNL\) Learning Center “Security and Counterterrorism; Access to Financial Services: The Challenge of Bank Derisking”](#)

2021

December

[Government Accountability Office \(GAO\) “Bank Secrecy Act; Views on Proposals to Improve Banking Access for Entities Transferring Funds to High-Risk Countries”](#)

October

[Médecins Sans Frontières \(MSF\) “Adding Salt to the Wound: The experience of MSF frontline workers providing impartial healthcare in counter-terrorism environment”](#)

[Financial Action Task Force \(FATF\) “High-Level Synopsis of the Stocktake of the Unintended Consequences of the FATF Standards”](#)

September

[Kolja Brockmann & Keith A. Preble \(Stockholm International Peace Research Institute\) *Mitigating Humanitarian Impact in a Complex Sanctions Environment: The European Union and the Sanctions Regimes against Iran*](#)

[Steven Orientale \(Yale Jackson School of Global Affairs\) *The Impacts of Sanctions on Humanitarian Assistance: Bringing Data into the Conversation*](#)

[Emanuela-Chiara Gillard \(Chatham House\) “IHL and the humanitarian impact of counterterrorism measures and sanctions: Unintended ill effects of well-intended measures”](#)

[Yale University Capstone Project “A Data-Based Approach for Understanding the Impact of AML/CFT/Sanctions on the Delivery of Aid: The Perspective of Nonprofit Organizations”](#)

August

[Diakonia International Humanitarian Law Centre Lebanon “*Humanitarian Action, Counterterrorism Measures and Sanctions in Syria: Fact Sheet Series*”](#)

July

[Megan Corrado, Kay Guinane, Gabe Murphy, & Liz Hume \(Alliance for Peacebuilding/Charity and Security Network\) “Preventing Peace: How “Material Support” Laws Undermine Peacebuilding”](#)

June

[NYU Paris/EU Public Interest Clinic “Bank De-Risking of Non-Profit Clients : A Business and Human Rights Perspective”](#)

April

[Natasha Hall & Will Todman \(Center for Strategic and International Studies\) *Lessons Learned from a Decade of Humanitarian Operations in Syria*](#)

[InterAction “Detrimental Impacts: How Counter-Terrorism Measures Impede Humanitarian Action”](#)

[Johan Schaar “The Burden of the Unintended: The Humanitarian Consequences of Sanctions and the Role of the Red Cross Red Crescent”](#)

March

[London School of Economics “NGOs Due Diligence and Risk Management: A Holistic Approach”](#)

[VOICE Survey Report “Adding to the Evidence: The Impacts of Sanctions and Restrictive Measures on Humanitarian Action”](#)

January

[Zaki Mehchy & Rim Turkmani \(London School of Economics and Political Science; Conflict Research Programme\) “Understanding the Impact of Sanctions on the Political Dynamics in Syria”](#)

[Rebecca Brubaker & Sophie Huvé “UN Sanctions and Humanitarian Action: Review of Past Research and Proposals for Future Investigation”](#)

2020**November**

[VOICE “EU restrictive measures impact on humanitarian aid: Between a principled view for exemptions and a pragmatic approach for an effective derogation process”](#)

October

[International Association of Professionals in Humanitarian Assistance and Protection “Learning Stream on Risk Management in Practice: The Impact of bank derisking on humanitarian action”](#)

[The Carter Center “Navigating Humanitarian Exceptions to Sanctions Against Syria – Challenges and Recommendations”](#)

September

[VENRO “Preventing Terrorist Financing in the NPO Sector: Measures to mitigate the risk of terrorist financing in the NPO sector in Germany”](#)

[Nazanin Zadeh-Cummings & Lauren Harris “The Impact of Sanctions against North Korea on Humanitarian Aid”](#)

August

[Tytti Erästö \(Stockholm International Peace Research Institute\) European Non-Proliferation Diplomacy in the Shadow of Secondary Sanctions](#)

[Lia van Broekhoven and Sangeeta Goswami “What the G20 can do to Ease Financial Restrictions Facing Humanitarian Organizations”](#)

July

[ACAMS “Sanctions Masterclass with Justine Walker, Risk Managing Humanitarian Payments into High Risk Conflict and Sanctioned Environments”](#)

[Alliance for Financial Integrity “Inclusive Financial Integrity: A Toolkit for Policymakers”](#)

[U.N. General Assembly Report \(A/75/209\) “Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights”](#)

June

[VOICE “The Impact of EU Sanctions and Restrictive Measures on Humanitarian Action”](#)

May

[Financial Action Task Force \(FATF\) “Covid-19-related Money Laundering and Terrorist Financing - Risks and Policy Responses”](#)

[Elizabeth Rosenberg, Eric Lorber, & Eric A. Sohn “The Impact of Sanctions on Humanitarian Aid”](#)

[Justine Walker \(ACAMS\) “Risk Management Principles Guide for Sending Humanitarian Funds into Syria and Similar High-Risk Jurisdictions”](#)

[Norwegian Refugee Council \(NRC\) “Toolkit for principled humanitarian action: Managing counterterrorism risks”](#)

April

[Grégoire Mallard, Farzan Sabet, & Jin Sun “The Humanitarian Gap in the Global Sanctions](#)

Regime”

Nazanin Zadeh-Cummings & Lauren Harris “Humanitarian Aid in North Korea: Needs, Sanctions and Future Challenges”

Justine Walker (ACAMS) “Navigating Humanitarian Exceptions”

March

International Crisis Group Imagining a Resolution of Venezuela's Crisis: Sanctions Relief

U.N. General Assembly Report (A/75/337) “Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism”

Dustin Lewis, Naz Modirzadeh, & Jessica Burniske “The Counter-Terrorism Committee Executive Directorate and International Humanitarian Law: Preliminary Considerations for States”

Norwegian Refugee Council (NRC) “Practical Guide for Project Cycle Management and Counterterrorism Risks”

US Department of Treasury “National Strategy For Combating Terrorist And Other Illicit Financing”

January

Joseph Daher (IMPACT) “Invisible Sanctions: How over-compliance limits humanitarian work on Syria. Challenges of Fund Transfer for Not-profit Organizations Working on Syria”

International Peace Institute “Ensuring that Sanctions Do Not Impede Humanitarian Action”

Publication Date Unknown

Human Security Collective, et al. “Financial Access Issues Facing Civil Society Organizations in Tunisia”

Norwegian Refugee Council “Toolkit for principled humanitarian action”

[Justine Walker \(ACAMS\) “Navigating Humanitarian Exemptions – Part 1: Challenges, opportunities and relaties for the COVID-19 Pandemic response”](#)

[Justine Walker \(ACAMS\) “Risk Managing Humanitarian Payments into High Risk Conflict and Sanctioned Environments”](#)

2019

December

[Alice DeBarre “Making Sanctions Smarter: Safeguarding Humanitarian Action”](#)

November

[VOICE “The impact of EU sanctions and restrictive measures on humanitarian action”](#)

October

[Korea Peace Now “The Human Costs and Gendered Impact of Sanctions on North Korea”](#)

[Platforma CiviKos “Impact of Banking Restrictions on NGOs in Kosovo”](#)

September

[Jessica Trisko Darden \(American Enterprise Institute\) Development Assistance and Counterterrorism](#)

[Jacob Kurtzer “Denial, Delay, Diversion: Tackling Access Challenges in an Evolving Humanitarian Landscape”](#)

[Jacob Kurzer “Never More Necessary: Overcoming Humanitarian Access Challenges”](#)

August

[Fionnuala Ní Aoláin “Report of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism”](#)

June

[NK Humanitarian “Peering Beyond the DMZ: Understanding North Korea behind the Headlines](#)

[– Part 1”](#)

[Consortium for Financial Access “Banking Nonprofits – The Way Forward”](#)

May

[Michael Pisa “Does the Financial Action Task Force \(FATF\) Help or Hinder Financial Inclusion? A Study of FATF Mutual Evaluation Reports”](#)

April

[WO=MEN & Human Security Collective “Protecting Us by Tying Our Hands: Impact of measures to counter terrorism financing on Dutch NGO’s working on women’s human rights and gender equality”](#)

March

[InterAction & USAID “NGOs and Risk: Managing Uncertainty in Local-International Partnerships”](#)

January

[Tracey Durner & Danielle Cotter \(Global Center on Cooperative Security\) “Untangling a Marriage of Convenience: Anti-Money Laundering and Countering the Financing of Terrorism”](#)

[Florence Keen & Kayla Izenman “Swiss–UK Dialogue Promoting a Coordinated Response to Derisking”](#)

[Anne Charbord & Fionnuala Ní Aoláin “The Role of Measures to Address Terrorism and Violent Extremism on Closing Civic Space”](#)

2018

December

[Fabian Hetz & Annika Elena Poppe \(CSIS Human Rights Initiative\) “Responding to Closing Civic Space: Recent Experiences from Three Global Initiative”](#)

September

[Alice Debarre \(International Peace Institute\) “Safeguarding Space for Medical Care and Humanitarian Action in UN Counterterrorism Activity”](#)

[U.S. General Accountability Office, GAO-18-669 “USAID Should Improve Information Collection and Communication to Help Mitigate Implementers’ Banking Challenges”](#)

[Sherine el Taraboulsi-McCarthy \(Overseas Development Institute and Humanitarian Forum\) “A humanitarian sector in debt’: counter-terrorism, bank derisking and financial access for NGOs in the West Bank and Gaza”](#)

August

[U.N. General Assembly Report \(A/73/314\) “Special Rapporteur of the Human Rights Council on extrajudicial, summary or arbitrary executions, Saving lives is not a crime”](#)

[Stuart Gordon, Alice Robinson, Harry Goulding & Rawaad Mahyub \(Overseas Development Institute and Humanitarian Forum\) “The impact of bank derisking on the humanitarian response to the Syrian crisis”](#)

June

[Dan Jasper \(American Friends Service Committee\) “Engaging North Korea: A Toolkit for Protecting Humanitarian Channels Amid ‘Maximum Pressure’”](#)

[Sherine El Taraboulsi-McCarthy \(Overseas Development Institute and Humanitarian Forum \) “The challenge of informality: counter-terrorism, bank derisking and financial access for humanitarian organisations in Somalia”](#)

[Emma O’Leary \(NRC\) “Principles Under Pressure: The Impact of Counterterrorism Measures and Preventing/Countering Violent Extremism on Principled Humanitarian Action”](#)

[World Bank/ACAMS Stakeholder Dialogue on De-risking “Financial Access for Nonprofit Organizations”](#)

[USAID “Risk Appetite Statement”](#)

March

[U.S. General Accountability Office, GAO-18-313 “Remittances to Fragile Countries; Treasury Should Assess Risks from Shifts to Non-Banking Channels”](#)

[Center for Strategic & International Studies Human Rights Initiative “Counterterrorism Measures and Civil Society: Changing the Will, Finding the Way”](#)

February

[Sherine El Taraboulsi-McCarthy & Camilla Cimatti \(Overseas Development Institute and Humanitarian Forum\) “Counter-terrorism, derisking and the humanitarian response in Yemen: a call for action”](#)

[Jim Woodsome & Vijaya Ramachandran \(Center for Global Development\) “Fixing AML: Can New Technology Help Address the Derisking Dilemma?”](#)

[Human Security Collective “Report of the Hague International Stakeholder Dialogue: Ensuring Financial Services for Non-Profit Organizations”](#)

January

[World Bank “The Decline in Access to Correspondent Banking Services in Emerging Markets: Trends, Impacts, and Solutions Lessons Learned from Eight Country Case Studies”](#)

Publication Date Unknown

[Jim Woodsome, Vijaya Ramachandran, Clay Lowery, & Jody Myers “Policy Responses to Derisking : Progress Report on the CGD Working Group’s 2015 Recommendations”](#)

[Charity Finance Group “Impact of Money Laundering and Counterterrorism Regulations on Charities”](#)

[Human Security Collective & European Center for Not-for-Profit Law “At the Intersection of Security and Regulation: Understanding the drivers and impact of “derisking” on civil society organizations, Illustrated by case studies from Brazil, Mexico and Ireland”](#)

2017**December**

[Peter Romaniuk & Tom Keatinge “Protecting charities from terrorists and counterterrorists: FATF and the global effort to prevent terrorist financing through the nonprofit sector, Crime, Law & Social Change”](#)

November

[Abbas Barzegar & Nagham El Karhili “The Muslim Humanitarian Sector: A Review for Policy Makers and NGO Practitioners”](#)

[Rukanova, Sevdalina, Rosien Herweijer, Russell Kerkhoven, Hanna Surmatz, Julian Oram, Deborah Doane “Why Shrinking Civil Society Space Matters in International Development and Humanitarian Action”](#)

October

[Peace Women “Conference report: report, Financial Inclusion for Freedom and Security”](#)

August

[Emanuela-Chiara Gillard \(Chatham House\) “Research Recommendations for Reducing Tensions in the Interplay Between Sanctions, Counterterrorism Measures and Humanitarian Action”](#)

July

[Ben Hayes, Lia van Broekhoven, & Vanja Skoric “Derisking and nonprofits: how do you solve a problem that no-one wants to take responsibility for?”](#)

[Financial Services Board “Correspondent Banking Data Report”](#)

June

[Norwegian Refugee Council & OCHA “Presence and Proximity - To Stay and Deliver, Five Years On”](#)

[Spaces for Change “Closing Spaces for Civil Society and Democratic Engagement in Nigeria, Beyond FATF: Trends, Risks and Restrictive Regulation of Nonprofit Organisations in Nigeria”](#)

April

[Mayada El-Zoghbi, Nadine Chehade, Peter McConaghy, & Matthew Soursourian \(CGAP\) “The Role of Financial Services in Humanitarian Crises”](#)

[Ben Hayes \(Bread for the World\) “The Impact of International Counterterrorism on Civil Society Organisations: Understanding the Role of the Financial Action Task Force”](#)

[Tom Keatinge & Florence Keen \(Chatham House\) “Humanitarian Action and Non-state Armed Groups: The Impact of Banking Restrictions on UK NGOs”](#)

March

[Duke Law International Human Rights Clinic and Women Peacemaker Program “Tightening the Purse Strings: What Countering Terrorism Financing Costs Gender Equality and Security”](#)

February

[Sue Eckert, Kay Guinane & Andrea Hall \(Charity & Security Network\) “Financial Access for US Nonprofits”](#)

[Sherine El Taraboulsi-McCarthy, Nisar Majid & Barnaby Willitts-King \(Humanitarian Policy Group\) “Private sector engagement in complex emergencies: case studies from Yemen and southern Somalia”](#)

[Emanuela-Chiara Gillard \(Chatham House\) “Humanitarian Action and Non-state Armed Groups: The International Legal Framework”](#)

[Kate Jones \(Chatham House\) “Humanitarian Action and Non-state Armed Groups: The UK Regulatory Environment”](#)

[World Bank & ACAMS “Stakeholder Dialogue on Derisking: Supporting Financial Access for Humanitarian Organizations and Charities”](#)

Publication Date Unknown

[Lia van Broekhoven \(Human Security Collective\) “Derisking and Civil Society: Drivers, Impact and Possible Solutions”](#)

2016**December**

[Tom Keatinge & Florence Keen \(Amnesty International\) “Study of the Cooperative Bank’s Closure of Accounts of Not-for-Profit Organizations”](#)

August

[Alliance for Financial Inclusion “Stemming the Tide of Derisking Through Innovative Technologies and Partnerships”](#)

[Financial Stability Board “Progress report to G20 on the FSB action plan to assess and address the decline in correspondent banking”](#)

July

[Norwegian Refugee Council \(NRC\) “Challenges to Principled Humanitarian Action: Perspectives from four countries”](#)

June

[World Bank & ACAMS “Stakeholder Dialogue on Derisking: Findings and Recommendations”](#)

[Financial Action Task Force \(FATF\) “Outcomes of the Plenary meeting of the FATF, Busan Korea”](#)

[International Monetary Fund \(IMF\) Staff “The Withdrawal of Correspondent Banking Relationships: A Case for Policy Action”](#)

May

[Justine Walker “Humanitarian Impact of Syria-Related Unilateral Restrictive Measures, Prepared for the United Nations \(UN\) Economic & Social Commission for Western Asia”](#)

April

[Katie King, Naz K. Modirzadeh & Dustin A. Lewis “Understanding Humanitarian Exemptions: U.N. Security Council Sanctions and Principled Humanitarian Action”](#)

February

[John Howell & Co. Ltd “Drivers and impacts of derisking, a study of representative views and data in the UK”](#)

[Abby Stoddard, Katherine Haver, & Monica Czwarno “NGOs and Risk How international humanitarian actors manage uncertainty”](#)

January

[Teresa Dumasy & Sophie Haspelslagh “Proscribing peace: the impact of terrorist listing on peacebuilding programs”](#)

2015**December**

[Norwegian Refugee Council \(NRC\) “Risk Management Toolkit in Relation to Counterterrorism Measures”](#)

November

[High Level Review of UN Sanctions](#)

[Tracey Durner & Liat Shetret \(Global Center on Cooperative Security\) “Understanding bank derisking and its effects on financial inclusion”](#)

[Financial Stability Board “Report to the G20 on actions taken to assess and address the decline in correspondent banking”](#)

[World Bank “Withdrawal from Correspondent Banking: Where, Why, and What to Do About It”](#)

October

[Financial Action Task Force \(FATF\) “FATF takes action to tackle derisking”](#)

[Clay Lowery & and Vijaya Ramachandran \(Center for Global Development\) “Unintended Consequences of Anti-Money Laundering Policies for Poor Countries”](#)

[World Bank “Report on the G-20 Survey on Derisking Activities in the Remittance Market”](#)

July

[Edwina Thompson \(Beechwood International\) “Technical Assessment: Humanitarian Use of Hawala in Syria”](#)

June

[Financial Action Task Force \(FATF\) “Best Practices: Combating the Abuse of Nonprofit Organisations \(Recommendation 8\)”](#)

[Financial Action Task Force \(FATF\) “Drivers for ‘derisking’ go beyond anti-money laundering/terrorist financing”](#)

March

[Charity Finance Group “Briefing: Impact of banks’ derisking on Not for Profit Organisations”](#)

[Victoria Metcalfe-Hough, Tom Keatinge, & Sara Pantuliano \(Overseas Development Institute\) “UK humanitarian aid in the age of counterterrorism: perceptions and reality”](#)

February

[Financial Action Task Force \(FATF\) “Financing of the Terrorist Organisation Islamic State in Iraq and the Levant \(ISIL\)”](#)

Publication Date Unknown

[UN General Assembly \(A/70/731\) “Report of the Special Rapporteur on the promotion and protection of human rights and fundamental freedoms while countering terrorism”](#) - not online

2014 and Earlier

2014

[Tom Keatinge \(DEMOS\) “Uncharitable Behaviour”](#)

May 2014

[Harvard Law School & Brookings “Counterterrorism and Humanitarian Engagement Project: An](#)

[Analysis of Contemporary Counterterrorism-related Clauses in Humanitarian Grant and Partnership Agreement Contracts](#)

September 2013

[Dean Thompson et. al, \(Beechwood International\) “Safer Corridors Rapid Assessment”](#)

August 2013

[Dean Thompson & Tom Keatinge “Draining the Ocean to Catch One Type of Fish: Evaluating the Effectiveness of the Global Counter-Terrorism Financing Regime”](#)

July 2013

[Kate Mackintosh & Patrick Duplat “Study of the Impact of Donor Counter-Terrorism Measures on Principled Humanitarian Action”](#)

2010

[Emile Van der Does de Willebois \(World Bank\) “Nonprofit Organizations and the Combatting of Terrorism Financing”](#)

January 2008

[Edwina Thompson \(World Vision\) “Principled pragmatism: NGO engagement with armed actors”](#)