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Sanctions of the European Union as an instrument for the protection of human rights: Current state, challenges and prospects for legal regulation

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Abstract

This article examines the sanctions policy of the European Union as an instrument for the protection of human rights, with a particular focus on the EU Global Human Rights Sanctions Regime of 2020. The aim of the study was to outline the current state of the legal framework, identify the challenges associated with its implementation, and propose directions for its further development. A systematic approach was employed, combining formal legal, comparative legal and historical legal methods. The article considered the development of the global sanctions regime as a "horizontal" (thematic) instrument that enables targeted responses to serious human rights violations regardless of jurisdiction, through a combination of travel bans, asset freezes and prohibitions on making funds available. Practical application has demonstrated its suitability for supporting international human rights standards and facilitating coordination with international partners; however, it has also revealed inconsistencies and selectivity in listings, largely dependent upon the requirement for unanimity within the Council of the European Union. Several procedural risks have been identified, including limited transparency regarding the reasoning behind listings,

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difficulties faced by sanctioned individuals in accessing evidential material, and inconsistencies in national implementation, particularly concerning visa restrictions and the identification and freezing of assets. The absence of corruption as an independent ground for sanctions narrows the scope of the regime in comparison with its counterparts in the United States and the United Kingdom, thereby limiting its effectiveness against networks in which human rights abuses are intertwined with kleptocratic practices. Cross-regime coordination of sanctions lists has increased, yet remains incomplete, creating opportunities for circumvention. The practical significance of this research lies in the potential use of its findings to broaden the substantive criteria that may justify the imposition of sanctions, enhance transparency and the frequency of list reviews while safeguarding the right to defence, institutionalise monitoring of sanctions implementation at EU level, and strengthen international coordination

Keywords: restrictive measures; targeted sanctions; EU global sanctions regime; international sanctions law; EU foreign policy

Introduction

The use of sanctions to protect human rights is no longer merely a political signal; it has become a tool expected to yield tangible results: a change in the behaviour of violators, the isolation of officials responsible, and support for victims. As of 2025, it is the European Union that is expected to act as a consistent defender of human rights, and not merely as an economic union; thus, the question arises as to whether actual sanctioning practices correspond to the declared values. This concerns not only pressure on authoritarian regimes, but also whether sanctions can be legally sound, proportionate and capable of withstanding judicial scrutiny, without becoming a form of political punishment without due process. Furthermore, there is a growing demand for sanctions not to remain a declaratory mechanism of foreign policy, but to actually hinder further human rights violations and prevent the guilty parties from maintaining a financial presence within the European legal order. At the same time, an important question remains open within the Union itself: whether a sanctions regime designed to respond to serious human rights violations can become a stable instrument applied without selectivity, political compromise, or double standards.

There is no consensus in the academic literature as to whether sanctions actually function as a tool for improving human rights, and this debate concerns not only political expediency but also actual effectiveness and compliance with the rule of law. Some studies describe sanctions as a largely ineffective or even counterproductive tool: empirical analyses of the consequences of economic and targeted sanctions show that, in some cases, they do not lead to a change in the behaviour of regimes. P.H. Egger *et al.* (2024) have shown that sanctions are sometimes accompanied by an increase in repression against the opposition and civil society, as political elites shift external pressure onto vulnerable groups. The focus of such studies is the actual practice of applying sanctions in specific states; the subject is the causal link between sanctions and the level of violence or the restriction of rights, and their conclusion is that sanctions alone do not guarantee a reduction in human rights violations and may have the side effect of consolidating the power of the perpetrators.

At the same time, F.A. Giumelli (2024) and T. Hamilton *et al.* (2024) note that targeted sanctions (smart sanctions), particularly when combined with political and diplomatic pressure and

public, personalised exposure, are capable of performing a deterrent and preventive function: they individualise responsibility, demonstrate international support to victims, restrict specific individuals' access to financial resources and channels of legitimisation, and lay the groundwork for subsequent criminal or quasi-criminal prosecution of these individuals through international legal or national mechanisms. In these works, the object of study is not states in general, but specific natural and legal persons included on sanctions lists, and the subject is the mechanism of their individual accountability; the authors conclude that personalised sanctions can serve as a form of foreign policy "accountability pressure", provided that decisions are properly justified and partners act in a coordinated manner.

E. Korkea-aho & L. Lonardo (2025) analyse the EU's Global Human Rights Sanctions Regime itself as a new stage in the evolution of the Union's foreign policy: this regime is viewed as an attempt to provide the Council of the EU with a tool extending beyond the geographical boundaries of a specific state, enabling the punishment of individual perpetrators for serious human rights violations regardless of jurisdiction, and thereby positions the EU as an actor aspiring to consistent leadership in the protection of fundamental values; it is noted that the European Commission has secured greater influence in the emergency response process, which has strengthened the role of interest groups and third countries in decision-making. I. Zamfir (2023) emphasises that this regime is still in the process of formation: the literature highlights its selectivity, limited scope, dependence on unanimity among Member States, the need to expand the substantive grounds (in particular, to add corruption as a separate ground) and the need for greater alignment with related regimes in the US and the UK. In parallel, S. Eckes (2022) raises the question of whether such a regime complies with the EU's own legal standards: the researchers note that the inclusion of a person on the sanctions list entails restrictions on freedom of movement, interference with property rights and an impact on business reputation, and therefore requires transparent justification, access for sanctioned persons to the grounds for sanctions, and effective judicial review by the Court of Justice of the EU. Ultimately, the academic challenge lies not merely in assessing the "effectiveness of sanctions", but in determining the limits within which EU sanctions can simultaneously remain an instrument of political pressure on human rights violators and be legitimate from the perspective of the rule of law. It is precisely this dual dimension – the practical effectiveness of sanctions and their legal soundness – that determines the relevance of this work and defines its objective: to analyse how the EU attempts to reconcile the foreign policy expediency of sanctions in the field of human rights with the requirements of legal certainty, procedural guarantees and predictability for those subject to them.

The aim of the study was to determine the extent to which the European Union consistently employs sanctions as an instrument for the protection of human rights, as well as what legal challenges arise in the implementation of such a policy and how overcoming them might influence the further development of the sanctions regime.

Materials and Methods

Conceptually, this study draws on a number of theoretical principles articulated in discussions regarding the effectiveness of measures such as targeted/smart sanctions, and the requirements of the rule of law: the right to know the grounds for a decision, access to evidence, judicial review and proportionality of intervention (Hafner-Burton, 2014; Eckes, 2022; Hamilton *et al*., 2024). The research materials consist of official legal acts of the European Union that directly established and specified the global sanctions regime in the field of

human rights, as well as subsequent acts concerning its application and judicial review. The key foundational documents are: Decision of the Council of the European Union No. 2020/1999 (2020), which first defined the content of the "global" sanctions regime for serious human rights violations, and Council Regulation of the European Union No. 2020/1998 (2020), which established the legal consequences of such a regime at the level of Union law – asset freezing, a ban on the provision of funds, an entry ban, etc. To analyse the actual practice of applying the regime, Council implementing acts were used, by which specific natural and legal persons were added to the sanctions lists and subject to travel bans and asset freezes (Council Decision of the Council of the European Union No. 2021/372, 2021; Council Implementing Regulation of the Council of the European Union No. 2021/371, 2021; Council Decision of the Council of the European Union No. 2021/481, 2021). To assess how the EU justifies individual liability and to what extent these decisions withstand judicial review, the following cases were consulted: Judgment of the General Court of the European Union in Case No. T-212/22 (2023), in which the Court explicitly examined the adequacy of the reasoning and the evidential basis for including specific individuals on sanctions lists under the human rights regime. A comparative dimension was provided by an analysis of the legal frameworks of similar global personal sanctions regimes in the United States – the Global Magnitsky Human Rights Accountability Act (2016) and Executive Order of the President of the United States No. 13818 (2017), which allow sanctions to be imposed for both serious human rights violations and corruption) and the Global Human Rights Sanctions Regulations 2020 of the United Kingdom (2020), which establish an autonomous post-Brexit mechanism for targeted sanctions for torture, extrajudicial executions, slavery and other grave human rights violations). To record the scale and coordinate the practical application of sanctions by different jurisdictions, as well as to quantitatively compare the lists of sanctioned individuals in the EU, the US, the UK and Canada, analytical summaries and comparisons of sanctions lists have been used to document the degree of cross-listing (LexisNexis Risk Solutions, n.d.).

The methods employed included: a formal legal analysis of the aforementioned EU Council acts and US/UK acts to establish the criteria for inclusion on the lists; an analysis of documents (EU Council implementing decisions for 2021 and EU case law since 2020) to reconstruct the actual application of the regime; a comparative legal analysis to highlight the differences between the mandates of the EU, the US and the UK; and a quantitative element – a comparison of the coverage of sanctions lists across different jurisdictions and the extent of their overlap, which is used later in the "Results" section to assess the effectiveness and coherence of the regime.

Results

Sanctions (referred to in official EU documents as "restrictive measures") are adopted within the framework of the Common Foreign and Security Policy (CFSP) of the EU. Pursuant to Articles 75 and 215 of the Consolidated Version of the Treaty on the Functioning of the European Union (2012), decisions to impose sanctions are adopted unanimously by the Council of the European Union under the CFSP framework. Subsequently, where implementation concerns matters falling within EU competence, such as the freezing of assets or restrictions on financial transactions, corresponding EU regulations may be adopted to give effect to those decisions. This two-stage mechanism was also applied when establishing the global sanctions regime for human rights violations – on 7 December 2020, the Council of the European Union adopted Decision of the Council of the European

Union No. 2020/1999 (2020) and, in parallel, Council Implementing Regulation of the Council of the European Union No. 2021/478 (2021), which established a new sanctions regime. This regime became the European Union's third "horizontal" sanctions regime (following the thematic regimes against the use of chemical weapons, adopted in 2018, and against cyberattacks – in 2019). Unlike traditional geographically targeted sanctions (which are directed against specific countries or governments), horizontal regimes allow for the targeting of any individuals worldwide responsible for certain types of prohibited conduct (in this case, serious human rights violations).

The new sanctions regime is designed to significantly expand the EU's ability to respond to gross human rights violations, regardless of where they occur. This mechanism applies to both state officials and non-state actors (including organisations and groups) involved in serious crimes against human rights. Council Regulation (EU) No 2020/1998 (2020) provides an exhaustive list of such violations, including: genocide; crimes against humanity; torture and inhuman or degrading treatment; slavery; extrajudicial or arbitrary executions and killings; enforced disappearances; arbitrary arrests or detentions. In addition, individuals responsible for other violations of human rights and freedoms may be subject to sanctions if such acts are widespread or systematic. Examples cited include: human trafficking; sexual and gender-based violence; and violations of the freedom of peaceful assembly, association, thought, expression, religion or belief. Thus, the criteria cover both the most serious crimes infringing on fundamental rights and mass or systematic repressive practices. In terms of its structure, the new regime is largely modelled on similar measures previously introduced by the EU's partners – primarily the US and the UK, which had already established their own global targeted sanctions regimes against individuals responsible for serious human rights violations and/or corruption by 2020 (Global Magnitsky Human…, 2016; Executive Order of the President of the United States No. 13818, 2017; The Global Human Rights…, 2020).

In terms of its structure, the new regime is largely modelled on similar measures previously introduced by the EU's partners – primarily the US (Global Magnitsky Human…, 2016) and the UK (The Global Human Rights…, 2020). Sanctions that may be imposed on the relevant persons include: 1) a ban on entry into EU countries for natural persons; 2) the freezing of assets of natural and legal persons (blocking of funds and property within the EU); 3) a ban on the provision of funds or resources to sanctioned individuals by any person within the EU's jurisdiction. These sanctions are typical of "Magnitsky" regimes in other states. A key feature is that restrictions on entry and movement apply uniformly across the entire territory of the Union (within the Schengen area), whilst financial sanctions oblige all Member States to identify and freeze the assets of the designated persons. The Regulation also provides for narrow exceptions (derogations) – for example, the possibility of authorising transactions involving frozen funds to cover the basic needs of the families of sanctioned persons, to pay for legal services or for humanitarian purposes (cision of the Council of the European Union No. 2020/1999, 2020).

The decision-making procedure under this regime remains intergovernmental: the Council of the EU unanimously adopts the list of persons subject to sanctions, following a proposal from Member States or the EU High Representative for Foreign Affairs. The list is reviewed annually with the possibility of its extension. This means that despite the "global" nature of the regime, the political will of each Member State is decisive for the inclusion of a particular violator on the list.

The first sanctions under the new regime were introduced as early as the beginning of 2021;

on 2 March 2021, the Council of the European Union adopted Council Implementing Regulation No. 2021/371 (2021) and No. 2021/372 (2021), which added four high-ranking officials of the Russian Federation to the list in connection with their involvement in the persecution and unlawful detention of Alexei Navalny; asset freezes and a ban on entry into the EU were imposed on them. This marked a fundamentally new step, as for the first time EU restrictive measures were imposed not within the framework of a separate "country-specific" regime, but specifically on the basis of serious human rights violations defined under a global regime (torture, arbitrary detention, denial of the right to a fair trial). Subsequently, on 22 March 2021, the Council of the European Union adopted the following package: Council Implementing Regulation (EU) 2021/478 (2021) and Council Decision (EU) 2021/481 (2021), which simultaneously imposed sanctions on 11 individuals and 4 organisations from various jurisdictions for serious human rights violations, in particular in connection with mass repression against the Uyghur minority in the Xinjiang Uyghur Autonomous Region of China, the suppression of peaceful protests and political killings in North Korea, Libya and Chechnya (Russian Federation), as well as torture and extrajudicial killings in South Sudan and Eritrea. The broad geographical scope of the Council's initial decisions demonstrated that the regime was conceived from the outset as a global mechanism for individual accountability, rather than as a tool for responding solely within the confines of a single conflict or a single country.

Subsequently, the application of sanctions for human rights violations within the EU was uneven. In total, over the first four years of the regime's operation, around 150 entities were added to the list – by the end of 2024, 115 individuals and 33 legal entities from various countries were subject to sanctions (Schreiber, 2024). A significant portion of the list consists of Russian military commanders, officials and judges implicated in war crimes and repression both within the Russian Federation and in the occupied territories of Ukraine (Portela *et al*., 2025). For example, following the outbreak of full-scale war against Ukraine in 2022, Russian army officers and propagandists responsible for atrocities against the civilian population were added to the list under the human rights regime. The inclusion of these individuals took place in parallel with broader sanctions measures against the Russian Federation, reflecting a desire to hold specific perpetrators of violations of international humanitarian law to account. Apart from Russians, a significant proportion of the list consists of individuals from countries such as Myanmar (responsible for the junta's crimes against the Rohingya people), Iran (involved in the violent suppression of protests and the execution of demonstrators), North Korea, Syria, and certain African states. Despite this, it is clear that many gross human rights violations around the world remain unaddressed by the EU – as of 2024, this mechanism has covered only a fraction of cases, whilst known repressive actions in other countries (for example, in Ethiopia during the conflict in Tigray, in Saudi Arabia, and so on) have not been met with sanctions.

The application of the EU's global human rights sanctions regime has been uneven. The trend has shown that listings occur in waves: in 2022, the EU relied in most cases on other existing sanctions regimes (including country-specific and thematic regimes concerning Iran, the Russian Federation, etc.), whilst updates to the global human rights list itself were limited (Portela *et al*., 2025). In 2023, the Council of the EU again used this mechanism to respond, in particular, to systematic human rights violations during the suppression of protests in Iran and to violence by military regimes in Myanmar and Sudan, which indicates the gradual consolidation of the regime

as an instrument of individual accountability for the most serious human rights violations. As of early 2025, this regime not only remains in force but has also been extended by the Council of the EU until at least 8 December 2026, which clearly indicates the Union's intention to use it as a permanent feature of its foreign policy in the field of human rights.

Assessing the effectiveness of sanctions as a means of protecting human rights remains inherently challenging because outcomes cannot be reduced to a simple determination that sanctions have either "worked" or "failed". A study prepared for the European Parliament notes that there is currently limited evidence regarding the direct impact of EU sanctions on the human rights situation within specific states and that, more generally, "little is known about the impact and effectiveness" of the regime (Portela *et al.,* 2025). However, the authors do not conclude that the mechanism is ineffective. On the contrary, they argue that effectiveness should be assessed not solely by reference to ultimate improvements in human rights conditions but through a broader set of intermediate indicators. The study highlights, in particular, the following criteria: firstly, the quality of the legal framework for sanctions (the presence of clearly formulated and substantiated grounds for listing an individual, and the ability of these acts to withstand judicial scrutiny); secondly, the intensity and consistency of the regime's application (the regularity of list updates, the timeliness of responses to new violations); thirdly, the material consequences for sanctioned individuals (asset freezes, restrictions on access to financial resources and international legitimacy); fourthly, the level of coordination with partners, namely the extent to which names included by the EU are duplicated on the sanctions lists of the US, the UK and other states. It is on the basis of these criteria that the study draws a cautiously positive conclusion: the regime has demonstrated an ability to personalise accountability for serious human rights violations, exerts financial and political pressure on specific officials and institutions, and signals support for victims. At the same time, the authors acknowledge that a proven causal link between EU sanctions and actual improvements in the human rights situation on the ground has been observed only sporadically, and therefore requires further monitoring and documentation (Portela *et al*., 2025).

In a study prepared for the European Parliament, the effectiveness of the EU's global human rights sanctions regime is assessed not as an abstract capacity to "improve the human rights situation", but through specific metrics proposed by the authors of this study (Portela *et al*., 2025). Firstly, the study analyses the impact of sanctions on the behaviour of those against whom they are imposed, specifically whether the sanctions have led to personnel changes, the removal of certain officials, or a reduction in their involvement in documented violations. Secondly, it examines the extent to which such individuals' ability to continue their abuses has been curtailed: whether their assets have been frozen, access to financial flows and international business contacts restricted, and their movement impeded. Thirdly, the law enforcement and institutional implications are assessed, in particular the coordination of EU actions with partners, the use of sanctions as part of broader international pressure, and the resilience of EU Council acts to judicial challenge. Fourthly, specific human rights outcomes on the ground are recorded, namely whether detainees have been released, the scale of the most serious violations has been reduced, or the practices of state bodies have been corrected. It is precisely these indicators that the authors of the study use as criteria for concluding that the regime has had a "cautiously positive" impact: EU human rights sanctions have demonstrated the ability to personalise accountability and exert targeted

pressure on individual violators, however, causally proven changes in the overall human rights situation remain fragmentary and are recorded only in isolated cases (Portela *et al*., 2021).

To eliminate ambiguity in the understanding of "effectiveness", a three-tiered "output – outcome – impact" framework is used below. It is proposed that "output" should capture the legal and organisational results of the regime: the stability and quality of the grounds for listings, the frequency of reviews, the volume and duration of asset freezes, the proportion of cross-listings with allies, as well as indicators of the judicial robustness of acts (the proportion of decisions successfully upheld by the Court of Justice of the European Union). "Outcome" refers to behavioural and institutional changes among the target groups and the environment: personnel shifts, voluntary resignations, the severing of funding and supply chains, increased transaction costs for sanctioned individuals, as well as "legal effectiveness" in the form of withstanding judicial scrutiny. Impact refers to concrete human rights improvements that have already been achieved (release of detainees, reduction in torture/arbitrary arrests, amendments to subordinate legislation, etc.).

Empirical and review studies from 2020-2025 indicate that targeted sanctions are more likely to generate tangible outputs and outcomes (restricted access to resources, reputational and transaction costs for those affected) than rapid human rights impact changes at the national level. This is summarised by comparative reviews of the effects of sanctions and a case study of the Belarusian context (Zelyova, 2021; Miadzvetskaya & Challet, 2022; Egger *et al*., 2024). In the case of Belarus, changes in the incentives of elites and difficulties in accessing finance for those targeted have been observed, yet without a rapid improvement in aggregate human rights indicators, confirming the gap between outcome and impact (Miadzvetskaya & Challet, 2022). The legal stability of acts (proper justification, periodic review and withstanding judicial scrutiny) is a necessary condition for the regime's effectiveness, as the repeal of acts undermines the signal and enforcement (Tilahun, 2021; Lonardo, 2023). The effect of sanctions increases under conditions of inter-alliance coordination and synchronisation of lists, which reduces "loopholes" and raises costs for violators (Giumelli, 2024; Egger *et al*., 2024). Based on the above, the overall assessment of the EU's global human rights regime is cautiously positive: it delivers strong outputs (targeting, regular updates) and relevant outcomes (restricting violators' opportunities), whilst proven impacts remain limited and context-dependent.

The shift from outcomes to impact requires, firstly, greater transparency regarding the rationale behind decisions and the establishment of clear indicators for review and delisting, in order to reduce the risk of reversals and enhance legal certainty (Tilahun, 2021; Lonardo, 2023). Secondly, deeper coordination with key partners (the US/UK/Canada) is needed in selecting targets and timing announcements, which enhances the cumulative effect (Giumelli, 2024). Thirdly, the issue of addressing corruption as a systemic driver of human rights violations must be resolved – either through a separate anti-corruption regime or by expanding the substantive criteria, in line with the current EU sanctions policy agenda (Korkea-aho & Lonardo, 2025).

The effectiveness of sanctions as an instrument for the protection of human rights depends to a large extent on the coordination of actions by states that apply targeted sanctions for serious human rights violations and/or corruption. In this context, "coordination among like-minded partners" refers to the degree of overlap in the lists of sanctioned individuals across different jurisdictions, that is, so-called cross-listings – instances where the same natural or legal person is simultaneously included on the European Union's

sanctions lists under the global human rights sanctions regime, on the US lists under the Global Magnitsky Act, and on the national lists of the United Kingdom and Canada, which cover both serious human rights violations and corruption (Portela *et al*., 2025). According to the results of a comparative analysis of the lists conducted for the European Parliament, the level of such cross-listings remains low: as of 2023, only around 3% of individuals against whom Canada had imposed sanctions for serious human rights violations or corruption were simultaneously included in the EU's global human rights sanctions regime (Portela *et al*., 2025). This means that a significant proportion of individuals appear in only one jurisdiction (for example, under Canadian or US sanctions) but not in the other, which reduces the restrictive effect of the sanctions: such individuals retain the ability to move assets, conduct financial transactions or travel in those states where they are not formally designated as subject to sanctions. This discrepancy stems not only from political priorities but also from structural differences between the regimes: the EU regime in its current form covers serious human rights violations, whereas the US Global Magnitsky regime and the Canadian sanctions regime also allow for sanctions to be imposed for significant corruption; Similarly, following Brexit, the UK regime under the Global Human Rights Sanctions Regulations 2020 of the UK (2020) allows for targeted punishment for torture, extrajudicial executions, slavery and other serious violations, but operates independently of EU decisions (Portela *et al*., 2025). Despite these differences, there are examples of coordinated action: on 22 March 2021, the Council of the EU adopted acts adding to the lists individuals responsible, in particular, for repression against the Uyghur population in the Xinjiang Uyghur Autonomous Region of China; these actions were accompanied by parallel sanctions announcements by the United States, the United Kingdom and Canada, which significantly amplified the political signal and international pressure (Council of the European Union, 2021c; Council of the European Union, 2021d). Academic assessments emphasise that the further expansion of the circle of states implementing comparable personal sanctions regimes (in particular, the adoption of their own "Magnitsky laws" in jurisdictions outside the EU and North America), as well as the establishment of information exchange between them, is seen as a key condition for enhancing the effectiveness of sanctions on a global scale.

The European Union and the United States of America have developed similar "Magnitsky-style" sanctions regimes aimed at holding accountable those responsible for serious human rights violations and corruption. A contemporary global trend has emerged whereby various democratic states have introduced thematic "Magnitsky sanctions", beginning with the United States and subsequently extending to Canada, the United Kingdom, the European Union, Australia, and others (Hamilton *et al*., 2024). These measures belong to the category of targeted sanctions, namely personalised restrictive measures imposed on specific individuals and entities, as distinct from broad economic embargoes. Such sanctions typically involve asset freezes and travel bans imposed upon identified perpetrators, and these are precisely the instruments employed by both the United States and the European Union within their respective regimes (Pavlidis, 2023). As a result, a new mechanism of international accountability has emerged, complementing traditional judicial remedies. Although sanctions do not constitute criminal punishment in the formal legal sense, they signal the international community's condemnation of serious misconduct and create tangible material consequences for those responsible.

At the same time, significant differences exist between the sanctions mechanisms of the European Union and the United States, reflecting

differences in jurisdiction, legal foundations, and substantive scope. First, the United States Global Magnitsky regime possesses a broader mandate. Under the Global Magnitsky Human Rights Accountability Act of 2016, sanctions may be imposed on foreign persons responsible for gross violations of internationally recognised human rights, including extrajudicial killings, torture, and other serious abuses, as well as those involved in significant corruption. Moreover, Executive Order No. 13818 (2017) further expanded the criteria by authorising sanctions in response to serious human rights abuses and corruption more generally, rather than limiting measures solely to cases of "significant" corruption. By contrast, the European Union has thus far confined its global sanctions regime exclusively to human rights-related conduct. The regime encompasses the gravest violations, including genocide, crimes against humanity, torture, slavery, extrajudicial executions, enforced disappearances, and other serious human rights violations or abuses (Pavlidis, 2023).

It is worth noting that the issue of including corruption in the EU sanctions regime is under active discussion. Large-scale corruption among high-ranking officials directly undermines democratic institutions and the rule of law, creating a breeding ground for human rights violations, and should therefore be prosecuted in the same way as purely "human rights" crimes. European Commission President Ursula von der Leyen, in her 2022 State of the Union address, also announced an initiative to add corruption to the criteria for EU sanctions. Thus, the main substantive difference is that the US already has an integrated mechanism for punishing both human rights violations and corruption, whereas the EU currently acts only against human rights offenders, thereby somewhat losing its potential to "surgically" target global networks of kleptocrats. According to T. Tsertsvadze (2023), the absence of an anti-corruption component places the EU behind other Western states in the use of sanctions to counter serious corruption.

Secondly, decision-making mechanisms and legal procedures for applying sanctions differ significantly between the US and the EU, a consequence of the specific nature of their governance systems. In the US, the Global Magnitsky Human Rights Accountability Act of 2016 is a federal law, the implementation of which is delegated to the executive branch: decisions on adding individuals to the sanctions list are made by the President (de facto by the State Department and the Treasury Department via OFAC) in consultation with Congress. The American process is quite flexible and efficient: sanctions lists are updated via presidential decrees, and the criteria set out in the law are broad enough to allow for the inclusion of perpetrators from any country in the world in response to confirmed cases of human rights abuses or acts of corruption. In practice, the United States Government announces new Global Magnitsky sanctions packages on a regular basis. Notably, it has become customary to unveil significant sanctions designations on 10 December, International Human Rights Day, thereby reinforcing the United States' claim to global leadership in promoting accountability for human rights violations and corruption (LexisNexis Risk Solutions, n.d.).

The European Union, for its part, acts through a common foreign policy, which requires a collective decision by all Member States (Zamfir, 2023). EU sanctions are imposed by a unanimous decision of the Council of the EU within the framework of the CFSP (Consolidated version of the Treaty on the Functioning of the European Union, 2012), on a proposal from the EU High Representative for Foreign Affairs (Portela *et al.*, 2025). Where a decision entails economic restrictions, such as asset freezes or financial prohibitions, it must be implemented by a separate legislative act – a joint resolution of the Council and the European Commission (based on Article 215 of the Consolidated

version of the Treaty on the Functioning of the European Union (2012)). Thus, the EU procedure is usually more protracted and complex, as it requires the consensus of 27 countries. This may result in delays or the dilution of sanctions lists due to the political interests of individual Member States. Both the US and the EU emphasise the importance of close coordination of their sanctions policies: recently, there has been a drive towards greater alignment of sanctions lists among allies (LexisNexis Risk Solutions, n.d.), so that violators cannot evade accountability by exploiting loopholes. It is noteworthy that, despite shared objectives, the overlap in individuals on the sanctions lists of the US, the EU and other partners remains fairly limited (LexisNexis Risk Solutions, n.d.). This is explained both by differences in criteria and priorities, and by factors of procedural independence: each jurisdiction conducts its own assessment of evidence and makes decisions autonomously.

Thirdly, it is worth comparing the scope of implementation of the two regimes – that is, how many individuals and organisations have actually been subject to sanctions. Since the launch of the Global Magnitsky Act in the US (the first wave of sanctions in late 2017), sanctions have been imposed on a significantly larger number of entities than in the EU. According to estimates as of early 2025, the US Global Magnitsky list comprised over 600 individuals and entities from more than 60 countries (LexisNexis Risk Solutions, n.d.). This is more than four times the combined list of the UK and the EU as of early 2025 (LexisNexis Risk Solutions, n.d.). The US lead is explained by both a broader mandate (including corrupt officials) and a longer duration of the programme: the US began imposing such sanctions earlier than the EU and has had time to accumulate more cases (LexisNexis Risk Solutions, n.d.). The European Union, meanwhile, is only just rolling out its mechanism. The first EU sanctions lists under the new regime appeared in March 2021, and 23 individuals were added to the list during 2021 (Tsertsvadze, 2023). Thus, as of early 2025, around 88 entities were subject to EU sanctions for human rights violations (LexisNexis Risk Solutions, n.d.). This is still fewer than on the US list, but the growth rate is accelerating noticeably, indicating that the EU is building up its capacity to actively utilise the new regime. In the longer term, extending the EU framework to encompass corruption could substantially increase the number of designated persons, given that many instances of serious human rights violations are closely connected to corrupt practices. Examples include the diversion of public funds by authoritarian regimes to finance coercive apparatuses responsible for repression and abuse. The US is likely guided by foreign policy priorities when selecting targets (imposing sanctions on a case-by-case basis), rather than automatically sanctioning all key figures in corruption rankings. For the EU, this means that the inclusion of an anti-corruption element must be accompanied by the development of clear criteria and a transparent procedure for selecting targets, in order to ensure the objectivity and consistency of the Union's actions with its partners.

Despite the differences outlined above, the US and EU sanctions regimes also share a number of common features and advantages that reinforce their complementarity on a global scale. Both regimes are based on the principle of individual accountability – punishing specific perpetrators rather than imposing collective punishment on entire populations. This is consistent with the 'smart sanctions' approach, which minimises harm to the wider population whilst targeting offenders precisely. Both the EU and the US emphasise that such sanctions are preventive in nature – they are designed to deter potential offenders by demonstrating the inevitability of consequences. It is important that both sanctions regimes provide legal mechanisms to protect the rights of the sanctioned individuals themselves, which distinguishes

them from arbitrary repression: in the US and the UK, those placed on the list have the right to apply to the authorities for an administrative review of the decision, as well as to challenge their inclusion on the list through the courts. The situation is similar in the EU: all Council decisions on sanctions are subject to judicial review by the Court of Justice of the EU, and those on the lists may file applications for removal, citing insufficient evidence or violations of procedural rights.

Discussion

The analysis has identified a number of key challenges affecting the effectiveness and legitimacy of EU sanctions in the field of human rights. Many of these issues have already attracted the attention of researchers and human rights defenders, and discussing them allows to compare the EU's experience with the assessments of other authors. Upholding legal safeguards and the rule of law within the EU itself is one of the key challenges facing the functioning of the global human rights sanctions regime after 2020. Targeted sanctions impose significant restrictions on the rights of listed individuals: a ban on entry and movement within the Union directly interferes with freedom of movement, which is recognised as a fundamental right under international human rights law; the freezing of assets and the prohibition on the provision of economic resources restrict the ability to dispose of one's property and income, thereby affecting the protection of property; public listing as a human rights violator affects business reputation and may result in the loss of access to financial and contractual relations in Member States.

Such consequences are evident, for example, in cases where entry bans and account freezes are imposed on individuals listed in the EU Council's sanctions regulations; these measures are of a long-term nature and are not merely declaratory, as banks, counterparties and public authorities are obliged to refuse financial transactions and any economic interaction with sanctioned individuals (Council Implementing Regulation of the Council of the European Union No. 2021/478, 2021; Council Implementing Regulation of the Council of the European Union No. 2021/371, 2021). Under these conditions, the EU, as a legal order, is obliged to ensure that the inclusion of a person on the list is based on sufficiently specific factual grounds, clearly stated reasoning and the possibility of effective legal protection, rather than merely on political expediency. Research highlights that the listing procedure remains largely opaque: decisions are taken by the Council of the EU at intergovernmental level, the justifications published in the annexes to regulations and decisions are sometimes presented in summary form, and the full body of evidence (including intelligence) is not always disclosed to the sanctioned individual, which complicates the exercise of the right to defence and the verification of the validity of the charges. Despite the formal right to challenge one's inclusion before the Court of Justice of the European Union, the effectiveness of judicial review depends on the extent to which the Council is able to prove the individual responsibility of the person concerned and to provide adequate justification as to why that specific person is the target of the sanctions. In a number of cases since 2020, the General Court has explicitly pointed to the inadequacy of such justification and annulled the sanctions against individual applicants. Thus, in the case of Prigozhina v. Council (2023), the court held that a family relationship with a person already subject to sanctions is not, in itself, sufficient grounds for automatic inclusion on the sanctions list, and required the Council to provide specific facts demonstrating the applicant's personal involvement in or benefit from actions constituting grounds for sanctions. Similarly, in 2024, EU courts partially annulled the restrictive measures imposed on certain Russian businessmen, finding that the Council had not demonstrated their role

in supporting prohibited activities with sufficient conviction and had not adequately justified their continued inclusion on the list following changes in their status (in particular, stepping down from management positions and divesting assets). These examples highlight two interrelated issues. Firstly, the scale and nature of the sanctions constitute a very significant interference with an individual's rights (travel bans, asset freezes, reputational damage), effectively amounting to quasi-punishment without a criminal conviction. Secondly, the mechanism for judicial review formally exists and is capable of overturning the Council's acts, but it operates ex post, after the restrictions have been in place for months, and thus does not eliminate the risk of disproportionate interference at an early stage. This is precisely why the academic literature emphasises the need to improve the quality of the reasoning sections of sanctioning acts, to review lists regularly, and to ensure access to the key grounds for listing an individual, so as to make this instrument both effective and compliant with EU rule of law standards.

There are as yet no precedents for the revocation of human rights regimes, but, as C. Eckes (2022) notes, ensuring the right to defence and a fair trial is a constant challenge: the EU must strike a balance between the operational effectiveness of sanctions and their legal robustness. One solution could be to improve the procedure for reviewing sanctions lists: more frequent reviews, allowing individuals to submit information regarding their innocence, appointing independent experts to verify evidence, and so on. Ensuring a high standard of legality is also critical for the regime's legitimacy in the eyes of the public: if courts regularly overturn Council decisions due to errors, this will undermine confidence in the instrument itself. On the other hand, careful selection of targets and a sound evidential basis will reduce the risks of successful challenges and, as a result, strengthen the authority of the sanctions mechanism.

Particular attention should be devoted to the question of how human rights sanctions fit within the broader foreign policy identity of the European Union. The academic literature advances the argument that, through sanctions, the EU seeks to act as a bearer of "collective sovereignty", namely as an actor capable of establishing standards of conduct at the global level on behalf of the Union and demanding their observance beyond its own borders (Beaucillon, 2023). According to this view, sanctions regimes, and especially the global sanctions regime for human rights violations, function not merely as technical instruments of pressure directed at specific individuals, but as mechanisms for projecting the EU's normative power. When the Council of the European Union adopts measures such as asset freezes or travel bans against foreign officials, it effectively asserts that the Union possesses the authority to determine which forms of conduct are so unacceptable from a human rights perspective that they warrant transnational consequences. This resembles a form of extraterritorial application of value-based standards: even where the conduct in question has occurred outside the Union, within the territory of a third state and against its own citizens, the EU claims the right to respond through financial and legal measures by excluding such individuals from its economic and legal infrastructure. Such an approach transforms human rights into an area in which the Union seeks to act not merely as a "club of Member States" but as a unified holder of public authority in the external sphere. At the same time, this approach generates criticism from states that perceive such sanctions as an infringement upon their sovereignty and an attempt to impose European human rights standards in the absence of a universally agreed international legal mechanism (Beaucillon, 2023). In other words, the more actively the European Union employs targeted human rights sanctions, the more it assumes the role of a global normative

actor, while simultaneously exposing itself to accusations of selectivity and double standards, particularly from states of the Global South.

At the same time, the question arises of regional leadership and the competitiveness of the EU's sanctions policy within the wider Western bloc. On the one hand, sanctions are seen as a mechanism through which the European Union seeks to maintain its own agency within the international security architecture, without reducing its role to that of a junior partner to the US. This involves demonstrating the ability to independently identify human rights violators, formulate sanctions packages, defend them legally in EU courts, and compel member states to implement them, which in theory should reinforce "the EU's status as a regional (and sometimes global) centre of gravity" in matters of security and human rights (Cardwell, 2023). On the other hand, practice shows that such leadership is not absolute and often proves to be reactive. A significant proportion of the EU's human rights sanctions initiatives align with existing measures taken by the US or the UK, which have a longer tradition of applying targeted sanctions for corruption and serious human rights violations. In academic discourse, this is presented as ambivalence: the European Union simultaneously positions itself as an independent centre of sanctions policy and, at the same time, relies heavily on its partners for political legitimacy, evidence gathering and the identification of individuals. For the human rights regime, this means that it is a test not only of internal legal robustness (quality of reasoning, judicial review), but also of the EU's ability to transform sanctions into a systemic instrument of its international authority, rather than merely a confirmation of solidarity with its allies (Beaucillon, 2023; Cardwell, 2023).

Adopting a sanctions decision is only the first step; ensuring its effective implementation is equally important. Within the European Union, responsibility for enforcing sanctions is shared between the supranational and national levels. The European Commission monitors compliance with financial sanctions, including asset freezes and prohibitions on making funds available, and may initiate infringement proceedings against Member States that fail properly to implement EU regulations. However, as noted in the literature, the Commission's powers to monitor sanctions involving travel bans are considerably more limited. Responsibility for enforcing visa and entry restrictions rests entirely with national authorities, including border agencies and consular services. And although Member States coordinate their actions within the Schengen Information System, there have been cases where sanctioned individuals have visited EU countries, citing exemptions (for example, to participate in international forums, which is permitted as an exception for the performance of duties in intergovernmental organisations). The Commission has no means of compelling a state to deny entry to such a person or to penalise it for a breach, which effectively undermines the effectiveness of the entry restrictions. Another dimension is the enforcement of sanctions by the business sector. Companies in the EU are obliged to freeze the accounts of sanctioned individuals and to refuse to provide them with services. However, practice shows that effectiveness depends on the awareness and diligence of the private sector. There may be cases where sanctioned individuals hold assets through complex schemes (trusts, shell companies), and it is difficult to detect them without an active stance from state authorities.

Political coordination and unanimity. As the analysis has shown, the requirement for unanimity when adopting sanctions often becomes an obstacle to a prompt and fair response to human rights violations. For example, in 2021, the EU was unable to impose sanctions on any individual implicated in the mass killings of

civilians in Ethiopia (the Tigray region), despite the existence of ample evidence of war crimes. At the same time, an increasing number of studies are drawing attention to the "human dimension" of sanctions policy and the real consequences that targeted restrictions have for human rights in the target states. An analysis of the regimes in Myanmar and Zimbabwe shows that so-called "smart" sanctions guarantee neither consistent pressure on the elites nor predictable democratisation: the outcome depends on the configuration of the domestic regime, the availability of alternative economic partners, and the elites' ability to shift the burden of sanctions onto the population (Rochat, 2024). Research on multinational companies operating in sanctioned jurisdictions demonstrates that market exit, triggered by reputational pressure and the risk of secondary sanctions, can paradoxically worsen the human rights situation: assets are transferred to entities close to the regime, and workers lose their jobs without adequate safeguards (Thein *et al*., 2024). Similar effects are observed at the macro level: econometric estimates show a link between sanctions and increased emigration from authoritarian states, signifying a "brain drain" of the most active segment of society and placing additional pressure on the socio-economic rights of those who remain (Gutmann *et al*., 2024). For the EU, this raises the question of the need for systematic assessments of the impact of sanctions on human rights and the introduction of minimum standards for "responsible disengagement" for businesses, so that targeted measures do not become a factor in the erosion of social rights in third countries.

Another important dimension of the debate concerns the issues of bias and legitimacy in sanctions decision-making. Comparative analysis of EU and US practice suggests that both sanctions "senders" display a degree of selectivity and double standards. The intensity and frequency of restrictive measures appear to depend not only upon the gravity of the underlying violations but also upon factors such as the economic significance of the target state, the structure of trade relations, and the presence of diaspora communities capable of mobilising political pressure (Schneider *et al*., 2025). Research examining the appropriateness of restrictive measures further highlights a "pendulum effect" between targeted and sectoral sanctions. Where individual sanctions fail to achieve the desired political outcome, policymakers often revert to broader sectoral restrictions, thereby increasing the risk of disproportionate consequences for the wider population (Cookman, 2024). At the same time, studies examining sanctions as instruments of multilateral diplomacy, particularly in the context of the Iranian nuclear negotiations, demonstrate that perceptions of the sender's legitimacy have a direct impact upon whether the target state views sanctions as an incentive to compromise or as politically motivated punishment that must simply be endured (Niemeier & Schneider, 2024; Isaac & Fouda, 2025). In the context of the EU Global Human Rights Sanctions Regime, this suggests that transparency in the selection criteria, the adequacy of the evidential basis for designations, and the consistent application of standards across different regions are not merely legal requirements but also political conditions for the effectiveness and acceptability of sanctions as a human rights instrument.

Comparing the EU's global regime with other "Magnitsky-type" instruments provides a better understanding of its place within the broader architecture of the fight against impunity. National laws such as Canada's Justice for Victims of Corrupt Foreign Officials Act (2017) create parallel channels for holding perpetrators accountable for serious human rights violations and corruption, whilst simultaneously shaping expectations regarding the role of democratic states in

the global "public order" (Arabi & Lilly, 2020). An analysis of the US "Magnitsky Act" as the foundation of a global system of anti-corruption sanctions demonstrates how thematic regimes are gradually weaving themselves into a transatlantic network, where key democratic actors coordinate lists and criteria, yet simultaneously preserve their own political priorities (Lizak & Skuza, 2024). Against this backdrop, the EU, on the one hand, positions its global regime as a legally balanced and more "procedural" alternative, whilst on the other hand, it reproduces the typical problems of sanctions policy: vague boundaries of "proximity" to offending regimes, which justify inclusion on the list, and the risks of an expansive interpretation of the criteria, as evident in the analysis of the Union's counter-terrorism sanctions (Datzer *et al*., 2024). The experience of the UN Security Council's universal sanctions against North Korea further demonstrates that even restrictions formally "legitimised" within the UN system have limits in terms of their compatibility with international law and the principle of proportionality if their cumulative socio-economic impact goes beyond the specifically defined objective (Kondoch, 2024). Taken together, this underscores that the further development of EU sanctions in the field of human rights cannot be limited to technical adjustments to procedures: a systematic reassessment of the balance between the symbolic, preventive and punitive functions of sanctions is required, taking into account empirical data on their actual impact on human rights and democratic development.

Finally, it should be noted that, in practice, the Council of the European Union frequently gives preference to country-specific sanctions regimes where such frameworks already exist. The Global Human Rights Sanctions Regime therefore often functions as a supplementary or residual mechanism, applied in situations not covered by other sanctions programmes. This was the case, for example, with sanctions imposed on individuals connected with Chechnya and Libya, where no dedicated country-specific sanctions regime was available. Whilst this approach is understandable from a policy perspective, since geographical regimes allow for more comprehensive measures, including sectoral restrictions directed at particular governments, it also creates a risk of duplication and inconsistency between different sanctions frameworks. The European Union has succeeded in establishing a global human rights sanctions regime; however, the effective realisation of its full potential requires addressing the challenges identified above. Comparison with the findings of other scholars demonstrates that concerns regarding the need for greater transparency, consistency, and the expansion of sanctions criteria are widely shared within the academic and policy communities. This reinforces the validity of the proposals advanced in this study for the further development and improvement of the legal framework governing EU sanctions policy.

Conclusions

The European Union has established itself as an influential actor that uses sanctions to uphold and protect human rights on the international stage. The introduction in 2020 of the Global Sanctions Regime for serious human rights violations marked a significant milestone in the evolution of the EU's sanctions policy, demonstrating its commitment to a values-based approach in foreign affairs. The current state of this regime is characterised by its institutional anchoring in EU law and the first results of its application: as of 2024, around 150 individuals and entities worldwide implicated in crimes such as torture, repression and war crimes have fallen under its scope. EU sanctions have thus become a globally oriented instrument capable of responding in a targeted manner to serious

human rights violations irrespective of the jurisdiction in which they occur.

At the same time, the analysis highlighted a number of challenges that prevent the full realisation of the potential of sanctions as an instrument for the protection of human rights. First, political disagreement among Member States, stemming from the requirement of unanimity, results in selectivity: certain particularly serious violations, especially those involving strategic partners of the European Union, remain unaddressed, thereby undermining the consistency of EU policy. Secondly, the issue of compliance with legal standards needs to be addressed: the EU must ensure a transparent and fair sanctioning process to guarantee the rights of those included on the lists and withstand judicial scrutiny. Thirdly, there are problems with the implementation and monitoring of sanctions: in practice, effectiveness depends on the conscientious implementation of measures by all Member States and the private sector, and EU oversight is currently limited. Fourthly, the current EU sanctions regime does not cover corruption, which reduces its effectiveness in combating regimes where corruption and human rights violations are closely intertwined. Finally, the EU faces reputational risks on the international stage: critics point to double standards and the illegitimacy of unilateral sanctions, prompting a need to improve communication and seek broader support.

The future development of the legal framework governing EU human rights sanctions lies in the gradual refinement of both the regulatory framework and implementation practice. Priority measures may include reform of the sanctions decision-making process through consideration of a limited departure from the unanimity requirement, at least in matters relating to human rights, or the development of mechanisms designed to facilitate consensus-building, such as enhanced preliminary consultations and a stronger role for the High Representative in forging agreement among Member States. Strengthening legal safeguards should also be prioritised through greater transparency regarding listing criteria, the development of clear guidelines and indicators for assessing whether sanctions should be maintained or lifted, and improvements to judicial review procedures. This could potentially involve the establishment of an independent expert body responsible for examining sensitive evidence in closed proceedings; expanding the scope of the regime – either by supplementing the existing regime with an anti-corruption element, or by introducing a separate parallel anti-corruption sanctions mechanism (as proposed by the European Commission in 2023). This would address a significant gap and ensure a more comprehensive approach to countering abuses that go hand in hand with human rights violations; enhancing the effectiveness of implementation – establishing a permanent sanctions monitoring system within the EU structure (for example, appointing a special representative for sanctions or a working group within the European External Action Service), developing standards for member states' reporting on measures taken, and involving the European Banking Authority and other regulators more closely to oversee the financial aspect; strengthening international coordination – more active coordination of sanction measures with partners (the US, the UK, Canada, etc.), exchanging lists of potential sanction targets, and jointly announcing new packages on symbolic dates (for example, ahead of International Human Rights Day or Anti-Corruption Day). Such coordination will enhance the global impact of sanctions and reduce opportunities for circumvention.

In conclusion, EU human rights sanctions generally meet their stated objective – to serve as a tool for protecting fundamental rights and freedoms – yet their effectiveness is uneven. The regime requires further development to become

a truly comprehensive and sustainable element of European foreign policy. The prospects for its evolution are closely linked to the political will of the Member States: if the EU wishes to maintain its role as a global leader in the defence of human rights, it must ensure that the sanctions mechanism is as effective, fair and consistent as possible. Implementing the outlined improvements will enhance the effectiveness of sanctions, strengthen confidence in them and ensure a greater contribution to the protection of human rights worldwide, which will, in fact, constitute further progress in the legal regulation of this sphere.

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Санкції Європейського Союзу як інструмент забезпечення прав людини: сучасний стан, виклики та перспективи правового регулювання

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Анотація

У статті досліджено санкційну політику Європейського Союзу як інструмент забезпечення прав людини з фокусом на Глобальному режимі санкцій ЄС у сфері прав людини 2020 року. Метою дослідження було окреслити сучасний стан правового режиму, виявити виклики його застосування та запропонувати напрями вдосконалення. Застосовано системний підхід і поєднання формально-юридичного, порівняльно-правового, історико-правового методів. Розглянуто процес оформлення глобального режиму санкцій як «горизонтального» (тематичного) інструменту, що дозволяє адресно реагувати на серйозні порушення прав людини незалежно від юрисдикції, поєднуючи заборону в'їзду, замороження активів і заборону надання коштів. Практика застосування засвідчила його придатність для підтримки міжнародних стандартів прав людини та координації з партнерами, але висвітлила нерівномірність і вибірковість включень, залежних від вимоги одностайності в Раді ЄС. Ідентифіковано процесуальні ризики: обмежена прозорість обґрунтувань, складність доступу підсанкційних осіб до доказової бази, неоднаковість національного виконання (візові обмеження, виявлення/замороження активів). Відсутність корупції як самостійної підстави звужує охоплення режиму порівняно з аналогами США та Великої Британії, що обмежує вплив на мережі, де порушення прав людини поєднані з клептократією. Перехресна координація санкційних списків різних режимів зростає, однак залишається неповною, що створює «вікна обходу». Практична значущість дослідження полягає у можливості використання його результатів для розширення матеріальних критеріїв, що можуть слугувати підставою для запровадження санкцій, підвищення прозорості і частоти перегляду списків із гарантіями права на захист, інституціалізації моніторингу виконання санкцій на рівні ЄС та поглиблення міжнародної координації

Ключові слова: обмежувальні заходи; цільові санкції; глобальний санкційний режим ЄС; міжнародне право санкцій; зовнішня політика ЄС