



INSIGHT

# UN(PACKING) SANCTIONS DATA: WHAT CAN SANCTIONS NUMBERS TEACH US

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**ABSTRACT:** There is an ongoing academic discussion on the concept of smart and targeted sanctions, suggesting that these measures should be tailored, allow for humanitarian exemptions, and include an accessible de-listing procedure for designated subjects, among other criteria. However, a question arises as to whether the concept of smart sanctions should be limited to these well-established standards or if it encompasses a broader scope than currently explored. This *Insight* aims to investigate how the smart sanctions concept might be enriched through the analysis of sanctions data, examining factors such as the number of sanctions imposed, the frequency of impositions, and the appropriateness of personal targeting. Such a review can offer valuable insights and practical guidance for policymakers and practitioners shaping the future of smart sanctions, grounding discussions not only in theory but also in empirical data.

**KEYWORDS:** sanctions – sanctions data – EU sanctions – international sanctions – smart sanctions – targeted sanctions.

## I. INTRODUCTION

The literature predominantly discusses sanctions from various perspectives, including their relevance to human rights concerns raised by sanctions implementation,<sup>1</sup> the proportionality of measures taken,<sup>2</sup> effectiveness,<sup>3</sup> humanitarian considerations in sanctions design,<sup>4</sup>

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<sup>1</sup> TJ Biersteker, 'Targeted Sanctions and Individual Human Rights' (2010) *International Journal: Canada's Journal of Global Policy Analysis* 99.

<sup>2</sup> A Hofer, 'The EU's 'Massive and Targeted' Sanctions in Response to Russian Aggression, a Contradiction in Terms' (2023) *CYELS* 19.

<sup>3</sup> TJ Biersteker, SE Eckert, M Tourinho and Z Hudáková, 'The Effectiveness of United Nations Targeted Sanctions: Findings from the Targeted Sanctions Consortium (TCS)' (The Graduate Institute of International and Development Studies 2013).

<sup>4</sup> L Ashley, 'Unilateral Coercive Measures: Towards International Humanitarian Law and International Human Rights' in S P Subedi (ed), *Unilateral Sanctions in International Law* (Hart Publishing 2021) 233.



and sanctions relief policy aspects,<sup>5</sup> among others.<sup>6</sup> Moreover, the sanctions datasets<sup>7</sup> analysed in the literature often come from socio-political or economic fields of study.

A prominent attempt to capture the evolution of sanctions data was made by Clara Portela and Andrea Charron, who explored various sanctions databases developed by scholars.<sup>8</sup> They reviewed the usability of sanctions databases for policymaking and examined whether they enhance the understanding of sanctions or introduce new concepts. In my analysis, I want to delve deeper into the topic of sanctions data, going beyond the databases created by scholars. I propose examining sanctions mandated by the G7 and EU (hereafter collectively referred to as “G7,” including the EU) from an additional perspective using data sets provided by official sources.<sup>9</sup>

Despite the dramatic growth of G7’s sanctions since Russia’s full-scale invasion of Ukraine in February 2022, the way we understand sanctions when evaluated as a bulk dataset is still underexplored in academic or expert discussions. In some cases, the discussions around certain sanctions regimes are more intense and alarming than the actual regimes themselves. An important step was taken by the EU with the launch of the Sanctions Data Tracker,<sup>10</sup> highlighting the need for officials to monitor how sanctions data is structured, organized, and where it is directed.

In this *Insight*, I propose diving into one of the underexplored areas of sanctions – the data behind these limitations and restrictions – and what sanctions data can teach us.

## II. WHAT MAKES SANCTIONS SMART: FIGURING OUT THE DATA

The concept of modern sanctions aligns with the idea of targeted or smart sanctions. Practitioners and scholars argue that such measures should be tailored to specific needs,

<sup>5</sup> E Moret, ‘Sanctions Relief and Security Guarantees in the Ukraine Conflict’ (2022) Ukraine Options Paper repository.graduateinstitute.ch.

<sup>6</sup> I Chernohorenko, ‘Seizing Russian Assets to Compensate for Human Rights Violations in Ukraine: Navigating the Legal Labyrinth’ European Papers (European Forum Insight of 28 December 2023) www.europeanpapers.eu 1067; P Kehl, ‘Seizing Russia’s Frozen Assets: Quis Iudicabit?’ (24 January 2024) EJIL: Talk www.ejiltalk.org; A Vlasyuk, ‘Legal Report on Confiscation of Russian State Assets for the Reconstruction of Ukraine’ (February 2021) KSE kse.ua; C Zilioli, R Bismuth and L Thévenoz, *International Sanctions: Monetary and Financial Law Perspectives* (Brill 2024); M Happold, ‘Economic Sanctions and International Law: An Introduction’ in M Happold and P Eden (eds), *Economic Sanctions and International Law* (Hart Publishing 2016); and many others.

<sup>7</sup> “Databases, defined as organized, searchable collections of data [related to sanctions]”, C Portela and A Charron, ‘The Evolution of Databases in the Age of Targeted Sanctions’ (2022) *International Studies Review*.

<sup>8</sup> *Ibid.*

<sup>9</sup> For instance, EU official sanctions data is provided here: Directorate-General for Financial Stability, Financial Services and Capital Markets Union, *Consolidated List of Persons, Groups and Entities Subject to EU Financial Sanctions* (2024) data.europa.eu. The EU sanctions data is provided in a machine-readable format.

<sup>10</sup> European Commission, *EU Sanctions Tracker* data.europa.eu.

adjusted as situations evolve, include provisions for humanitarian exceptions,<sup>11</sup> avoid impacting vulnerable groups,<sup>12</sup> and allow for de-listing,<sup>13</sup> among other considerations. These elements form part of the broader sanctions design, governing proper implementation.

However, should the understanding of smart or targeted sanctions be limited to the standards outlined above, or should it encompass broader policy design? There remains an open, largely uninvestigated area regarding how broadly smart and targeted sanctions should be interpreted. Should policymakers consider the frequency of new sanctions listings? Should there be a dynamic imposition of sanctions at regular intervals? Should the trend be planned to increase or decrease pressure? In other words, is it smarter to apply maximum pressure immediately, or should pressure gradually increase over time? All of these points are often ignored when discussing the concept of smart sanctions, so it is crucial to address this gap. On the other hand, should smart sanctions also include a de-listing strategy, an easing framework, and specific criteria for sanctions relief? Will the sanctions target always expect a complete removal of all sanctions at once, or does a gradual lifting better align with the concept of smart sanctions?

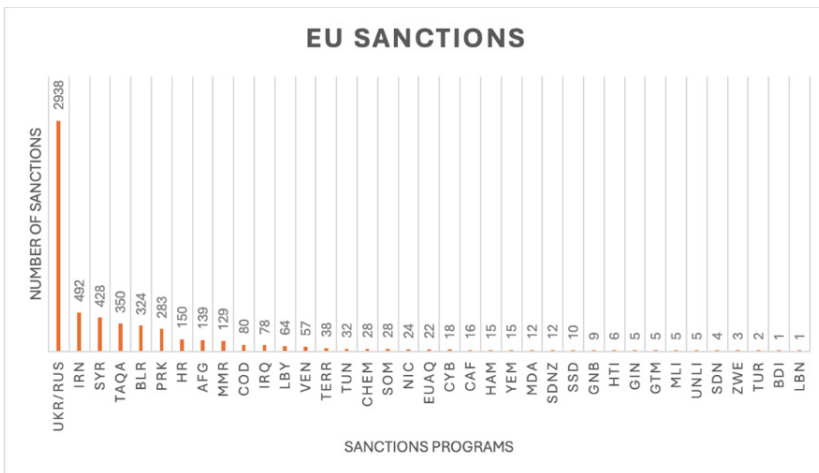


TABLE 1. EU Sanctions in Numbers as of November 2024.<sup>14</sup>

<sup>11</sup> L Ashley, 'Unilateral Coercive Measures: Towards International Humanitarian Law and International Human Rights' cit.

<sup>12</sup> ARTE Agence; Nationale de Gestion des Oeuvres Audiovisuelles; Angoa-Agicoa, *Documentary Embargo Sur L'Iran* (2020) [www.youtube.com](http://www.youtube.com).

<sup>13</sup> T Biersteker and A Niederberger, 'UN Individual Sanctions Listing and Delisting Patterns and Their Interaction with Autonomous Measures: Considerations for Mediators' (2022) United Nations University collections.unu.edu; E Moret, 'Sanctions Relief and Security Guarantees in the Ukraine Conflict' cit.; T Biersteker, 'Using Sanctions Relief to Facilitate Negotiations: Challenges of Calibration, Communication, Coordination, and Credibility' (2023) Geneva Graduate Institute Working Papers.

<sup>14</sup> Sanctions-finder.com, Search | Sanctions Finder on EU Sanctions in Numbers as of November 2024 [sanctions-finder.com](http://sanctions-finder.com).

For example, can sanctions truly be considered “smart” when only 14 individuals and four companies are targeted for cyberattacks (CYB) against EU member states?<sup>15</sup> When such a small number of cybercriminals are being affected by sanctions, the answer seems quite questionable. Only recently EU officials reported that number of cyberattacks doubled in 2024, with Russia playing a prominent role in these attacks.<sup>16</sup> Politico described the EU as being under digital siege, with a cyberattack directed against it almost every month in 2024.<sup>17</sup>

In 2024, five years after the adoption of its cyber sanctions regime, the EU added several cybercriminals to its cyber sanctions list, noting that the “...EU and its member states reaffirm their willingness to step up efforts to provide a stronger and more sustained response to persistent malicious cyber activities targeting the EU...”.<sup>18</sup> Given the enormous volume of cyberattacks and the threats posed by malware, it is rather doubtful that such a narrowly designated group can serve as persuasive evidence of the EU’s “willingness” and “sustained response” to addressing cyber threats, as described above.

The EU sanctions program targeting Turkey’s unauthorized drilling activities in the Eastern Mediterranean raises questions about its practical effect, as it was developed to target only two individuals. Similar concerns apply to sanctions against those supporting Hamas and Palestinian Islamic Jihad or related to Zimbabwe. With such low-intensity measures targeting only a few people, can these sanctions truly be considered “smart”? Can sanctions be impactful if they are so minimal, or would it be more accurate to describe them as symbolic or even fictional? If the imposer of the sanctions seeks to create a meaningful impact, it cannot be achieved by designating just a few individuals and a single company.

Hence, my idea is not to highlight discrepancies between official statements and the actual state of play, but, rather, to argue that the concept of smart and targeted sanctions should also incorporate policy considerations, such as how often the sanctions mechanism is expected to be used against potential targets, the threshold for activating such sanctions, and proper program management aligned with global foreign aims at G7/EU fora. While many observers claim that the transformation to smart sanctions has occurred,<sup>19</sup> it is uncertain whether these measures are truly smart yet.

<sup>15</sup> Sanctions Finder, *Sanctions Finder on EU CYB sanctions program* sanctions-finder.com.

<sup>16</sup> D Gatopoulos, ‘Europe’s Cybersecurity Chief Says Disruptive Attacks Have Doubled in 2024, Sees Russia behind Many’ (29 May 2024) AP News apnews.com.

<sup>17</sup> S Starcevic, ‘Timeline: Europe under Cyber Siege in 2024’ (9 May 2024) Politico www.politico.eu.

<sup>18</sup> Council of the EU, *Cyber-Attacks: Six Persons Added to EU Sanctions List for Malicious Cyber Activities against EU Member States and Ukraine* (24 June 2024) www.consilium.europa.eu.

<sup>19</sup> TJ Biersteker, SE Eckert, M Tourinho and Z Hudáková, ‘The Effectiveness of United Nations Targeted Sanctions: Findings from the Targeted Sanctions Consortium (TCS)’ cit. 8; A Charron and C Portela, ‘The Relationship between United Nations Sanctions and Regional Sanctions Regimes’, in TJ Biersteker, SE Eckert and M Tourinho (eds), *Targeted Sanctions: The Impacts and Effectiveness of United Nations Action* (Cambridge University Press 2016) 115. For example, regarding the nature of targeted sanctions against Russia, see the

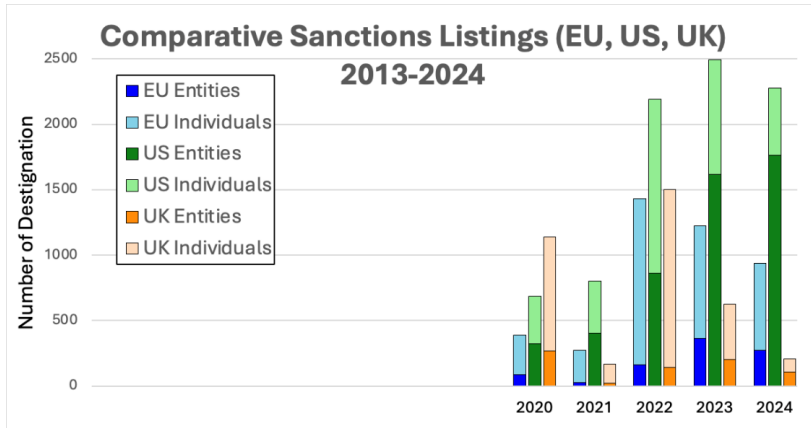


TABLE 2. Comparative Sanctions Listings (EU, US, UK).<sup>20</sup>

Also, a separate aspect of smart sanctions should focus on refining the dynamics of sanctions imposition, particularly how the sanctions against Russia have set a new precedent in terms of scope and volume of restrictive measures. The distinction between two periods of sanctions – before and after February 2022, following the full-scale invasion of Ukraine – is evident. Given that the scale of sanctions has doubled and tripled since Russia’s aggression, comparing the regimes enforced against Russia with those applied to other third countries becomes increasingly problematic. The period from 2020 to 2021 shows a conventional dynamic to sanctions imposition, with the EU designating approximately 250-300 subjects annually. Following the full-scale invasion of Ukraine, nearly half of the newly imposed sanctions have been directed at Russia. As a result, the overall scope of sanctions targeting various other jurisdictions is now comparable to those imposed on a single jurisdiction, highlighting the intensified focus on Russia.

Overall, the US has the most dynamic and adaptive sanctions programs. There are many explanations for this, requiring substantive analysis, but in terms of figures, the US continuously expands its scope of personal sanctions and does so regularly. After the first extensive sanctions packages against Moscow in 2022, the US shifted its focus to combating anti-circumvention schemes, targeting companies in third countries that help Russia import critical goods.<sup>21</sup> Every two months, there is an expected increase of 300–400 new personal sanctions listings, with about half involving companies outside

post on X (Twitter) by Anton Moiseienko: “All Sanctions against [Russia] are either targeted, or prevent it from making money [...]” (3 August 2024) x.com.

<sup>20</sup> The data has been collected from Sanctions-Finder.com sanctions-finder.com.

<sup>21</sup> Sanctions-finder.com on X(Twitter), “In December 2023, the US imposed sanctions on various networks. These networks were involved in supplying Russia with chips, electronics, dual-use technologies [...]” (18 January 2024) x.com.

Russia.<sup>22</sup> This approach raises the cost of non-compliance, making US sanctions among the most aggressive globally.

The EU has adopted a “sanctions package principle”, with nine packages delivered in 2022, three in 2023, and two in 2024 (as of November 2024).<sup>23</sup> The trend of slowing sanctions momentum was evident even in 2023, a year after the full-scale invasion of Ukraine. With increasing difficulties in reaching consensus among 27 Member-States, the EU faces greater challenges in maintaining any form of systematic pressure against Moscow, particularly in designating new enablers of sanctions evasion. Observers also highlight that the EU’s infrastructure struggles to handle the volume of sanctions,<sup>24</sup> unlike the US, which focuses on countering circumvention sharply.<sup>25</sup> The lengthy EU process makes it harder to quickly adapt to evolving needs, creating a gap that needs addressing. This makes it challenging to conclude that the concept of smart sanctions has been fully revitalized in EU practice.

Another critical date in sanctions data is the emergence of a “new-old” sanctions actor, the United Kingdom, which introduced its own autonomous sanctions program in 2019-20 after Brexit,<sup>26</sup> comparable to that of the EU. While discussions about the effectiveness and impact of UK sanctions continue, there is growing trend suggesting that the UK, despite being a G7 member and a former leader in EU sanctions policy, is falling behind in developing its sanctions portfolio, particularly against Russia.<sup>27</sup>

<sup>22</sup> 367 companies designated in August 2024; 405 in June 2024; 272 in May 2024; 300 in April 2024; 72 in March 2024; and 505 in February 2024, see more on x.com.

<sup>23</sup> European Commission, *Sanctions Adopted Following Russia's Military Aggression against Ukraine* finance.ec.europa.eu.

<sup>24</sup> C Portela and KB Olsen, 'Implementation and Monitoring of the EU Sanctions' Regimes, Including Recommendations to Reinforce the EU's Capacities to Implement and Monitor Sanctions' (10 October 2023) European Parliament [www.europarl.europa.eu](http://www.europarl.europa.eu).

<sup>25</sup> It is important to note that the US adopts sanctions autonomously, whereas reaching sanctions decisions at the EU level is considerably more complex. In this *Insight*, I primarily focus on the final outcomes of imposed sanctions, while acknowledging that EU sanctions implementation is constrained by institutional mechanisms. Drawing from the US experience, continued delays in countering sanctions evaders could ultimately undermine the EU's goals in weakening Russia's capacity to sustain its war economy. In other words, new companies aiding in sanctions circumvention may be established more quickly and frequently than the EU can identify and target them.

<sup>26</sup> After Brexit, the UK adopted a number of sanctions legislative acts, such as the Syria (Sanctions) (EU Exit) Regulations 2019, the Zimbabwe (Sanctions) (EU Exit) Regulations 2019, the South Sudan (Sanctions) (EU Exit) Regulations 2019, the Somalia (Sanctions) (EU Exit) Regulations 2020, the Russia (Sanctions) (EU Exit) Regulations 2019, among others, to replicate existing EU sanctions programs and keep them in force autonomously.

<sup>27</sup> Since Brexit, the current number of UK personal sanctions stands at 4,570 designations, while the EU has expanded its sanctions portfolio to 5,686 (as of November 2024). This suggests that the EU, despite requiring consensus, is more agile and adaptive in expanding sanctions, adopting new programs, and addressing sanctions gaps. In contrast, the UK has added new listings much less frequently, despite having the autonomy to adopt sanctions independently. See Sanctions Finder [sanctions-finder.com](http://sanctions-finder.com).

All commitments and promises to strengthen sanctions pressure<sup>28</sup> seem doubtful when, over a span of several months, there have been almost no new designations under Russia-related programs (for example, none in July 2024 and only seven in August 2024). This suggests that London is lagging, even as new schemes to circumvent sanctions are emerging weekly. With many companies highlighted by the US for supporting Russia's war machine, it is puzzling why London fails to see new sanctions targets, even to counter evasion attempts. This approach certainly contradicts the idea of smart sanctions.

Sara Poli explored the convergence and divergence between UK and EU sanctions after Brexit.<sup>29</sup> She concluded that UK-EU sanctions have largely remained aligned, with only minor shifts occurring. It should be noted that, while her contribution is still important, it may appear outdated if we compare the numbers since March 2022. The initial convergence effect seems to be fading, as London is increasingly, albeit unwillingly, distancing itself from the efforts of its allies, the EU and the US, to expand sanctions pressure.

### III. TARGETING INDIVIDUAL SANCTIONS

The targeting of individual sanctions at the EU level is designed based on various factors, such as political, military, and economic influence, as well as involvement in actions that violate international norms or laws. Whether this approach reflects the principles of smart and targeted sanctions is debatable, as the process remains opaque and under-researched. A deeper examination of the data, including the number and type of individuals targeted, is essential to determine if the G7/EU's sanctions are truly smart and effective.

Targeted sanctions imply that they have to be based on sufficient grounds for imposition. They often include humanitarian exceptions and a de-listing mechanism. However, determining who should be sanctioned depends on the specifics of each sanctions program and the political will of the sanctions imposer. While it's possible that the EU might predominantly target top-level executives or military representatives, the potentially targeted group is not defined beforehand and can vary based on the nature of the sanctions program and the goals it seeks to achieve.

Furthermore, can we truly know which groups are being targeted more than others once sanctions are implemented or during their design phase, prior to their imposition? Can we even speculate that certain sanctions are smart while others are not, if we lack sufficient knowledge about who is being targeted? Does the stated aim of a sanctions program align with the individuals and entities being sanctioned? These are crucial questions that need to be addressed if the sanctions imposer aims to make sanctions coherent, more targeted and to avoid unintended negative consequences.

<sup>28</sup> Foreign, Commonwealth & Development Office, *Deter, Disrupt and Demonstrate – UK Sanctions in a Contested World: UK Sanctions Strategy* [www.gov.uk](http://www.gov.uk).

<sup>29</sup> Forum: S Poli, 'The UK as a Third Country: The Current Model of Cooperation with the European Union in the Adoption of Restrictive Measures' European Papers (European Forum Insight of 14 May 2021) [www.europeanpapers.eu](http://www.europeanpapers.eu) 141.

For example, when it comes to sanctions against Russia, should the primary targets be Russian oligarchs, parliamentarians, government officials, the military-industrial complex, propagandists, warmongers, or others? Which group's targeting best aligns with the concept of targeted and smart sanctions? This remains an important question for further investigation. Answering it will help us make sanctions mechanisms more precise and effective.

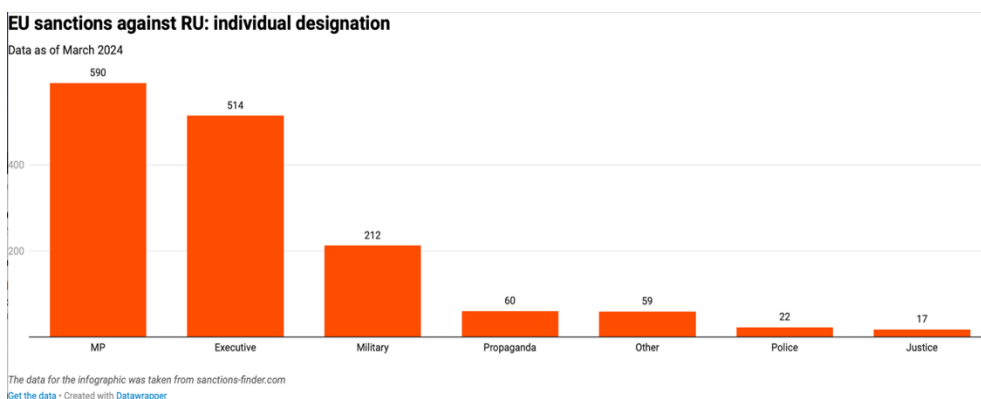


TABLE 3. EU sanctions against RU: individual designation.<sup>30</sup>

To analyse individual sanctions targeting against Russia, we assessed the position (status) and activities of each designated person. The majority of Russian sanctions appear to be status-based, particularly targeting parliamentarians who supported the recognition of the so-called Donetsk and Luhansk People's Republics. Additionally, most designated individuals in the executive group are from the occupation administrations in Ukraine's temporarily occupied territories. However, the numbers seem limited, as only heads of the occupation administrations are listed, while not all members of the so-called cabinet of ministers in these regions are sanctioned.

An additional insight is that despite ongoing attacks on the Russian opposition, democratic backsliding, and false criminal charges against protesters, only a limited number of individuals from the police and justice sectors have been designated under EU sanctions. This suggests that the EU's sanctions policy prioritizes targeting Russia's political and military leadership, while giving less attention to sanctions as a response to democratic erosion in Russia.

The level of personal sanctions, despite proper targeting strategy, remains extremely limited. While sanctions are perceived as extensive, a closer look reveals that they are quite narrow. This raises questions about criticisms claiming that EU sanctions are

<sup>30</sup> Sanctions-Finder.com [sanctions-finder.com](https://sanctions-finder.com).



disproportionate. For instance, Hofer argues that sanctions currently affect not only those responsible for the war but also Russian civil society, potentially impacting wages and increasing inflation.<sup>31</sup> This critique highlights the broader unintended consequences of sanctions on the Russian economy and its citizens.<sup>32</sup> However, such a position is difficult to support, given the data outlined below.

While critics argue that sanctions are disproportionate, the logic is reversed. These measures are disproportionate to their intended goal, as targeting merely 1,500 individuals – mostly MPs and representatives of the occupation administration – cannot significantly harm either Russian civil society or the Russian military-industrial complex. Additionally, these sanctions do not adequately reflect the scale of Russia's involvement in the aggressive war. Therefore, the scope of the sanctions falls short of addressing the broader realities of Russia's war effort.

The current EU individual sanctions target less than 0.01 per cent of Russia's population,<sup>33</sup> despite the fact that Russia's defence industry and state security services are among the largest employers in the country. Those employed in these sectors, who protect the regime, should be the primary sanctions targets to make the measures truly proportionate and smart. According to Russian government data, the military-industrial complex comprises 1,355 enterprises employing two million people.<sup>34</sup> Notably, around 70 top-level managers from the Russian defence companies remain unsanctioned by the EU.<sup>35</sup> There is also a significant gap in addressing support for the regime by Russian kleptocrats. While they have been sanctioned, their family members continue to enjoy luxury expenditures in Europe.<sup>36</sup>

<sup>31</sup> A Hofer, 'The EU's 'Massive and Targeted' Sanctions in Response to Russian Aggression: A Contradiction in Terms' cit. 1–21.

<sup>32</sup> *Ibid.* While the claim that wages in Russia have decreased is highly controversial, Russia has funnelled millions of rubbles into its war economy through high-paid military contracts and billion-ruble contracts for its military-industrial complex, for instance "[...] On top of that, figures from the Federal Tax Service show that the Russian state's income tax revenues in 2023 were 40 percent higher than in 2021 (the lion's share of this increase took place in 2023) [...]" (E Kurbangaleeva, 'Russia's Soaring Wartime Salaries Are Bolstering Working-Class Support for Putin' (28 May 2024) [carnegieendowment.org](https://www.carnegieendowment.org)).

<sup>33</sup> Here, I account only for individual (personal) sanctions against persons and companies. Assessing the full extent of sectoral sanctions' impact on the Russian population would require a separate, comprehensive analysis of numerous economic and social parameters – some of which are classified by the Russian state – making it challenging to gauge the real effects of sectoral sanctions. In contrast, personal designations are easier to track, as they specifically target groups involved in the aggressive war. Therefore, evaluating whether sectoral sanctions on Russia's defense sector are sufficient without personally designating all companies within the military-industrial complex remains highly relevant.

<sup>34</sup> Government of the Russian Federation, *Defence-Industrial Complex. State Defence Order: Some Facts Over 6 Years* government.ru.

<sup>35</sup> Y Drozdova, N Kelm, and Trap Aggressor, 'The War Machine: The Structure and Faces of Russia's Military-Industrial Complex' [Texty.org.ua](https://texty.org.ua) (9 August 2022) [Texty.org.ua](https://texty.org.ua).

<sup>36</sup> M Johnson, 'Horses, Art and Private Jets: The Charmed Life of Russian Warlord's Family' (26 April 2023) [Financial Times www.ft.com](https://www.ft.com).

The final point is to figure out which types of designations are more commonly used. Moiseienko suggested that there are several types of designations, such as position (status)-based designations, activity-based designations, or profit-based designations.<sup>37</sup> Status-based designations have been dominant in the sanctions against Russia. However, activity-based and profit-based designations should also be implemented, as they would create a greater deterrent for those who might still be inclined to support Russia's war machine.

#### IV. CONCLUSIONS

The concept of targeted and smart sanctions has to be reconsidered to encompass broader aspects, beyond simply focusing on legitimacy and human rights standards. It should also address how sanctions are crafted, designed, and their dynamic implementation is set on. As I have analysed, smart and targeted sanctions should mean that these measures are properly designed and configured to avoid ineffective sanctions programs with only two or three designated entities. The dynamic and rhythm of sanctions imposition should be a key consideration for the sanctions imposer. The EU's sanctions regimes, such as the cyber sanctions or the Turkey-related program, cannot remain inactive for years or serve merely as illusory tools. If the sanctions imposer implements a program to address specific conduct, the approach needs to be consistent with the stated objectives and strategically timed. However, current actions in certain instances appear more sporadic and lack a cohesive strategic vision.

A less addressed and more debatable question is how sanctions should meet the criteria and standards of proportionality. On the one hand, EU sanctions face allegations of being disproportionate; on the other, data shows that the scope of personal designations is minimal, raising further questions about their adequacy. This suggests that analysing sanctions data could help in developing more informed and coherent policies, making sanctions genuinely effective and targeted.

<sup>37</sup> A Moiseienko, 'The Sins of the Fathers: Targeted Sanctions against Family Members of Primary Targets' (2024) ModLRev 926.