



THE DOSSIER

Gendering Economic Sanctions: Best Practices for the U.S.

By Kallie Mitchell and Dr. Max Thompson

Executive Summary

The United States has recently imposed economic sanctions to prevent and respond to abuses and violations of human rights against women and girls. Despite the disproportionate impacts of economic sanctions on women and children, and the growth of thematic sanctions to address women's rights, there has been limited formal integration of the Women, Peace, and Security (WPS) agenda into the design, implementation, and monitoring of unilateral economic sanctions programs by the U.S. Department of the Treasury.

In 2017, the U.S. passed a comprehensive law on WPS – the Women, Peace, and Security Act. Although the 2019 Women, Peace, and Security Strategy claimed it was [“de facto, the first \(legislation\) with a whole-of-government strategy that responds to such a domestic law,”](#) it designated only four departments as key WPS implementing agencies: the Department of State (DOS), the Department of Defense (DOD), the Department of Homeland Security (DHS), and the U.S. Agency for International Development (USAID). Notably, the Treasury is not a designated implementing agency and sanctions policy has not explicitly engaged with the agenda. The U.S.'s 2023 Women, Peace, and Security Strategy and National Action Plan similarly does not consider the Treasury Department or its role in WPS implementation. To achieve a genuine “whole-of-government” approach to WPS, the Treasury must mainstream gender into sanctions policy.

While there has been a welcome shift toward targeted sanctions and humanitarian exceptions



A poster of Mahsa Amini, the 22-year-old woman allegedly killed by the morality police in Iran for not wearing a hijab, is displayed in front of the Lincoln Memorial in Washington, D.C., in October 2023. (Ali Khaligh / via AFP)



where comprehensive sanctions are imposed, U.S. sanctions policy has yet to consider women and girls' specific needs and vulnerabilities. Assessing U.S. unilateral human rights-related sanctions against Iran, Venezuela, Uganda, and Russia through gender mainstreaming and the global WPS agenda's pillars – participation, protection, prevention, and relief and recovery – reveals inconsistent and inadequate gendering of economic sanctions. Using the WPS agenda throughout sanctions policy can accelerate U.S. commitments to gender equality, as well as broader strategic and geopolitical interests.

Key Takeaways:

- Economic sanctions can stifle women and girls' participation in politics and public life.
- Sanctions policy, along with relief and recovery efforts, can be boosted by engagement with women's civil society groups.
- The U.S. Treasury Department and the Office of Foreign Assets Control (OFAC) can be key to developing sanctions policy that takes the needs of women and girls into account.

Policy Recommendations:

- The U.S. government must formalize the gendered impact of economic sanctions within relevant WPS and sanctions policies and develop guidance for gender mainstreaming in the development, application, and oversight of sanctions policy.
- Future strategies and national action plans should designate the Treasury Department as a key

agency for WPS delivery and integrate economic sanctions policy and guidance for OFAC.

- Congress should require the Treasury to develop a WPS implementation plan and report progress toward policy objectives.
- Interagency departments relevant to sanctions should set up metrics and monitoring and reporting mechanisms to evaluate how economic sanctions and sanctions compliance affect women, men, girls, and boys using sex and age disaggregated data.
- Relevant governmental entities should ensure that women's, LGBTQ+, and civil society groups participate in discussions on the development and assessment of targeted sanctions policy.
- The Treasury and OFAC should continue shifting toward targeted sanctions and, where comprehensive sanctions are required, ensure that humanitarian exemptions are adequate and not hindered by over-compliance.
- DOS and USAID should advocate for the strengthening of women's economic rights in law in partner countries and ensure elections and political processes consider the gendered consequences of corruption.
- DOD, DOS, and USAID should develop relief and recovery measures that consider the different needs, vulnerabilities, and economic inequalities between men and women that historic and ongoing sanctions could exacerbate.
- The Treasury should establish at least one gender or WPS focal point role and mandate training for relevant Treasury personnel on gender analysis and WPS.



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The views expressed in this article are those of the authors and not an official policy or position of the New Lines Institute.

Note: A previous version of this publication included two transposed graphics. The error has been corrected.

COVER PHOTO: Members of the Economic Freedom Fighters picket against Uganda's anti-homosexuality bill at the Uganda High Commission on April 4, 2023 in Pretoria, South Africa. On March 21, 2023, Uganda became the seventh country to introduce the death penalty for crimes related to homosexuality. (Alet Pretorius / Gallo Images via Getty Images)

The New Lines Institute for Strategy and Policy

Our mission is to provoke principled and transformative leadership based on peace and security, global communities, character, stewardship, and development.

Our purpose is to shape U.S. foreign policy based on a deep understanding of regional geopolitics and the value systems of those regions.



Introduction

In November 2022, U.S. President Joseph Biden signed the [Presidential Memorandum on Promoting Accountability for Conflict-Related Sexual Violence](#) (CRSV). The memorandum noted CRSV “has devastating effects on individuals and communities, undermines peace and security, and prevents inclusive and sustainable development.” Emphasizing the widespread use of CRSV in contemporary conflict, its impunity, and its noninevitability, the memorandum outlined several U.S. policy responses to prevent and deter CRSV in its various forms. A notable and novel inclusion was the following section on economic sanctions:

It is the policy of the United States to fully exercise existing authorities to impose economic sanctions and implement visa restrictions in order to promote justice and accountability for acts of CRSV; devote the necessary resources to ensure regular coordination and reporting on CRSV incidents and to conduct training on CRSV issues more broadly, including to support the designation of sanctions targets; [and] strengthen the implementation of other existing tools and authorities to promote accountability for CRSV, including the provision of United States security assistance.

Economic sanctions pursuant to this memorandum were first imposed six months later with the concurrent designation of [two officials](#) involved in the perpetration of CRSV in South Sudan and [two ISIS leaders](#) who committed sexual violence against Yazidi women and girls. The use of economic sanctions to punish and/or prevent CRSV enables a broader discussion of the need to mainstream gender within sanctions policy.

The Women, Peace, and Security (WPS) agenda seeks to promote gendered perspectives and women’s meaningful contributions to international peace and security. The agenda rests on four pillars: participation, protection, prevention, and relief and recovery, all underpinned by gender mainstreaming. Its goal of gender equality in peace and security requires that women be enabled and empowered



U.S. President Joe Biden delivers remarks following Russia’s “unprovoked and unjustified” invasion of Ukraine. Following the attack, Biden announced a new round of sanctions against Russia. (Drew Angerer / Getty Images)

as agents in conflict prevention, management, and resolution. Economic sanctions are one of many tools that governments may use for conflict management and promoting positive peace. However, unlike other tools, the gendered impacts of sanctions are poorly understood, discussed, and addressed. This is surprising given both the [centrality of the women’s movement in opposing economic sanctions](#) in the early 20th century and the increasing use of economic sanctions by the United States and other states invested in WPS, ostensibly to promote global human and women’s rights. The intersection between the WPS agenda and economic sanctions is a gap in academia, policy, and practice that needs to be closed.

U.S. current and historic WPS commitments are set out in four U.S. National Action Plans (NAPs) on WPS (2011, 2016, 2019, and 2023); the Women, Peace, and Security Act (2017); the Women, Peace, and Security Strategy (2019); and the U.S. Strategy and National Action Plan on WPS (2023), none of which explore or reference the intersection of WPS and economic sanctions. There was also no mention of economic sanctions in the July 2022 [Women, Peace, and Security Congressional Report](#). The 2022 Presidential Memorandum on CRSV is referenced as a case study within Line of Effort (LoE) 2 Protection in the 2023

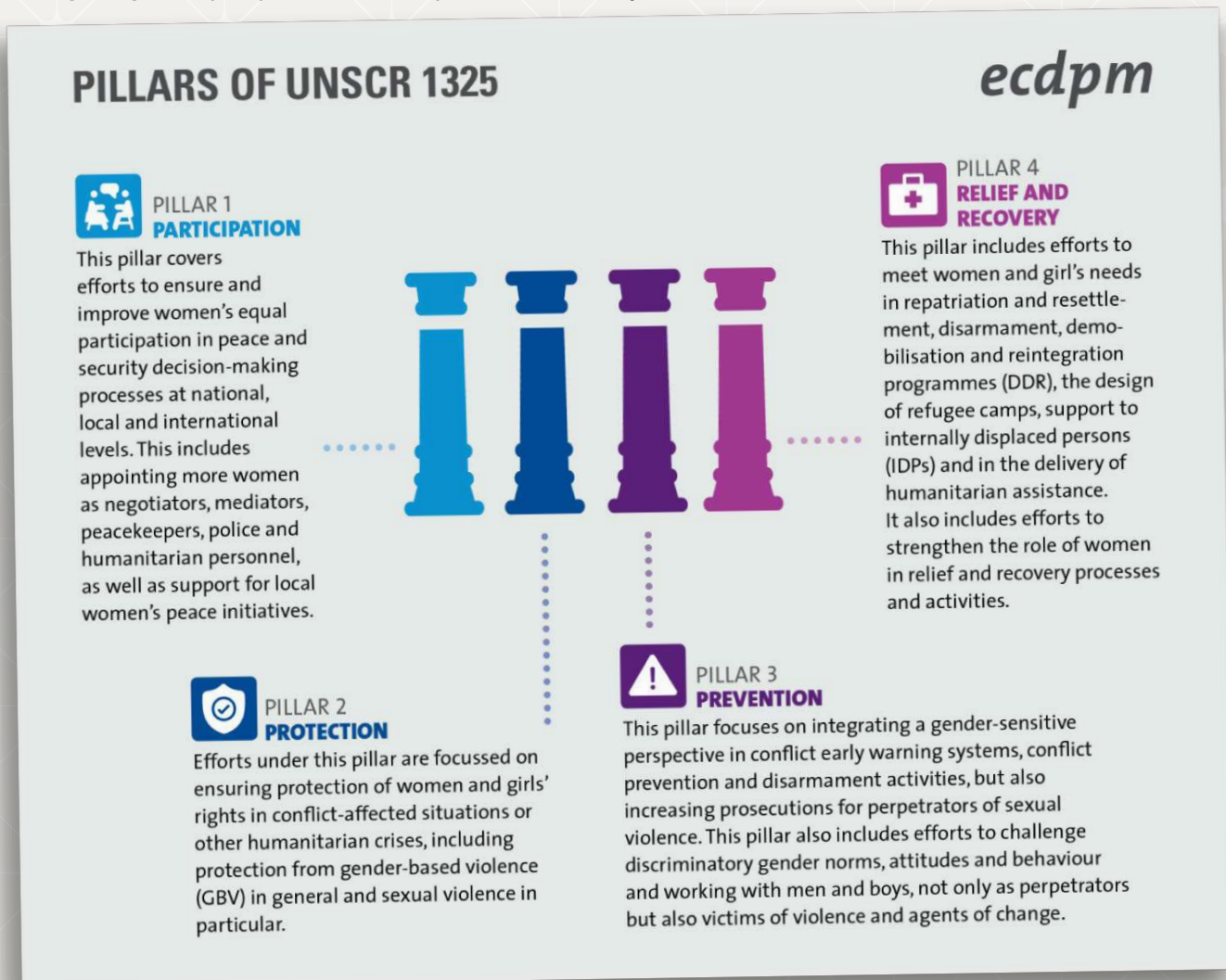


Strategy and NAP, published Oct. 31, 2023, but though the word “sanctions” appears for the first time in any of these documents, there remains no systematic engagement with sanctions as a means of furthering gender equality, and the Treasury Department’s role is unreferenced. If the U.S. wants to claim a genuine “whole-of-government” approach to WPS, the Treasury Department needs to mainstream gender into sanctions policy and use the WPS pillars to make them more effective.

Similarly, despite the growing use of economic sanctions to prevent and respond to abuses and violations of human rights against women and girls, there has been little to no formal integration of the four pillars of WPS into the design, implementation, and assessment of U.S. economic sanctions. There is no publicly available guidance or implementation plan around WPS for the U.S. Department of the Treasury. Even the November 2022 memorandum is limited to CRSV and does not reference the WPS agenda. Given the disproportionate impacts of economic sanctions on women and girls, as well as the growth

Implementing the WPS Agenda

This chart, from the European Centre for Development Policy Management, illustrates the four key issue areas, or pillars, that comprise the WPS Agenda as outlined in UNSCR 1325. The pillars are supported by gender mainstreaming efforts to integrate gender perspectives into all peace and security work.



Source: European Centre for Development Policy Management (ECDPM) [Discussion Paper No. 245: Rhetoric and real progress on the Women, Peace and Security agenda in Africa, Page 8; by Desmidt and Davis]



of thematic sanctions to address women's rights, the WPS agenda presents itself as a useful tool for all stages of sanctions policy to ensure that sanctions programs address the unique experiences of women and girls and effectively accelerate women's security and empowerment.

The authors consider four ongoing uses of U.S. unilateral sanctions (Iran, Venezuela, Uganda, and Russia) that are motivated by human rights considerations and that reveal a lack of engagement between WPS and the sanctions' development. U.S. sanctions policy should meaningfully engage with the WPS agenda to enhance not only the U.S. commitment to gender equality but also its strategic and wider geopolitical interests. Specific policy changes are suggested to help integrate WPS within economic sanctions policy and develop best practices to meet U.S. stated legislative, defense, and foreign policy goals and commitments to gender equality and positive peace.

U.S. Economic Sanctions and WPS

Economic sanctions, defined as “coercive economic ... measures taken against a target to bring about a change in behavior,” can be used as an alternative to other forms of coercive intervention. They have been imposed with [increasing frequency](#) by the U.S. executive and legislative branches since the end of the Cold War. These programs typically involve trade restrictions and/or asset blocking, and they may be comprehensive in their impact on an entire state's economy or targeted to affect organizations or individuals. Sanctions have been wielded to address a wide variety of actions and actors, including terrorism and terrorist organizations, corruption, antagonistic governments, the undermining of democracy, drug trafficking, illicit trading, spoilers of peace, and nuclear proliferation. Economic sanctions as a tool of foreign policy are routine, so ensuring they are as effective and well designed as possible is an essential task for policymakers and practitioners.

There have been two notable developments in U.S. sanctions policy since its inception that have had significant impacts on women and girls. The first has been the shift from comprehensive sanctions toward targeted sanctions, with the goal of reducing

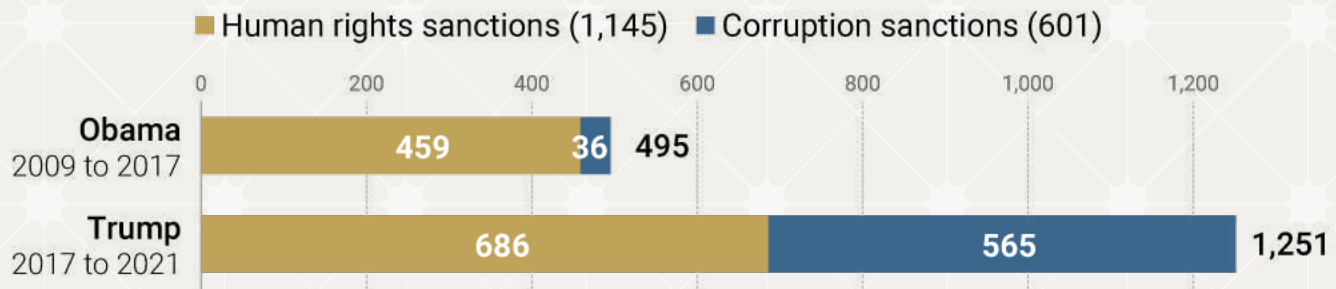
humanitarian impact, given that comprehensive sanctions have a negative impact on public health and access to food, water, and other basic goods. The second is that the United States and its Western allies have increasingly used economic sanctions to achieve not only geostrategic advantage, but also to [promote human rights and gender equality](#). Given these shifts, discussions around economic sanctions must include the needs and agency of women and girls.

The U.S. government bolstered its commitment to prevention of and accountability for human rights abuses with the 2016 passage of the [Global Magnitsky Human Rights Accountability Act](#). This act increased the ability of the U.S. to impose sanctions against those who commit violations of human rights in countries that are not already subject to sanctions programs. The act allows sanctions to be applied toward any individual involved in human rights violations – regardless of rank – and incentivizes accountability for human rights among foreign governments. Sanctions policy is overseen by the Office of Foreign Assets Control (OFAC), which is part of the Treasury Department, but has clear implications for strategic, foreign, security, and defense policies. The use of sanctions as a method of deterring human rights abuses both under country-related sanctions and through the development of thematic sanctions programs demonstrates the Treasury's recognition that [“respect for human rights is a prerequisite for global peace, security, and prosperity.”](#)

A major element of contemporary human rights discourse and a framework for conduct in conflict prevention, management, and transformation is the Women, Peace, and Security agenda. Since the unanimous adoption of United Nations Security Council Resolution ([UNSCR](#)) 1325 on Women, Peace, and Security in 2000, the United States government has held a commitment to recognition of the critical role that women play in the achievement of sustainable peace and security globally. The Biden administration reaffirmed the U.S. commitment to the progression of the WPS agenda, noting it has been bolstered over 23 years through [“a growing body of policies to affirm gender equity and equality in security, peace-making, and peacekeeping”](#) at home and abroad. Foremost among these is the [Women, Peace, and Security Act of 2017](#). The act



Sanctions Designations by Administration



Source: Center for a New American Security

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outlined training requirements for relevant government personnel, laid the groundwork for stakeholder collaboration on WPS issues, and mandated that then-U.S. President Donald Trump submit to Congress [the 2019 Strategy on Women, Peace, and Security](#). The 2019 strategy's four LoEs delineate the U.S.'s approaches to implementing the WPS agenda and its pillars. The LoEs focused on "improving women's empowerment and equality in ... preventing conflict and preparing for disasters; managing, mitigating and resolving conflict and crisis; and post-conflict and post-crisis efforts in relief and recovery." The 2017 act also required that an updated WPS strategy be submitted by the president four years later; the updated United States Strategy & National Action Plan on Women, Peace, and Security was released on Oct. 31, 2023. The [fact sheet](#) released by the executive branch started as follows:

Promoting women's meaningful participation, leadership and engagement in decision-making at all levels is both a moral and a strategic imperative for U.S. foreign policy and national security. Wherever the rights of women and girls are under threat, so, too, is democracy, peace, and stability.

Despite ostensibly applying to the whole of the United States government, the 2019 Strategy designated four departments as key agencies: the Department of State (DOS), the Department of Defense (DOD), the Department of Homeland Security (DHS), and the United States Agency for International

Development (USAID). It mandated that these key agencies monitor and report on their progress toward strategy implementation and provide plans for their implementation activities. (These implementation plans are: [DOD, 2020](#); [DHS, 2020](#); [DOS, 2020](#); and [USAID, 2020](#).) The updated United States Strategy and National Action Plan on Women, Peace, and Security was published on Oct. 31, 2023, emphasizing a whole-of-institution approach to WPS principles (which had also been emphasized in the [2022 WPS Congressional Report](#) and [E.O. 14020](#) [March 2021], which established the White House Gender Policy Council). The plan inserted an extra LoE between LoEs 4 and 5 that focused on Integration and Institutionalization across U.S. Policies and Programs (now known as LoE4). This LoE reflects the need to model behavior and further domesticize the agenda and to ensure coordination across agencies. It also highlights the need for better guidance, training, and education on integrating and mainstreaming WPS and broader gender equality initiatives across existing government programs as well as the need for staff dedicated to advancing WPS across the government.

While the 2017 act and 2023 strategy focus on accelerating progress toward the substantive inclusion of women and diverse gender perspectives in security, diplomatic, and development initiatives through these key agencies, it is critical to recognize the implications that WPS also has in other areas of policy. This includes economic sanctions overseen by the Treasury, which has not been designated a key agency and has no departmental implementation plan with similar



monitoring and reporting mechanisms on WPS. Within the 2023 strategy and NAP, LoE4 represents a missed opportunity to explicitly consider sanctions policy in efforts toward institutionalization of WPS principles across policies and programs. Though LoE4 does not specifically mention the Treasury Department and economic sanctions policy, training and development of best practices in the development, implementation, and monitoring of sanctions policy clearly falls under this revised LoE, and the omission of a substantive discussion about the role of the Treasury and its training needs is a shortcoming of the 2023 WPS Strategy and NAP.

The United States has in recent years turned toward targeted sanctions to bolster efforts to accelerate the goals of gender equality. However, economic sanctions have not explicitly drawn on WPS as a means of justifying, advocating, diagnosing, and developing them. On March 8, 2023, International Women's Day, the U.S. took additional steps toward using economic sanctions as a means of achieving its WPS commitments by imposing sanctions against several Iranian entities and individuals for ["denying the women and girls of Iran their human rights and dignity."](#) This indicates a growing desire to use economic tools as a means of furthering women's rights. However, the Treasury, which imposed these sanctions, did so in pursuance of existing human rights-related and country-specific sanctions targeting the Iranian regime rather than as part of the U.S. commitments to WPS or with reference to either the WPS Act or WPS Strategy. This is not unusual; references to women and WPS in formal Treasury and OFAC statements and documents are largely, if not entirely, absent. For example, the June 2023 [Fact Sheet on the Provision of Humanitarian Assistance and Trade to Combat COVID-19](#), which set out the "most relevant exemptions, exceptions, and authorizations for humanitarian assistance and trade under the OFAC-administered Iran, Venezuela, North Korea, Syria, Cuba, and Russia-related sanctions programs" does not mention women or WPS, nor does it have any meaningful indication that the gendered impact of sanctions had been considered. If the U.S. wants to claim a genuine "whole-of-government" approach to WPS, the Treasury needs to mainstream gender into sanctions policy and use the WPS pillars to make them more effective.

Gendering Sanctions

Mainstreaming gender within U.S. sanctions policy is a strategic and moral imperative. The U.S. [currently has](#) some form of economic sanction against 27 states, as well as 11 thematic sanctions programs. On Dec. 8, 2021, Alena Douhan, special rapporteur on unilateral coercive measures, [reported that](#) unilateral sanctions hurt everyone but are particularly damaging to vulnerable groups such as women and children. Increases in human rights violations in response to economic sanctions disproportionately impact efforts toward women's empowerment, as the shrinking of civil space leaves women with few alternatives through which to assert their rights. Unilateral sanctions can have similar effects on other marginalized groups as well, including indigenous populations, people with disabilities, migrants, the elderly, and LGBTQ+. Even targeted economic sanctions can be worse for women's gender equality metrics. The targeting of regimes and political leaders negatively affects the economy of states, as elites can be placed in competition with civilians for resources. The harmful effect that targeted sanctions have on the civilian poverty gap, through asset freezes and restrictions on trade, can be [significantly larger](#) than the impact of other types of sanctions programs. In short, it is not sufficient to shift from comprehensive to targeted sanctions; economic sanctions must be gender sensitive.

Gender mainstreaming is a central element of the global WPS agenda. It underpins the four pillars of the WPS agenda and requires that policymakers consider the gendered impacts of any element of public or foreign policy. LoE4 is a major addition and speaks especially to gender mainstreaming. Though the term "gender mainstreaming" is absent from the strategy and NAP, the approach to delivering LoE4 [notes that](#):

Our work to improve the integration and institutionalization of the WPS agenda requires mainstreaming WPS principles across policy, planning, and program formulation and implementation. We will improve our monitoring, evaluation, and learning systems and data collection methods to better capture existing gender equality efforts across the U.S. government. This will give us the ability to



Lines of Effort Within U.S. Strategy and the National Action Plan on WPS

2019	2023
1. Participation: “Seek and support the preparation and meaningful participation of women around the world in decision-making processes related to conflict and crises.”	1. “Participation: Seek and support the preparation and meaningful participation of women and girls in civic and political leadership, in informal and formal decision-making processes, and in institutions related to peace and security.”
2. Protection: “Promote the protection of women and girls’ human rights; access to humanitarian assistance; and safety from violence, abuse, and exploitation around the world.”	2. “Protection: Promote the protection of the human rights of women and girls, and prevent and respond to all forms of GBV across the continuum of peace, conflict, and crisis contexts, including conflict-related sexual violence.”
3. Integration: “Adjust United States international programs to improve outcomes in equality for, and the empowerment of, women.”	3. “Relief, Response, and Recovery: Prioritize gender-responsive policies and programs to support the safety, participation, and leadership of women and girls in U.S. government responses to conflict, crises, and disasters, and provide safe, equitable access to humanitarian assistance.”
4. Partnerships: “Encourage partner governments to adopt policies, plans, and capacity to improve the meaningful participation of women in processes connected to peace and security and decision-making institutions.”	4. “Integration and Institutionalization: Integrate WPS principles across U.S. policies and programs to strengthen the institutionalization of comprehensive gender analyses and improve gender equality outcomes.”
	5. “Partnerships: Encourage partners to mainstream WPS principles across policies and strategies, and strengthen capacity to improve gender equality in processes and institutions connected to peace and security decision-making.”

Sources: trumpwhitehouse.archives.gov, whitehouses.gov

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identify both gaps and successes and ensure we continue investing in what is working.

The inclusion of LoE4 opens space for consistent mainstreaming of gender perspectives across the U.S. government. It is a hook that could improve the ability of U.S. sanctions policy to both progress efforts toward gender equality and to ensure sanctions programs that work as intended and in line with WPS commitments. As outlined below, however, all four pillars of WPS provide guidance on how economic sanctions can be effectively devised in line with the WPS Act, WPS Strategy, and CRSV memo to effectively mainstream gender into policymaking.

Participation

Of the 10 U.N. Security Council resolutions that comprise the WPS agenda, five seek to promote women’s full and meaningful participation “[at all decision-making levels ... for the prevention,](#)

[management, and resolution of conflict](#)” as well as in post-conflict peacebuilding efforts. Despite these efforts, women continue to be underrepresented. In order to advance the participation objectives laid out by the WPS agenda, the [2023 U.S. WPS Strategy and NAP](#) builds on the 2019 strategy and expands first LoE on participation beyond the conflict cycle to “seek and support the preparation and meaningful participation of women and girls in civic and political leadership, in informal and formal decision-making processes, and in institutions related to peace and security.” In support of this, the strategy delineates activities intended to empower women and girls with the necessary tools and capabilities for substantive participation, to integrate gendered perspectives and interests into peace and security efforts, and to integrate localized, survivor-centered, data- and evidence-driven mechanisms to better identify and address barriers to women’s meaningful participation. For sanctions, this includes ensuring engagement with women’s and civil society groups, enabling the Treasury Department



to develop sex- and age-disaggregated metrics on women's participation, and taking a broad perspective when considering the implications of sanctions policy.

Protection

As a policy framework, the WPS agenda has tended to focus on issues that fall under the protection pillar as [“the most visible and most readily associated concerns related to the agenda.”](#) Within the 2023 strategy and NAP, the second LoE builds upon the Protection LoE in the 2019 strategy by moving beyond considerations of violence against women and girls primarily within the context of phases of conflict to consider the broader spectrum of gender-based violence (GBV), including intimate partner violence and technology-facilitated GBV. Although LoE2 briefly discusses the linkages between GBV and domestic terrorism, its approach to protection primarily focuses on international efforts. This is part of a wider issue of a [failure of domestication](#) of the WPS agenda. Despite the focus on violence in conflict settings, the strategy does lay out an approach to protection efforts that can be usefully applied to the use of sanctions as coercive measures in foreign policy and conflict management. Sanctions programs of all types can have cascading negative consequences for civilians; as targeted regimes and leaders attempt to evade, subvert, or alleviate the pressures placed on them by sanctions programs, civilians living under their leadership often experience a repression of human rights and a devolution of humanitarian conditions as the flow of vital goods and services is disrupted.

Prevention

The prevention pillar has been called [“the weakest ‘P’ in the 1325 pod,” leading to concerns](#) that the WPS agenda is more interested in making conflict safer than it is in preventing its outbreak. Economic sanctions policy is an area with boundless potential when considering the prevention pillar of WPS. As a tool for conflict management, sanctions are often applied as a means of avoiding violence and escalation rather than as a means of punishment for those already engaged in fighting. The prevention pillar [“includes integrating gender considerations into conflict early warning systems and involving women and their specific needs in conflict prevention and disarmament activities,”](#)

which opens a significant space for considering gender perspectives in the design and implementation of economic sanctions. While the impact of conflict on the lived experiences of women and girls falls more closely under protection, applying a gendered analysis to conflict prevention and resolution efforts illustrates the ways in which gender relations drive and influence violence. Prevention calls for strengthening women's rights in law, enabling improved gender relations and the transformation of patriarchal hierarchies. This can be causal in peace and security. Empowerment of women in society and their participation in policymaking lead to less aggressive behavior by states and a decreased likelihood of regression into conflict. While [this finding is acknowledged](#) within the 2023 strategy, the activities outlined by the U.S. in its efforts toward inclusive conflict prevention do not, ostensibly, extend to diplomatic and economic tools of coercion. However, looking at economic sanctions through the lens of the prevention pillar provides quick wins for implementation.

Relief and Recovery

While economic sanctions often occur as preventive policies to avoid escalating conflict, relief and recovery often follow conflict. Nevertheless, this pillar presents itself as a pathway toward the promotion of gender equality and women's social and economic empowerment, the transformative power of which has the potential to improve conflict prevention and sustainable peace efforts. Not only do women and girls [“play a crucial role in”](#) relief and recovery efforts during post-conflict reconstruction, but their participation in this transitional window provides an opportunity for transformation of the causal mechanisms that exist between gender relations and conflict. In recognition of the value of women in post-conflict recovery and in planning next steps during transition, the 2023 strategy outlines its activities during post-conflict and post-crisis relief and recovery, which are intended to follow a “do no harm” approach that centers the protection and participation of women. It also includes Relief, Response, and Recovery as its third LoE, highlighting that “too often, relief and recovery efforts do not take into account the unique needs of women and girls in program design, leaving them without safe and equitable access to humanitarian assistance.”



There is scope within LoE3 to consider the gendered impact of sanctions and ensure that their implementation in post-conflict scenarios does not make the situation worse for women, children, and other marginalized groups. Sanctions can be applied effectively and ineffectively and, especially when not considered through a gendered lens, may have inadvertent consequences for the most vulnerable. As such, the shift from comprehensive to targeted sanctions is a welcome development. Where comprehensive sanctions are applied, specific carve-outs for health and humanitarian assistance should be encouraged to ensure that refugee camps and internally displaced persons maintain access to basic goods and services. For relief and recovery, it is essential that sanctions are not misused and that their application follows a significant consideration of their gendered impact.

The WPS agenda and its pillars provide a useful framework through which the gendered considerations and impacts of U.S. sanctions programs related to Iran, Venezuela, and Russia – as well as the potential sanctions related to Uganda that have been weighed by the administration – can be evaluated.

Iran Sanctions

The United States has deployed sanctions against Iran since 1979. Over four decades, U.S. sanctions against Iran have developed to become “arguably the most extensive and comprehensive set of sanctions that the United States maintains on any country.” The first human rights-related sanctions on Iran were imposed in July 2010 with the passing of the [Comprehensive Iran Sanctions Accountability and Divestment Act](#), which Obama signed into law in response to the Iranian government’s brutal crackdown on the Iranian Green Movement protests following the 2009 presidential election. The United States continues to use that act, the Global Magnitsky Act, and relevant executive orders to sanction Iranian actors and entities responsible for gross abuses of human rights. On Sept. 22, 2022, the Biden administration [introduced sanctions](#) against Iran’s morality police “for abuse and violence against Iranian women and the violation of the rights of peaceful Iranian protestors,” who had taken to the streets in protest after the murder of Mahsa Amini. These were supplemented on March 8,

2023 – International Women’s Day – with [action taken](#) in coordination with the European Union, the United Kingdom, and Australia to sanction several further Iranian regime officials for human rights abuses against women and girls in prisons and three Iranian companies for enabling the violent oppression. The Biden administration [announced](#) further sanctions against Iranian officials on Sept. 15, 2023, to mark the anniversary of Amini’s death.

These latest sanctions indicate that the gendered impact of sanctions and the real implications for women and girls on the ground is understood and sanctions are being targeted and developed in response to the regime’s evolving tactics to suppress the protests. The most recent round of sanctions [noted](#), for example:

Iran’s prisons are notorious for mistreatment, abuse, and death. Women prisoners, especially, suffer sexual violence, torture, and other cruel, inhumane, and degrading treatment.

However, there have been several weaknesses in both the implementation and the monitoring of sanctions policy for women and girls in Iran. The commitment to women’s participation in the development and implementation of policy is absent in the text and the monitoring of these sanctions. There has been a history of failure to meaningfully engage with women and women’s groups in the development of sanctions, and this has undermined the stated human rights aims of those sanctions. Economic sanctions against the Iranian regime have, in the past, made it more difficult for women to make gains toward full and substantive participation in Iran’s social and political issues. According to a 2020 [commentary](#) by the International Crisis Group, thematic sanctions against Iran have created additional barriers to Iranian women’s participation in public and political life. [The Women Peace and Security Index](#), produced annually by the Georgetown Institute for Women, Peace and Security, illustrates that before the current wave of protests, conditions for women’s security and empowerment in Iran had worsened, with the country’s index value dropping from [.649 in 2022](#) to [.557 in 2023](#). During economic hardship, Iranian women [report making significant sacrifices](#) to provide for their families,



Sanctions Overview

	Iran	Venezuela	Uganda	Russia
Year of sanction	1979	2014	2014, 2023	2014
Considerations for human rights, WPS, and/or gender	2010 onward; 2022 explicit gender considerations made	2014 onward	2014	2012
Congressional authorization	Comprehensive Iran Sanctions Accountability and Divestment Act (CISADA)	Venezuela Defense of Human Rights and Civil Society Act of 2014	N/A	Ukraine Invasion War Crimes Deterrence and Accountability Act (SSIDES Act)
Purpose of sanctions	To impose sanctions on certain individuals with respect to human rights abuses by the government of Iran.*	To impose targeted sanctions on persons responsible for violations of human rights of antigovernment protesters in Venezuela, to strengthen civil society in Venezuela, and for other purposes.	To urge the Ugandan government to repeal this abhorrent law and to advocate for the protection of the universal human rights of LGBT persons in Uganda and around the world.	To impose targeted sanctions on individuals responsible for, complicit in, or responsible for ordering, controlling, or otherwise directing the commission of serious human rights abuses in any territory forcibly occupied or otherwise controlled by the government of the Russian Federation.
Biden administration statements	Biden, Sept. 15, 2023: “We have also sanctioned over 70 Iranian individuals and entities responsible for supporting the regime’s oppression of its people. And today, we are announcing additional sanctions targeting some of Iran’s most egregious human rights abusers.”	National security adviser Jake Sullivan, Sept. 15, 2023: “We are prepared, on a step-by-step basis, to provide sanctions relief to Venezuela as long as they are meeting milestones towards credible elections.”	Biden, June 10, 2023: “Making human rights for LGBTQ people around the world — not just here, around the world — a top priority for my foreign policy, including a review of our engagement with Uganda following its recent antigay law, the most extreme in the world.”	Biden, June 20, 2023: “The United States is committed to doing all we can to end this blatant abuse of human rights. That’s why, today, my Administration is issuing historic sanctions targeting actors who perpetrate this abuse — marking the first time that a dedicated focus on conflict-related sexual violence has led to the imposition of U.S. sanctions.”

*2022 sanctions were imposed specifically on Iran’s Morality Police for abuse and violence against Iranian women and violation of the right to peaceful protest.

Sources: The White House, The American Presidency Project, U.S. Dept. of the Treasury, U.S. House of Representatives (Office of the Law Revision Council, govinfo.gov)

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cutting back on any activities that did not contribute to the alleviation of financial pressures.

The major women-led public protests against the morality police and the enforced dress code after the murder of Mahsa Amini create an urgency for gender-responsive sanctions. Policymakers must ensure that these sanctions enable participation through

supporting spaces for activism, and they must develop monitoring and reporting mechanisms to ensure protection and the strengthening of women’s rights in law. The empowerment of women and the centering of women’s agency and violence against women is not an afterthought in these sanctions but their prime motivation. For these reasons, it is particularly surprising that the OFAC, the DOS, and the White



House have not explicitly mentioned the WPS agenda in the context of the Iranian women's movement. It is also surprising that U.S. policy toward women's rights in Iran is not included in the 2023 Strategy and NAP. It would appear that gender is being considered, but this implicit consideration should be foregrounded in the monitoring and future development of sanctions against Iran generally and those targeting the regime and morality police for their ongoing suppression of women's rights specifically.

Venezuela Sanctions

Though relations between the United States and Venezuela were strained during the presidency of Hugo Chavez, U.S. President George W. Bush's administration carved out an exception that meant automatic sanctions were not levelled against Venezuela in 2005. However, the United States has used sanctions as a coercive tool against antidemocratic activities, corruption, and human rights violations carried out by the Venezuelan government and/or individual Venezuelans since the passage of the [Venezuela Defense of Human Rights and Civil Society Act of 2014](#). Political, economic, and humanitarian conditions in Venezuela have declined since the 2013 election of President Nicolás Maduro, whose government has become increasingly autocratic: quashing dissent through violent suppression, extrajudicial killings and detainment of opposition, and mismanaging resources through corruption. The United States has been vocal in its support for the Venezuelan opposition leader, Juan Guaidó, recognizing him as interim president in 2019.

[Sanctions are a key part of U.S. policy toward Venezuela](#), including individual sanctions, financial sanctions, sectoral sanctions, and sanctions on Maduro's government. [As of August 2023](#), the U.S. Department of Treasury has sanctioned over 110 Venezuelans and more than eight entities through the Venezuela Defense of Human Rights Act, which was amended in 2019 and is set to expire in December 2023. They are also covered by E.O. 13692; it is notable that even though this executive order came into force on March 8, 2015, International Women's Day, there was no mention of women and children or the WPS agenda in its announcement. Additionally, neither the press release issued by the State Department or

the Treasury Department, following the signing of an electoral roadmap that eased select sanctions on oil and gold against Venezuela on Oct. 18, 2023, in exchange for a timeline for free and fair elections and the release of political prisoners, included any explicit considerations of women and girls. This suggests that human rights-based sanctions against Venezuela have little engagement with WPS.

The political mismanagement of Venezuela has created an economic and humanitarian crisis. [Evidence](#) suggests that sanctions imposed by the U.S. to limit crude oil exports since 2015 likely contributed to the economic decline and resulting humanitarian crisis. Despite the issuance of humanitarian exemptions to allow for unrestricted aid operations to Venezuela, many organizations and financial institutions through which the aid is intended to flow engage in over-compliance to avoid violating sanctions, "[further accentuat\(ing\) the pre-existing economic and humanitarian situation](#)." In 2020, the Centre for Strategic and International Studies highlighted the increasingly dire situation for women in Venezuela, noting that "[Humanitarian crises are never gender neutral](#)." Venezuelan women face a series of challenges from unemployment, a collapsing health system that has further limited access to sexual and reproductive health, and increases in gender-based violence. The paper argued that:

Neither Venezuelans nor the international community have appropriately identified or responded to these unique challenges faced by women. Placing a gender lens on Venezuela's man-made humanitarian crisis does not only comply with international and human rights standards but can also benefit the outcome of policies and shape the international response for a more stable and prosperous Venezuela by including women in political positions.

Maduro's political mismanagement has direct impacts on the United States due to the large number of refugees who have fled Venezuela, most to neighboring countries but some to the U.S. On Sept. 20, 2023, DHS Secretary Alejandro Mayorkas announced an [extension and redesignation of Venezuela for Temporary Protected Status](#), which means almost half a million



“ It [U.S. sanctions policy] must also ensure future efforts that use sanctions as mechanisms to advocate for free and fair elections consider women political prisoners and barriers to women’s participation explicitly. ”

Venezuelans will have temporary permission to live and work in the United States. The United Nations has estimated that [7.3 million people have fled](#) Venezuela as of February 2023. Women and children are particularly vulnerable as refugees to organized criminal groups, exploitation, and modern slavery. USAID has offered training on trafficking and issues related to GBV as part of its policy on [Promoting Justice and Protection for Venezuelan Migrants, Returnees, and Receptor Communities in Colombia](#), which is part of LoE2 2019 and reported on in the 2023 strategy and NAP. However, this is the sole mention of Venezuela in the 2023 strategy.

Economic sanctions policy regarding Venezuela does not appear to have mainstreamed gender in any notable way. Though the gendered impact of the conflict and economic crisis are clear and well documented, there are no public references to gendered vulnerabilities in the formation of policy. Supporting the meaningful participation of women’s and civil society groups, ensuring protection from gender-based and domestic violence, strengthening women’s rights in law, and ensuring that relief and recovery efforts are gendered, especially for those seeking refuge in the United States, should be at the forefront of the development and monitoring of sanctions policy. Efforts to monitor and assess the impact of sanctions should also include a review of relevant compliance policies to mitigate the negative impact of over-compliance on relief and recovery provisions. This would accord more fully with the 2014 act, which emphasizes that it is the policy of the U.S. [“to support the development of democratic political processes and independent civil society in Venezuela.”](#) To achieve this, U.S. sanctions policy must support civil society by engaging with and empowering women’s groups and developing policy with a full understanding

of the gendered impact of the humanitarian crisis. It must also ensure future efforts that use sanctions as mechanisms to advocate for free and fair elections consider women political prisoners and barriers to women’s participation explicitly.

Uganda Sanctions

The United States has had a close geostrategic relationship with Ugandan President Yoweri Museveni’s government since he came to power in 1986. Uganda plays a major role in the U.S.’s regional security goals and is the top beneficiary of U.S. foreign aid and security assistance. Since 2000, concerns about Ugandan antidemocratic governance, corruption, and human rights have strained the relationship. Of particular concern have been the threats to LGBTQ+ rights in Uganda. In February 2014, the Obama administration responded to Uganda’s passage of the [Anti-Homosexuality Act](#) (AHA), which made “aggravated homosexuality” a capital offense, with sanctions that included travel restrictions for certain Ugandan individuals and the restriction of aid to certain government programs. Museveni’s government remained steadfast in its support of the law, but the AHA was struck down by the Constitutional Court of Uganda in August 2014.

On May 2, 2023, the Ugandan government passed one of the world’s harshest anti-LGBTQ+ laws, a revised version of the AHA. Since then, at least six people have been charged, including two for the capital charge of “aggravated homosexuality.” On May 29, 2023, Biden [condemned](#) this as “a tragic violation of universal human rights – one that is not worthy of the Ugandan people, and one that jeopardizes the prospects of critical economic growth for the entire country.” He declared the law to be fundamentally wrong and



confirmed that “we are considering additional steps, including the application of sanctions and restriction of entry into the United States against anyone involved in serious human rights abuses or corruption.” DHS has been offering GBV and LGBTQ+ training under the DHS Pride organization, which has included participants from seven sub-Saharan African countries including Uganda, but this is the sole reference to Uganda in the WPS 2023 Strategy and NAP.

[Travel restrictions on Ugandan officials were announced in June](#), but broader targeted sanctions have not materialized. There is much intersection between putative LGBTQ+-related sanctions and the WPS pillars that build on academic and policy work to [address heteronormativity within the agenda](#) that neglects the vulnerabilities of LGBTQ+ individuals. Economic sanctions policy should avoid unwanted consequences, including “[worsening the conditions for the affected groups on the ground](#).” Interviews with a U.S. Embassy senior official in 2014 reveal that this challenge is something that U.S. policymakers were well aware of, and so there is scope for a gender- and queer-responsive targeting of sanctions to maximize pressure on the government and minimize harm to LGBTQ+ persons. Developing targeted sanctions to promote LGBTQ+ rights requires a full understanding of and engagement with the context in which LGBTQ+ persons exist in Uganda. Nicolette D. Manglos-Weber [argues](#) that anti-LGBTQ+ rhetoric in Uganda “is better understood as a political tactic to retain power by distracting the public from failure of good governance.” Understood as a strategy used by authoritarian heads of state to play up a [western cultural threat](#), U.S. response to anti-LGBTQ+ legislation needs to be mindful that the blame for the economic consequences of such sanctions will likely be targeted at the communities most vulnerable to that legislation. Poorly designed and implemented sanctions may lead to a failure to protect and may worsen the situation.

In terms of the WPS agenda, sanctions policy should ensure broad participation and engage with key activists, such as Rev. Dr. Kapya Kaoma and Dr. Stella Nyanzi, drawing on their experiences in countering moral panics and supporting women’s rights and LGBTQ+ rights in sub-Saharan Africa. It should draw on the work of academics and policymakers with experience working in the region and a detailed,

evidenced-based understanding of the cause and purpose of homophobia. In 2014, the Obama administration engaged with the Civil Society Coalition on Human Rights and Constitutional Law; similar groups, such as Convening for Equality Uganda, are best placed to advise of their development and monitoring. In September 2023, Convening for Equality released a report highlighting the human rights abuses perpetrated against LGBTQ+ persons since the passage of AHA. Among their major findings were 180 cases of evictions, displacements, and banishment of LGBTQ+; 176 cases of torture; 159 violations of the right to equality and freedom from discrimination; and 102 mental health conditions. This indicates a need for sanctions policy to consider measures for relief and recovery of those subjected to harassment, including ensuring that those most vulnerable are not cut off from health and humanitarian services. Finally, any economic sanctions on Uganda need to be coordinated with other diplomatic and aid strategies that advocate for strengthening rights of LGBTQ+ persons in law in accordance with the prevention strand of WPS.

Russia Sanctions

Russia is one of the world’s most heavily sanctioned countries. Since the 2014 Russian seizure of Crimea, the United States government has used comprehensive sanctions to counter the Russian government’s territorial ambitions. The United States has imposed targeted sanctions on Russian entities and individuals for several reasons, including but not limited to weapons proliferation, illicit trade, chemical weapons, support to oppressive governments such as Syria and Venezuela, and human rights abuses. As of January 2022, OFAC had designated sanctions against [more than 14 Russian nationals](#) pursuant to the Global Magnitsky Act. Since the Russian invasion of Ukraine in February 2022, the U.S. – both unilaterally and multilaterally – has imposed sanctions against Russian actors pursuant to [Executive Order \(E.O.\) 14024](#), which authorizes sanctions in response to the harmful foreign activities of the Russian government. While human rights violations do fall under the designation criteria of E.O. 14024, the U.S. has also employed the Global Magnitsky Act to deter and punish the commission of human rights abuses and atrocities by Russia and its partners.



U.S. Assistant Defense Secretary for International Security Affairs Celeste Wallander (L) prepares to testify about Russian sanctions and Ukrainian aid before the Senate Foreign Relations Committee on Jan. 26, 2023. (Chip Somodevilla / Getty Images)

On Dec. 9, 2022, on the eve of International Human Rights Day, the United States [imposed sanctions on malign Russian actors](#) who were involved in the commission of human rights abuses in Ukraine pursuant to [E.O. 13818](#), which implements and builds upon the Global Magnitsky Act. In remarks given in 2022 in Warsaw, Poland, Biden [stated](#):

Swift and punishing costs are the only things that are going to get Russia to change its course. ... (T)hese economic sanctions are a new kind of economic statecraft with the power to inflict damage that rivals military might.

In a [statement](#) made in June 2023 to issue sanctions against two South Sudanese and two Islamic State group terrorists for crimes of CRSV, Biden recognized the perpetration of sexual violence in the Russian invasion of Ukraine. CRSV as a weapon of war [has been widespread](#) since the start of the conflict between Russia and Ukraine, being committed primarily by Russian actors and affiliates against Ukrainians. As stated in the November 2022 Memorandum, it is the “[policy of the United States to fully exercise existing authorities to impose economic sanctions ... to promote justice and accountability for acts of CRSV](#).” However, Biden did not make any indications that the accountability tools outlined in the memo would be applied to Russian crimes of sexual violence against Ukrainians. Some country-specific sanctions programs related to Russia and Ukraine – including E.O. 13818 and the [Ukraine Invasion War Crimes Deterrence and Accountability Act](#) – do

contain criteria for the imposition of sanctions against those responsible for the commission of CRSV, but these existing programs do not explicitly include considerations for the specific challenges of collecting, assessing, and sharing information regarding CRSV.

From a WPS perspective, the considerations outlined in the CRSV memorandum must be mainstreamed across sanctions policy in recognition of the unique and pervasive nature of CRSV as a weapon of war to improve prevention and protection efforts. In order to accurately and efficiently investigate the commission of CRSV and crimes of sexual and gender-based violence, appropriate monitoring and reporting mechanisms must integrate – both through sanctions policy and the U.S. National Action Plan – the [collection](#) of sex and age disaggregated data. Gender-sensitive data collection is important particularly as global recognition of CRSV against men is growing, and reports from Ukraine and other conflict settings note perpetration of this form of CRSV that has been overlooked in many policy discussions. This also requires the meaningful participation of and consultation with civil society and grassroots organizations, which are [often best placed](#) to accurately gather this information and inform relief and recovery efforts.

Policy Recommendations

Currently, systematic engagement between WPS and economic sanctions is at best implicit and at worst absent; it is certainly not highlighted in public documents and statements. Drawing on WPS pillars and the four cases discussed above, the following policy recommendations are proffered for a more coherent and consistent policy on WPS and economic sanctions:

1. The U.S. government, in order to have a true whole-of-government approach, must formalize the gendered impact of economic sanctions within relevant WPS and sanctions policies and develop guidance for gender mainstreaming in the development, application, and oversight of sanctions policy.
2. Future U.S. strategies and national action plans should designate the U.S. Treasury Department as a key agency for WPS delivery and integrate



economic sanctions policy and guidance for OFAC into future WPS NAPs.

3. Congress should require that the Treasury develop a WPS implementation plan and report progress toward policy objectives to Congress.
4. Interagency departments relevant to sanctions should set up appropriate metrics and monitoring and reporting mechanisms to evaluate the impact of economic sanctions and sanctions compliance on women, men, girls, and boys using sex and age disaggregated data.
5. The Treasury, OFAC, DOS, and the executive branch should ensure that women's, LGBTQ+, and civil society groups participation in discussions on the development and assessment of targeted sanctions policy.
6. The Treasury and OFAC should continue to shift toward targeted sanctions over comprehensive and where comprehensive are required ensure that humanitarian exemptions are adequate and are not hindered by overcompliance.
7. DOS and USAID should advocate for the strengthening of women's economic rights in

law in partner countries and ensure elections and political processes efforts consider the gendered consequences of corruption and political prisoners.

8. DOD, DOS, and USAID should develop relief and recovery measures that consider the different needs, vulnerabilities, and economic inequalities between men and women that may be exacerbated by historic and ongoing sanctions.
9. The Treasury should establish at least one gender or WPS focal point role and mandate training for relevant personnel on gender analysis and WPS.
10. Congress should allocate funding to research activities into the gendered impact of current economic sanctions.

Economic sanctions have not been adequately gendered, but through systematic engagement with the pillars of WPS, they can be better designed and implemented to ensure that they strengthen the security of women and girls and are a positive tool for empowerment and change.



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