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Expert Roundtable on Canadian Economic Sanctions Oct 9-10 2019 Summary of Findings and Recommendations

Sponsored by SSHRC, the University of Manitoba's Centre for Defence and Security Studies and Institute for Humanities, the Canadian Defence and Security Network and Carleton University

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Executive Summary

A workshop on Canadian Economic Sanctions was held 9 and 10 October 2019 at the Museum of Nature in Ottawa, ON and Carleton University. The workshop was organized by Andrea Charron (University of Manitoba) thanks to a SSHRC connection grant and funding from the University of Manitoba's Centre for Defence and Security Studies and Institute for Humanities, the Canadian Defence and Security Network and Carleton University

The workshop brought together academics, practitioners and students as well as public servants to consider the challenges and opportunities associated with Canadian economic sanctions. The four panels on the first day investigated: 1) Domestic Factors Influencing Canada's Unilateral (Autonomous) Sanction Decisions 2) the machinery of government; 3) lessons learned from other allies; and 4) the future of sanctions as a tool of foreign policy. The second day including a brain storming sections on what data might be collected for a Canadian sanctions database.

Findings:

- Canada has fallen into a sanctions' paradox trap: the conditions in which sanctions are most likely to be effective are not the countries that Canada is targeting.
- The Canadian sanctions' legislation does not address the scope of corruption prevalent in the world and in Canada.
- The changes to the threshold level allowing Canada to apply sanctions more independently has several implications which need to be studied. Furthermore, the human rights and corruption amendments added to SEMA in 2017 were *unnecessary* for cases of sanctions.
- Questions regarding why Canada has extraterritorial *criminal* reach but not so when it applies to sanctions as well as questions as to why Canada does not apply secondary sanctions measures have not been debated and researched adequately.
- There is a screening deficit for small, medium or even large companies which are not screening for who they are doing business with and whether they are sanctioned let alone screening for customers' customers.
- Prudent compliance risk management is being downloaded onto the public and away from government.
- The issue of 'owned' or 'controlled' remains fuzzy in the legislation. It is not a clear 50% rule, for example, like in the U.S.
- The lack of Government support for FIs and businesses is problematic for compliance.

- Comprehensive, publicly available, written guidance for public and private sectors regarding interpretation of sanctions regulations is needed as well as a clear rationale for the listing and delisting of peoples and entities and an independent administrative process by which designated individuals and entities can challenge their designation in a transparent and fair manner.
- Charities are particularly impacted by sanctions because they have a chilling effect on assets going to a targeted state.
- The main question to ask first before creating a sanctions database is what do we mean to do with the data? This is crucial in figuring out what kind of data we actually need.

Recommendations:

- The time has come to improve sanctioning coherence and compliance via more study and oversight. More study, training and accreditation would be served by investing in a sanctions centre of excellence. Stricter parliamentary oversight, perhaps via a permanent subcommittee on sanctions, would help with foreign policy coherence. Simple changes, such as listing names alphabetically rather than when names are added to the lists would be tremendously helpful and the sorts of oversight suggestions centres can track and subcommittees could make.
 - 9/11 fundamentally changed the nature of sanctions. These trends are understudied in the US and EU and nonexistent in Canada.
 - a review of all of Canada's sanctions Acts in an omnibus fashion is overdue but particular the UN Act which was last amended in 1985.
 - The EU has adopted guidelines for sanctions implementation and best practices. <https://www.consilium.europa.eu/en/policies/sanctions/> Canada has neither publically available. The EU also has mandatory reviews for autonomous and supplementing sanctions of 12 months which Canada does not have. (Canada has a review process for the SEMA and Magnitsky Acts, but not sanctions lists and measures).
 - Canada has few searchable databases that limits academic and practical study of Canada's sanctions.
 - Given that asset freezes are the go-to sanctions measure of choice, governments must wrestle with how to manage/sanction new digital assets from bitcoin, to data to digital files and media.
- Canada's current UNSC sanctions campaign could benefit from a rediscovery of Canada's past sanctions championing.
- Cost of sanctions is highest at the threat stage and so Canada should not rush to apply sanctions before maximizing the threat of sanctions and investigate "smart enforcement".

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Context

Canada is an enthusiastic supporter of economic sanctions. Sanctions are traditionally defined as a tool of foreign policy used by “senders”, like Canada, to signal the need for a change in behaviour or policy by a target using measures short of force. The problem is that the definition does not match practice anymore. Targets rarely change behaviour often because the senders’ requirements are incoherent and because the sanctions are not sufficient to induce a change in behaviour.

Canada currently applies sanctions to respond to international crisis, violations of peace and security, gross violations of human rights or acts of significant corruption around the world. With 21 regimes currently in place, the government has adopted new legislation including the Justice for Victims of Corrupt Foreign Officials Act (JVCFOA), otherwise known as the [Sergei Magnitsky Law](#), to complement [the many other related pieces of Canadian legislation](#) to enable an even greater pace of sanctioning activity. *All but travel sanctions against Guinea Bissau have an asset freeze as one of the sanctions measures.*

Canada’s list of sanctions regimes run the gamut from what are considered blunt sanctions targeting an entire state (such as an arms export ban to and import from Libya), to highly targeted sanctions against select individuals (such as against Venezuelans), to sanctioning a phenomenon (i.e. terrorism committed by Al Qaida and associates). Canada applies sanctions in compliance with international law when required by the UN Security Council or when another international organization or association, of which Canada is a member, calls on its members to take economic measures against a foreign state. Additionally, Canada may apply sanctions unilaterally or with likeminded states, for example, in concert with the EU.

Canada is not alone in its preference for sanctions. Use by the U.S. and EU are also on the rise. Given the proliferation of sanctions’ use Canada and its allies, there are direct implications for Canadian interests, financial institutions (FI) and companies. Global supply chains and the connection of money laundering activity with sanctions busting activity means that Canadian companies and FIs are more likely to be affected by sanctions. As trade becomes increasingly weaponized, there will be more political and regulatory landmines for Canada to avoid. Given new global geopolitical conditions, including resurgent world rivalry, emboldened states and a U.S. ally that uses sanctions as a retaliatory weapon, now is the time to reconsider and refresh how Canadian economic sanctions are used.

This one and half day workshop dedicated to Canadian economic sanctions and sanctions databases, brought together thirteen sanctions scholars as well as several graduate students. Financed via a SSHRC connection grant and from funding from the University of Manitoba’s Centre for Defence and Security Studies, and Humanities Institute, it is one of the few workshops convened recently to focus exclusively on Canadian economic sanctions. Members of the public service were invited to attend and take away lessons learned under the Chatham House rule of nonattribution. **Findings and recommendations are bolded throughout this report.**

Panel 1: Canada’s use of sanctions to date

Domestic Factors Influencing Canada’s Unilateral Sanction Decisions

Pre 2017, the conditions for Canada to apply sanctions included:

1. Collectively with other states via the United Nations Act (UNA)
2. Together with other states via the Special Economic Measures Act (SEMA)
3. Unilaterally via SEMA if a “grave breach of international peace and security has occurred that has resulted or likely to result in a serious international crisis” (Section 1.1b)

The threshold to apply sanctions was high. In 2017, Canada lowered the legal threshold for action, allowing Canada to respond unilaterally to gross human rights violations and acts of corruption in foreign states via the adoption of *Justice for Victims of Corrupt Foreign Officials Act*, ((S.C 2017, c. 21)

Thus the 2 new conditions to apply sanctions post 2017 include:

4. gross and systematic human rights violations committed in a foreign state; and
5. engagement in “acts of significant corruption” on behalf of a foreign state (SEMA s.4 (1.1)(c); SEMA s.4(1.1)(d)).

The changes to the threshold level allowing Canada to apply sanctions more independently have several implications:

- The amendments dramatically increase the discretion of Canadian ministers of foreign affairs to trigger sanctions;
- Diaspora politics, signaling, and weakening Canada’s influence
- Canada applies sanctions more inconsistently

Table 1 Canadian Human Rights/Corruption Sanctions, 2017-2019

Year	Country of Residence	Canadian Instrument	Partners	# Indivs
2017	Venezuela	Magnitsky Law	USA	19
2017	South Sudan	Magnitsky Law	USA	3
2017	Russia	Magnitsky Law	USA, UK, Estonia, Lithuania, Latvia	30
2018	Myanmar	Magnitsky Law	USA, EU	1
2019	Saudi Arabia	Magnitsky Law	USA, EU	17
2019	Nicaragua	SEMA	USA	9

Created by Meredith Lilly.

Table 1 outlines that, in every case of independent sanctions application between 2017 and 2019, Canada acted unilaterally but in tandem with the United States, and occasionally also European states (either via the EU or individual states). If Canada is always applying sanctions in concert with other states, it begs the question why the need for the Magnitsky-style legislation?

Canada undertook action via authorities reflected in legislation prior to 2017, typically via SEMA due to a breach in international peace and security or via the *UN Act*. In other words, **the human rights and corruption amendments added to SEMA in 2017 were unnecessary for cases of sanctions** Canada has applied since 2017. Given that Canada has not yet implemented the Magnitsky Law with full autonomy, the evidence to date suggests that Canada *could* have implemented sanctions for the cases listed in table 1 under SEMA's previous legislative authorities, as it did with Russia in 2014 and Venezuela in 2017-2019.

To date, all individuals sanctioned by Canada for human rights violations and/or corruption reside in developing and/or authoritarian countries. Canada has poor diplomatic relations and weak economic ties with countries currently sanctioned. Via these actions, Canada has exemplified the '**sanctions paradox**' identified by Drezner (2011) which suggests that the conditions in which sanctions are most likely to be effective are not the countries that Canada is targeting.

Furthermore, **the Canadian legislation does not address the scope of corruption prevalent in the world and in Canada**. For example, according to the German and Maloney Laundering Reports in 2019, more than 70% of money laundering in BC occurs through real estate transactions. Yet those purchases can be made without revealing the true (or beneficial) owner of that newly purchased multi-million dollar home. (BC is in the process of creating Canada's first public beneficial ownership registry.)

More research is needed to identify the factors influencing Canadian sanctions decisions. For example, what influence do diaspora communities have on the government's decision to apply sanctions? Is the government using sanctions to knowingly or unknowingly affect Canada's trade competitiveness? Does the inconsistent approach to applying sanctions harm Canadian interests?

Autonomous/Unilateral Sanctions

Canada's autonomous or unilateral sanctions seem to be the most problematic. In 2007, Canada applied sanctions against Burma (Myanmar) under the SEMA. They were known as the first unilateral sanctions imposed by Canada of a list of individuals that fully coincided with the U.S. list (albeit established many years before), but this was considered unilateral sanctions on the part of Canada. Why do sanctions that are reportedly unilateral look more multilateral than sanctions Canada imposes multilaterally in some cases? **Questions regarding why Canada has extraterritorial criminal reach but not so when it applies to sanctions as well as questions as to why Canada does not apply secondary sanctions measures have not been debated and researched adequately.** Canada is applying unilateral sanctions at an unprecedented rate but with inadequate enforcement. Of the few enforcement cases Canada has had, transshipment seems to be a common theme. The question was posed: Why can the government list an Iranian company but not a company in Dubai controlled out of Panama by Iranians that operates out of Dubai and transships to Iran? Often it is argued that the latter would

run afoul of Canada's lack of extraterritorial legislation. One solution is to list transshippers but this might require legislative changes to the UNA and SEMA. Another solution might be to adopt civil enforcement mechanisms similar to those in the United States except this would require tremendous investment in infrastructure and resources. Finally, more transparency is needed surrounding how lists of names and entities are created.

Panel 2: Canadian Machinery

The Business Perspective

There is a screening deficit for small, medium or even large companies which are not screening for who they are doing business with and whether they are sanctioned let alone screening for customers' customers. The fact that foreign business partners should be screened seems to come as a shock to many businesses. This includes screening the broker, the financial institution, the middleman, service provider, research partner etc. which comes at a high cost for exporters.

One of the challenges is that there is limited consolidation of lists by Canada. (Example, there is a list of terrorist entities. See <https://www.publicsafety.gc.ca/cnt/ntnl-scr/cntr-trrrsm/lstd-ntts/crrnt-lstd-ntts-en.aspx>)

While there is the Consolidated Canadian Autonomous Sanctions List, this is only for SEMA and JVCFOA (Magnitsky Law) applications and does not include many sanctions that are enacted under other policy instruments. (See <https://www.international.gc.ca/world-monde/international-relations-relations-internationales/sanctions/consolidated-consolide.aspx?lang=eng>) Lists are likely to be a continuing feature of Canadian sanctions given that SEMA sanctions (for example against Venezuela and Nicaragua) are solely list based. Names on listed in the Gazette are not by alphabetical order but rather by order in which the names are listed.

This means that businesses need to incur further costs to hire other companies for this screening process (compliance costs). In this case, the due diligence is on the screener.

The issue of 'owned' or 'controlled' remains fuzzy in the legislation. Prohibition against, for example, dealing "in any property, wherever situated, that is owned, held or controlled by a listed person or by a person acting on behalf of a listed person." The law is unclear, but in practice it has been that any entity associated with a listed entity is also sanctioned. In contrast, the U.S. has an explicit 50% rule for Specially Designated Nationals.

The lack of Government support for FIs and businesses is problematic. There is a gap between Canadian administration and its guidance on economic sanctions vs businesses dealings with the U.S. and other countries. Canada has very limited FAQs, guidelines, rulings, or opinions. There is also no deferred or non-prosecution agreements for sanctions but they do exist for the *Foreign Corruption Act*.

Comprehensive, publicly available, written guidance for public and private sectors regarding interpretation of sanctions regulations is needed as well as a clear rationale for

the listing and delisting of peoples and entities and an independent administrative process by which designated individuals and entities can challenge their designation in a transparent and fair manner.

The lack of guidance leads to 'over compliance' or the 'better safe than sorry' side of business decision making which raises the costs associated with compliance. **Prudent risk management is being downloaded onto the public and away from government.**

Businesses act more conservatively than they need to and the consumer, inevitably, has to pay more as the associated costs of compliance are pushed to the consumer. This means that Canadian businesses are not as competitive as they could be.

Enforcing Sanctions

Enforcement of sanctions has been uneven and insufficient. Questions still abound concerning the shipment of armoured personnel carriers to Libya from a Canadian-owned company's Mideast facilities which violated the UN arms embargo – an incident that raises questions about how extensively Ottawa should be policing the defence and military trade conducted by its citizens abroad and how a Canadian company named in a UN Panel of Experts' report is not investigated more fully.

Politically difficult decisions need to be made with respect to Canada's move to lift sanctions against Iran in support of the JCPAO which runs afoul of U.S. sanctions tightening.

Two solutions to improve sanctioning coherence and compliance would be to a) support a sanctions centre of excellence in Canada and b) require stricter parliamentary oversight, perhaps via a permanent subcommittee on sanctions, to make recommendations on monitoring and tweaking sanctions.

Panel 3: Learning from Allies

EU

The EU has three types of sanctions (referred to as restrictive measures) which are characterized by their relationship with the UN:

Autonomous – which has no UN mandate
Implementing – which has a UN mandate
Supplementing – going beyond UN mandate

Similar to Canada, the number of sanctions regimes has remained fairly stable except that rather than the bulk originating with the UN, both Canada and the EU apply more autonomous sanctions. In recent years, EU sanctions have been moving up the discrimination scale, as a result of the expansion of the designation criteria and the adopted of (limited) economic bans. The departure from blacklists makes sanctions more difficult to implement for the private sector.

The decision to apply sanctions is centralised in Brussels via a two-step process. After a proposal is made by the High Representative of the Union for Foreign Affairs and Security

Policy (HR), a decision, by unanimity, is made under the Common Foreign and Security Policy (CFSP). If the Council Decision includes an asset freeze and/or other types of economic and/or financial sanctions, those measures need to be implemented in a Council regulation.

The EU has also adopted guidelines for sanctions implementation and best practices. <https://www.consilium.europa.eu/en/policies/sanctions/> **Canada has neither publically available. The EU also has mandatory reviews for autonomous and supplementing sanctions of 12 months which Canada does not have.** (Canada has a review process for the SEMA and Magnitsky Acts, but not sanctions lists and measures). The procedure for adopting sanctions by the EU is outlined in <https://www.consilium.europa.eu/en/policies/sanctions/adoption-review-procedure/>

The EU has not yet adopted Magnitsky-like legislation. The EU is conducting a review of the implications for the CFSP.

U.S.

The United States uses economic and financial sanctions more than any other country. Sanctions policy may originate in either the executive or legislative branches. The President can launch sanctions via an Executive Order (EO) in response to an “unusual or extraordinary” foreign threat. The more typical route is via Congress. The Office of Foreign Assets Control (OFAC) of the US Department of the Treasury administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes. OFAC’s main sanctions tool is lists of “specifically designated nationals” or SDNs.

There is a growing gap between Washington and the UN on sanctions. The U.S. was the primary pen of many UN sanctions regimes but the relationship has deteriorated with the present administration in the U.S.

Given that asset freezes are the go-to sanctions measure of choice, governments must wrestle with how to manage/sanction new digital assets from bitcoin, to data to digital files and media.

UN

Canada has a long history with the UN and sanctions. Canadians Robert Fowler, David Malone and Margaret Doxey have changed, fundamentally, the architecture and understanding of international sanctions. Canada too ran its 1998 UNSC election platform on improving sanctions and providing funding to the Secretariat to capture a database of sanctions best practices. Since the early 2000s, Canada has been largely absent from the sanctions world.

Canada’s current UNSC sanctions campaign could benefit from a rediscovery of past sanctions efforts. (Charron 2010, Cortright et al. 2010). For example, collaboration with the AU, how sanctions affect women and girls and how to strengthen sanctions multilateralism are all issues for the UN and in-line with current Canadian foreign policy goals.

Finally, if Canada is successful in its campaign, it is highly likely it will Chair one or more of the [current 14 Sanctions committees](#) as only the E10 are Chairs.

Unique to the allies, has been the effect of 9/11 on sanctions. **9/11 fundamentally changed the nature of sanctions.** First, the UN, EU, and U.S. adopted far reaching legislation that allowed states to freeze the assets of individuals. Before, the focus was on state assets or denying goods and services to states. The individualization of sanctions targeting has also led to the criminalization of sanctions lists and more court cases. The other effect of 9/11 was the increased severity on individuals and entities which failed to enforce sanctions. This too has further changed sanctions from a tool of statecraft to a criminal enforcement tool – the ramifications are still unclear. Third and finally, the EU and US have extraterritorial sanctions (sometimes called secondary sanctions or a secondary boycott) designed to restrict the economic activity of governments, businesses, and nationals of third countries. **These trends are understudied in the US and EU and nonexistent in Canada.**

Panel 4: The Future of Sanctions

Iran

The *Justice for Victims of Terrorism Act* (S.C. 2012, c. 1, s. 2) allows victims to sue states (Syria and Iran) for acts of terrorism. The courts can seize government property or assets owned by a listed state in Canada. Today, Canada's relations with Iran are particularly strained in part because the Liberal government decided to keep Iran on the list of state sponsors of terrorism. For the Iranians, it is incongruent to be list *and* re-establish diplomatic relations. JVTVA and the trend toward the criminalization of sanctions move sanctions from an executive purview to the judiciary. The now entrenched legal, judicial and political consequences of the JVTVA have tied the hands of future governments. (It is noted, however, Canada's Freezing Assets of Corrupt Foreign Officials <https://laws-lois.justice.gc.ca/eng/acts/F-31.6/index.html>, under which some Iranian assets in Ontario were recently "redistributed Iran's properties in Canada sold, proceeds handed to terror victims", See <https://globalnews.ca/news/5893768/irans-properties-in-canada-sold/>)

Sanctions and the JVTVA take a legal and political life of their own. **Has the time come for Canada to review its sanctions regulations** - especially UN Act given that Canada continues to leave in place sanctions against Liberia, Sierra Leone, Côte d'Ivoire and Eritrea long after the UNSC has lifted them?

Sanctions Effectiveness

What we cannot find is any evidence that once sanctions are fully enforced, that the target and sender are paying attention to each other in a way the theory expects they would be. The behaviour does not support the theory. We need to rethink the theory of sanctions. We should not think so much in terms of whether imposed sanctions are working in this particular case, but to think about why we would go about imposing sanctions at all? **Cost of sanctions is highest at the threat stage and so, Canada may wish to reconsider at what point sanctions**

should be applied. A review of the literature via a sanctions centre of excellence, would aid Canada in this regard.

We also need to look at enforcement in a different way. As opposed to full-on sanctions implementation, perhaps we should look at “*smart enforcement*”? In other words, Canada needs to consider maximum threat with minimum width of implementation.

Sanctions and Humanitarian Exceptions

Charities are impacted by sanctions in a number of ways, in particular by facing challenges in importing certain types of goods necessary for their work, restrictions on receiving and transferring funds due to financial de-risking, and through overcompliance due to the lack of clarity on the scope of sanctions and the high risks associated with violating them. Exceptions for humanitarian activities should be included in sanctions regimes to help protect charities from these impacts. There should also be a clearer and more cohesive framework for sanctions. As do businesses, charities seek more guidance generally to better understand the scope of sanctions so that they can better manage the risks associated with them.

Requirements for a Sanctions Database

In order to successfully research many of the important questions associated with Canada’s use of sanctions, it would be helpful for a Canadian sanctions database to routinely collect and reflect the following information:

- the legal instruments used for triggering Canadian sanctions; the legislative rationale listed; other countries involved, if any; the name of the foreign affairs minister who authorized the action; and the political party governing at the time. Researchers can then link this data to separate surveys of Canada’s diaspora, voting patterns by ethnic groups in Canada, Canadian international trade and foreign direct investment statistics.
- Eventually, and if the database is grown and supported financially, it may also be possible to begin tracking calls for Canadian sanctions (by human rights groups, diaspora communities, the media) that are *not* acted upon by government. Analysis of Canadian inaction would offer a more complete picture of the factors influencing Canadian decision making.
- In addition, linking a Canadian database to other international databases (such as migration patterns) would increase the research community’s ability to study the overall efficacy of unilateral sanctions to address human rights violations and corruption, and the factors that influence success.
- use known data sources such as the United Nations Human Rights Index, the CIRI Human Rights Index, or other reputable survey data, enabling analysis of whether the worst performers are being singled out for action by Canada. These can also be linked to information about Canada’s largest diaspora groups and their voting behavior to explore political influence on sanction policy.

Data needs of various communities of interests (government, academia, business, public, and allies) include:

a. Academics:

- o Who, what, target, when, why?
- o Who else is involved?
- o Scope of sanctions
- o Under what authority
- o The outcome or the response
- o Unintended consequences
- o The norm/law that is violated (same as why?)
- o Economist view: imports, exports, GDP etc.

b. Government:

- o Who else is sanctioning and for what reasons?
- o The difference between the executives and bureaucracy
- o The government will have to engage in risk analysis, and this is a major difference between government efforts vs. academia
- o How much is imposing sanctions costing us?
- o Enforcement is an issue
- o National interest and foreign policy
- o The role (and challenges) of inter-agency cooperation regarding enforcement and monitoring.

c. Businesses:

- o What is sanctioned?
- o How to challenge the sanctions
- o What are the challenges of compliance?
- o Points of lobbying
- o How and where to access the information needed for compliance and business due diligence
- o Who is next to be listed?

d. Allies:

- o Common measures
- o Canada's measures vis-à-vis allies (in terms of secondary sanctions)
- o Where do we match or vary from other states?

e. Target:

- o What are the criteria of lifting the sanctions?
- o Whether the target is the initial target of sanctions (or secondary or tertiary)
- o Are there any exemptions (for example for medicine)

f. Civil Society: o What is the government doing?

- o NGO concerns
- o Security and humanitarian implications

The main question to ask first, however, is what do we mean to do with the data? This is crucial in figuring out what kind of data we actually need. As a policy community, we should perhaps *not* be focusing on compliance of small businesses and instead answer broader questions regarding whether and how sanctions function and work as a policy tool. **Simple changes, such as listing names alphabetically rather than when names are added to the lists would be tremendously helpful.**

Next, what are the common sources of information?

- a. Are there culture clashes among different communities?
- b. Do they use different languages?
- c. Do they have different end goals?

Challenges with database?

- a. No consolidation of the listed entities under separate legislations
- b. Depending on the interest group (government vs. academics vs. businesses), the database would be consolidated differently for ease of reference depending on what the database is going to be used for.
- c. We should start with the question we want to answer first and then move on to see what kind of data we require instead of starting with looking for data.
- d. Starting with the question might shed light on if new data needs to be collected or if the data is already available.
- e. The impact of the questions we're asking, the data needed and what this means for internal and external validity (focused on in academia) and the strength of external validity (for government use).
- f. A difference between fully new data vs. consolidating existing data to answer specific questions.
- g. Public database for public use vs. database for government use.

Data challenges – actionability

- a. Ranking variables by priority is crucial
- b. Data vs. analysis (information vs. analysis) -> analysis is often not in the purview of the dataset. The importance of analysis when we code data (not just to interpret the results of the data, but to compile the data in the first place)
- c. Networks of datasets might be the way to go
- d. Considering secondary sanctions and onwards really increases the magnitude of the network we are mapping -> at one point we would be looking at data that is too broad to be useful.
- e. List of people vs list of countries -> again, separate datasets.

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