

International
Institute of
Social Studies

Erasmus

**The Inconsistency of EU Sanctions in Sub-Saharan Africa
Hypocrisy or Careful Policy Making?
A Systematic Literature Review**

A Research Paper presented by:

Nina Maria Brehl
(Germany)

in partial fulfilment of the requirements for obtaining the degree of
MASTER OF ARTS IN DEVELOPMENT STUDIES

Major:

ECONOMICS OF DEVELOPMENT
(ECD)

Specialization:

Econometric Analysis of Development Policies

Members of the Examining Committee:

Prof. Dr. Syed Mansoob Murshed
Prof. Dr. Peter A. G. van Bergeijk

The Hague, The Netherlands
December 2022

Disclaimer:

This document represents part of the author's study programme while at the International Institute of Social Studies. The views stated therein are those of the author and not necessarily those of the Institute.

Inquiries:

International Institute of Social Studies
P.O. Box 29776
2502 LT The Hague
The Netherlands

t: +31 70 426 0460
e: info@iss.nl
w: www.iss.nl
fb: <http://www.facebook.com/iss.nl>
twitter: [@issnl](https://twitter.com/issnl)

Location:

Kortenaerkade 12
2518 AX The Hague
The Netherlands

TABLE OF CONTENTS

LIST OF FIGURES	ii
LIST OF TABLES	ii
LIST OF APPENDICES	ii
LIST OF ACRONYMS.....	iii
ACKNOWLEDGEMENTS.....	iv
ABSTRACT.....	v
RELEVANCE TO DEVELOPMENT STUDIES	v
1. INTRODUCTION	1
1.1. RESEARCH QUESTION	3
1.2. RESEARCH OBJECTIVE.....	3
1.3. RESEARCH MOTIVATION	3
2. CONTEXTUALIZATION	4
2.1. DEFINING SANCTIONS.....	4
2.2. EU SANCTIONS IN SUB-SAHARAN AFRICA	7
2.3. THEORETICAL CONSIDERATIONS.....	12
3. METHODOLOGY.....	16
3.1. COMPARING DATABASES.....	19
3.2. USABILITY FOR ANALYSING THE EU'S SANCTIONING BEHAVIOUR	22
4. SYSTEMATIC LITERATURE REVIEW	24
4.1. SEARCH STRATEGY	24
4.2. INCLUSION/ EXCLUSION CRITERIA	25
4.3. LIMITATIONS	27
5. RESULTS	28
5.1. DESCRIPTIVE CHARACTERISTICS OF THE LITERATURE	28
5.2. UNDERSTANDING THE INCONSISTENCY OF EU SANCTIONS	32
5.3. DISCUSSION OF THE RESULTS	38
5.4. USABILITY FOR ANALYSING THE EU'S SANCTIONING BEHAVIOUR	43
6. CONCLUSION	44
APPENDICES	46
REFERENCES	53

LIST OF FIGURES

Figure 1: Adoption of a sanction under the CFSP.....	8
Figure 2: Overlap of cases across databases.....	20
Figure 3: Flowchart of selection process for systematic literature review.....	26
Figure 4: Distribution of selected studies across authors.....	30
Figure 5: Number of time a country has been selected as case/non-case.....	31
Figure 6: Number of cases/non-cases selected by each study.....	32
Figure 7: Influential factors that (could) explain the EU's sanctioning behaviour.....	39

LIST OF TABLES

Table 1: Comparing Databases.....	17
Table 2: Result Table Literature Review.....	29
Table 3: Factors That Influence the EU's Sanction Policy.....	33

LIST OF APPENDICES

Appendix A: Comparing coverage of EU sanctions across databases.....	46
Appendix B: Comparing coverage of EU sanctions with target country in SSA across databases.....	49
Appendix C: List of non-cases.....	50
Appendix D: PRISMA-P Checklist for systematic literature review.....	51
Appendix E: Inclusion/Exclusion Criteria - Extended elaboration.....	52

LIST OF ACRONYMS

EU	European Union
UN	United Nations
TEU	Treaty of the European Union
CFSP	Common Foreign and Security Policy
GSP	General System of Preferences
HR	High Representative
EEAS	European External Action Service
RELEX	Foreign Relations Counsellors Working Party
COREPER II	Committee of Permanent Representatives
ACP	Africa the Caribbean and the Pacific
SSA	Sub-Saharan Africa

ACKNOWLEDGEMENTS

*As we formed a circle around you
Seven words were said to you
Seven words were said
And they never left me*

*Thank you for bringing us all together
Thank you for bringing us all together*

Tom Rosenthal - 2021

First and foremost I of course would like to thank my supervisors Prof. Mansoob Murshed and Prof. Peter van Bergeijk. Next to your professional and intellectual guidance I very much valued your positivity and support throughout the process, not to mention the good sense of humour.

I also would like to thank ISS as an institution and community. This last year has been a journey filled with joy, inspiration, challenge, friendship and true companionship. I am immensely grateful for having experienced this and being part of this physical and mental space. Each and everyone who crossed my path this year made their contribution. Carmen, Lizi, Sophie, Robert, ... the list is too long. You are the fellow travellers one can wish for. Let's keep sharing too many beers and too heated discussions as long as we can!

A big thank you also goes to my colleagues and friends at Swapfiets. Your support was beyond amazing - and much needed in challenging times. You did not shy away from seeing me for who I am. A very rare employment relationship which I am very grateful for.

There have been many jokes about this next part but the truth must be written. My dear Immo, without you the last year would have been twice as hard and half as fun. Thank you for always reminding me of my dreams, for making me laugh when I am down, for your sharp mind and ears and for making every challenge a little easier. I could not be more grateful to have you by my side whether it's walking, cooking, biking, studying or travelling.

And last but definitely not least my family. Meine Eltern, Annie und Phillip. Ihr seid der Heimathafen, den man für unbestimmte Zeit verlassen kann, immer wissend, dass ein Platz zum Anker legen frei bleibt. Ihr seid diejenigen, die mich motivieren, Herausforderungen anzunehmen und immer kritisch zu bleiben. Bei euch habe ich das Denken gelernt und ohne diesen Schatz würde ich nicht stehen, wo ich heute bin. Vielen Dank, dass ihr immer da seid.

ABSTRACT

The EU is a frequent sender of sanctions. Yet, according to some voices the EU is too selective with this tool and inconsistent in its foreign policy stance. Scholars have discussed reasons for the inconsistent application of sanctions primarily in thematic silos, leading to two main positions where the EU is either viewed as a normative or realist foreign policy actor. Whilst it is argued that Sub-Saharan Africa is a frequent target for EU sanctions due its low economic and political importance there are also substantial inconsistencies in sanction application within the region. In a systematic literature review this thesis therefore aims to compile an overview of all factors that influence EU's decision to (not) impose a sanction in the context of Sub-Saharan Africa. The leading argument is that the EU is neither a purely normative nor a purely realist actor but instead carefully considers a variety of aspects. The conclusion of this thesis points in this direction, however, it remains unclear to what extent each of these factors play into the decision to impose a sanction. Additionally, the literature review identifies important gaps in the research revolving around inconsistencies. Most importantly, the insufficient understanding of how expectations of effectiveness and impact of sanctions contribute to the sanction decision.

RELEVANCE TO DEVELOPMENT STUDIES

For a long time, economic and political development has not only been a matter of domestic politics. With powerful actors like the US and China as well as supranational organisations like the UN or the EU in the global playing field, questions regarding peacekeeping, international norms and poverty reduction are omnipresent in foreign policy. Foreign policy between the EU and Sub-Saharan Africa is especially concerned with development. However, the EU's inconsistent use of sanctions - as a tool of foreign policy – has frequently resulted in negative criticism, not at least because of the unequal power relations between the two regions. Unequal power relations are particularly serious when the stronger power exhibits its advantages at the expense of the other. It is therefore of importance to understand what informs the sanction application of the EU. Considering that it might be neither purely informed by self-interests nor by norms could smooth the tensions between the EU and developing nations and to consequently contribute to a better allocation of resources for development.

Keywords: EU, sanctions, inconsistencies, Sub-Saharan Africa

1. INTRODUCTION

Since the turn of the millennium the European Union (EU) has frequently used sanctions as a foreign policy tool, either as part of its obligation to follow United Nations (UN) Security Council resolutions or autonomously. Sanctions are usually a response to breaches of international norms, such as flawed elections, violations against human rights or the rule of law. These values find a strong emphasis in the EU's legal frameworks that shape its foreign policy. However, despite this accentuation on norms and principles the EU does not decide to impose autonomous sanctions in all cases of objectionable behaviour. For instance, the EU decided to sanction Ivory Coast in 2001 due to flawed elections but refused to do so in Rwanda in 2008 despite the same accusation. Rwanda is just one example of several cases where the EU decided not to impose a sanction regardless of breaches of international norms. This ambiguity is especially remarkable given the fact the EU itself constitutes an aspiration for consistency in the Treaty on the European Union (TEU). Article 21 of the TEU (2008, 21:3), which is the first article of the EU's external action policy, states "The [European] Union shall ensure consistency between the different areas of its external action and between these and its other policies." Amongst others, these policy areas include the Common Foreign and Security Policy (CFSP), Human Aid and Trade; areas that are of particular importance for the EU sanctions.

So, why is it that the EU's sanctioning behaviour varies so much? Several scholars have aimed to answer this question. A common argument is that the EU tends to avoid coercive measures when it pursues an economic or political self-interest in the country in question (Crawford, 2001; Brummer, 2009). As such we could indeed brandmark the EU as an hypocritical actor. However, even though self-interest is a component in the EU's foreign policy, more recent literature has gone beyond the self-enrichment narrative and factors like development performance (Saltnes, 2017) international cooperation (Pospieszna and Portela, 2015) and effectiveness of sanctions (Del Biondo, 2012) have become part of the calculation.

All these considerations are important contributions to the understanding of the EU's sanction calculus. However, Baldwin (2020, p. xii; 107) points out that the analysis of foreign policy often ignores the fact that policy makers are motivated by multiple targets that are not necessarily compatible. He argues that case studies, though valuable, risk simplifying the complexity of the motivation to use a sanction (*ibid.*, p. 16).

Indeed, Del Biondo (2012, pp. 116-118) shows in a comparative case study that no one argument applies consistently to the EU's decision to (not) impose a sanction. In the same vein Saltnes (2018, pp. 166-168) argues that explanations brought forward by scholars cannot

sufficiently explain the variation in sanction application due to a bias in the selection of non-cases. According to Saltnes authors tend to select cases that confirm a preliminary assumption, i.e., that the EU does not impose sanctions where it has a self-interest (ibid., p. 169). Yet there are cases where no sanction is imposed even though there is no strong connection between the EU and the target. Likewise, there are also sanction cases in countries where the EU is expected to have an interest in the partnership (Saltnes, 2022, ch. 5).

Following Baldwin's argument, it is therefore likely that the EU's sanctioning behaviour cannot be explained by a single argument but instead is informed by a multitude of variables that go beyond the binary of norms versus interest. This is the starting point for this thesis. The objective is to disentangle the complexities by generating an overview of the factors that influence the EU's sanctioning behaviour with a special focus on target countries in Sub-Saharan Africa. In a systematic literature review I will compile all arguments that have been brought forward by scholars to explain the EU's inconsistent application of sanctions. The contribution of this thesis lies in the holism of the approach. Instead of only looking at a few specific aspects the literature review delivers a set of factors that are considered and potentially traded off in the sanction decision-making process. Based on the literature analysis I will argue that the EU's inconsistent application of sanctions can be assigned to a careful policy making process and is less hypocritic than often assumed.

The remainder of this thesis is structured as follows: The subsequent sections of this chapter explicitly state the research question, objectives, and motivation of the thesis. Consecutive chapter 2 will present the important cornerstones for the analysis, including the definition of a sanction, the frameworks that constitute the EU's sanction policy towards Sub-Saharan Africa as well as some theoretical considerations. Chapter 3 is an in-depth discussion of the choice of method along with a comparison of five databases on EU sanctions. I will show that the available data varies significantly in coverage and falls short in the documentation of non-cases which makes them insufficient for the purpose of this thesis. Chapter 4 introduces the details of the systematic literature review before turning to the results in chapter 5. The last chapter concludes the thesis and reviews if the research question could be sufficiently answered.

1.1. RESEARCH QUESTION

To achieve the objective of understanding of what explains the EU's inconsistent application of sanctions in cases of violations against international norms this thesis is guided by the following research question:

What are the influential factors explaining the inconsistency in the EU's sanctioning behaviour towards Sub-Saharan Africa?

This question is deliberately kept broad as the thesis aims to take a more comprehensive approach in explaining these inconsistencies. Such an approach is motivated by the scholars presented in the introduction and expected to contribute to a more thorough understanding of the EU's sanctioning behaviour.

1.2. RESEARCH OBJECTIVE

Building on the research question presented in the previous chapter this thesis has four main objectives:

- A) Developing a comprehensive understanding of EU sanctions against SSA
- B) Understand if accusations of hypocrisy in the EU's sanctioning behaviour are valid
- C) Identifying factors that influence the EU's decision-making process to impose a sanction
- D) Identifying gaps in the research, including methodological approaches

The first two objectives form the framework of this thesis. Throughout all chapters they serve as a common focus. As such they especially guide the content in the building chapters 2 and 3. Objective C is a narrower and more practical objective that is mainly achieved through the systematic literature review. And finally, objective D is not only a natural but also a deliberate result of the thesis in general and the literature review specifically.

1.3. RESEARCH MOTIVATION

For the purpose of this thesis, I decided to limit the scope to sanctions imposed by the EU and targeted at a country in Sub-Saharan Africa. The US and the UN as the two other major senders of sanctions have been well researched whereas EU sanctions are a more recent topic. In addition, there is an ongoing debate about the EU's stance in foreign policy, whether it favours norms above self-interest or the other way around. Due to its inconsistent treatment of norm violations the EU gets accused of not practising what it preaches.

Shedding light on this is of relevance since inconsistencies can weaken the credibility of the EU foreign policy standing. On the other hand, should the results of the analysis show that the EU is indeed a realist actor, this further increases the pressure on the EU to change the course. A more detailed elaboration on the debate evolving around the EU as normative or realist actors will follow in the theoretical considerations in chapter 2.

Whereas inconsistencies in the EU's sanction policy are prevalent at the global scale I decided to focus on sanctions targeted at Sub-Saharan Africa. Especially in the development context the relationship between the EU and Sub-Saharan Africa is of particular interest. With Europe being one of the biggest aid donors and Sub-Saharan African being on the receiving end, aid sanctions and conditionality play an important role in this context. Beyond this special relationship the factors that explain inconsistencies are also expected to be different to those that explain sanctioning behaviour on the global scale. For instance, it is often believed that Sub-Saharan Africa is one of the most frequently targeted regions of sanctions because of its weak economic and political importance (Crawford, 2001; Smith, 2003). In the same vein Driscoll, Halcoussis and Lowenbweg (2011, p. 442) argue that countries with strong cultural similarities (i.e., measured by geographical proximity or civil liberties) are less likely to impose sanctions against each other. However, even within Sub-Saharan Africa there are substantial inconsistencies which need explanation. From the literature I could identify 39 non-cases in Sub-Saharan Africa alone (see Appendix C). Interestingly most non-case countries have also been the target of sanctions at other times. This points to a sanction policy that is not only motivated by a single factor.

The geographical restriction has two additional practical advantages. First, it allows for a sufficient degree of similarities and differences across countries, which makes the analysis more comprehensible. Second, the restriction narrows down the number of results and improves the precision of results for the systematic literature review.

2. CONTEXTUALIZATION

2.1. DEFINING SANCTIONS

This thesis is interested in the reasons why the EU decides to impose or to not impose a sanction in reaction to objectionable behaviour. This involves the equal examination of sanction cases and cases where no sanction was imposed despite a norm violation. It is therefore required to clarify what is understood as a case and what is understood as a non-case in the context of this thesis.

Commonly, a sanction has a sender and a target. The sender is the country or a group of countries (i.e., the EU) that initiates the sanction. The target on the other hand is the country or group of people (i.e., a terrorist group) that is addressed with a sanction (Hufbauer, Schott, Elliott and Oegg, 2007, p. 44).

The term sanction includes a range of coercive measures, such as trade embargos, financial restrictions, or the suspension of aid. In the traditional sense sanctions are considered as an economic tool of foreign policy. Lowenfeld (2008, p. 850) defines this as follows:

“The term ‘economic sanction’ is used [...] to define measures of an economic—as contrasted with diplomatic or military—character taken by states to express disapproval of the acts of the target state or to induce that state to change some policy or practice or even its governmental structure.”

This is in line with Baldwin’s (2020, p. 107) approach to economic statecraft. He locates sanctions as a foreign policy tool between a milder diplomatic disapproval and a heavier military intervention. However, in more recent literature the term sanction has been stretched beyond the economic spectrum. Targeted sanctions, such as travel bans or asset freezes, have been used more frequently to directly target those responsible for the norm violation whilst protecting the general population of the target country (Hufbauer & Oegg, 2000, pp. 12-18). Targeted coercive measures are also sanctions in the sense that they aim to change ‘some policy or practice’, however they go beyond classic economic restrictions and are more refined to a specific topic or person.

In the context of Sub-Saharan Africa sanctions are also closely connected to the concept of conditionality. Most of the countries in this region are developing economies and recipients of aid donations from the EU. This donor-recipient relationship often entails conditionalities which allows the suspension of aid and preferences. Building on Koch’s (2015, pp. 102-103) typology of conditionality there are four types of conditionality: negative or positive ex-ante conditionality and negative or positive ex-post conditionality. Positive conditionality refers to the fulfilment of a condition (usually a political reform or measure) as a prerequisite for benefits and requirement for additional benefits, respectively. This includes the selection of recipient countries and amount of aid received. Negative conditionality on the other hand refers to more restrictive measures. Either ex-ante or ex-post by reducing or suspending benefits before or within an existing partnership when conditions are not met. Aid suspensions or aid sanctions are a negative ex-post conditionality.

Since this thesis emphasises on EU sanctions in Sub-Saharan Africa this specific type of sanction must also be considered. More recent efforts to define the term sanctions therefore expand the range of what is understood as a sanction. Portela (2010, ch. 2) identifies three categories of sanctions:

- i) The withdrawal of unilaterally given benefits
- ii) The suspension of international agreements
- iii) Bans (i.e., embargoes on commodities, band on financial services and investment, air transportation bans)

Especially the first category acknowledges negative conditionalities as sanctions. Withdrawal of aid or of preferential trade agreements such as the Generalised Scheme of Preferences (GSP) fall under this category. In a later work Portela (as cited in Portela 2021, p.270) then goes on to define sanctions as follows:

“They [sanctions] are routinely described as the deliberate interruption, reduction or withdrawal of normal relations or of a benefit that would otherwise be granted in response to what is considered objectionable behaviour by a target.”

This thesis will follow this broader understanding of sanctions because it is less concerned with the type of action the EU has chosen but rather with the higher-level question why in some situations of objectionable behaviour the EU chooses to act and in some cases it does not. Thus, economic sanctions, targeted sanctions and negative conditionality are all included when using the term sanction in the following.

Before turning to the definition of a non-case another important concept needs to be addressed. Next to cases and non-cases authors have also discussed the role threats, meaning the communication about the possibility of a sanction. A threat might or might not be followed by an imposition. Threats have gained importance in the sanction research because evidence has shown that threats are often already effective in changing the target’s behaviour and might even be more effective than an imposed sanction (Drezner, 2003, p. 654). For simplicity this thesis considers a threat that has not been followed by the imposition of a sanction as a non-case. However, it is important to notice that a sanction may not be imposed because the threat was already successful.

There is also some literature that not only looks at the EU’s decision to impose or not impose a sanction but also identifies inconsistencies in the type and severity of imposed sanctions (Brummer, 2009; Schneider, Weber and Inverinizzi, 2022). This thesis, however, considers this as two separate phenomena and only focuses on the former one. In essence,

this thesis is not concerned with the type of sanction imposed but focuses on the imposition of a sanction versus the non-imposition.

Turning to non-cases, no universal definition for non-cases exists. Instead, authors tend to phrase non-cases according to the focus of their study. This is because most studies that investigate non-cases are concerned with a specific breach of international norms. Del Biondo (2011a, p. 381) defines non-cases as the “non-application of Article 96 in ACP countries where flawed elections have taken place in the last ten years”. For Saltnes (2018, p. 166) non-cases are “cases where punitive measures were not imposed even though breaches of the human rights clause have occurred”. And Crawford and Kacarska (2019, p. 186) analyse those cases where no aid sanctions had been implemented “despite gross human rights violation”. All these studies focus on sanctions under conditionality clauses. Sanctions, however, can also be adopted outside of international agreements. Del Biondo (2015b, p. 77) thus expands her definition to: “non-cases are those where no or only weak sanctions were adopted, while the cases are those where strong sanctions were adopted or where there was a credible threat of sanctions.”. In contrast to the presented studies this thesis is neither concerned with a specific violation of international norms nor with a specific type of sanction. However, we can expand the given definitions for the purpose of this thesis. They all have in common that non-cases are the absence or non-application of a coercive measure as defined in the corresponding study. Sticking to Portela’s (2021) extensive understanding of sanctions as outlined above we can adopt this approach. Non-cases in this thesis are therefore cases where objectionable behaviour was *not* opposed by the interruption, reduction, or withdrawal of normal relations, even though a change of behaviour would be desirable according to international norms and in terms of legal frameworks. In short, no sanction – as defined above – was imposed.

This broad understanding of sanction cases and non-cases might not be suitable for all types of sanction research. However, in the systematic literature review we must expect to come across various specifications of sanction cases and non-cases. To achieve the objective of a comprehensive approach a broad definition is therefore appropriate.

2.2. EU SANCTIONS IN SUB-SAHARAN AFRICA

In the previous section I have defined what this study considers a sanction. To identify the reasons for the EU’s inconsistent sanctioning behaviour it is also of relevance to briefly discuss the international legal frameworks that allow the EU to adopt sanctions.

A large part of the sanctions imposed by the EU are grounded in the UN Security Council’s measures to maintain international peace and security. According to Chapter I, Article 2.2 of the UN Charter (1945) the EU is obliged to follow the UN’s sanction regime. Next to UN sanctions the EU can also decide to take autonomous external action. Why the EU only in some cases of norm violations decides to do so is the concern of this thesis. It is therefore of interest to take a closer look at the legal frameworks that constitute the EU’s foreign and implicit sanctions policy and to analyse the extent to which they contribute to

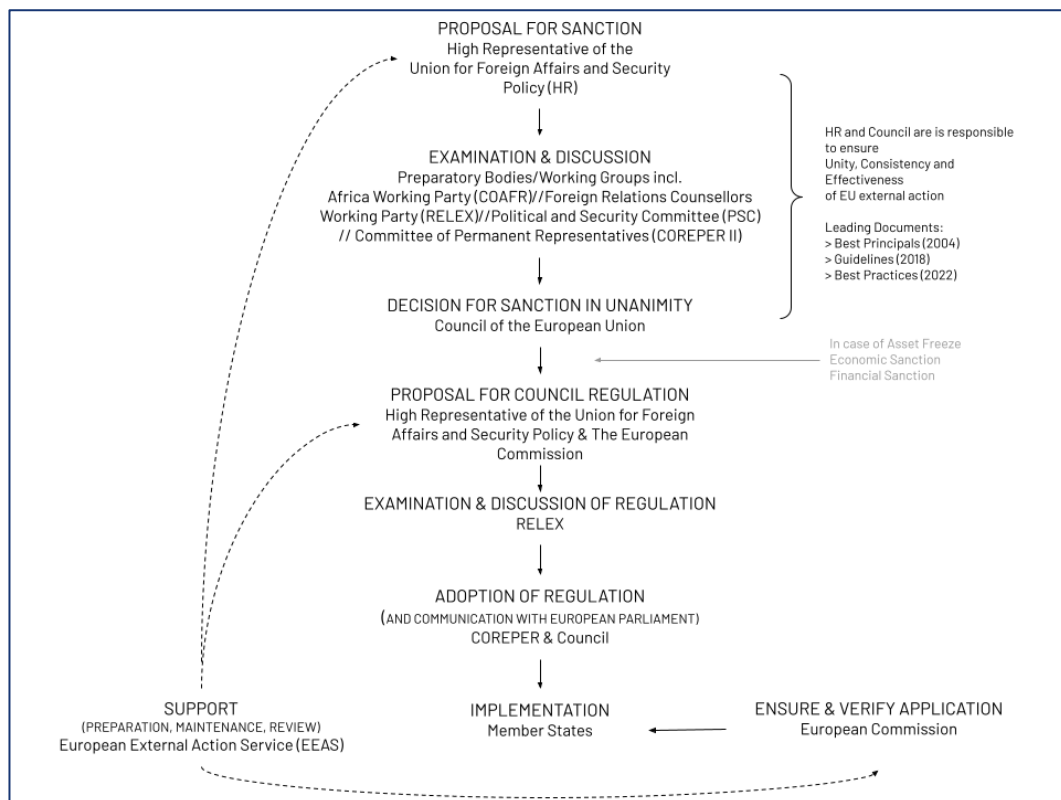


Figure 1: Adoption of a sanction under the CFSP (Source: Own illustration based on European Union, 2022a; European External Actions Service 2021)

the (in)consistency in the EU’s sanctioning behaviour. In the context of Sub-Saharan Africa three documents are of relevance. Namely, the Common Foreign and Security Policy (CFSP) established in 1993, the 2000 Cotonou Agreement which replaced the Lomé Treaty of 1975 and the Generalised Scheme of Preferences (GSP), introduced in 1971. Whereas the CFSP establishes the EU’s authority to impose sanctions, the Cotonou Agreements and the GSP are arrangements between the EU and other nations. More specifically, the CFSP is a policy framework that allows the EU to respond to external conflict and crisis. Sanctions that are implemented based on the CFSP are thus part of the EU’s external action aiming to “safeguard EU values, fundamental interests, and security” (European Union, 2022a). This also includes preserving peace as well as the promotion of democracy, human rights, and the

rule of law. Reasons to adopt a sanction thus include human rights violations, the deliberate destabilisation of a sovereign country and terrorism (ibid.).

Figure 1 displays the application procedure for a sanction under the CFSP. A first proposal is provided by the High Representative of the Union for Foreign Affairs and Security Policy (HR) which is supported by the European External Action Service (EEAS). The proposal is then examined and discussed by multiple working groups of the Council of the European Union (hereafter Council). A sanction proposal can only be adopted by unanimity of the Council. Sanctions can be of different form and intensity; in case of asset freezes, economic or financial sanction the HR and the European Commission (hereafter Commission) must provide an additional regulation proposal to the Council. This regulation is a binding document that entails all details about the sanction including the implementation procedure. Once the joint proposal is laid out it will be discussed by the Foreign Relation Counsellors Working Party (RELEX) whose main task is to share best practices for sanctions, revise and implement guidelines. RELEX forwards the regulation to the Committee of Permanent Representatives (COREPER II), which is the main preparatory body of the Council, and the Council itself. Once COREPER II and the Council adopt the regulation they inform the European Parliament. Based on the regulation sanctions are implemented by the EU member states, it is the Commissions responsibility to ensure and verify this implementation across all member states (ibid). During the entire procedure the EEAS plays a crucial role in supporting the different institutions. It helps with the preparation of the proposals, the maintenance, and the implementation of the sanctions as well as the constant review of sanctions (European External Action Service, 2021). A review must take place at least every twelve months (European Union, 2022a).

In the specific context of sanctions, the EEAS (2021) states that the responsibility to ensure “unity, consistency and effectiveness” of the sanction lies with the HR and the Council. The three leading documents that guide the Council’s adoption of sanctions are the ‘*Basic Principles on the Use of Restrictive Measures (Sanctions)*’ (hereafter Basic Principles) from 2004; the ‘*Guidelines on the Implementation and Evaluation of Restrictive Measures (Sanctions)*’ (hereafter Guidelines) and the ‘*Best Practices for the Effective Implementation of Restrictive Measures*’ (hereafter Best Practices) that was added in June 2022. However, the focus of the three documents lies on the effectiveness and effects of sanctions as well as the commitment for a comprehensive approach when using this tool but does not give further specifics on the decision-making process that leads to the adoption of a sanction. The 2018 Guidelines are mainly concerned with the standardisation of implementation, such as standardised wording

and aligned definitions in the legal documents (Council of the European Union, 2018, p. 4). Similarly, as already indicated in the title, the 2022 Best Practices revolve around the effective implementation of sanctions. They are the most recent addition to the Guidelines and take a more legal perspective as they outline best practices of implementation in the context of the EU's and the national legal systems (Council of the European Union, 2022, p. 3). Neither the guidelines nor the Best Practices give a more detailed explanation of when and what kind of sanctions the EU should consider in specific cases. In the introduction of the Guidelines, it clearly states that they do “not address the political process leading to the decision to impose or repeal such restrictive measures.” (Council of the European Union, 2018, p. 4). For the policy consideration it refers to the Basic Principles. However, this third document also does not state any specifics. Reasons to adopt sanctions are declared in point 3 of Annex I:

“If necessary, the Council will impose autonomous EU sanctions in support of efforts to fight terrorism and the proliferation of weapons of mass destruction and as a restrictive measure to uphold respect for human rights, democracy, the rule of law and good governance.” (Council of the European Union, 2004, p. 2).

This statement of objectives in the broadest sense does not deliver a guideline of what kind of measures are considered appropriate in any specific case. The three documents discussed here might serve the purpose of “unity” and “effectiveness” as stated by the EEAS, however the question of consistency remains.

Next to the CFSP there are two other important official documents that establish the EU's foreign policy towards Sub-Saharan Africa: The GSP and the Cotonou Agreement. The GSP is a trade agreement that assures preferences, in the form of import duty reduction, to countries that have an income level below ‘upper middle income’ as classified by the World Bank (European Union, no date). The GSP is an important economic policy in the EU's efforts to support sustainable development. In the context of sanctions, the GSP is relevant insofar as it contains a negative conditionality. Article 19 of the General Provisions of the GSP (Regulation (EU) No 978/2012, 19:1) allows the withdrawal of any of the trade benefits in case of “serious and systematic violation of principles laid down in the conventions listed in Part A of Annex VIII;” Annex VIII lists fifteen international human and labour rights conventions. Article 19 allows the EU to suspend a country from the GSP in case the beneficiary violates the norms laid out in the conventions. It also includes four more reasons for withdrawal, however less relevant in the context of this study. This negative conditionality lays the groundwork for the possibility to impose a (trade) sanction. Compared to CFSP the

GSP regulation delivers a much narrower reasoning for a sanction in from a withdrawal. However, the procedure towards a sanction can be time consuming. In case of a violation of human and/or labour rights any member state, legal or natural person can report this to the Commission. The Commission can then initiate an investigation, which can last over a year. Only when the Commission verifies the accusations a proposal for withdrawal will be handed to the Council (Portela and Obie 2014, p. 66). In addition to the lengthy process, Portela and Obie (ibid., p. 63;71) also point out that withdrawal of the GSP has only been used in very few cases and always in addition to a CFSP sanction. Thus, although the GSP regulation specifically suggests the withdrawal of preferences in case of a violation of any of the fifteen human and labour rights conventions the application of Article 19 cannot be considered consistent.

The third relevant document in the Cotonou Agreement between the EU and 79 countries in Africa, the Caribbean, and the Pacific (ACP). It is the foundation for the economic and political development cooperation between the parties. In the context of EU sanctions against Sub-Saharan Africa it is of particular importance due to its special emphasis on human rights, democratic principles, and the rule of law. Article 96 of the agreement allows the initiation of formal diplomatic consultations between the parties in case of a violation of these norms. Should the procedure not lead to a consensus the parties can withdraw from the initial agreement and take ‘*appropriate measures*’ (European Union 2022b). Appropriate measures in this case can be understood as suspension of the cooperation, specifically aid sanctions. Article 96 is closely connected to Article 8 and 9 which establish constant political dialogue and emphasise on the importance of respect for human rights, democratic principles, and the rule of law. For instance, it defines good governance:

“[...] good governance is the transparent and accountable management of human, natural, economic and financial resources for the purposes of equitable and sustainable development. It entails clear decision-making procedures at the level of public authorities, transparent and accountable institutions, the primacy of law in the management and distribution of resources and capacity building for elaborating and implementing measures aiming in particular at preventing and combating corruption.” (Partnership Agreement (EU), 2000/483/EC, 2000, 9:3)

The understanding of human rights, democracy and the rule of law is thus laid in more detail in the Cotonou Agreement than in the leading documents of the CFSP. However, the critique that Article 96’s wording still leaves room for interpretation and does not state clearly

what kind of measure should be taken in which cases, remains (Mackie and Zinke 2005, p. 5).

Consequently, none of the frameworks delivers a clear guideline that strictly requires the implantation of a sanction in reaction to a specific objectionable behaviour. The unspecific and interpretable wording as well as the complex procedures towards a sanction leave diplomats with a lot of political leeway. Uncertainty in the legal frameworks for sanctions policy is a first source for inconsistency, however it does not sufficiently explain what factors are taken into account in the decision-making process. Especially considering the EU's self-declared quest for consistency we must assume that it is a multitude of factors that lead to the decision to (not) impose a sanction. In the following section I will therefore share some theoretical considerations that explore the origins of political inconsistency.

2.3. THEORETICAL CONSIDERATIONS

The objective of this thesis is to understand the influences and considerations that shape the inconsistency of the EU's sanctioning behaviour. In the previous section I showed that the EU does strive to be consistent in its foreign policy, however there is no policy framework that clearly guides this goal. Because of its strong emphasis on international norms the EU is often seen as a normative power but at the same time, it is easily critiqued as a power that betrays its own values, precisely because of the inconsistent application of sanctions.

The term 'Normative Power Europe' is shaped by Manners (2002, p. 252), who suggests that the EU has a unique, historically grown normative basis for its interactions with the world. As such it promotes norms, and its actions are primarily informed by these norms. Birchfield (2011, p. 159) concludes that the EU's development policy, which is closely connected to sanctions, can also be seen in the light of a normative approach as put forth by Manners. Contrary to Manners perspective other authors have taken a more realist stance. Hyde-Price (2008, p. 32) argues that it is impossible for the EU to be a normative power given the fact that one of its main purposes is to foster the prosperity and security of its member states. He continues that a normative path is not only hypocritical but also ineffective (*ibid.*, pp. 34-35). Thus, the EU's foreign policy will only be informed by norms when it does not contradict with its self-interests (*ibid.*, p. 39).

Thus far the theory delivers two possible views that could explain the EU's foreign policy choices. The normative perspective argues that norms are weighted more heavily than interests for foreign policy decisions. The realist perspective takes the opposite stance, concluding that interests are more important than norms.

Diez (2013, p. 201) also acknowledges that seeing Europe as a purely normative power can too easily lead to judgements of hypocrisy. Indeed, in a display of the inconsistent application of sanctions Brummer (2009, pp. 202-206) heavily critiques the normative understanding of the EU and states that the EU is much more driven by economic and security interests and consequently loses credibility. However, Diez (2013, pp. 201-202) critique of the 'Normative Power Europe' is not the possibility of hypocrisy but rather the weaknesses of the terminology as he acknowledges that norms and interests are often intertwined. It therefore might be neither purely normative nor hypocritical. Following this line of thought, several political scholars argue that political inconsistency is in fact inevitable. Building on Machiavelli's *The Prince* Tillyris (2016, p. 7) writes: "The popular [moral] way of thinking about the relationship between hypocrisy and democratic politics [...] displaces the complex realities of democratic politics." Tillyris interpretation refers to domestic politics and conflict of interest of a leader to satisfy voters and the leader's interest to remain in power which urges him or her to cooperate with political opponents (ibid., p. 10). The argument is that societies are pluralistic and, to be democratic, leaders must deviate from their own truth – thus hypocrisy is inevitable in a democratic system. The core of the supposed hypocrisy lies in the complexity of opposing interests in politics (ibid, p. 14). We can translate this into foreign policy by building a bridge to Kaempfer and Lowenbergs' (1988) public choice approach to sanction theory. The authors argue that sanctions are not always designed to change the target country's behaviour most effectively but instead reflect domestic consent with the sanction. Different interest groups can either gain or lose utility from a foreign economic policy. A policy maker under the assumption that the policy maker aims to remain in power needs to respond to the different interest groups (ibid., pp. 787-788). The ability to organise and generate political pressure will then determine if and what form a sanction will be imposed (ibid., p. 789). McLean and Whang (2014, p. 597) add to this by displaying that the probability for a sanction increases with the level of voter awareness. Note that interest in the context of the public choice approach can be of economic and non-economic kind; for instance, a group could gain utility from the promotion of human rights or the continuation of a trade agreement (Halcoussis, Kaempfer and Lowenberg 2021, pp. 153-154). The public choice approach relates to Tillyris' idea of inevitable hypocrisy in a democratic system. By the simple fact that the policy maker answers to the public he or she can no longer decide for what is the 'right' thing to do but decides for what best reflects the public demand.

Based on the considerations by Diez, Tillyris, Kaempfer and Lowenberg the discussion about a norm versus interest informed policy becomes more complex than Manners and Hyde-Price's binary understanding. In essence, Kaempfer and Lowenberg (1988) add two important points. First, the sanction choice is informed by mixed motives and utility can be lost or gained from economic as well as humanitarian actions. Second, utility and awareness about the sanction creates public pressure that influences the sanction application. Because of these considerations the EU's sanctioning behaviour might be more context dependent than value dependent.

Another theoretical strand that acknowledges that the complexity of these interactions in foreign policy is rooted in the conditionality literature. Murshed (2009, p. 2) develops a principal-agent model for the donor-recipient relationship of aid where the donor is the principal, the recipient is the agent. He argues that donors have altruistic and non-altruistic motives in their aid allocation and that both must be considered in analytical models (ibid.). When translated to (aid) sanctions the assumption is that there is also altruistic and non-altruistic motivation to (not) impose a sanction.

Murshed's model (ibid., pp. 3-5) shows that a single agent (the aid receiving country) deals with multiple principals (i.e., foreign vs. domestic donors) that have conflicting interests (i.e., poverty reduction vs. commercial benefits). Consequently, the recipient cannot fulfil either of the demands and payments from the donor to the recipient will decline. Murshed (ibid.) introduces a model with two principals (1,2) that have each have a utility depending on the tasks completed by the agent (x_1, x_2) the cost of the task (h), the agent's reservation utility (v) and the payment made to the agent (w).

The two principals' utility functions look as follows:

$$U_1 = hx_1 - v - wx_1 - w[hx_1^2 + hx_2^2 + 2kx_1x_2]$$

$$U_2 = hx_2 - v - wx_2 - w[hx_1^2 + hx_2^2 + 2kx_1x_2]$$

The variable k indicates if the two tasks are substitutes (positive sign) or complementary (negative sign). Murshed (ibid.) then shows that the joint utility would increase if the principals cooperated and traded their objectives.

Maximising the individual utility functions with respect to x and rearranging delivers the following optimal payment:

$$w = \frac{h}{1+2x(h+k)}$$

Whereas maximising the joint utility function (by summing up the two individual functions) with respect to x and rearranging delivers the following optimal payment:

$$w = \frac{h}{1+x(h+k)}$$

Because of

$$w = \frac{h}{1+2x(h+k)} < w = \frac{h}{1+x(h+k)}$$

cooperation of principals would be beneficial.

Whereas Murshed's model works with two different principals –the donor and a domestic actor – this can also be translated to different objectives within the principal's government in the context of sanctions. For instance, principal 1 is concerned with security issues and thus rather does not suspend aid, since the agent/target is a good ally in securing the region. At the same time the agent/target is violating democratic principles which is why principal 2 advocates for a sanction. The joint utility function would then be the optimal sanctioning level. Of course, questions of how much representative power each group has also play a role. Similar to Kamepfer and Lowenberg's (1988) public choice approach this model displays i) that competing normative and realist interests exist and ii) that principals (policy makers) have to trade their objectives to achieve the best outcome. In fact, the EU decision-makers are simultaneously principle and agent. They are principle(s) to the recipient/target country and agent to the different domestic interest groups. The job is to trade the different interests. Thus, inconsistencies in sanction policy can be related back to a bargaining game between multiple principles.

Murshed argues (*ibid.*, p. 1) that the fact that principals trade objectives would make aid more effective if it was managed by only one global agency that prioritises only one goal, i.e., poverty reduction. The fact that bilateral aid relationships exist is evidence for the existence of interests beyond those promoted by international agencies like the IMF or the World Bank in these relationships. Logically the same is true for suspension of aid. If only one global agency with one objective would exist, aid would also be suspended according to this single objective. Consequently, the fact that the EU also chooses to impose autonomous sanction could be taken as an indication for EU interests that go beyond the UN mandate.

The theoretical considerations outlined above display that the analysis of inconsistent foreign policy requires a comprehensive approach. In a complex global playing field, it is easy to mark inconsistent foreign policy as hypocrisy. However, the nature of policy making itself inhabits these inconsistencies and must be carefully weighted. By disentangling this complexity this thesis aims to contribute to the debate and to develop a deeper understanding of the EU's motivations in foreign policy.

3. METHODOLOGY

Based on the theoretical consideration the expectation of this thesis is that the EU's decision to sanction or not to sanction a country cannot be traced back to one specific aspect but rather to several influences that are weighed against each other. Thus, a methodology that allows to control for a multitude of variables, to generate a comprehensive overview of the influential factors, would be preferable.

Conducting interviews is a method that has been used frequently to answer related research questions. Interviewing the decision-makers behind the EU and/or carrying out a comparative case study could be a valid option for this thesis. However, these methods would have required a reduction to a few selected cases to keep the interviews and analysis manageable. Unless the number of cases selected is larger than what has been done so far, selecting a few prominent cases would not only risk a selection bias (Saltnes, 2013) but it would also not sufficiently serve the purpose to get a more comprehensive understanding of the EU's sanctioning. A classic qualitative approach is therefore not suitable.

An option is to carry out a quantitative statistical analysis with a large n dataset. This approach would allow to control for a multitude of variables whilst keeping the analysis manageable. The selection of explanatory variables could be informed by the literature and expert interviews, resulting in a mix method approach. However, the coverage of the available databases on EU sanctions is not sufficient to answer the research question. In the following two sections I will compare five databases that document sanctions and take the EU as unitary sender into account and discuss their usability to answer the research question. Three main problems occur: The uneven coverage of cases, the insufficient coverage of variables that influence the EU's sanctioning decision and the missing coverage of non-cases.

Since neither a qualitative nor a quantitative approach can sufficiently answer the research question with the given resources another method had to be preferred. Other research has already addressed the inconsistency in the EU's foreign policy as well as the influential factors that lead to a sanction. An alternative to the approaches discussed above is therefore a systematic literature review. By building on – mostly qualitative – studies that have been done so far, I am able to identify a range of influential factors that inform the EU's sanctioning behaviour in a systematic way. By comparing the scholars' findings, I can also develop a better understanding of the EU's foreign policy decision – if it is more informed by self-interests or if it is indeed normative. Finally, a literature review helps to identify important research gaps that would need to be filled to better answer the research question. Consequently, a systematic literature review was chosen as a method for this thesis.

DATABASE CHARACTERISTICS		EUROSANCT		EUSD		TIES		GIGA		HSE	
AUTHORS	Weber P.M., Schneider G. (2020)		Giumelli F. (2020)		Morgan T.C., Bapat N.A., Kobayashi Y. (2013)		Portela, C. von Soest, C. (2012)		Hufbauer, G.C., Schott, J.J., Elliott, K. (2007)		
TIME COVERED	1989-2015		1994-2019		1945-2005		1990-2010		1914-2006, selected pre world war I cases		
CASES COVERED (TOTAL)	326		48		1412		121		174		
EU SANCTION CASES COVERED	81 (33 EU as primary sender)		48 (42 targeted at countries)		24 (17 EU as primary sender)		44		22 (21 targeted at countries) (12 EU as primary sender)		
COVERING THREATS	YES		NO		YES		NO		NO		
INCLUDES EPISODES	NO		YES		NO		YES		YES		
NUMBER OF VARIABLES COVERED (incl. Code, Sender, Target, Source)	85		37		64		9		34		
INCLUDES A VARIABLE THAT CAPTURES ECONOMIC/NORMATIVE INTEREST	NO		NO		YES		NO		YES		
SELECTION CRITERIA	The sanctions should target the (de facto) government of the country and thus those actors who hold power over (the majority of) a country's territory. EUSANCT consequently not does cover any measures against non-state actors. (Weber and Schneider, 2020b, p. 3)		First, the database includes all CFSP sanctions imposed by the EU since the Treaty of Maastricht as well as the politically binding arms embargo on China. The sender, which is conventionally the actor who enacts sanctions, is the EU when acting autonomously, while targets are the actors against whom sanctions are enacted. (Giumelli, Hoffmann & Książczaková, 2020, p. 7)		By definition, a sanctions must: 1. involve at least one sender state and a target state. 2. Be implemented by the sender in order to change the behavior of the target state. (Morgan, Bapat and Kobayashi, 2013b, p. 1)		"Included are all sanctioned countries which have been coded - at least - at the start of sanction episodes as 'autocratic regimes' by the Hadenius/Teorell/Wahman dataset on authoritarian regimes (2012). (Portela and von Soest, 2012b, p. 2)		YES Estimation of the economic and political sender cost (Net gain to sender, little effect on sender, modest loss to sender, major loss to sender)(Hufbauer, Schott and Elliott, 2007, pp. 108-112) Also, economic health and political stability of target country, though used to capture effectiveness (pp. 99-106)		
START DATE	A sanction case typically begins when a threat is made by the sender, or the sender imposes a sanction against the target. If a sender is not involved in the case, the variable is coded as missing. (Weber and Schneider, 2020b, p.3)		"First date of case/episode based on the date of decision" (Giumelli, 2020b, p. 1)		A sanctions cases typically begins when a threat is made by the sender, or the sender imposes sanctions against the target (Morgan, Bapat and Kobayashi, 2013b, p. 2)		"A case starts with the first imposition of sanctions against one target [...]" (Portela and von Soest, 2012b, p. 2)		"[...] the episode [starts] with the first recorded sanctions threat from official sources or the first recorded sanctions event, whether or not the threat or sanction was made public at the time." (Hufbauer, Schott and Elliott, 2007, p. 48)		
END DATE	The sanction case is considered to end if any of the following conditions are met: a) The target state acquiesces to the demands of the sender. b) The target state changes, if at any time, the threat or the imposition of the sanction is no longer directed at the original target state, then the case is considered concluded. c) The issue directed at the target state alters, if the sender threatens a new sanction against the target, but is referring to a new, separate issue, then a new case is considered to begin. d) A sender lifts its sanctions without reaching a policy change of the target. In the case of the EU, this also includes sanction episodes which are not prolonged after the expiration date stated in the resolution passes. e) A threat case is considered to be end if the sender declares that the threat is no longer valid, the target acquiesces to the demands of the sender of the threat is not repeated for more than a year." (Weber and Schneider, 2020b, p. 3)		"It is possible that the end of a case in the database does not mean that restrictive measures were lifted, but it could mean that the UN decided to impose sanctions that had been previously adopted by the EU (Giumelli, Hoffmann & Książczaková, 2020, p. 8) "Additionally, it is also possible that, while sanctions have been suspended the case is still ongoing. This is due to the fact that suspension is treated differently to the lifting of sanctions. The suspension of sanctions means that the case continues." (Giumelli, Hoffmann & Książczaková, 2020, p. 8)		A sanctions case is considered to end if any of the following conditions are met: (a) The target state acquiesces to the demands of the sender state. (b) The target state changes, if at any time, the threat to or the imposition of sanctions is no longer directed at the original target state, the case is considered concluded. (c) The issue directed at the target state alters, if the sender(s) threaten new sanctions against the target, but are referring to a new, separate issue, a new case is considered to begin. (Morgan, Bapat and Kobayashi, 2013b, p. 2)		"A case [...] ends when the sender(s) remove/s [the sanctions]." (Portela and von Soest, 2012b, p. 2)		"We treat the episode as ended when the sender or the target country changes its policies in a significant way or when the campaign simply withers away." (Hufbauer, Schott and Elliott, 2007, p. 48)		

Table 1: Comparing Databases (Source: Own Analysis based on Weber and Schneider, 2020a; 2020b; Giumelli, Hoffmann and Książczaková, 2020; Morgan, Bapat and Kobayashi, 2013a; 2013b; Portela and von Soest, 2012a; 2012b; Hufbauer, Schott, Elliott and Oegg, 2007)

DATABASE CHARACTERISTICS	EUROSANCT	EUUSD	TIES	GIGA	HSE
NUMBER OF SANCTION TYPES IDENTIFIED	13	6	10	12	4
SANCTION TYPES	Total Economic Embargo Partial Economic Embargo Import restriction Export restriction Blockade Major Financial Sanction Targeted Financial Sanction (a) Targeted Financial Sanction (b) Termination of Foreign Aid Travel Ban Diplomatic Sanctions Arms Embargo Other (Weber and Schneider, 2020b, pp. 6-7)	Arms Embargo Travel Ban Financial Restriction Trade Restriction Diplomatic Restriction (Giunelli, 2020b, pp. 1-2)	Total Economic Embargo Partial Economic Embargo Import Restriction Export Restriction Blockade Asset Freeze Termination of Foreign Aid Travel Ban Suspension of Economic Agreement Other (Morgan, Bapat and Kobayashi, 2013b, p. 10)	Arms Embargo Freezing of Financial Assets Aid Sanctions Commodity Embargo Comprehensive Trade Embargo Diplomatic Sanctions Enforcement of Sanctions Flight Ban Financial Sanctions Interruption of Military Co-Operation Other (Portela and von Soest, 2012b, pp. 5)	Export Sanctions Import Sanctions Financial Sanctions (incl. Aid Sanctions) Asset Freeze (Hufbauer, Schott and Elliott, 2007, pp. 91-98)
NUMBER OF OBJECTIVES IDENTIFIED	14	7	15	7	5
OBJECTIVES	Contain Political Influence Contain Military Behaviour Leadership Change Release Citizens, Property or Material Solve Territorial Dispute Deny Strategic Materials Retaliate for Alliance or Alignment Choice Improve Human Rights End Weapon/material Proliferation Terminate Support of Non-State Actors Deter or Punish Drug Trafficking Practices and Corruption Violation of Constitutional Order Other (Weber and Schneider, 2020b, pp. 4-5)	Democracy promotion Conflict Management Post-Conflict Management Non-Proliferation Terrorism EU Interests International Norms (Giunelli, 2020b, p. 3)	Contain Political Influence Contain Military Behaviour Destabilize Regime Release Citizens, Property, or Material Solve Territorial Dispute Deny Strategic Materials Retaliate for Alliance or Alignment Choice Improve Human Rights End Weapon/ Materials Proliferation Terminate Support of Non-State Actors Deter or Punish Drug Trafficking Practices Improve Environmental Policies Trade Practices Implement Economic Reform Other (Morgan, Bapat and Kobayashi, 2013b, p. 3)	Democratization Support Human Rights Fight against narcotics Stop biological and chemical weapons of mass destruction End nuclear proliferation Termination of belliciosities, establishment of peace Fighter terrorism, including releasing of hostages Other (Portela and von Soest, 2012b, p. 5)	Change target-country policies in relatively modest and limited way Change target country's regime Disrupt military adventure Impair the target country's military potential Change target-country policies in a major way (Hufbauer, Schott and Elliott, 2007, pp. 52-54)
FOCUS ON SUB-SAHARAN AFRICA					
RESTRICTIONS APPLIED	Only cases where the EU was identified sender Only cases in which a Sub-Saharan African country was a target	Only cases in which a Sub-Saharan African country was a target	Only cases where the EU was identified sender Only cases in which a Sub-Saharan African country was a target	Only cases where the EU was identified as sender Only cases in which a Sub-Saharan African country was a target	Only cases where the EU was identified as sender Only cases in which a Sub-Saharan African country was a target
CASES - IMPOSED SANCTIONS EU AS SENDER & SSA AS TARGET	35 (10 with EU as primary sender)	10	6 (4 with EU as primary sender)	21	9 (4 with EU as primary sender)

Table 1: Comparing Databases: (Source: Own Analysis based on Weber and Schneider, 2020a; 2020b; Giunelli, 2020a; 2020b; Morgan, Bapat and Kobayashi, 2013a; 2013b; Portela and von Soest, 2012a; 2012b; Hufbauer, Schott, Elliott and Oegg, 2007) - continued

3.1. COMPARING DATABASES

For the context of this thesis five databases have been identified: The EUSANCT Dataset (Weber and Schneider, 2020a), the EU *Sanctions Database* EUSD (Giumelli, 2020a), the *Threat and Impositions of Sanctions* (TIES) Database (Morgan, Bapat and Kobayashi, 2013a), the GIGA Sanctions Dataset (Portela and von Soest, 2012a) and the Database by Huffbauer, Schott, Elliot and Oegg (HSE) (2007, 3rd Edition). Out of the five databases EUSD is the only database that *only* covers EU sanctions. All other databases either include the US and the UN as sender (EUSANCT, GIGA) or any possible sender (TIES, HSE). The juxtaposition of the dataset's characteristics is documented in table 1. First and foremost, the total number EU sanction cases covered varies significantly across the databases cases (counting only imposed sanctions). The largest number of EU sanctions is covered by EUSANCT, counting 81 cases in total and 35 imposed sanctions against a Sub-Saharan African country. This is followed by EUSD and GIGA which cover 48 and 44 cases respectively. The later one covers 21 cases in Sub-Saharan Africa and the former one covers 10 cases. TIES is the largest database overall; however, it only covers 24 cases with EU as first sender, including six cases targeted at countries in Sub-Saharan Africa. EUSANCT and GIGA both build on the HSE dataset, which covers 22 cases with the EU as principal including nine cases targeted at Sub-Saharan Africa. EUROSANCT, TIES and HSE document multiple senders with the primary sender being the country or supranational organisation which initiated the sanctions case. When only those cases are considered where the EU is the primary sender the numbers decrease, especially in the EUROSANCT database that includes only 33 cases where the EU is a primary sender including 10 cases targeted at Sub-Saharan Africa. In TIES the total number of cases reduced to 17 and 4 respectively. In HSE the number of EU cases almost halves to a total of 12 cases and 4 cases in Sub-Saharan Africa.

The incongruent coverage can partially be explained by different selection criteria for sanction cases and variable definitions. Whereas TIES and EUSANCT do not put any restriction on the type of sanction, EUSD does only include autonomous EU sanctions that are established under the CFSP, GIGA only includes sanctions that are targeted at autocratic regimes and HSE only includes trade and financial sanctions.

Across the databases start and end dates are also defined slightly differently, resulting in incongruencies. This is mainly grounded in the fact that EUSANCT and TIES include threats that do not necessarily translate into the imposition of a sanction, thus they consider the utterance of a threat as the starting point. EUSD, GIGA and HSE on the other hand only account for the date of the decision and imposition of sanctions respectively. For this reason,

only imposed sanctions were considered for the present comparison. When the date of imposition deviated more than 6 months between databases, and it was not within the timeframe of a case with multiple episodes the sanction was considered a separate case. For the complete comparison of coverage across the databases see Appendix A and B.

Given these slight differences in definitions one would expect that the databases have large overlaps. For instance, all sanctions documented in EUSD should be included in

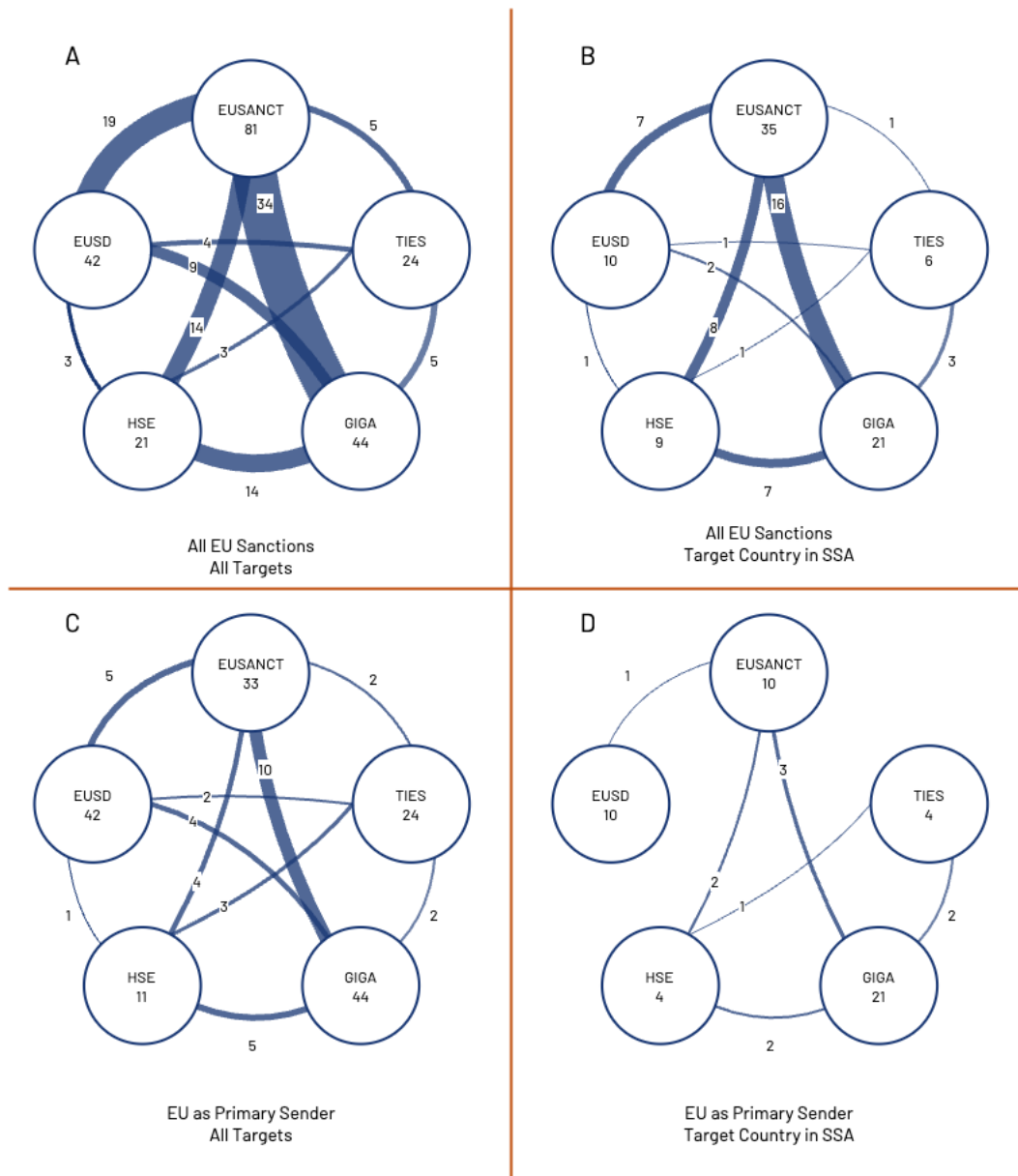


Figure 2: Overlap of cases across databases. The numbers below the name of the database indicate the number of cases covered in total. The lines and numbers between the databases indicate the overlap. (Source: Own illustration based on Weber and Schneider, 2020a; Giunelli, 2020a; Morgan, Bapat and Kobayashi, 2013a; Portela and von Soest, 2012a; Hufbauer, Schott, Elliott and Oegg, 2007)

EUSANCT. However, this is not the case, the two databases only overlap in 19 cases (see figure 2). Even when accounting for the different timeframes the databases cover and the fact that EUSANCT does not cover any sanctions against non-state actors the overlap is too

small. The direction of omitted cases goes both ways. EUSANCT documents which sanctions are based on the CFSP, all except one (sanctions against North Korea in 2002) are also recognized in EUSD. EUSD on the other hand recognized sanctions against Burma/Myanmar from 1996-2018 as a case which this finds no documentation in EUSANCT. Similarly, the overlap between EUSANCT, TIES and HSE is unexpectedly small. EUSANCT builds on TIES and HSE but still only 63% of the HSE and 21% of the TIES sanctions are included in EUSANCT. The GIGA set introduces aid sanctions against Zambia in 1996, Comoros in 1999 and Peru in 2000 that are not recognized by any other of the databases.

Combined the databases cover 131 EU sanction cases and 164 episodes. Out of the 164 episodes 107 episodes are only covered by one of the databases and no single episode is covered by all five databases. When narrowed down to cases where the EU is the sender and a country in Sub-Saharan Africa is the target the overlap is still small, albeit more congruent. EUSANCT captures eight of the nine cases documented in HSE, the ninth case is Togo 1992, though EUSANCT covers a sanction case against Togo in 1993. GIGA and HSE also overlap on seven of nine cases captured by HSE. The other two cases are sanctions against Gambia in 1994 and Ivory Coast in 1999, both are cases where the EU was not the primary sender. Yet GIGA also covers other cases where the EU was not the primary sender. The reason for the difference might be due to the selection restriction in GIGA which only covers sanctions that are targeted at autocratic regimes. For all other comparisons there are still substantial differences (see figure 2, box B and D). A further specification to only cases where the EU was the primary sender makes no differences. For this comparison all cases where at least one database indicated that the EU was not the primary sender were excluded. In fact, when looking at the cases where the EU was the primary sender and the target country was in Sub-Saharan Africa the maximum overlap is 50% (see figure 2, box C and D).

The number of sanction types and objectives is also considerably different across the databases. EUSANCT accounts for 13, GIGA for 12, TIES for 10, EUSD for 6 and HSE for only 4 different sanction types. This difference can be explained by the level of detail the authors consider in the definition of these types. This, however, should not lead to differences in coverage as less detailed types usually include the more detailed out types. For instance, EUSANCT and TIES consider total economic embargoes, partial economic embargoes, important restrictions, and export restrictions separately whereas EUSD includes all of these under trade restrictions. One difference that is worth pointing out is that all datasets except the EUSD and HSE list 'termination of foreign aid' or 'aid sanctions'

separately. In HSE this falls under ‘financial restrictions’, this might be the same case for EUSD, however this is not clearly defined by the authors. Since aid suspension or aid sanctions are of particular importance in the development context this category should be considered separately as it can serve to classify the severity of the EU’s reaction.

Similarly, there is a difference in the detailing of objectives or issues identified. EUSANCT builds a lot on TIES, thus the distinction of objectives is quite similar with only small adjustments, which leads to 14 different objectives in EUSANCT and 15 in TIES. EUSD and GIGA list seven different goals each. Since GIGA focusses on sanctions against democratic regimes these goals deviate from the objectives listed in the other datasets and are quite narrow such as ‘Fight against narcotics’ or ‘end nuclear proliferation’. EUSD on the other hand takes a high-level approach referring to objectives such as ‘Conflict management’ ‘Self-Interest’ or ‘International Norms’. HSE as the oldest database is the least detailed and accumulates different specific types in four categories. Again, the differences in detailing out the objectives cannot be considered the sources for inconsistent coverage.

To conclude, this brief comparison has shown that there are some substantial inconsistencies in the coverage of sanctions cases across the datasets that cannot be explained by differences in definition and selection of sanction cases. Albeit not the focus of this thesis this is also an important finding for future research. The following section will continue to discuss the usability of the presented databases for the purpose of this thesis.

3.2. USABILITY FOR ANALYSING THE EU’S SANCTIONING BEHAVIOUR

The previous chapter has compared five databases that include EU sanctions. I have shown that there are substantial differences in the coverage of cases also when narrowed to target countries in Sub-Saharan Africa. Next to coverage issues two additional problems occur. First, the extent to which these databases give an indication about the EU’s motivation to impose a sanction are very limited. Mainly this is documented in the objective variable. For instance, EUSANCT accounts for ‘Improve Human Rights’ and EUSD accounts for ‘Self-Interest’ and ‘International Norms’ (see table 1). However, it is easy to conclude that this is not detailed enough. Self-interest could be various (securitization, energy security etc.). TIES gives some more information by accounting for sender costs. However, this is only broken down to the categories ‘minor’, ‘major’, and ‘severe’ as well as a variable for monetary cost (if applicable). Again, non-monetary sender costs could vary significantly and are crucial in explaining the EU’s sanctioning behaviour. Additionally, the EU might also have concerns

about unwanted costs in the target country, such as the further deterioration of human rights (Saltnes, 2020; Peksen, 2009). To shed light on the EU's sanctioning behaviour with a quantitative data analysis it would therefore be necessary to document expected costs and concerns in more detail. Certainly, the challenge would be to find the correlating data (i.e., the target country's public expenditure on poverty reduction) and to quantify variables (i.e., public or media pressure).

Second, there is no database currently available that sufficiently documents non-cases. By only looking at sanction cases one can merely identify the influential factors to impose a sanction. The criticism that the EU acts hypocritically, however, emerges from the fact that it decides to *not* impose sanctions against countries that have violated international norms. Thus, analysing the factors that lead to non-cases are equally important. Only in comparison with the alternative outcome can we sufficiently explain the situation in place. A dataset that allows for the quantitative analysis of the EU's sanctioning behaviour would therefore take a backwards approach. By first investigating where objectionable behaviour occurred, then detailing the different concerns and interests of the EU (and other senders) and only as a final step documenting if a sanction or a threat followed the event (or not). The databases cover this only to a limited extent. TIES also documents threats that have not been followed by sanctions. Next to threats EUSANCT also includes several cases where a country was sanctioned by the US or the UN, however not by the EU – thus those cases could be understood as EU specific non-cases. Based on this an important contribution has been made by a recent study. Schneider, Weber and Internizzi (2022) analyse the EU's inconsistent application of sanctions (at global scale) quantitatively. The findings confirm that sanctions are implied when international norms are breached, and that public pressure impacts the sanctioning behaviour (ibid., pp. 18-19). However economic and political interest are only of marginal importance (ibid., pp. 12-13). Even though this could be a starting point for the analysis, the available data on non-cases cannot be considered sufficient because the foundation for non-case is a sanction by another sender and not the norm violation itself.

A documentation objectionable behaviour that has not been followed by a sanction has partially been done by researchers for the purpose of case studies. Appendix C is a list of non-cases that could be identified from the literature and do not find any documentation in the five databases. Note that this has not followed a systematic approach but is a random collection. It contains 39 non-cases all located in Sub-Saharan Africa. Interestingly the majority of the (potential) target countries that occur in this list have also occurred in the list of sanctioned countries. This might be an indication that the theoretical considerations of

chapter 2 are valid. Instead of normative or realist objectives being dominant, the decision to impose a sanction is more complex and context specific. Another possible explanation would be the time component. It is possible that a country gained or lost importance for the EU and thus there are different reactions to objectionable behaviour in the same country. Something that would be important to consider in a database that documents cases and non-cases.

Expanding the list of non-cases to other regions and combining it with the existing case-based datasets as well as variables that one needs to account for would be valuable for future research. Such a database needs to be created very conscientiously and carefully, a task that would have gone beyond the scope of this thesis. As discussed at the beginning of this chapter I will conduct a systematic literature review instead, which can also serve as preliminary work for compiling a new database.

4. SYSTEMATIC LITERATURE REVIEW

The core of this study is a systematic literature review with the aim to compile an overview of all arguments that have been brought forward by scholars to explain the inconsistency in the EU's sanctioning behaviour. To select and review relevant studies I followed the PRISMA Protocol (Preferred reporting items for systematic review and meta-analysis protocols). This methodology allows for the replicability and validity of this study (Shamseer *et al.*, 2015). The Prisma-P checklist can be found in Appendix D.

4.1. SEARCH STRATEGY

For the systematic literature review I used three online databases – Web of Science, Scopus and Google Scholar – to locate relevant studies and articles. Web of Science and Scopus deliver peer reviewed journal articles, books, and book chapters. By including Google Scholar, the number of results expands to grey literature, such as NGO reports and non-peer reviewed articles. These sources are relevant inasmuch as the discussion about the right policy response in reaction to objectionable behaviour goes beyond academia. Since the objective of this thesis is to develop a comprehensive overview of all arguments that contribute to the understanding of the variation in the EU's sanctioning behaviour towards sub-Saharan African countries this is important to consider.

The search method consisted of several keywords connected with the Boolean 'AND' as well as 'OR'. This is resulted in the following search term:

("EU Sanctions" OR "European Union Sanctions") AND "Sub-Saharan Africa" AND ("Double Standards" OR "hypocrisy" OR "self-interest" OR "inconsistency" OR "contradictory" OR "variation" OR "discrepancy")

Due to practical considerations, the results were limited to English language and a publication date between 2000 and 2021 – the last year for which the full year was available. The results were then entered to Microsoft Excel to be screened for the inclusion/exclusion criteria. Since most of the research work is qualitative the analysis of the selected sources will also be qualitative. The selected sources will be compiled in a result table (see table 2) documenting the characteristics and main findings of the study (see chapter 5). Before analysing to what extent the literature answers the research questions and relates to the theory, I will describe the selected sources in terms including a brief assessment of the quality of the studies.

4.2. INCLUSION/ EXCLUSION CRITERIA

The selection of the studies was conducted following the PRISMA-P 2015 checklist (see Appendix D and E). This allowed me to formulate clear inclusion and exclusion criteria. Based on the search results all journal articles, book chapters, working papers, Reports, Policy Briefs and Conference Papers that were physically or electronically available¹ are included in the review. Next to duplicates, I exclude juridical cases, opinion papers, master thesis, unpublished dissertations, website, and newspaper articles as well as encyclopaedia entries. I also exclude journal articles and book chapters that are published in journals or by a publisher with a CERES Ranking lower than C or a Scimago H-Index lower than 10, as well as unrecognised journals. Thematically the systematic literature review focuses on studies that examine the EU's inconstant sanctioning behaviour towards sub-Saharan African countries. However, an explicit mentioning of Sub-Saharan Africa or a country from the region was not a necessary requirement. This is so to not exclude studies that take a meta perspective on the EU's sanctioning behaviour and deliver important arguments for my analysis, i.e., the EU's tendency to follow the UN's lead in its sanction policy (Pospieszna and Portela, 2015). On the other hand, studies that examine the EU sanctions explicitly in the context of any other country or region, but Sub-Saharan Africa are excluded. This is to limit the scope of the analysis, since different regions also differ in their historical and geographical relationship

¹ Some documents had to be excluded since they were not accessible for the author

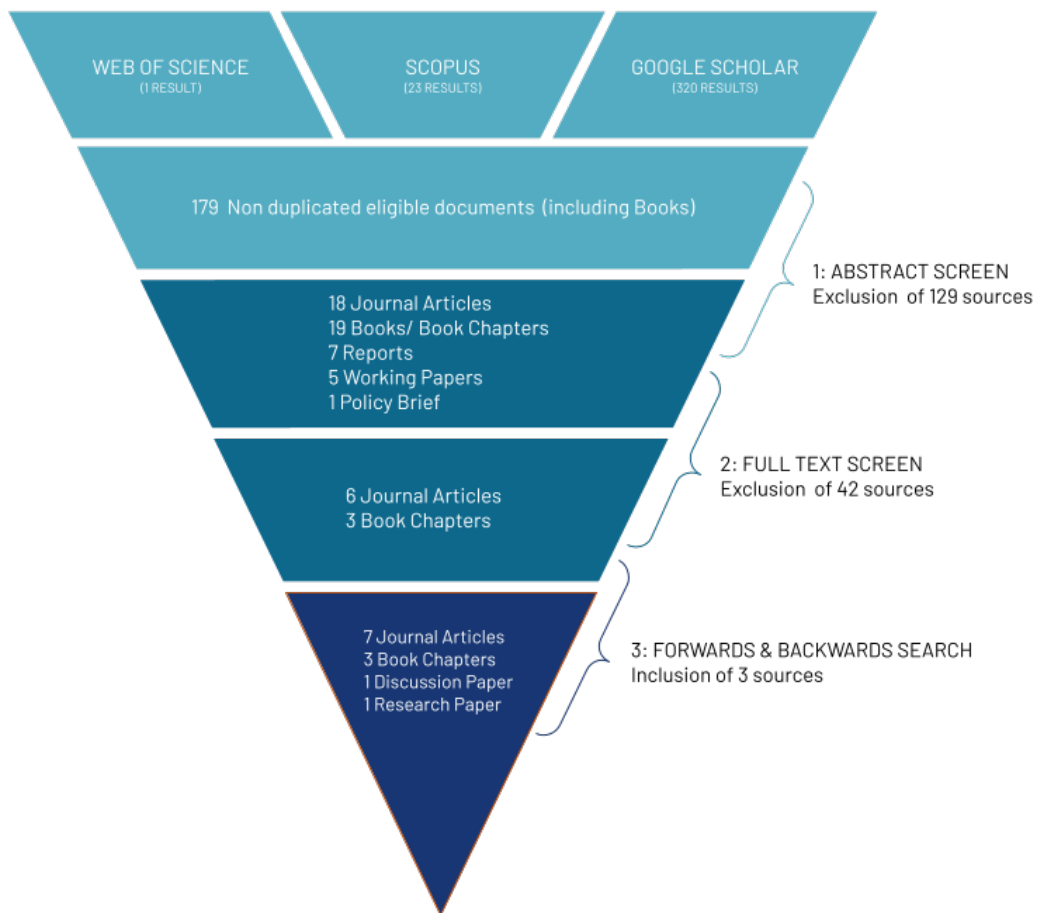


Figure 3: Flowchart of selection process for systematic literature review (Source: Own illustration, 2022)

with the EU, which to some extent could also influence the EU’s decision-making process for sanctions. Naturally studies that do not focus on EU sanctions, i.e., UN sanctions, US sanctions or unilateral sanctions are also excluded.

The query in the electronic databases delivered a different number of results. Web of Science delivered one result for the combined search, Scopus returned 23 and Google Scholar 320 results. The process of literature selection took a total of two months and was done in three steps (see figure 3). First, all article’s titles and abstracts (if available) were screened for the exclusion criteria. Books were screened for eligible book chapters. Reasons to exclude a study are a) it is a duplicate, b) the topic is not eligible, c) the document type is not eligible, d) it does not examine EU sanctions, e) it does not examine the EU’s decision-making process behind sanctions, f) the study explicitly examines a sanction case outside Sub-Saharan Africa. For elaboration of these criteria see Appendix E. All other documents were marked for further screening in stage 2. The remaining 50 sources were then skimmed and if necessary, more carefully accessed, for the eligibility criteria. In the second step 42 sources were dropped. Out of the 42 sources 40 were excluded because the study did not examine the decision-making process, and two studies were dropped because it was located

outside Sub-Saharan Africa. This resulted in 9 selected studies out of which two book chapters are in the same book. In the third and final stage a forwards and backwards search of the selected studies was conducted. This led to the inclusion of three additional studies. The systematic literature review resulted in a total of eleven sources including twelve studies that discuss the influential factors for the EU's decision to (not) impose a sanction. Out of the twelve sources three sources were added in the forward and backward search. Three studies may not seem like a lot but in relation to the total number of sources included they still account for a quarter of the selected sources. Two of these sources are papers that are published outside a journal or academic institution, which is why they might not be recognized by the search engines. There is however no satisfying explanation why the search term did not deliver the Article by Brummer (2009), as it uses the term sanctions, discusses inconsistencies, and uses specific examples in Sub-Saharan Africa. Before turning to description of the literature characteristics and analyses of the findings in chapter 5 the next sections will discuss the limitations of the literature review.

4.3. LIMITATIONS

The main challenge of systematic literature review is the risk to not include all highly relevant studies whilst keeping the search strategy coherent. With a focus on Sub-Saharan Africa, I am covering an area with 51 countries, thus a search for each individual country to ensure that no case study is eliminated could add credibility. However, a more narrowed down search term did not lead to more refined results in stage 1 of the process. The large number of results and the expectation that most studies will deviate from the core research question led to the decision not to conduct additional single-country research but to stick with the more generic keyword "Sub-Saharan Africa". This focus also resulted in the exclusion of all studies that explicitly investigate the research topic in the context of any other region. However, there might exist studies located in other areas that could be generalised for the Sub-Saharan African context. Similarly, the terminology of studies that investigate inconsistencies of sanctions might differ substantially. For instance, an article could discuss aid suspension or negative conditionality without using the term sanction itself. Broadening the search term however would not have been manageable in the time frame of this thesis. It is also expected that the forwards and backwards search in step 3 eliminates the issue. The limitation to studies in English language could also lead to the omission of relevant studies. Another shortcoming, but a requirement for this paper, is that this review has been done single-handedly which allows for a certain level of subjectivity when applying the

inclusion/exclusion criteria. Finally, the selected literature differs in methodology and selection of cases which does not allow for any further analysis beyond the systematic review. This might also be because the available data for EU sanction (non-)cases varies or is not covered respectively, as set out in chapter 3.

5. RESULTS

In what follows I will first outline the characteristics of the literature including a brief analysis of their impact and relevance for the research field. I will then continue to describe how the studies' main findings attempt to answer the question and discuss the results based on the previous chapters. Finally, I will critically reflect on the usability of a systematic literature review to analyse the EU's sanctioning behaviour.

5.1. DESCRIPTIVE CHARACTERISTICS OF THE LITERATURE

The systematic search for relevant literature resulted in eleven relevant sources and twelve relevant studies (see table 2). This includes seven articles in peer reviewed journals, three book chapters out of which two are in the same book, one Discussion Paper and one Research Paper. The books are published by two high ranking publishers, Palgrave Macmillan and Polity Press. The two non-peer reviewed papers are published by the European Centre for Development Policy Management and the ARENA Centre for European Studies. The earliest study identified is a book chapter in Crawford (2001, p. 209-227). The publications stretch across the entire twenty-year time frame, with a maximum of two studies published in 2011 and 2015. The latest study by Saltnes was published in February 2020 and the median study was published in 2013. It is worth mentioning that multiple authors are selected twice or more. Figure 4 displays the distribution of publications across authors. With four included studies Del Biondo (2011a; 2011b; 2015a; 2015b) clearly leads the discourse, followed by Crawford (2001; 2019) and Saltnes (2017; 2020) with two included studies each. Despite the high relevance of the topic, the EU's sanctioning behaviour, as a specific foreign policy tool, seems to be discussed by only a small group of scholars. Though it is possible that there is a larger debate in the broader context of foreign policy.

For an indication of quality and relevance table 2 also states how often each study has been quoted according to Google Scholar. The earlier studies by Crawford (2001) and Smith (2003) have an impressive number of citations with over 400 and over 1400 citations respectively. The median citation count is 40 and only one paper by Saltnes (2020), which is

TITLE	AUTHORS	YEAR	DOCUMENT TYPE	JOURNAL/PUBLISHER	RANK/JP JOURNAL/ PUBLISHER	CITATION IN GOOGLE SCHOLAR	CASE EXAMINED N/A IF NOT APPLICABLE	NON-CASES N/A IF NOT APPLICABLE	METHODOLOGY	INTEREST OF THE PAPER	KEY FINDINGS
Aid Sanctions: In Foreign Aid and Political Reform. A Comparative Analysis of Democracy Assistance and Political Conditionality	Crawford, G.	2001	Book Chapter	palgrave macmillan	A	460	> Nigeria 1993, Violation against human rights and democratic principles		Case Study	Aid Sanctions	> The measures taken by the EU were not rigorous due to the EU's significant economic interest (p. 213) > Aid sanctions are dominantly applied in SSA because of the limited economic and political interest in the region (p. 227) > Aid sanctions are absent where the EU has great economic and political interest (p. 227)
Human Rights, European Union Foreign Policy in a Changing World	Smith, K. E.	2003	Book Chapter	Polity Press	B	1432	N/A		Qualitative Analysis	Sanctions in Human Rights Promotion Aid Sanctions in Democracy Promotion	> One or more member states block sanctions if they have an economic, political or strategic interest in the potential target country (p.116) > Consideration about in-effectiveness of sanctions affect the application of sanctions (p.116) > The Councils required unanimity is a political hurdle for the application of sanctions (p. 117) > The EU does not manage to set clear priorities in its foreign policy which results in inconsistencies (p. 120) > The EU does not manage to set clear priorities in its foreign policy which results in inconsistencies (p. 120)
Suspension of Development Cooperation: An Instrument to Promote Human Rights and Democracy?	Hazelzet, H.	2005	Discussion Paper	European Center for Development Policy Management	N/A	N/A	approx. 500 cases of human rights violations and the corresponding reaction of the EU from 1989-2000		Review of official documents Expert Interviews Statistical Analysis	Aid Sanctions	> EU Member states undermines EU sanctions due to strategic and economic interests (p. 203) > Unanimity hinders the imposition of sanctions, consequently sanctions are only imposed against weak, authoritarian and/or political isolates states (p. 205) > The panelization of Human Rights Violation is more important to the EU than strategic or economic interest (p. 11) > Security and Welfare interests are more important than norms and values (p. 206)
Imposing Sanctions: The Not-So Normative Power Europe?	Brunner, K.	2009	Journal Article	European Affairs Review	C	107	34 Cases out of which 17 are located in SSA. 51 Non-Cases out of which 16 are located in SSA > specific mentioning of Democratic Republic of Congo, Sudan, Zimbabwe > Ethiopia 2005, 2009, 2010, flawed elections > Rwanda 2003, 2007, flawed elections > Nigeria 2003, 2007, flawed election > Chad 2001, 2002, 2005, flawed elections > Chad 2005, constitutional coup		Qualitative Analysis	Sanctions	> Political-historical interest can play a role, but not consistent across all non-cases (p. 388) > Economic interest are a minor influential factor - not consistent across all cases (i.e. Nigeria) (p. 388) > Strategic (security) interests are more important than political-historical and economic interests (p. 388). > A democratisation-stability dilemma can lead to non-application of sanctions (i.e. Rwanda, Ethiopia) (p. 389)
EU aid conditionality in ADP countries: Explaining inconsistency in EU sanctions practice	Del Blonde, K.	2011a	Journal Article	Contemporary European Research	H-index 18	72	N/A		Qualitative Case Studies	Aid Sanctions	> In the context of conditionality the EU seems most concerned with issues regarding electoral democracy (p. 869) > There are no significant differences in the electoral process although other problems remain human rights violations, etc (p. 870) > Coup detats and flawed elections are clearly identifiable and therefore more often reacted to than violations against human rights or the rule of law (p. 872)
Democracy promotion meets development cooperation: The EU as a Promoter of Democratic Governance in Sub-Saharan Africa	Del Blonde, K.	2011b	Journal Article	European Foreign Affairs Review	C	28	> Ivory Coast 2001, flawed elections > Liberia 2001, human rights violation, lack of freedom of press & expression, corruption > Guinea-Bissau 2003, Coup detat > Top 2004, flawed presidential elections > Guinea 2004, flawed presidential elections > Mauritania 2005, Coup detat > Guinea 2009, Coup detat > Niger 2009, constitutional coup		Comparative Case Study	Aid Sanctions in Democracy Promotion	> No consistency in the realist view that strong EU sanctions are less likely against countries that are of high historical importance, useful in the fight against terrorism or of high commercial importance (pp. 244-248) > More consistent is the idealist view that strong EU sanctions are less likely in stable, economically well performing countries and when there is no pressure from regional or domestic actors. (pp. 244-248)
Norms or Interests? Explaining Instrumental Variation in EU Democracy Promotion in Africa	Del Blonde, K.	2015a	Journal Article	Journal of Common Market Studies	H-index 95	32	> Guinea 2009, violation of human rights > Niger 2009, constitutional coup		Comparative Case Study Review of official documents and other records Expert Interviews	Sanctions in Democracy Promotion	> When donor interest and good development performance are absent, sanctions are applied (p. 81) > Non-case can be observed in situations where no donor interest and good development performance exists (p. 81) > Exception: threat against Kenya, sanction against Niger despite donor interest > regional and domestic pressure (p. 81)
Donor Interests or Developmental Performance? Explaining Sanctions in EU Democracy Promotion in sub-Saharan Africa	Del Blonde, K.	2015b	Journal Article	World Development	A H-index 192	48	> Ethiopia 2005, flawed elections > Niger 2009, constitutional coup > Zimbabwe 2002, 2008, flawed elections > Guinea 2003, constitutional coup > Guinea 2005, constitutional coup > Chad 2001, flawed elections > Chad 2005, flawed elections > Chad 2005/2006, constitutional coup > Rwanda 2003, 2010, flawed elections > Ivory Coast 2004, crackdown on demonstrations		fuzzy-set Qualitative Comparative Analysis (fsQCA) Review of official documents and other records Expert Interviews	Sanctions in Democracy Promotion	> Some member states (Sweden) but not the EU itself apply sanctions to satisfy domestic voters (p. 580) > A self-interest in terms of power expansion is no explanation for the non-case (pp. 582-583) > The objective is no longer normative (i.e. democracy, human rights), security interests are the primary driver for democracy dilemma (pp. 582-586) > Instruments are not chosen on the basis that universal principles have been breached - context is relevant (p. 586)
Norm collision in the European Union's Democracy Promotion in sub-Saharan Africa: Explaining the inconsistency in EU aid sanctions towards Rwanda	Saltner, J.D.	2017	Journal Article	Cooperation and Conflict	A H-index 44	16	N/A	> Rwanda 2002, Gacaca court system > Rwanda 2003, flawed elections > Rwanda 2009/2012, support of rebel groups in DRK	Case Study Systematic review of official documents Expert Interviews	Sanctions	> Political conditionality and the non-application of aid sanctions is driven by security interests (p. 205) > The objective is no longer normative (i.e. democracy, human rights), security interests are the primary driver for foreign policy (p. 205)
Aid sanctions and political conditionality: continuity and change	Crawford, G. Kacarska, S.	2019	Journal Article	Journal of International Relations and Development	H-index 34	22	N/A		Literature Review	Aid Sanctions	> Donors weigh multiple outcomes (norms) against each other, which can lead to the non-application of sanctions (p. 12) > Expected negative consequences for affected persons are taken into account in the decision-making process (p. 15)
To Sanction or Not to Sanction? Explaining the Inconsistency in EU Aid Sanctions Towards LGBTI Human Rights	Saltner, J.D.	2020	Global Research Paper	ARENA Center for European Studies	N/A	5	N/A	> Uganda 2014, Anti Homosexuality Act (AHA)	Case Study Systematic review of official documents and other records Expert Interviews	Aid Sanctions in Human Rights Promotion	> Donors weigh multiple outcomes (norms) against each other, which can lead to the non-application of sanctions (p. 12) > Expected negative consequences for affected persons are taken into account in the decision-making process (p. 15)

Table 2: Result Table Literature Review (Source: Own analysis based on literature review, 2022)

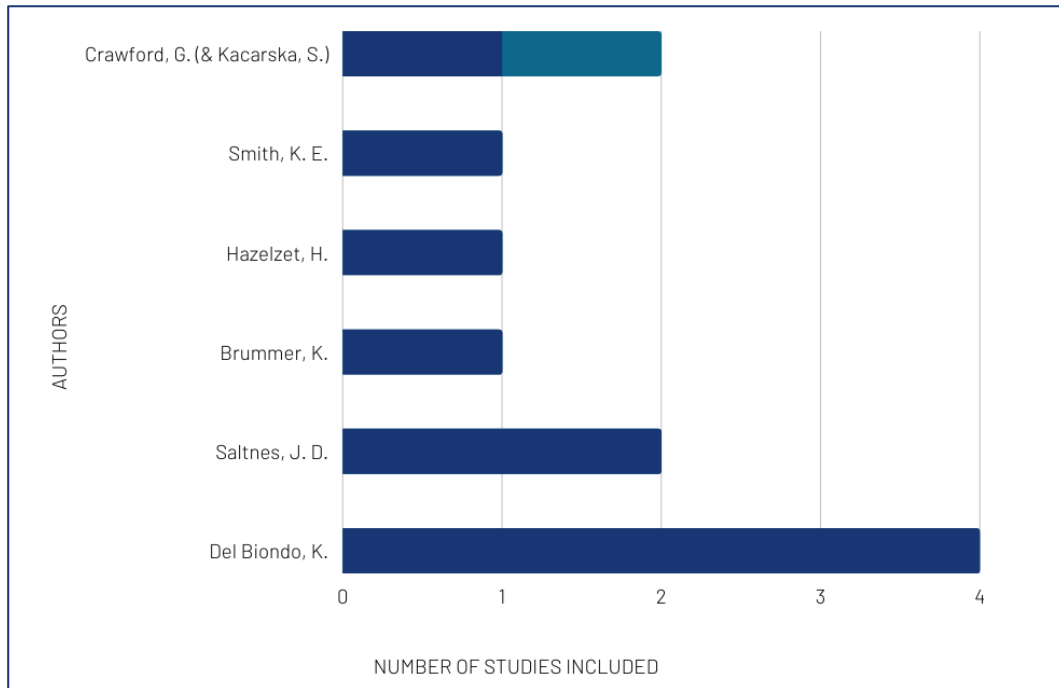


Figure 4: Distribution of selected studies across authors (Source: Own Illustration based on literature review, 2022)

also the most recent publication, has below 15 citations. Thus, most of the sources have a medium to very high relevance in the field.

The selected studies focus on different sanction types. Most of the studies discuss aid sanctions, four studies focus on (aid) sanctions in democracy promotion and two studies that focus on aid sanctions in human rights promotion. This underlines the strong connection between aid, conditionality, and sanctions in the context of Sub-Saharan Africa. Only two studies refer to sanctions in general (Brummer, 2009; Saltnes, 2017). These two studies as well as the contribution by Smith (2003) and Hazelzet (2005) take a more general approach and include sanctions outside of Sub-Saharan Africa. The remaining seven Studies on the other hand are more nuanced to ACP countries or Sub-Saharan Africa.

Except one study (Hazelzet, 2005) all publications use exclusively qualitative methods. Five studies use expert interviews and combine these with other methods, mainly the review of official documents and other records. Six publications are (comparative) case-studies, four studies are qualitative analysis of the EU’s sanctioning behaviour, including one review work, one study is a fuzzy set qualitative comparative analysis, and one study uses quantitative methods. Referring to chapter 3, this also highlights the need for more quantitative studies in the context of inconsistencies.

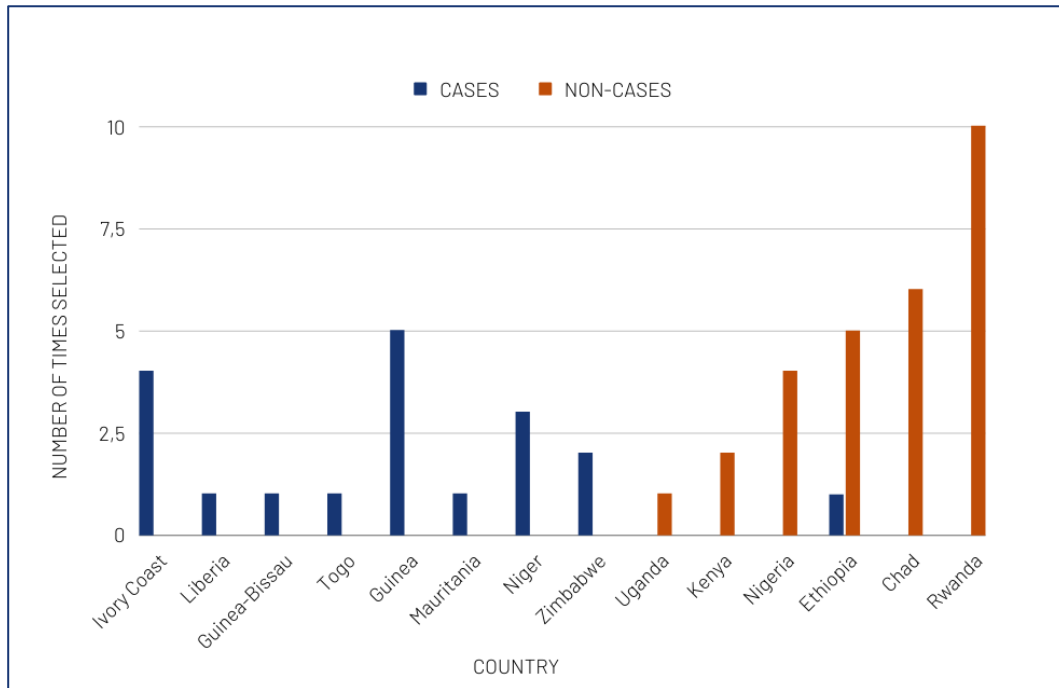


Figure 5: Number of time a country has been selected as case/non-case (Source: Own Illustration based on literature review, 2022)

In total fifteen individual cases and sixteen non-cases were identified across all studies. Figure 5 displays the number of times a country has been selected either as case or non-case; note that the same cases can be counted for twice when it has been analysed in two different studies. Guinea and Ivory Coast are strong representatives of cases with five and four applications respectively. In Guinea three studies refer to the 2009 Coup d'état and the associated crackdown of demonstrations and one study refers to the constitutional coup in 2003 and one to the flawed presidential elections in 2004. In Ivory Coast all four cases refer to different events of violations against democratic principles between 2000 and 2010. On the side of the non-cases, Rwanda gets mentioned by far the most. Across all studies five different non-cases are identified in Rwanda. The objectionable behaviour includes flawed elections, violations against the rule of law and the support of rebel groups in the DR Congo. Prominent countries for non-cases are also Chad, Ethiopia, and Nigeria, with six, five and four applications respectively. Four different non-cases are identified in Chad, three in Ethiopia and two in Nigeria. Ethiopia is the only country that gets mentioned as case (Flawed Elections in 2005) and non-case (flawed elections 2005, 2008, 2010). However, from the databases discussed in Chapter 3 we can conclude that Rwanda, Nigeria, and Kenya also have been sanctioned before.

Seven studies use clearly identified cases and/or non cases for their analysis. However, they differ substantially in their selection approach (see figure 6). Some of these studies only focus on non-cases whereas others only focus on cases. Also, the number of countries

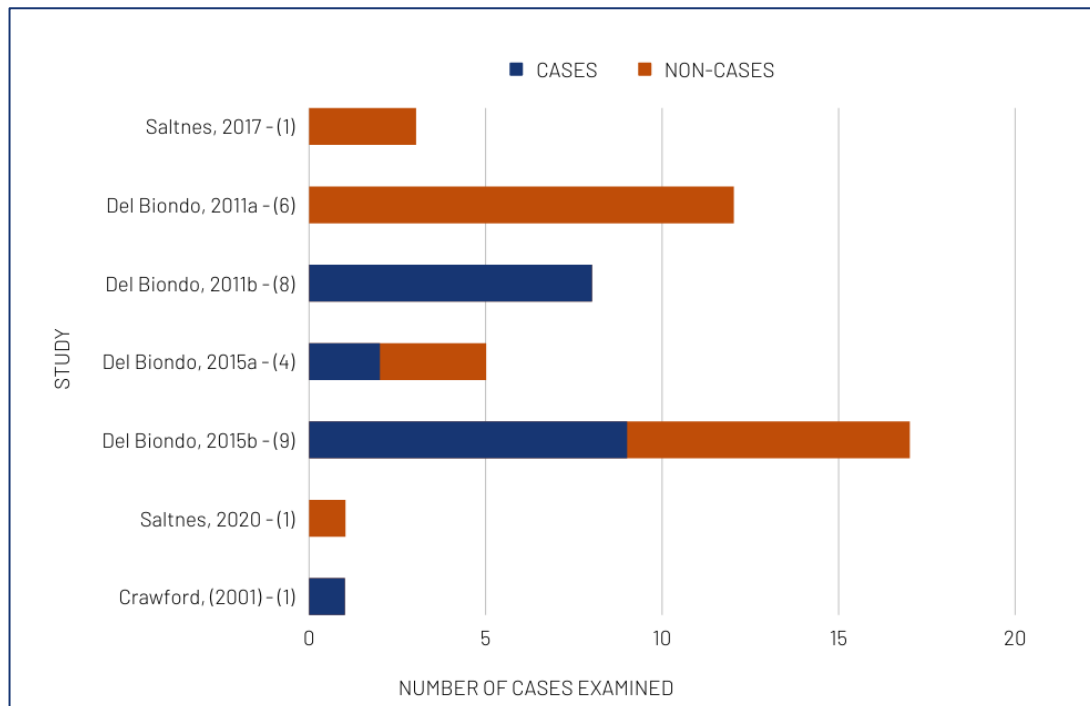


Figure 6: Number of cases/non-cases selected by each study; number of countries included in the study in parenthesis (Source: Own illustration based on literature review, 2022)

selected varies (as indicated by the number in parenthesis in figure 6) from a minimum of one country to a maximum of nine countries. These differences might be due to the nature of the study and the selected methodology. For instance, Del Biondo (2015b) takes a more structured approach with a fuzzy-set qualitative comparative analysis which allows for the inclusion of more cases. On the other hand, Saltnes (2017; 2020) makes use of expert interviews for her analysis of the non-application of sanctions in Rwanda and Uganda, which makes it more difficult to include a variety of cases. After the description of the literature characteristics, I will now turn to the studies' main findings in regard to the research question.

5.2. UNDERSTANDING THE INCONSISTENCY OF EU SANCTIONS

The twelve selected studies discuss seven influential factors that can explain the inconsistency of the EU's sanctioning behaviour: the EU's economic, historical, and strategic interest, the target countries' development performance, the expected effectiveness, and effects of sanctions as well as regional and domestic pressure. Table 3 presents the studies' conclusions about these factors as an explanation (or no explanation) for the EU's sanctioning behaviour. In what follows I elaborate on the studies' findings, their contradictions and consensus in

	INFLUENTIAL FACTORS		NON-CASES		CASES	
			EXPLANATION	NO EXPLANATION	EXPLANATION	NO EXPLANATION
SELF-INTEREST	The Issue of Unanimity: Smith, 2003 Brummer, 2009	Economic Interest	Crawford, 2001 Smith, 2003 Brummer, 2009 Del Biondo 2011a	Hazelzet, 2005 Del Biondo, 2015a	Del Biondo 2015b	
		Political Interest	Crawford, 2001 Smith, 2003 Del Biondo, 2011a	Saltnes, 2017 Hazelzet, 2005		
		Strategic Interest	Smith, 2003 Brummer, 2009 Del Biondo, 2011a	Crawford & Kacarska, 2019		
DEVELOPMENT PERFORMANCE	Development Performance (Stability, Democratization)		Del Biondo, 2011a Del Biondo, 2015a Del Biondo, 2015b Saltnes, 2017	Del Biondo 2011b	Del Biondo 2015b	
EXPECTED EFFECTIVENESS AND EFFECTS	Expected Effectiveness			Smith, 2003		
	Expected Regional Effects (Norm weighing)		Saltnes, 2017 Saltnes, 2020			
PUBLIC PRESSURE	Regional/Domestic Pressure				Del Biondo, 2015a Del Biondo, 2015b Saltnes, 2017	

Table 3: Factors That Influence the EU's Sanction Policy (Source: Own illustration based on literature review, 2022)

more detail. For this purpose, I have summarised the factors into four main blocks: Self-interest, development performance, expected effectiveness and effects and public pressure.

Self-Interest

Three types of self-interest could be identified from the literature. First an economic or commercial interest in terms of high trade volumes or other economic dependencies. An example in Sub-Saharan Africa would be the oil/energy exporting countries such as Nigeria. Second, a political or historical interest. This refers to the political influence that European governments want to maintain in their former colonies and towards other international powers. Lastly strategic interests are considered; security issues, military cooperation and the joint fight against terrorism fall under this category. The influence of self-interest, be it economic, political, or strategic, on the EU's sanctioning behaviour is addressed in most of the selected studies. Only two studies do not make a final statement on the role of self-interest in the imposition of sanctions. Del Biondo (2011b) is more concerned with the EU's approach to democracy promotion in general and Saltnes (2020) attempts to formulate an argument that speaks against the interest-driven sanction policy. The remaining eight sources are highly inconclusive in whether the existence of a self-interest can explain the non-

application of sanctions. Crawford (2001, p. 227), Smith (2003, p. 116) and Brummer (2009, p. 203) clearly state that sanctions are not applied when an economic (all three studies), political or historical (Crawford 2001; Smith 2003) or a strategic (Smith 2003; Brummer 2009) interest is present. However, these three studies take a broader approach in their comparisons and are also including countries outside of Sub-Saharan Africa leading to the conclusion that Sub-Saharan Africa states are most frequently targeted because of their minor economic and political importance (Crawford, 2001, p. 227; Smith 2003, p. 116). Both studies have a very high impact in terms of their citation count. Yet, since their comparison is globally, they can only to some extent explain the inconsistencies within the Sub-Saharan African region.

The three studies by Del Biondo (2011a; 2015a; 2015b) are contradictory in themselves. The 2011a (p. 388) study shows that in the context of ACP countries economic interest only plays a minor role, which can mainly be attributed to the inappropriately mild sanctions against Nigeria; an energy exporting country that is of high importance to the EU. Taking a slightly different angle, the 2015b study examines how the linkage between economic interest and good development performance affects the sanction application. It concludes that in countries where sanctions are applied both are absent (*ibid.*, p. 81). Yet again, the third study (2015a, p. 244-248) rejects the view that EU sanctions are less likely against countries where the EU has an economic, historic, or strategic interest. This is supported by Hazelzet (2005, p. 8) whose quantitative study reveals that the EU's economic interests do not explain the inconsistency of aid sanctions; note that this study also examines sanctions on a global level.

The ambiguity remains when looking at political interest. As mentioned above Crawford (2001, p. 227) and Smith (2003, p. 116) conclude that political interest does explain the non-application of sanctions. Del Biondo (2011a, p. 388) only agrees partially with this, highlighting the fact that political interest is not a consistent explanation across all non-cases. In the same vein Saltnes (2017, pp. 562-563) finds that political interest played only a small role in the Rwandan non-cases. Hazelzet (2005, p. 9) also finds that former colonies are not sanctioned less, however, they are sanctioned harsher. Countries that have an institutionalised relationship through a special agreement on the other hand are sanctioned milder.

In contrast to economic and political interest there is clear consensus amongst the studies that the existence of security interests explains why sanctions are not imposed (Smith, 2003; Brummer, 2009, Del Biondo, 2011a; Crawford and Kacarska, 2019). In a review work Crawford and Kacarska (2019, p. 205) even conclude that security interests are the primary influential factors in the EU's decision process and that questions of security trump

normative considerations. Out of the eight sources that address self-interest the study by Saltnes (2017) is the only one that does not consider the existence of self-interest of any kind as an explanation for the non-application. However, not only is this a study that looks at a single country it does also not pose the question of economic or strategic interest.

With respect to the role of self-interest we can therefore conclude that it does play a role in the EU's decision-making process. However economic and political interest is neither a consistently appearing nor a strong factor for explaining the non-application of a sanction in Sub-Saharan Africa. Strategic interests, mainly in the form of security concerns on the other hand seem to play a larger role.

Smith (2003, p. 116; 120) and Brummer (2009, p. 205) bring up an additional issue in the context of self-interest: The hurdle of unanimity in the Council. If an EU country has an interest in the non-application of a sanction, i.e., because of commercial interest, it can block the Council's decision to impose a sanction. Thus, even though the EU might not have a strong interest it only takes one member state to value its own interest above international norms. Apart from being a source for inconsistency this also complicates the analysis of EU sanctions as the discussion about a sanction case becomes more complex.

Development Performance

The second block is clearly dominated by Del Biondo. All her four studies address the role of development performance for the imposition of sanctions (2011a; 2011b; 2015a; 2015b). Development performance is of particular importance in the context of aid sanctions. Development cooperation and aid aim to support the receiving country in democratisation processes, economic growth, and improved social systems. A good performance in these areas could indicate the effectiveness of aid and suspending it would therefore be counterproductive.

The studies unanimously conclude that a good development performance is an explanatory factor for the EU's sanction policy. Del Biondo's earliest study (2011a, p. 388) shows that donor countries find themselves in a democratisation-stability dilemma, leading to the non-application of sanctions. This refers to the case of Rwanda in particular. Since the country is considered relatively stable, the EU is more hesitant to intervene in democratisation processes. Indeed, the 2011b (p. 669) study reveals that democratisation and in particular progressing towards an electoral democracy is the EU's main concern in the context of aid sanctions. When democratic principles are clearly violated the EU tends to suspend aid, however it is also willing to lift aid sanctions as soon as there are improvements

in the electoral process despite the persistence of other norm violations (*ibid.*). Del Biondo's first study from 2015a (pp. 244-258) also concludes that sanctions are less likely in stable and economically well performing countries. The weight of development performance for the EU's decision to (not) impose a sanction is highlighted strongest in Del Biondo's latest study (2015b). Here she shows that sanctions are applied in the absence of good development performance (and economic interest). Countries with good development performance (and the absence of economic interest) on the other hand are spared from sanctions (*ibid.*, p. 81). Next to Del Biondo, Saltnes (2017, pp. 563-566) also supports the argument that good development performance explains the absence of sanctions against Rwanda.

Building on the selected sources it is evident that good development performance influences the EU's decision to not impose a sanction. However, these results should also be taken with care since there is a possibility that the studies suffer from selection bias. Del Biondo uses the same non-cases across three of the studies (2011a; 2015a; 2015b), which include Rwanda and Ethiopia – two countries known as development success stories – as well as Chad, Kenya and Nigeria. One must therefore consider the results of the two later studies as less novel. Rwanda is also the country of choice for Saltnes's (2017) single-case study, which increases the risk of generalising a special case.

Expected Effectiveness and Effects

The third block unites two influential factors: the expected effectiveness of sanctions and the expected (negative) effects of sanctions. Both aspects find less attention than the factors discussed above. Only one of the selected studies from the literature review (Smith, 2003, p. 116) briefly mentions that the expected in-effectiveness of a sanction might lead to the non-application of a sanction. This is unexpected since a lot of sanction research revolves around questions of effectiveness (i.e., van Bergeijk, 1989; Allen, 2005; Peksen, 2019). Two studies that also deal with inconsistencies but were excluded in the process of the systematic literature review (due to quality of the journal) address issues of effectiveness. Del Biondo (2012, p. 115) includes considerations about sanction coordination with other international actors, the diplomatic relationship between the EU and the target country as well as the domestic position of the target's government. All three points can influence the effectiveness of a sanction. The results show that out of the three points the expected coordination with other actors as well as the domestic positions of the target country's government indeed influence the EU's sanctioning behaviour (*ibid.*, 118). Pospieszna and Portela (2020, pp. 65-67) on the other hand show that considerations about sender alignment are only valid in

specific cases. According to the authors, the EU tends to act autonomously in breaches of human rights and democratic principles, whereas it tends to align with UN sanctions in cases of violent conflict and proliferation of weapons of mass destruction; topics that fall under UN mandate. This is an interesting observation given that the combination of EU and UN sanctions tends to be more successful compared to when the EU acts alone (ibid., p. 64). Thus, even though considerations about (in-)effectiveness are not prominent in the selected studies of the literature review, this is expected to be an important factor in the EU's decision-making process.

The second factor in this block is the concerns about effects of sanctions, also referred to as norm weighing. Again, this field is dominated by one author. Saltnes (2017, pp. 563-566; 2020, p. 12) proves that EU officials weigh norms against each other, which ultimately results in the non-application of a sanction. Decision makers are concerned with possible negative outcomes of sanctions that further destabilise the democratisation process and thus decide to not impose a sanction. She shows this for three non-cases in Rwanda and one non-cases in Uganda. Again, it is surprising that the systematic literature review did not deliver more studies that include the expected impacts on civilians as an explanation for the EU's inconsistent sanctioning behaviour. Negative impacts of sanctions such as the further deterioration of human rights (Peksen, 2009; Carneiro and Apolinário Jr, 2016), increasing poverty (Neuenkirch and Neumeier, 2015) or the decrease of food security (Afesorgbor, 2021) have been well studied. It must therefore be expected that policy makers take this into account.

On the one hand this block is not strongly represented in the selected literature and the impact in terms of citation count is also relatively low. On the other hand, the expected effectiveness and effects of sanctions could still be an important influential factor for the EU's decision-process to impose a sanction given the relatively large amount of research in both fields. Overall, the fact that there is proof of normative weighing of possible outcomes makes it impossible to explain the EU's sanctioning behaviour through *either norms or interest*.

Public Pressure

The final block is again not the focus of the selected literature; however, it does get addressed in three studies. Domestic and regional pressure refers to the influence of other official or public voices on the EU's decision to impose a sanction. Regional pressure refers to voices in or close to the target country that demand sanctions and domestic pressure refers to voices

in the sender country. Del Biondo (2015a, pp. 245-246; 2015b, p. 81) mentions regional and domestic pressure as reason for the application of sanctions despite the existence of sender interest or good development performance. Saltnes (2017, p. 560) argues that domestic pressure motivated the suspension of aid by Sweden (EU member state), however not by the EU.

Like the previous block the fact that the topic of public pressure is only briefly touched upon is unexpected. Given that a main strand of theory on sanctions is building on public choice theory, as set out in chapter 2, one would have expected that this is also explored in empirical research. One reason might be that it is challenging to analyse public opinion and media retrospectively, due to limited available data. Nonetheless, Peksen, Peterson and Drury (2014, pp. 860-865) have investigated the role of media for the use of sanctions by the US. They conclude that media attention on violations against human rights does increase the likelihood of a sanctions threat and imposition. Given this result as well as the analyses in the selected literature one must consider public pressure as an influential factor, however, it remains unclear to what extent public pressure explains inconsistencies in the EU's sanction policy. Consequently, Saltnes' (2017, pp. 560-561) assumption that voter pressure might not be as relevant for the EU's decision making as it is at the country remains as such.

5.3. DISCUSSION OF THE RESULTS

The initial expectation of this thesis was that the analysis of the EU's sanctioning behaviour required a comprehensive approach to cover all complexities behind the decision-making process. By conducting a systematic literature review the objective was to identify the factors that influence the EU's sanctioning behaviour in order to develop such a comprehensive approach.

The analysis of the systematic literature review has identified seven factors that evidently influence the EU's sanctioning behaviour. Yet it remains at best inconclusive how strong this influence is. Figure 7 is a visualisation of the analysis displaying three points of discussion. First, if there is consensus about the relevance of each factor. Second, if there is a risk of bias in the selected empirical literature due to selection of cases and small number of authors. Third, if the factor is supported by related sanction literature that has not been selected in the systematic review. The analysis shows that authors come to different conclusions regarding the explanatory power of economic and political interest for the non-application of a sanction. This might be due to the different regional levels and the selection of cases that the studies look at. As expected, the role of economic interest is less pronounced in

studies that focus on ACP countries or Sub-Saharan Africa. In relation to the role of strategic interest on the other hand there is a clear consensus that sanctions are avoided if these interests are present. The aspect of good development performance as a shield for sanctions has also been studied. However, the small number of authors and the limited cases examined result in a risk for bias. Similarly, concerns about the expected negative effects of sanctions on civilians are dominated by one author. Yet, this aspect is considered important for the

	RELEVANT ACCORDING TO EMPIRICAL LITERATURE		RISK OF BIAS IN EMPIRICAL LITERATURE	SUPPORTED BY RELATED LITERATURE
Economic Interest	+	-		
Political Interest	+	-		
Strategic Interest	+			
Development Performance	+		×	
Expected Regional Effects	+		×	×
Expected Effectiveness	+			×
Public Pressure	+	-		×
FURTHER RESEARCH NEEDED				
Structure of EU Bodies	+			×
Expected Domestic Effects				×
'New' Norms				×

Figure 7: Influential factors that (could) explain the EU's sanctioning behaviour (Own illustration based on literature review, 2022)

EU's sanctioning behaviour as it has been well studied outside the context of inconsistencies. Expectations about the effectiveness of a sanction is only mentioned in one of the selected studies even though sanctions literature in general is much concerned with the issue of sanction effectiveness. Kaempfer and Lowenberg' (1988) first point about public awareness and pressure are not strongly pronounced in the empirical literature. Even though public pressure has been identified as a reason for the imposition of sanctions despite the existence

of self-interests (Del Biondo 2015a, 2015b), the empirical evidence in the context of Sub-Saharan Africa remains small and inconclusive in the context of EU sanctions.

Next to the factors that are addressed in the selected studies the systematic review also disposes research gaps regarding the breadth and depth of the studies. As set out in the previous section there is only limited research regarding the influence of the expected effectiveness, the expected effects and public pressure on the EU's decision to impose a sanction. More in-depth analysis would be required to confirm the role of these factors. In addition to that, related literature has identified other factors that might also influence the decision-making. For instance, Connell, Moya and Shin (2021, p. 17) found that members of the European Parliament are less likely to endorse the application of a sanction when they face migration pressure from the target country. Even though the study focuses on sanctions against Syria, Iran and Libya, this is also conveyable in the context of Sub-Saharan Africa. For instance, Nigerian, Somalian, Guinean and Eritrean are in the top fifteen nationalities that are first time asylum seekers in the EU (European Union, 1995-2022), making it likely that sanctions that affect the public in Sub-Saharan Africa could also lead to rising numbers of asylum seekers in the EU. Thus, the aspect of expected domestic effects of sanctions is a field for future research. In addition to that, Füllrutter (2020, p. 1588) claims that the norms that influence the EU's sanction policy have diversified. Thus 'new norms' such as environmental consideration could also influence the decision-making process. Further, she argues that the changing structure of the EU and the associated new responsibilities of different EU bodies influences the EU's ability to act, resulting in inconsistencies in its sanction policy (ibid., p. 1591). The structure of EU bodies as a hurdle to consistent sanction application is mentioned by two studies included in the review, albeit not analysed extensively. It can be said that the structure of EU bodies and considerations about norms outside human rights, rule of law and democratic principles are topics yet to be researched.

Overall, the systematic literature delivers only limited results in terms of identifying influential factors that can explain the inconsistencies of the EU's sanctioning behaviour. Except for strategic interests the weight of the influential factors is not clear. Some factors' significance could suffer from empirical bias and others only remain an assumption. This supports the need for additional research and especially quantitative research as outlined in chapter 3. It would allow us to look at a variety of variables simultaneously and to overcome biases.

Yet the results are in line with the theoretical considerations as set out in chapter 2. Altogether, the continuous discussion about the normative and realist influences on the EU's

sanction decisions is reflected in the systematic literature review. Earlier studies tend to lean towards a more realist view (Crawford, 2001; Smith, 2003) claiming that the EU's sanction decisions are informed by self-interest. On the contrary there are also studies that are in alignment with the normative argument that values are more important than self-interest (Hazelzet, 2005; Saltnes 2020). Over time factors that go beyond the debate of (commercial) interest versus norms are identified and addressed in the research. As studies become more nuanced to ACP countries or Sub-Saharan Africa the results are also less conclusive since even within the region there are inconsistencies. One of the selected comparative-case studies states that there is less consistency with the realist view that self-interest outweighs norms and more consistency with the normative view that values are more important in the EU's external policy (Del Biondo, 2015a, p. 245). Yet the author is only speaking of 'less' or 'more' consistency because neither of the two views serves as a consistent explanation across all studied cases. The systematic literature review shows that no single objective consistently outweighs the other. Consequently, even though Manners's (2002) normative theory and Hyde-Price's (2008) realist critique (as outlined in chapter 2) both find support in the literature, neither is dominating. The challenge of finding a consistently applicable rule in sanction application is also reflected in the fact that for many countries there is an example for non-cases *and* a case (also see chapter 3). Inconsistent sanctioning behaviour therefore might not be explained solely by country characteristics but is rather context motivated.

Indeed, there is support for the theoretical proposal that sanction application follows a mixed motivation where utility can be gained by altruistic and non-altruistic factors, as set out by Keampfer and Lowenberg (1988). Normative and realist interests compete in the decision-process and influence the EU's decision-making process simultaneously. This is also in alignment with Murshed's (2009) approach to aid allocations and sanctions. According to Murshed (2002, pp. 11-13) policy makers trade in objectives. There is empirical evidence for this in the literature. For instance, democratisation is traded in for development progress as in the case of Rwanda (Saltnes 2017, p. 253) or for security as in the case of Ethiopia (Del Biondo, 2011a, p. 386). Thus, economic considerations interact with concerns about poverty reduction and deterioration of human rights. Which variable outweighs on the other hand is specific to the context (i.e., which utility group is stronger, voter awareness, gains and losses from each objective, ...). Again, context does not solely refer to target country characteristics but also to domestic components.

There is also the supposition that coup d'états are more frequently sanctioned than other norm violations since they can be clearly defined (Del Biondo, 2011b, p. 672). This could

give an indication of the bargaining game within the EU. When a situation is more clear-cut, groups that gain utility from democracy promotions might be stronger than groups that support a self-interest, as opposed to cases where violations are harder to identify. On the other hand, Saltnes (2018, p. 171) challenges this by showing that there are cases of coups d'états that were not followed by a sanction. This again could interact with public awareness (McLean and Whang, 2014, p. 600).

Both, the aspect of mixed motives as well as the clarity of a norm violation point at the relevance of context. Even though the empirical evidence might suffer from biases, in terms of impact, generalisation of results and exception to the rule, it can be argued that the sheer existence of inconclusive results is evidence for context relevance. It is quite realistic to assume that every sanction case is found in a relatively unique interplay of factors, thus making inconsistencies in sanction application inevitable. This theoretical understanding of foreign policy does not mean that a large n study would not deliver valuable insight. Rather it could help to get rid of the contextual biases created in qualitative case studies. It would add to the debate by shedding light on the weight of each of the identified factors. These statistical weights can provide an indication of which influences the EU tends to react more strongly to.

Touching upon the required unanimity in the Council hinders the decision-process and leads to inconsistencies this is also in line with Murshed's (2009, p. 1) argument that sanctions would be more efficiently allocated when there was only one agency (in this case it could be an EU body) that takes the decision without consultation of member states and prioritises one goal.

Overall, the picture that emerges from the systematic literature review therefore confirms the expectation that the discussion about inconsistencies in the EU's sanctioning behaviour cannot simply evolve around the question whether the EU is more motivated by self-interest or international norms. Three points can be noted. First, neither normative nor realist objectives are dominant in their influence on the EU's decision (not) to impose a sanction. However, no conclusion can be made about the weight of each identified factor. Second, the literature review delivers empirical evidence for the theoretical assumption that the EU is informed by mixed motives, which motive dominates is context specific. Third, the selected literature review is still limited in terms of the width and depths of the research.

Before turning to conclusion of the thesis the following section will reflect on the limitations of the systematic literature review and discuss the extent to which the systematic literature review is able to answer the research question of this thesis.

5.4. USABILITY FOR ANALYSING THE EU'S SANCTIONING BEHAVIOUR

The findings of the systematic literature review clearly confirm some of the initial expectations, most prominently that there are a variety of factors that influence the EU's sanctioning behaviour. Consequently, a comprehensive approach that goes beyond opposing norms with interest is required to understand the inconsistencies in sanction application. However, the significance of the finding from the literature review is limited. This can mainly be assigned to the small number of authors involved in the debate. Even though the selected studies all have a sufficient quality and impact, the fact that similar points are repeated by the same author reduces its weight.

Related to that, almost all the selected studies are qualitative (case) studies that also refer to a very similar selection of cases and non-cases (see figure 5 and 6). Thus, there is a risk of bias within the empirical literature and ultimately in the literature review. Adding to that some of the case studies only look at one (or few) cases. This not only a source for bias but also raises the question of generalisation across cases and non-cases. Nonetheless as discussed in the previous section bias and individuality can also point at the contextual complexities in foreign policy analysis when embedded in a comprehensive analysis.

Finally, much of the research has also been done in thematic silos by looking at only a few of the identified factors (see table 3). This confirms the initial assumption that the existing research tends to simplify the complexity of sanctions as a foreign policy issue. Combined with the limitations of the literature review this underlines the need for a large-n study preferably with quantitative methods as discussed in chapter 3.

In summary the results from the systematic literature review must be taken with care due to the limited number of authors and the methods used in the studies. Nonetheless it gives a thorough understanding where the discourse does (not) take place and points out significant research gaps. Those gaps include methodologies as well as specific aspects that have not been researched in the context of inconsistencies in the EU's sanction policy. Finally, even though the systematic literature falls short in tangibility of influential factors, it very well demonstrates the theoretical considerations of chapter 2.

6. CONCLUSION

This thesis was guided by the research question ‘*What are the influential factors explaining the inconsistency in the EU’s sanctioning behaviour towards Sub-Saharan Africa?*’. With this research question I pursued four main goals. First, to develop a comprehensive understanding of the EU’s sanctioning behaviour. This included understanding the sanctioning process as well as the influences and mechanisms behind a sanction decision. Chapter 2 attempted to set the basis for this objective followed by a discussion of the results from the systematic literature review in chapter 5. The main finding is that the EU is simultaneously informed by normative and realist objectives and that neither consistently outweighs the other. Instead, there is constant weighing of influences that is more complex than a simple black and white approach. Consequently, the EU’s sanctioning behaviour is likely to be context relevant. This is closely related to the second objective to understand if accusations of hypocrisy are valid. Concluding from the previous chapters the stance of this thesis is that they are only marginally valid. Indeed, the EU is an ambiguous actor. It is a strong promoter of international norms, yet there is evidence that self-interests, primarily security concerns, reduce the likelihood of a sanction imposition. However, this is not consistently the case, as there are also sanction cases where the EU would have had an interest to not apply a sanction and yet it did – and vice versa. Additionally, the identified influential factors are not always easily assignable to either norm of self-interests, for instance when it comes to development performance. On top of that – even though not thoroughly studied – it is also likely that concerns of effectiveness and regional as well domestic effects of sanctions also enter the sanction calculus. Overall, there is a complexity to foreign policy that makes assumptions of hypocrisy seem too binary.

Following the two objectives that revolve around theoretical considerations and findings, a more practical objective of this thesis was to identify the factors that influence the EU’s sanctioning behaviour from the existing literature as indicated in the research question. I have identified seven factors: the EU’s economic, historical, and strategic interest, the target countries’ development performance, the expected effectiveness, and effects of sanctions as well as regional and domestic pressure. However, the limitation of the systematic literature review, including a small number of authors, methodologies, and potential selection bias make it challenging to generate a significant conclusion about the number and weight of influences. Nevertheless, the literature review confirms that the EU’s decision-making process is informed by several, sometimes competing variables. Closely related to the challenges of the literature review is the fourth and last objective: to identify gaps in the

research. Scrutinising the selected literature has shown that some aspects that are expected to influence the EU's sanctioning behaviour have only been studied to a very limited extent or not in the context of Sub-Saharan Africa. Amongst others this includes the expected effects of sanctions and the role of media and public pressure.

To conclude, given the limitations of the available data and literature, this thesis has answered the research question as best as possible. The first two objectives, as well as the last objective were achieved. However, to really develop a comprehensive overview of the influential factors that explain the inconsistency in the EU's sanction application more research is needed. Two main suggestions are defended by this thesis. First, further (case) studies that examine the influence of factors that have not yet been addressed in the research. Second, the compilation of a large n sanction database that includes sanctions cases and non-cases, so a quantitative analysis can be used to shed light on the weight of each of the identified factors. This would contribute to an even deeper understanding of the EU's tendencies in foreign policy.

APPENDICES

Appendix A: Comparing coverage of EU sanctions across databases (Own analysis based on Weber and Schneider, 2020a; Giunelli, 2020a; Morgan, Bapat and Kobayashi, 2013a; Portela and von Soest, 2012a; Hufbauer, Schott, Elliott and Oegg, 2007)

CASE NO.	EPISODE	EUSANCT			EUSD			TIES			GIGA			HSE		
		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition	
1	1	Afghanistan	17.12.1996	1*												
2	1	Algeria	01.07.1992	1												
3	1															
4	1															
5	1	Belarus	24.09.2004	1				Belarus	31.08.2002	1*						
6	1	Belarus	09.07.1998	1				Belarus	28.04.2004	1						
7	1	Belarus	19.11.2002	1												
8	2					04.02.2004	1									
9	3					10.11.2008	1	Belarus	15.06.2007	1				Belarus	2006	1
10	4					31.01.2011	1									
11	1				Belarus	29.05.2013	1									
12	1	Bosnia and Herzegovina	01.03.1992	1												
13	1	Bosnia and Herzegovina	10.12.2013	1												
14	1				Bosnia and Herzegovina	26.02.1996	1									
15	1				Bosnia and Herzegovina	15.09.1997	1									
16	1				Bosnia and Herzegovina	21.03.2011	1									
17	1				Bosnia and Herzegovina	17.03.1997	1									
18	1	Bulgaria	23.07.2008	1												
19	2					28.10.1996	1								Burma	1988
20	3					26.04.2000	1									
21	4				EU/Burma/Myanmar	19.11.2007	1									
22	5					12.04.2011	1									
23	1					26.04.2018	1									
24	1	Burundi	21.10.1993	1*												
25	1	Burundi	01.10.2015	1*												
26	1															
27	1	Cambodia	18.07.1997	1*				Cambodia	31 August 1998	1*						
28	1	Central African Republic	04.12.2003	1*												
29	1	China	27.06.1989	1*												
30	1				China	08.12.2008	1									
31	1															
32	1															
33	1															
34	1	Egypt	21.08.2013	1												
35	1	Egypt	21.03.2011	1												
36	1	Equatorial Guinea	15.04.1992	1												
37	1	Eritrea	15.03.1999	1												
38	1	Ethiopia	15.03.1999	1												
39	1															
40	1	Fiji	28.04.2001	1*				Fiji	06.06.2000	1*						
41	1															
42	1	Fiji	05.10.2007	1*												
43	1	Gambia	12.10.1994	1*												
44	1	Guatemala	28.05.1993	1*												
45	1															
46	1	Guinea	16.03.2009	1*												
47	2					27.10.2009	1									
48	1	Guinea	14.04.2005	1	Guinea	21.03.2011	1									
49	1	Guinea-Bissau	03.05.2012	1*												
50	1	Guinea-Bissau	31.01.2011	1*												
51	1	Haiti	01.10.1991	1*												
52	1	Haiti	29.01.2001	1*												
53	1	Honduras	20.07.2009	1*												
54	1															
55	1	Indonesia	16.09.1999	1*				India	28.11.1997	1						
56	2	Iran	23.04.2007	1*												
57	3					26.07.2010	1									
58	4					20.01.2014	1									
59	1	Iran	12.04.2011	1*	Iran	14.07.2015	1									
60	1	Iran	19.07.2013	1				Iran	10.04.2002	1						
61	1	Israel														

Appendix A: Comparing coverage of EU sanctions across databases (Own analysis based on Weber and Schneider, 2020a; Giuelli, 2020a; Morgan, Bapat and Kobayashi, 2013a; Portela and von Soest, 2012a; Hufbauer, Schott, Elliott and Oegg, 2007) - continued

CASE NO.	EPISODE	EUSANCT			EUSD			TIES		GIGA		HSE	
		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition	Target State	Date of Imposition		
60	1	Ivory Coast	16.06.2000	1*									
	2	Ivory Coast	13.12.2010	1		22.12.2010	1						
61	1				Ivory Coast	08.04.2011	1						
62	1	Ivory Coast	01.12.1998	1								Ivory Coast	1999 1*
63	1	Liberia	13.06.2000	1*						Liberia	2001	1	
	2	Libya	28.02.2011	1*									
65	1				Lybia	22.01.2013	1						
66	1	Libya	27.01.1986	1*									
67	1				Lybia	16.04.1999	1						
68	1	Macedonia	08.04.1993	1				Macedonia	28 Juni 2001	1			
	2				FYROM (North Macedonia)	16.07.2001	1						
69	1					10.02.2004	1						
70	1	Madagascar	06.02.2009	1									
71	1	Malawi	13.05.1992	1*									
72	1							Maledives	15.09.2004	1			
73	1				Maledives	17.07.2018	1						
74	1	Mali	23.03.2012	1*									
75	1	Mauritania	06.04.2009	1*						Mauretania	2008	1	
76	1	Myanmar	18.09.1988	1*									
77	1	Nepal	01.02.2005	1*									
78	1				Nicaragua	14.10.2019	1						
79	1	Niger	29.01.1996	1*									1*
80	1	Niger	11.07.2009	1*									
81	1	Nigeria	13.07.1993	1*									1*
	2					20.10.1995	1						
82	1				Nigeria	30.10.1998	1						
83	1	North Korea	14.11.2002	1*									
	2					27.07.2009	1						
	3					18.02.2013	1						
	4					27.02.2017	1						
84	1				North Korea	10.10.2017	1						
85	1							Pakistan	28.11.1997	1			
86	1										Peru	2000	1
87	1	Romania	15.06.1990	1*									
	2	Russia	17.03.2014	1*									
88	1				Russia	23.06.2014	1						
	2					28.04.2014	1						
89	1				Russia	31.07.2014	1						
90	1	Russia	20.08.1991	1*									1
91	1	Russia	17.01.1991	1									
92	1	Russia	10.12.1999	1									
93	1	Rwanda	26.04.1995	1*							Rwanda	1994	1
94	1	Sierra Leone	23.06.1997	1*									
95	1	Slovenia	05.07.1991	1									
96	1				Slovenia	26.02.1996	1						
97	1							South Africa	10.03.1978	1*			
98	1	South Africa	16.09.1986	1*									
99	1							South Korea	14.11.2002	1*			
	2					18.07.2011	1						
100	1	South Sudan	10.07.2014	1*	SouthSudan		1						
101	1	Sudan	30.03.2005	1*									
102	1	Sudan	01.03.1990	1*									
	2	Sudan	15.03.1994	1*									1
103	1	Sudan	09.01.2004	1*	Sudan		1						
104	1	Syria	09.05.2011	1*									
105	1	Syria	10.11.1986	1*							Syria	1987	1
	2					31.01.2011	1						
	3					23.05.2011	1						
106	1				Syria	28.02.2013	1						
107	1	Tajikistan	30.11.1997	1									
108	1	Togo	26.01.1993	1									
109	1							Togo	12.01.1992	1			1
110	1							Togo	10.02.2005	1			
111	1										Togo	1998	1
112	1				Tunisia	31.01.2011	1						
113	1												
114	1	Turkey	16.02.1995	1									1
115	1				Turkey	11.11.2019	1						1
116	1	Ukraine	20.02.2014	1	Ukraine	05.03.2014	1						
	2					22.11.1996	1						
	3					22.04.1998	1						
117	1				US	17.04.2019	1						
118	1							US	01.05.2005	1			
119	1							US	01.03.2004	1			
120	1							US	07.04.2004	1			1
	2	Uzbekistan	03.10.2005	1		14.11.2005	1						1
121	1				Uzbekistan	14.05.2007	1						
122	1				Venezuela	13.11.2017	1						
123	1	Yugoslavia*	22.11.1995	1*									

Appendix A: Comparing coverage of EU sanctions across databases (Own analysis based on Weber and Schneider, 2020a; Giunelli, 2020a; Morgan, Bapat and Kobayashi, 2013a; Portela and von Soest, 2012a; Hufbauer, Schott, Elliott and Oegg, 2007) - continued

CASE NO.	EPISODE	EUSANCT			EUSD			TIES			GIGA			HSE										
		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition									
124	1	Yugoslavia	05.07.0991	1												1*								
	2					26.02.1996	1																	
	3	Yugoslavia	19.03.1998	1												1*								
	4				FRY (Yugoslavia)	14.12.1998	1																	
125	1					09.10.2000	1																	
126	1	Yugoslavia	03.05.2006	1																				
127	1																							
128	1							Zimbabwe*	06.04.2000	1*		Zambia	1996			1								
	2	Zimbabwe	18.02.2002	1*												1								
129	1				Zimbabwe	16.02.2010	1																	
	2					27.02.2003	1																	
	3					25.02.2008	1																	
130	1				Transnistria	22.02.2010	1																	
131	1													USSR	1991	1*								
NUMBER OF CASES COVERED:				33					42					18					44					11
NUMBER OF EPISODES COVERED				N/A					77					N/A					N/A					N/A
*EU AS SENDER BUT NOT PRIMARY				48					N/A					7					N/A					10
					24 additional cases					17 additional cases					7 additional cases					3 additional cases				

Appendix B: Comparing coverage of EU sanctions with target country in SSA across databases (Own analysis based on Weber and Schneider, 2020a; Giummelli, 2020a; Morgan, Bapat and Kobayashi, 2013a; Portela and von Soest, 2012a; Hufbauer, Schott, Elliot and Oegg, 2007)

CASE NO.	EPISODE	EUSANCT			EUSD			TIES			GIGA			HSE					
		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition		Target State	Date of Imposition				
1	1	Burundi	21.10.1993	1*															
2	1	Burundi	01.10.2015	1*			1												
3	1	Central African Republic	04.12.2003	1*												1*			
4	1										Comoros	1999	1						
5	1				Comoros	03.03.2008	1												
6	1	Congo Democratic Republic of the Congo	05.06.1997	1															
7	1		22.01.1992	1*									1						
8	1	Democratic Republic of the Congo	16.05.1997	1									1						
9	1				DRC	21.10.2002	1												
10	1	Equatorial Guinea	15.04.1992	1									1			1			
10	1	Eritrea	15.05.1999	1															
11	1	Ethiopia	15.05.1999	1															
12	1	Gambia	12.10.1994	1*									1			1*			
13	1							Guinea	2002	1			1						
14	1	Guinea	16.03.2009	1*									1						
15	2					27.10.2009	1												
16	1	Guinea	14.04.2005	1	Guinea	21.03.2011	1									1			
16	2	Guinea-Bissau	03.05.2012	1*			1												
17	1	Guinea-Bissau	31.01.2011	1*															
18	1	Ivory Coast	16.06.2000	1*									1						
18	2	Ivory Coast	13.12.2010	1		22.12.2010	1												
19	1				Ivory Coast	08.04.2011	1												
20	1	Ivory Coast	01.12.1998	1										Ivory Coast	1999	1*			
21	1	Liberia	13.06.2000	1*							Liberia	2001	1						
22	1	Madagascar	06.02.2009	1									1						
23	1	Malawi	13.05.1992	1*									1						
24	1	Mali	23.03.2012	1*															
25	1	Mauritania	06.04.2009	1*							Mauretania	2008	1						
26	1	Niger	29.01.1996	1*									1			1*			
27	1	Niger	11.07.2009	1*															
28	1	Nigeria	13.07.1993	1*									1			1*			
29	2					20.10.1995	1												
29	1				Nigeria	30.10.1998	1												
30	1	Rwanda	26.04.1995	1*							Rwanda	1994	1						
31	1	Sierra Leone	23.06.1997	1*															
32	1							South Africa	10.03.1978	1*									
33	1	South Africa	16.09.1986	1*															
33	2					18.07.2011	1												
34	1	South Sudan	10.07.2014	1*	South Sudan		1												
35	1	Sudan	30.03.2005	1*															
36	1	Sudan	01.03.1990	1*															
36	2	Sudan	15.03.1994	1*			1						1						
37	1	Sudan	09.01.2004	1*	Sudan		1												
38	1	Togo	26.01.1993	1															
39								Togo	12.01.1992	1			1			1			
40	1							Togo	10.02.2005	1									
41	1										Togo	1998	1						
42	1										Zambia	1996	1						
43	1							Zimbabwe	06.04.2000	1*									
43	1						1						1			1			
44	2	Zimbabwe	18.02.2002	1*	Zimbabwe	16.02.2010	1												
NUMBER OF CASES COVERED:				10					10					4					21
NUMBER OF EPISODES COVERED				N/A					17					N/A					N/A
*EU AS SENDER BUT NOT PRIMARY				25					N/A					2					N/A

Appendix C: List of non-cases (Own analysis based on Crawford, 2001; Del Biondo, 2015b; 2011a; 2012; Meyer-Resende, 2006; Saltnes, 2013; 2017; 2021)

NO.	COUNTRY	OBJECTIONABLE BEHAVIOUR	YEAR	SOURCE	EU THREAT
1	Guinea	Flawed Elections	1993	<i>Crawford (2001)</i>	
2	Lesotho	Coup d'état	1994	<i>Crawford (2001)</i>	
3	Burundi	Coup d'état	1996	<i>Saltnes, D. (2013)</i>	
4	Sierra Leone	Coup d'état	1996	<i>Saltnes, D. (2013)</i>	
5	Congo-Brazzaville	Coup d'état	1997	<i>Saltnes, D. (2013)</i>	
6	Mauritania	Flawed Elections	2000	<i>Saltnes, D. (2013)</i>	
7	Tanzania	Flawed Elections Human Rights Violations	2000	<i>Saltnes, D. (2013)</i>	
8	Chad	Flawed Elections	2001	<i>Del Biondo, K. (2011a)</i>	
9	Zambia	Flawed Elections	2001	<i>Meyer-Resende (2006), EU Election Observation</i>	
10	Chad	Flawed Elections	2002	<i>Del Biondo, K. (2011a)</i>	
11	Equatorial Guinea	Flawed Elections	2002	<i>Saltnes, D. (2013)</i>	
12	Rwanda	Rule of Law (Gacaca court system)	2002	<i>Saltnes, D. (2017)</i>	
13	Malawi	Flawed Elections	2003	<i>Meyer-Resende (2006), EU Election Observation</i>	
14	Mozambique	Flawed Elections	2003	<i>Meyer-Resende (2006), EU Election Observation</i>	
15	Nigeria	Flawed Elections	2003	<i>Saltnes, D. (2013)</i>	
16	Rwanda	Flawed Elections	2003	<i>Del Biondo, K. (2011a)</i>	
17	Ivory Coast	Flawed Elections Human Rights Violations Rule of Law	2004	<i>Saltnes, D. (2013)</i>	YES, in 2003 (EUSANCT)
18	Chad	constitutional coup	2005	<i>Del Biondo, K. (2011a)</i>	
19	Ethiopia	Flawed Elections Human Rights Violations	2005	<i>Saltnes, D. (2013)</i>	
20	Chad	Flawed Elections	2006	<i>Del Biondo, K. (2011a)</i>	
21	Kenya	Flawed Elections Human Rights Violations	2007	<i>Saltnes, D. (2013)</i>	YES, in 2008 (EUSANCT)
22	Nigeria	Flawed Elections	2007	<i>Saltnes, D. (2013)</i>	
23	Ethiopia	Flawed Elections	2008	<i>Del Biondo, K. (2011a)</i>	
24	Rwanda	Human Rights Violation (Support of rebel groups)	2008	<i>Saltnes, D. (2017)</i>	
25	Ethiopia	Flawed Elections	2010	<i>Del Biondo, K. (2011a)</i>	
26	Rwanda	Human Rights Violation (Support of rebel groups)	2012	<i>Saltnes, D. (2017)</i>	
27	Rwanda	Flawed Elections	2012	<i>Del Biondo, K. (2011a)</i>	
28	Rwanda	Flawed Elections	2012	<i>Del Biondo, K. (2015b)</i>	
29	Burkina Faso	Coup d'état	2014	<i>Saltnes, D. (2021), Chapter 5</i>	
30	Uganda	Human Rights Violation (Anti-Homosexuality Act)	2014	<i>Saltnes, D. (2021), Chapter 6</i>	
31	Gambia	Flawed Elections	2016	<i>Saltnes, D. (2021), Chapter 5</i>	
32	Uganda	Flawed Elections	2016	<i>Saltnes, D. (2021), Chapter 5</i>	
33	Zambia	Flawed Elections	2016	<i>Saltnes, D. (2021), Chapter 5</i>	
34	Kenya	Flawed Elections	2017	<i>Saltnes, D. (2021), Chapter 5</i>	
35	Zimbabwe	Coup d'état	2017	<i>Saltnes, D. (2021), Chapter 5</i>	
36	Benin	Flawed Elections	2019	<i>Saltnes, D. (2021), Chapter 5</i>	
37	Sudan	Coup d'état	2019	<i>Saltnes, D. (2021), Chapter 5</i>	
38	Ivory Coast	Flawed Elections	2020	<i>Saltnes, D. (2021), Chapter 5</i>	
39	Mali	Coup d'état	2020	<i>Saltnes, D. (2021), Chapter 5</i>	

Appendix D: PRISMA-P Checklist for systematic literature review (Source: Shamseer, et al. 2015)

SECTION AND TOPIC	NO.	CHECKLIST ITEM	PAGE
ADMINISTRATIVE INFORMATION			
Title:			
Identification	1a	Identify the report as a protocol of a systematic review	Cover Page
Update	1b	If the protocol is for an update of a previous systematic review, identify as such	N/A
Registration	2	If registered, provide the name of the registry (such as PROSPERO) and registration number	N/A
Authors:			
Contact	3a	Provide name, institutional affiliation, e-mail address of all protocol authors; provide physical mailing address of corresponding author	Cover Page
Contributions	3b	Describe contributions of protocol authors and identify the guarantor of the review	N/A
Amendments	4	If the protocol represents an amendment of a previously completed or published protocol, identify as such and list changes; otherwise, state plan for documenting important protocol amendments	N/A
Support:			The Literature Review is a Master Thesis, Supervisors are indicated on cover page
Sources	5a	Indicate sources of financial or other support for the review	N/A
Sponsor	5b	Provide name for the review funder and/or sponsor	N/A
Role of sponsor or funder	5c	Describe roles of funder(s), sponsor(s), and/or institution(s), if any, in developing the protocol	N/A
INTRODUCTION			
Rationale	6	Describe the rationale for the review in the context of what is already known	Chapter 1 Chapter 3
Objectives	7	Provide an explicit statement of the question(s) the review will address with reference to participants, interventions, comparators, and outcomes (PICO)	Chapter 1, p. 3
METHODS			
Eligibility criteria	8	Specify the study characteristics (such as PICO, study design, setting, time frame) and report characteristics (such as years considered, language, publication status) to be used as criteria for eligibility for the review	Chapter 4.2
Information sources	9	Describe all intended information sources (such as electronic databases, contact with study authors, trial registers or other grey literature sources) with planned dates of coverage	Chapter 4.1, p. 25
Search strategy	10	Present draft of search strategy to be used for at least one electronic database, including planned limits, such that it could be repeated	Chapter 4.1
STUDY RECORDS:			
Data management	11a	Describe the mechanism(s) that will be used to manage records and data throughout the review	Chapter 4.1
Selection process	11b	State the process that will be used for selecting studies (such as two independent reviewers) through each phase of the review (that is, screening, eligibility and inclusion in meta-analysis)	Chapter 4.2
Data collection process	11c	Describe planned method of extracting data from reports (such as piloting forms, done independently, in duplicate), any processes for obtaining and confirming data from investigators	N/A
Data items	12	List and define all variables for which data will be sought (such as PICO items, funding sources), any pre-planned data assumptions and simplifications	N/A
Outcomes and prioritization	13	List and define all outcomes for which data will be sought, including prioritization of main and additional outcomes, with rationale	Chapter 4.2
Risk of bias in individual studies	14	Describe anticipated methods for assessing risk of bias of individual studies, including whether this will be done at the outcome or study level, or both; state how this information will be used in data synthesis	Chapter 4.1, p. 25 Chapter 4.3 Chapter 5
Data synthesis	15a	Describe criteria under which study data will be quantitatively synthesised	N/A
	15b	If data are appropriate for quantitative synthesis, describe planned summary measures, methods of handling data and methods of combining data from studies, including any planned exploration of consistency (such as I ² , Kendall's τ)	N/A
	15c	Describe any proposed additional analyses (such as sensitivity or subgroup analyses, meta-regression)	N/A
	15d	If quantitative synthesis is not appropriate, describe the type of summary planned	Chapter 4.1, p. 25
Meta-bias(es)	16	Specify any planned assessment of meta-bias(es) (such as publication bias across studies, selective reporting within studies)	N/A
Confidence in cumulative evidence	17	Describe how the strength of the body of evidence will be assessed (such as GRADE)	N/A

Appendix E: Inclusion/Exclusion Criteria - Extended elaboration (Source: Own analysis, 2022)

CRITERION		ELABORATION	
a	DUPLICATE	Exclude documents that are a duplicate of a document that has been screened before (all document types)	
b	TOPIC NOT ELIGIBLE	Exclude all studies that do not examine sanctions or closely related topics	
c	DOCUMENT TYPE NOT ELIGIBLE	Exclude:	
		Journal Article in Journal not recognised by Ceres or Scimago	
		Journal Article in Journal ranked below C by Ceres	
		Journal Article in Journal with Scimago H-Index below 10	
		Juridical Cases	
		Master/PhD Thesis	
		Website/Newspaper Articles	
		Encyclopaedia Entries	
		BOOKS	Entire books are excluded, however each book that was suggested as search result is screened in a second step
			Exclude Books with Ceres Rank for Publisher below C
	Exclude all not eligible chapters according to other criteria		
d	NOT EU SANCTIONS	Exclude all studies that examine multilateral or unilateral sanctions but not explicitly EU sanctions. For example UN, US, AU sanctions.	
e	NOT ON DECISION PROCESS	i.e., exclude all studies that focus on effects or effectiveness of sanctions	
		i.e., exclude all studies that focus on definition of sanctions	
f	NOT AFRICA	Exclude all studies/sources that exclusively examine EU sanctions in the context of a region or country that is not located in Sub-Saharan Africa	

REFERENCES

- Afesorgbor, S.K., 2021. Sanctioned to starve? The impact of economic sanctions on food security in targeted states. In: van Bergeijk, P. A. G. ed., *Research Handbook on Economic Sanctions*. Cheltenham: Edward Elgar Publishing. pp. 438-565.
- Allen, S.H., 2005. The Determinants of Economic Sanctions Success and Failure. *International Interactions*, pp. 117-138. doi: 10.1080/03050620590950097.
- Baldwin, D.A., 2020. *Economic Statecraft: New Edition*. 1. Princeton: Princeton University Press.
- Birchfield, V.L., 2011. The EU's Development Policy: Empirical Evidence of 'Normative Power Europe?'. In: Whitman, R. G. ed., *Normative Power Europe. Empirical and Theoretical Perspectives*. London: Palgrave Macmillan. pp. 141-160. doi: 10.1057/9780230305601_8.
- Brummer, K., 2009. Imposing Sanctions: The Not So 'Normative Power Europe'. *European Foreign Affairs Review*, 14(2), pp. 191-207. doi: 10.54648/eerr2009015.
- Carneiro, C.L. and Apolinário Jr, L., 2016. Targeted Versus Conventional Economic Sanctions: What Is at Stake for Human Rights? *International Interactions*, 42(4), pp. 565-589. doi: 10.1080/03050629.2015.1036989.
- Connell, B.J., Moya, S.L. and Shin, A.J., 2021. Migration and Economic Coercion. *Foreign Policy Analysis*, 17(3), doi: 10.1093/fpa/orab019.
- Consolidated Version of the Treaty on European Union and the Treaty on the Functioning of the European Union*. 2008. Official Journal C 115. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:2008:115:FULL&from=EN> (2) [Accessed 04.10.2022].
- Council of the European Union. 2004. *Basic Principles on the Use of Restrictive Measures (Sanctions)*. 10198/1/04. Available at: <https://data.consilium.europa.eu/doc/document/ST-10198-2004-REV-1/en/pdf> [Accessed 04.10.2022].
- Council of the European Union. 2018. *Guidelines on Implementation and Evaluation of Restrictive Measures (Sanctions) in the Framework of the EU Common and Foreign Security Policy*. 5664/18. Available at: <https://data.consilium.europa.eu/doc/document/ST-5664-2018-INIT/en/pdf> [Accessed 04.10.2022].
- Council of the European Union. 2022. *EU Best Practices for the effective implementation of restrictive measures*. 10572/22. Available at: <https://data.consilium.europa.eu/doc/document/ST-10572-2022-INIT/en/pdf> [Accessed 04.10.2022].
- Crawford, G., 2001. *Foreign Aid and Political Reform. A Comparative Analysis of Democracy Assistance and Political Conditionality*. 1. Hampshire and New York: Palgrave.
- Crawford, G. and Kacarska, S., 2019. Aid sanctions and political conditionality: continuity and change. *Journal of International Relations and Development*, 22, pp. 184-214. doi: 10.1057/s41268-017-0099-8 .
- Del Biondo, K., 2011a. EU Aid Conditionality in ACP Countries: Explaining Inconsistency in EU Sanctions Practice. *Journal of Contemporary European Research*, 7(3), pp. 380-395. doi: 10.30950/jcer.v7i3.294.
- Del Biondo, K., 2011b. Democracy Promotion Meets Development Cooperation: The EU as a Promoter of Democratic Governance in Sub-Saharan Africa . *European Foreign Affairs Review*, 16(5), pp. 659-672. doi: 10.54648/eerr2011044.
- Del Biondo, K., 2012. Norms, self-interest and effectiveness: explaining double standards in EU reactions to violations of democratic principles in Sub-Saharan Africa . *Afrika Focus*, 25(2), pp. 109-120. doi: 10.1163/2031356X-02502010.
- Del Biondo, K., 2015a. Norms or Interests? Explaining Instrumental Variation in EU Democracy Promotion in Africa. *Journal of Common Market Studies*, 53(2), pp. 237-254. doi: 10.1111/jcms.12169 .

- Del Biondo, K., 2015b. Donor Interests or Developmental Performance? Explaining Sanctions in EU Democracy Promotion in sub-Saharan Africa. *World Development*, 75, pp. 74-84. doi: 10.1016/j.worlddev.2014.11.002.
- Diez, T., 2013. Normative power as hegemony. *Cooperation and Conflict*, 48(2), pp. 194-210. doi: 10.1177/0010836713485387.
- Drezner, D.W., 2003. The Hidden Hand of Economic Coercion. *International Organization*, 57(3), pp. 643-659. doi: 10.1017/S0020818303573052.
- Driscoll, D., Halcoussis, D. and Lowenberg, A.D., 2011. Economic Sanctions and Culture. *Defence and Peace Economics*, 22(4), pp. 423-448. doi: 10.1080/10242694.2010.500826.
- European External Action Service, 2021. *European Union sanctions*. Available at: https://www.eeas.europa.eu/eeas/european-union-sanctions_en#10705 [Accessed 2022].
- European Union, 2022a. *How and when the EU adopts sanctions*. Available at: <https://www.consilium.europa.eu/en/policies/sanctions/> [Accessed 2022].
- European Union, 2022b. *Cotonou Agreement*. Available at: <https://www.consilium.europa.eu/en/policies/cotonou-agreement/> [Accessed 2022].
- European Union, 1995-2022. *Statistics on migration to Europe. Overall figures of immigrants in European society*. Available at: https://ec.europa.eu/info/strategy/priorities-2019-2024/promoting-our-european-way-life/statistics-migration-europe_en [Accessed 2022].
- European Union, no date. *Generalised Scheme of Preferences*. Available at: https://policy.trade.ec.europa.eu/development-and-sustainability/generalised-scheme-preferences_en [Accessed 04.10.2022].
- Fürutter, M., 2020. The transnationalized reality of EU sanctioning: a new research agenda beyond the study of effective economic sanctions. *Journal of European Public Policy*, 27(10), pp. 1585-1597. doi: 10.1080/13501763.2019.1678661.
- Giumelli, F., Hoffmann, F. and Książczaková, A., 2020. The when, what, where and why of European Union sanctions. *European Security*, 30(1), pp. 1-23. doi: 10.1080/09662839.2020.1797685.
- Giumelli, F., 2020a. *EU sanctions database* [Dataset]. Available at: <https://www.giumelli.org/eu-sanctions-database> [Accessed: 15.09.2022]
- Giumelli, F., 2020b. *Codebook & Term of References (ToR) - EUSD 1.0 (European Sanctions Database)*. Available at: <https://www.giumelli.org/eu-sanctions-database> [Accessed: 15.09.2022]
- Halcoussis, D., Kaempfer, W.H. and Lowenberg, A.D., 2021. The public choice approach to international sanctions: retrospect and prospect In: van Bergeijk, P. A. G. ed., *Research Handbook on Economic Sanctions*. Cheltenham: Edward Elgar Publishing. pp. 152-166.
- Hazelzet, H., 2005. *Suspension of Development Cooperation: An Instrument to Promote Human Rights and Democracy?* European Centre for Development Policy Management. Discussion Paper 2005. 64B. Available at: <https://ecdpm.org/work/suspension-of-development-cooperation-an-instrument-to-promote-human-rights-and-democracy> [Accessed 12.10.2022].
- Hufbauer, G.C. and Oegg, B., 2000. Targeted Sanctions: A Policy Alternative? *Law and Policy in International Business*, 32(1), pp. 11-20. Available at: <https://heinonline.org/HOL/LandingPage?handle=hein.journals/geojintl32&div=9&id=&page=> [Accessed 06.10.2022].
- Hufbauer, G.C., Schott, J.J., Elliott, K.A. and Oegg, B., 2007. *Economic Sanctions Reconsidered*. 3. Washington DC: Peterson G. Institute for International Economics.
- Hyde-Price, A., 2008. A 'Tragic Actor'? A Realist Perspective on 'Ethical Power Europe'. *International Affairs (Royal Institute of International Affairs 1944-)*, 84(1), pp. 29-44. Available at: <http://www.jstor.org/stable/25144713> [Accessed 12.10.2022].

- Kaempfer, W.H. and Lowenberg, A.D., 1988. Economic Sanctions and Developing Countries: A Public Choice Perspective. *The American Economic Review*, 78(4), pp. 786-793. doi: 10.4324/9780429441523-16.
- Koch, S., 2015. A Typology of Political Conditionality Beyond Aid: Conceptual Horizons Based on Lessons from the European Union. *World Development*, 75, pp. 97-108. doi: 10.1016/j.worlddev.2015.01.006.
- Lowenfeld, A.F., 2008. *International Economic Law*. 1. New York: Oxford University Press.
- Mackie, J. and Zinke, J., 2005. *When Agreement Breaks Down, What Next? The Cotonou Agreement's Article 96 Consultation Procedure*. European Centre for Development Policy Management. Discussion Paper 2005. 64A. Available at: <https://ecdpm.org/wp-content/uploads/2013/10/DP-64A-Cotonou-Agreements-Article-96-Consultation-Procedure-2005.pdf> [Accessed 01.10.2022].
- Manners, I., 2002. Normative Power Europe: A Contradiction in Terms? *Journal of Common Market Studies*, 40(2), pp. 235-258. doi: 10.1111/1468-5965.00353.
- McLean, E.V. and Whang, T., 2014. Designing foreign policy: Voters, special interest groups, and economic sanctions. *Journal of Peace Research*, 51(5), pp. 589-602. doi: 10.1177/0022343314533811.
- Meyer-Resende, M., 2006. *Exporting Legitimacy: The Record of EU Election Observation in the Context of EU Democracy Support*. Center for European Policy Studies. Working Document 2006.241. Available at: <https://www.ceps.eu/ceps-publications/exporting-legitimacy-record-eu-election-observation-context-eu-democracy-support/> [Accessed 14.09.2022].
- Morgan, T.C., Bapa, N.A. and Kobayashi, Y., 2013a. *Threat and Imposition of Sanctions (TIES)* [Dataset] Available at: <https://sanctions.web.unc.edu/> [Accessed 11.09.2022].
- Morgan, T.C., Bapa, N.A. and Kobayashi, Y., 2013b. *Threat and Imposition of Sanctions (TIES) Data 4.0 Users' Manual. Case Level Data*. Available at: <https://sanctions.web.unc.edu/wp-content/uploads/sites/18834/2021/04/tiesusersmanualv4.pdf> [Accessed 11.09.2022].
- Murshed, S.M., 2009. On the Non-Contractual Nature of Donor-Recipient Interaction in Development Assistance. *Review of Development Economics*, 13(3), pp. 416-428. doi: 10.1111/j.1467-9361.2009.00499.x.
- Murshed, S. M., 2002. *Strategic Interaction and Donor Policy Determination in A Domestic Setting*. UNU/WIDER Discussion Paper 2002. 107. Available at: <https://digitallibrary.un.org/record/536847> [Accessed: 03.11.2022]
- Neuenkirch, M. and Neumeier, F., 2016. The impact of US sanctions on poverty. *Journal of Development Economics*, 121pp. 110-119. doi: 10.1016/j.jdeveco.2016.03.005.
- Partnership Agreement (EU) 2000/483.EC between the members of the African, Caribbean and Pacific Group of States of the one part, and the European Community and its Member States, of the other part*. 2000. Official Journal L317. pp. 0003-0353. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A22000A1215%2801%29> [Accessed 04.10.2022].
- Peksen, D., 2009. Better or Worse? The Effect of Economic Sanctions on Human Rights. *Journal of Peace Research*, 46(1), pp. 59-77. doi: 10.1177/0022343308098404.
- Peksen, D., 2019. When Do Imposed Economic Sanctions Work? A Critical Review of the Sanctions Effectiveness Literature. *Defence and Peace Economics*, 30(6), doi: 10.1080/10242694.2019.1625250.
- Peksen, D., Peterson, T.M. and Drury, A.C., 2014. Media-driven Humanitarianism? News Media Coverage of Human Rights Abuses and the Use of Economic Sanctions. *International Studies Quarterly*, 58(4), pp. 855-866. doi: 10.1111/isqu.12136.
- Portela, C., 2010. *European Union Sanctions and Foreign Policy*. 1. Abingdon and New York: Routledge. doi: doi.org/10.4324/9780203847510.
- Portela, C., 2021. Trade preference suspension as economic sanctions. In: van Bergeijk, P. A. G. ed., *Research Handbook on Economic Sanctions*. Cheltenham: Edward Elgar Publishing. pp. 264-286.

Portela, C. and Orbie, J., 2014. Sanctions under the EU Generalised System of Preferences and foreign policy: coherence by accident? *Contemporary Politics*, 20(1), pp. 63-76. doi: 10.1080/13569775.2014.881605.

Portela, C. and von Soest, C., 2012a. *GIGA Sanctions Dataset*. [Dataset] GIGA German Institute of Global And Area Studies. Available at: https://search.gesis.org/research_data/SDN-10.7802-1346?doi=10.7802/1346 [Accessed 15.09.2022]

Portela, C. and von Soest, C., 2012b. *ARASP – Autocratic Regimes and Sanctions Project. Sanctions Dataset. Codebook*. GIGA German Institute of Global And Area Studies. doi: 10.7802/1346.

Pospieszna, P. and Portela, C., 2015. Understanding the EU sanctioning behavior. *Przełqd Zachodni*, 1, pp. 55-70. Available at: https://iz.poznan.pl/plik_pobierz_4985.c30afadf3fb39a907d5864c6644d96f0/04.%20Pospieszna.pdf [Accessed 05.09.2022].

Regulation (EU) No 978/2012 of the European Parliament and of the Council of 25 October 2012 applying a scheme of generalised tariff preferences and repealing Council Regulation (EC) No 732/2008. Official Journal L303. pp. 227-308. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L:2012:303:TOC> [Accessed 04.10.2022].

Saltnes, J.D., 2017. Norm collision in the European Union's external policies: The case of European Union sanctions towards Rwanda. *Cooperation and Conflict*, 52(4), pp. 553-570. doi: 10.1177/0010836717710528.

Saltnes, J.D., 2018. The European Union's human rights policy: is the EU's use of the human rights clause inconsistent? *Global Affairs*, 4(2-3), pp. 165-177. doi: 10.1080/23340460.2018.1535251.

Saltnes, J. D., 2020. *To Sanction or Not to Sanction? Normative Dilemmas in the Promotion of LGBTI Human Rights*. GLOBUS Research Paper 2020.2. Available at: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3536908 [Accessed 12.10.2022].

Saltnes, J.D., 2022. *The European Union and Global Development*. 1. Abingdon and New York: Routledge. doi: 10.4324/9781003036531.

Schneider, G., Weber, P.M. and Invernizzi, A., 2022. *If Russia were in Africa: Analyzing the double bias of EU and U.S. sanctions*. Available at: https://advance.sagepub.com/articles/preprint/If_Russia_were_in_Africa_Analyzing_the_double_bias_of_EU_and_U_S_sanctions/20728933 [Accessed 21.10.2022].

Shamseer, L., Moher, D., Clarke, M., Ghersi, D. et al., 2015. Preferred reporting items for systematic review and meta-analysis protocols (PRISMA-P) 2015: elaboration and explanation. *BMJ*, 349(g7647), doi: 10.1136/bmj.g7647.

Smith, K.E., 2003. *European Union Foreign Policy in a Changing World*. 1. Cambridge: Polity Press.

Tillyris, D., 2015. The virtue of vice: a defence of hypocrisy in democratic politics. *Contemporary Politics*, 22(1), pp. 1-19. doi: 10.1080/13569775.2015.1112958.

United Nations. *Charter of the United Nations and Statue of the International Court of Justice*. 1945. 1 UNTS XVI. Available at: <https://treaties.un.org/doc/publication/ctc/uncharter.pdf> [Accessed 03.10.2022].

van Bergeijk, P.A.G., 1989. Success and Failure of Economic Sanctions. *Kyklos*, 42(3), pp. 385-404. doi: 10.1111/j.1467-6435.1989.tb00200.x.

Weber, P.M. and Schneider, G., 2020a. Post-Cold War sanctioning by the EU, the UN, and the US: Introducing the EUSANCT Dataset. [Dataset] *Conflict Management and Peace Science*, 39(2), pp. 1-18. doi: 10.1177/0738894220948729.

Weber, P.M. and Schneider, G., 2020b. *EUSANCT Dataset – Codebook: Case-level Dataset – Version 1.0*. Available at: <https://www.polver.uni-konstanz.de/gschneider/research/archive/eusanct/> [Accessed: 11.09.2022]