



**Anna Cervi**

## › Sanctions and Gender: A Paradox between Aspirations and Outcomes?\*

- › A paradox exists where EU sanctions aimed at protecting human rights can inadvertently deepen gender inequalities.
- › Causality between gender and sanctions requires rethinking by examining women's financial isolation, reduced formal employment and limited access to public services.
- › The EU's goal to tackle gender inequalities needs gender-focused sanctions reassessment and strong political support to avoid being merely symbolic.



At the heart of the EU's external action lies a commitment to promoting and defending gender equality and the full enjoyment of rights by all women and girls.<sup>1</sup> EU sanctions are one of the tools to advance this commitment when violations or threats to international security occur. The EU's overarching objective is to introduce targeted restrictions, seeking to minimise adverse effects on the civilian populations. A recent study offers a critical analysis of the gender dimensions of European sanctions, revealing a paradox.<sup>2</sup> While sanctions aim to uphold human rights, their cumulative effects may contribute to deepening existing inequalities, including gender ones, particularly in unstable contexts. This brief aims to prompt further reflection on how sanctions can be enhanced as an effective mechanism for promoting gender equality and safeguarding the rights of women and girls worldwide.

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<sup>1</sup> European External Action Service, *Gender Equality*, 8 August 2025, [https://www.eeas.europa.eu/node/455312\\_en](https://www.eeas.europa.eu/node/455312_en). The author acknowledges that gender is a spectrum of identities and expressions, not a binary. In this article, "gender" mainly refers to women, reflecting its common use in literature and legislation. Gender is socially constructed, context- and time-specific, and changeable, influencing roles, expectations, access to resources, decision-making and inequalities.

<sup>2</sup> Ciampi, Annalisa et al., "Prospettiva di genere e impatto delle sanzioni sulle donne, i minori e altri gruppi vulnerabili", in *AWOS Policy Papers*, 2025, [https://www.esteri.it/wp-content/uploads/2025/08/AWOS\\_Policy-Paper\\_Def.pdf](https://www.esteri.it/wp-content/uploads/2025/08/AWOS_Policy-Paper_Def.pdf).



» Adopting sanctions that are sufficiently targeted to minimise their impact on populations is a delicate balancing act

## EU sanctions and gender: A delicate balancing act

In 2020, in parallel with the adoption of European Gender Action Plan,<sup>3</sup> the EU further expanded its sanctions toolkit by introducing “horizontal sanctions” through the Global Human Rights Sanctions Regime.<sup>4</sup> Designations under this regime – of individuals, entities and organisations responsible for, involved in, or linked to serious human rights abuses, including sexual and gender-based violence – have resonated significantly within political and media discourses. For instance, on International Women’s Day in 2023, the EU, alongside the US and the UK, jointly imposed sanctions in response to violations of women’s rights in Iran.<sup>5</sup>

The EU does not adopt horizontal sanctions in a vacuum. For example, in countries like Afghanistan, Iran, Russia and Syria, the collective set of autonomous European restrictions has been long-standing and extensive. With the necessary distinctions in mind, in these and other similar contexts, EU sanctions encompassed sectoral restrictions targeting critical economic sectors, such as energy and finance. They have also included direct or indirect restrictions on public institutions essential to the provision of basic services, as well as limitations on the export of dual-use goods. These trends signal a renewed focus on more comprehensive European approaches to sanctions.<sup>6</sup> Further, EU sanctions sit alongside other types of restrictions that amplify their effects, complicating efforts to attribute specific effects to individual regimes. These include sanctions imposed by other countries as well as EU and Financial Action Task Force anti-money laundering and counter-terrorism financing frameworks.<sup>7</sup> The cumulative effects of all these restrictions have induced practices of international private sector overcompliance with sanctions<sup>8</sup> and financial sector de-risking.<sup>9</sup>

In this complex regulatory environment, adopting sanctions that are sufficiently targeted to minimise their impact on populations is a delicate balancing act. This remains valid notwithstanding the introduction of broader humanitarian exceptions to sanctions in accordance with the UN Security Council Resolution 2664 (2022).<sup>10</sup> Further, a recent analysis indicates that gender is considered

<sup>3</sup> European Commission, *Gender Action Plan. Putting Women and Girls’ Rights at the Heart of the Global Recovery for a Gender-Equal World*, 25 November 2020, [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_2184](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2184).

<sup>4</sup> Council of the EU, *EU Adopts a Global Human Rights Sanctions Regime*, 7 December 2020, <https://www.consilium.europa.eu/en/press/press-releases/2020/12/07/eu-adopts-a-global-human-rights-sanctions-regime>.

<sup>5</sup> Willkie Compliance, “US, UK and EU Impose Coordinated Sanctions to Mark International Women’s Day”, in *Willkie Compliance Concourse*, 9 March 2023, <https://complianceconcourse.willkie.com/?p=9687>.

<sup>6</sup> Lepeu, Jan, “Ukraine, the De-targetization of EU Sanctions, and the Rise of the European Commission as Architect of EU Foreign Policy”, in *International Politics*, Vol. 61, No. 5 (October 2025), p. 975-987, <https://doi.org/10.1057/s41311-024-00649-7>.

<sup>7</sup> European Commission DG Finance, *Anti-money Laundering and Countering the Financing of Terrorism at International Level*, 9 January 2026, [https://finance.ec.europa.eu/node/199\\_en](https://finance.ec.europa.eu/node/199_en); Financial Action Task Force (FATF) website: *Black and Grey Lists*, <https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html>.

<sup>8</sup> Verdier, Pierre-Hugues, “Sanctions Overcompliance: What, Why, and Does It Matter?”, in *North Carolina Journal of International Law*, Vol. 48, No. 3 (2025), p. 471-498, <https://scholarship.law.unc.edu/ncilj/vol48/iss3/3>.

<sup>9</sup> FATF, *FATF Takes Action to Tackle De-risking*, 23 October 2015, <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-action-to-tackle-de-risking.html>.

<sup>10</sup> UN Security Council, *Resolution 2664 (2022) (S/RES/2664)*, 9 December 2022, <https://digitallibrary>.



## » Demonstrating direct and definitive causality between sanctions and gender is complex

in EU horizontal sanctions<sup>11</sup> – specifically with reference to gender-based violations. However, gender seems not to be considered in other types of EU sanctions, even when these measures aim to protect populations from human rights violations.

### Rethinking causality between gender and sanctions

There is significant diversity in gender dynamics among countries targeted by EU sanctions, such as Afghanistan, Iran, North Korea, Russia, Syria, Venezuela and Myanmar. In these and similar contexts, gender-based discrimination already existed prior to the introduction of EU sanctions – shaped by economic, political, historical and social factors. Discriminating practices and social norms affected women in particular, also resulting in restrictions on the work of civil society organisations concerning gender rights. In these contexts, gender relations and norms changed negatively also as a result of shocks, including political instability, forced migration, humanitarian crises, economic downturns, natural disasters and conflicts. Sanctions are only one of these factors.

Demonstrating direct and definitive causality between sanctions and gender is complex. It requires structured and in-depth causal analysis, which to date remains limited, suggesting avenues for further research.<sup>12</sup> However, the literature suggests three main recurring causal links between gender and sanctions: women's financial isolation, and their reduced access to (formal) labour market as well as to affordable basic public services. These three dimensions profoundly affect women's quality of life at multiple levels, thereby constraining their capacity to continue being socially and politically active.

First, international sanctions tend to trigger a process of “de-banking” that severely disrupts financial systems, cutting off access to international transactions, banking services and the SWIFT circuit. The resulting financial isolation deepens gender inequalities and weakens women's capacity to organise and advocate for their rights. For example, in Afghanistan,<sup>13</sup> Iran,<sup>14</sup> Russia<sup>15</sup> and Syria,<sup>16</sup> financial isolation has limited women's and women-led organisations' access to international funding,<sup>17</sup> obstructed transnational collaboration, threatened the continuity of vital services – like victim

[un.org/record/3997259](https://un.org/record/3997259).

<sup>11</sup> Ciampi, Annalisa et al., “Prospettiva di genere e impatto delle sanzioni”, cit.

<sup>12</sup> Bessler, Manuel et al., *Sanctions Assessment Handbook. Assessing the Humanitarian Implications of Sanctions*, New York, UN Inter-Agency Standing Committee (IASC), October 2004, <https://interagencystandingcommittee.org/node/2936>.

<sup>13</sup> Alexander, Kate, “A Case for Unfreezing Afghanistan's Assets”, in *MADRE*, 29 April 2022, <https://www.madre.org/?p=391>.

<sup>14</sup> Tadrissi Hassani, Shima, “How Female Vendors in Tehran's Metro are Forced Underground”, in *Bourse & Bazaar Articles*, 19 December 2023, <https://www.bourseandbazaar.org/articles/2023/12/15/how-female-vendors-in-tehrans-metro-are-forced-underground>.

<sup>15</sup> Lonardo, Luigi, “The Gender Dimension of EU Sanctions against Russia”, in *MINOS Working Papers*, No. 1 (March 2025), <https://minos.ugent.be/?p=628>.

<sup>16</sup> Ezzeddine, Nancy, “Prospects for Syrian Civil Society Remain Dim While Sanctions Linger”, in *Bourse & Bazaar Articles*, 1 April 2025, <https://www.bourseandbazaar.org/articles/2025/4/1/prospects-for-syrian-civil-society-remain-dim-while-sanctions-linger>.

<sup>17</sup> Subramanian-Montgomery, Ashleigh and Anika Kharkar, “Gender, Counter-Terrorism Financing, and De-Risking: Women Pay the Price”, in *Charity & Security Network Issue Briefs*, March 2024, <https://charityandsecurity.org/?p=10650>.



»» **The EU's ambition to more effectively address global gender inequalities risks remaining symbolic**

support and shelter – and hindered the sustainability of long-term women's rights movements, such as the Iranian Women, Life, Freedom movement.<sup>18</sup> Furthermore, systemic banking failures have restricted women's independent access to financial resources, increasing their vulnerability and dependence on male counterparts.

Second, the impact of sanctions on businesses makes the labour market uncertain and unstable, particularly when coupled with severe economic crisis. For example, Iran, Syria and Russia have witnessed a progressive informalisation of the female labour market.<sup>19</sup> Women's actual employment has moved to the informal market, remaining statistically invisible, socially unrecognised and fragmented.<sup>20</sup> This process is often associated with a corresponding increase in inequalities,<sup>21</sup> economic dependence on men within the family, "economic gender-based violence" and other forms of gender-based violence.

Finally, sanctions target government structures or those controlling them, as in Afghanistan, Iran, Russia and Syria. This directly impacts the delivery of essential and affordable services, including healthcare,<sup>22</sup> education,<sup>23</sup> electricity, water,<sup>24</sup> social policies,<sup>25</sup> transport and social safety nets.<sup>26</sup> Sanctions aim to raise costs or limit resources to prevent repression or conflict escalation. However, governments or armed groups often rely on these resources for survival. This diverts funds from public and welfare services, hitting women the hardest.

## Recognising and resolving the paradox

The EU's ambition to more effectively address global gender inequalities risks remaining symbolic unless it is supported by gender-focused reassessments of sanctions. This also requires a clear political backing. Three complementary trajectories could help reduce tensions in the interplay between gender and sanctions.

First, the EU should acknowledge the existence of causal links between sanctions and gender dynamics to actively qualify, quantify and monitor

<sup>18</sup> Adebahr, Cornelius and Barbara Mittelhammer, "The EU Needs an Iran Strategy, Not Just More Sanctions", in *Heinrich Böll Stiftung Articles*, 14 May 2024, <https://www.boell.de/en/node/77457>.

<sup>19</sup> Abdi, Asma, "A Feminist International Political Economy of Sanctions: Crises and the Shifting Gendered Regimes of Labor and Survival in Iran", in *International Feminist Journal of Politics*, Vol. 27, No. 1 (2025), p. 81-104, <https://doi.org/10.1080/14616742.2025.2454462>.

<sup>20</sup> Hallaj, Omar Abdulaziz, "Formality, Informality, and the Resilience of the Syrian Political Economy", in *GCSP Syria Transition Challenges Project Reports*, No. 8 (June 2021), <https://www.gcsp.ch/publications/formality-informality-and-resilience-syrian-political-economy>.

<sup>21</sup> UN Economic and Social Commission for Western Asia (ESCWA), *Dynamics and Unintended Effects of Unilateral Coercive Measures against the Syrian Arab Republic*, Beirut, ESCWA, July 2024, <https://www.unescwa.org/node/46211>.

<sup>22</sup> Mohamadi, Efat et al., "Impacts of Economic Sanctions on Population Health and Health System: A Study at National and Sub-national Levels from 2000 to 2020 in Iran", in *Globalization and Health*, Vol. 20 (December 2024), Article 81, <https://doi.org/10.1186/s12992-024-01084-2>.

<sup>23</sup> Cervi, Anna and Erica Moret, "After 14 Years of Conflict, Can Barriers to Education in Syria Be Overcome?", in *Carter Center Reports*, April 2025, p. 26, <https://www.cartercenter.org/?p=11778>.

<sup>24</sup> Cervi, Anna, "Turn on the Light. Why Tackling Energy-related Challenges in the Nexus of Water and Food in Syria Cannot Wait", in *Oxfam Discussion Papers*, 29 January 2024, <https://policy-practice.oxfam.org/?p=70421>.

<sup>25</sup> Ranjbar, Mohammad et al., "What Family Policies Do Iranian Couples Prefer for Childbearing? Evidence from a Discrete Choice Experiment", in *BMC Public Health*, Vol. 25 (2025), Article 821, <https://doi.org/10.1186/s12889-025-21938-7>.

<sup>26</sup> ESCWA, *Dynamics and Unintended Effects of Unilateral Coercive Measures*, cit.



**>> The EU should acknowledge the existence of causal links between sanctions and gender dynamics to actively qualify, quantify and monitor these effects and mitigate negative impacts**

these effects and mitigate negative impacts. Debates concerning sanctions and gender often focus on how sanctions *should* function rather than on how they *actually* operate. Progress has occurred, particularly through dialogue between the European Union, civil society and the private sector regarding, for example, humanitarian safeguards. However, policy frameworks lack systematic assessments of pre-existing social structures, gender inequalities and baseline metrics for ongoing impact evaluation of sanctions on women and girls. This gap contributes to hinder effective policy design. Analysis could benefit from formal, systematic consultations with practitioners, academia, gender experts and local grassroots organisations before the EU formulates or revises sanctions. Further, sanctions design and revisions could refer to checklists developed by experts<sup>27</sup> – which also include parameters related to gender issues to pre-empt unintended negative impacts.<sup>28</sup> Lastly, gender-sensitive actions could include embedding gender expertise within EU and member state sanctions teams and mandate comprehensive training programmes for policymakers. These steps could promote a stronger gender-aware culture in sanction environments, which to date remain predominantly gender-blind.

Secondly, it is essential to integrate targeted sanctions with other European foreign policy instruments. For example, the EU could strengthen policy coherence by applying a more joined-up and complementary use of humanitarian, development and stabilisation instruments to address gender inequalities. At the same time, it should seek to limit the adverse effects of de-risking and overcompliance by international private sector actors – key to preventing financial isolation. The effectiveness of these and other efforts hinges on diplomatic engagement with local authorities and civil society – even those that are controversial or restricted actors (e.g. sanctioned authorities, armed groups, or entities linked to terrorism). Often, international diplomatic isolation has reinforced existing power structures, further exposing women to discrimination. Developing effective methods of interaction can foster support for gender equality and promote progress on gender rights that adheres to the aspirations of local populations.

Finally, civil society organisations, sectoral experts and academia should adapt their advocacy strategies to recent transformations in the EU sanctions environment. Russia's invasion of Ukraine in 2022 marked a critical turning point in EU sanctions policy. It led to sanctions of unprecedented scale and scope and produced significant institutional and procedural changes. The restructuring of the European External Action Service strengthened its technical and operational capacity in the sanctions field. At the same time, decision-making shifted towards emergency-driven processes that prioritise security and economic considerations.<sup>29</sup> In practice, the European Commission now often drafts sanctions regimes at the initiative of member states, and the Council subsequently endorses them. This process leaves limited room for early-stage advocacy. As a result, gender-related considerations are

<sup>27</sup> AHSR, *A Model Humanitarian Checklist for Sanctions Units*, 8 October 2024, <https://ahsrproject.org/?p=481>.

<sup>28</sup> Verdier, Pierre-Hugues, "Sanctions Overcompliance", cit.

<sup>29</sup> Korkea-aho, Emilia and Luigi Lonardo, "How Russia's War against Ukraine Changed EU Sanctions Decision-making", in *Journal of European Integration*, 27 August 2025, <https://doi.org/10.1080/07036337.2025.2545921>.



frequently marginalised, since several member states do not view them as equally urgent as security or economic concerns. Addressing the causal links between gender and sanctions therefore requires advocacy efforts that are both timely and strategically recalibrated, focusing in particular on influencing member states prior to the consolidation of sanctions proposals at the EU level.<sup>30</sup> This necessitates sustained investment and coalition-building, as well as a willingness on the part of civil society organisations, NGOs and academic experts to adapt their advocacy approaches. It also requires an acceptance of shared lobbying space with competing actors – particularly from the private sector – whose interests are often regarded as more immediately aligned with prevailing European priorities in the areas of security and defence.

<sup>30</sup> Bergman Rosamond, Annika, “A Feminist Foreign Policy Approach to EU Security and Defence. A Contradiction in Terms”, in *FEPS Policy Briefs*, December 2024, <https://collections.fes.de/publikationen/ident/fes/21693>.



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