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## Piling on:

The Rise of Sanctions Cooperation between Regional Organizations, the United States, and the EU

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Inken von Borzyskowski and Clara Portela

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# PILING ON:

## THE RISE OF SANCTIONS COOPERATION BETWEEN REGIONAL ORGANIZATIONS, THE UNITED STATES, AND THE EU

**Inken von Borzyskowski and Clara Portela**

### Abstract

When a country is sanctioned for violating international rules today, it is usually targeted by several different entities. The degree to which sanctions by different senders overlap remains a largely unexplored phenomenon. In this paper, we examine the extent of sanctions cooperation, i.e. joint action among major sanctions senders (the US, the EU, and regional organizations) against identical targets. We then map regional patterns and evaluate one potential explanation for them. Our analysis leads to three major findings. First, sanctions overlap is predominant and has consistently increased over the last three decades. Two-thirds of sanctions involve more than a single sender. Targets today are usually subject to punishment by at least three different sanctions senders (up from one in 1980) and sometimes up to six different senders. Second, world regions vary widely in the extent of sanctions cooperation, the profile of sanctions senders, and their interactions. Third, to explain variation in sanctions cooperation, we find that hegemonic stability theory does not provide much leverage. We conclude by outlining avenues for future research on sanctions cooperation relating to sanctions onset and effectiveness.

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## 1. Introduction<sup>1</sup>

When Syrian President Bashar al-Assad cracked down on anti-regime protestors in February 2011, five different international entities imposed sanctions in response to government-sponsored violence. First, the League of Arab States called for sanctions, which were swiftly imposed by the European Union (EU) in March 2011. With the quick descent into civil war, the League of Arab States then suspended Syria's membership in the regional grouping in November 2011, while the US sharpened its pre-existing sanctions on the country. Piling on, the Organization of the Islamic Conference also voted to suspend Syria's membership in August 2012. Finally, the Islamic Development Bank decided to cease all its operations in the country.

With five entities imposing sanctions against the same target for identical reasons, Syria ranks on the high end of international attention but is not an outlier. On the opposite side of the globe, Fiji represents a similar case. In December 2006, military commander Frank Bainimarama staged a bloodless coup, declaring a state of emergency just a few months after elections had taken place. Three days after the coup, the Commonwealth of Nations suspended Fiji's membership. Another ten days later, the US imposed sanctions on Fiji, as did other countries such as Australia and New Zealand. In 2007, the EU ceased the application of its aid agreement with Fiji's government, re-channeling its aid. By 2009, in the absence of a return to democratic rule and a worsening of the human rights situation, the Pacific Islands Forum had also suspended Fijian membership. Again, multiple international actors imposed sanctions to condemn the Fijian military's refusal to reinstate democratic rule.

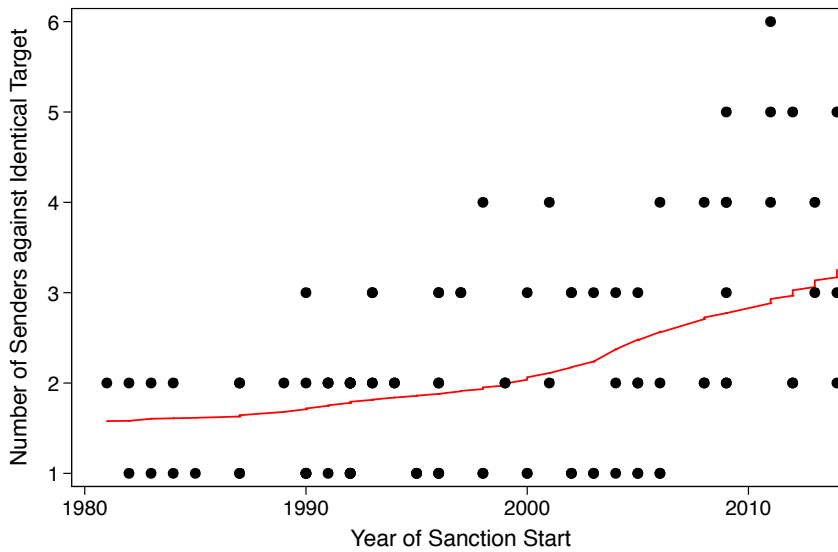
Our data show that sanctions cooperation (i.e. joint action) has become a trend: more often than not, *multiple* senders today impose sanctions against the same target and for the same reasons. Figure 1 illustrates this growing trend in sanctions cooperation, based on our sanctions dataset.<sup>2</sup> Every marker in Figure 1 represents a sanctions regime, involving at least one sender entity. The red line illustrates the average sanction in each year, showing a clear upward trend over the last three decades. While sanctions in the 1980s used to involve only one or two senders, this increased up to four senders in the 1990s, and up to six senders in 2011. What explains this rise in cooperation? A big part of the story involves more sanctions senders joining the field. As more entities have begun to use sanctions as a punishment tool, joint action has become more likely. The major type of actor joining the scene after the 1980s is regional organizations.

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1 We thank Emanuel Adler, Tanja Börzel, Amanda Clayton, Elin Hellquist, Mathis Lohaus, Thomas Risse, Ed Stoddard, and the participants in the KFG "The Transformative Power of Europe" for useful comments on earlier versions of this paper. We are also grateful to Andrea Charron and Felicity Vabulas for sharing their data with us.

2 For details on the sanctions dataset, see section 5.

Figure 1: Increase in Sanctions Cooperation, 1980-2014



Source: Authors.

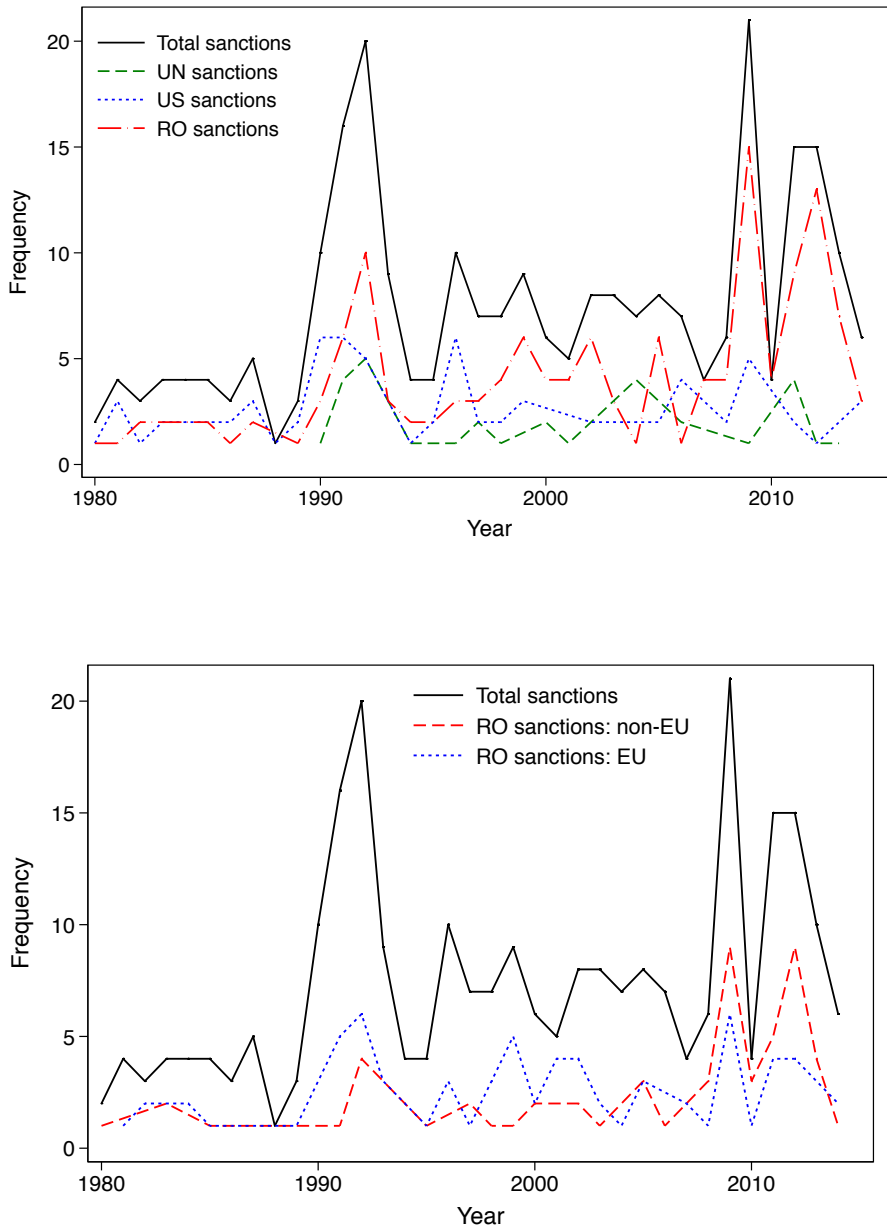
In the sanctions landscape, two important trends have emerged since 1990 that have not yet been systematically analyzed: (i) the rise of sanctions by regional organizations (ROs) and (ii) cooperation (defined here as joint activities, even in the absence of purposeful coordination) between different senders against identical targets.<sup>3</sup> Although the sanctions practice of the United Nations (UN) has received extensive scholarly attention (Cortright/Lopez 2000; Charron 2011; Beardsley/Schmitt 2012; Eriksson/Wallensteen 2015), the sanctions landscape is actually dominated by other actors. The United States remains the principal sanctions sender worldwide, and the EU's autonomous sanctions practice has increased steadily over the past decades (Elliott 2005). In addition, sanctions by regional organizations are on the rise (Closa 2013), a development often missed by observers. In contrast to the 1980s, when ROs rarely imposed sanctions, they began using this punishment tool aggressively in the 1990s. The rise in the autonomous sanctions practice by ROs has continued, with more than a dozen sanctions regimes imposed in 2012 alone. While the unprecedented rise of RO sanctions is a worldwide phenomenon, it is particularly true for African organizations such as the Economic Community of West African States (ECOWAS) and the African Union (AU) (Charron 2013; Eriksson 2010; von Borzyskowski/Vabulas 2015). Using our dataset, Figure 2 illustrates this dramatic development of an autonomous sanctions practice by regional organizations in comparison to other major senders such as the US or the UN.<sup>4</sup> It shows that UN sanctions are relatively rare compared to other sender

<sup>3</sup> As noted in section 2, we use the term "cooperation" loosely in line with prior sanctions research (Martin 1992: 10) to denote joint activity among states or IGOs. We make no assumption about whether this joint activity is the result of formal agreement (purposeful coordination), informal coordination, or coincidence, and whether it is due to persuasion or coercion. We flag these issues for future research in the concluding section 7.

<sup>4</sup> Data and figures refer to ROs' imposition of autonomous sanctions, defined as measures agreed and implemented by ROs in the absence of a UNSC mandate. Measures undertaken by ROs in implementation of UN sanctions are not considered.

types (ROs, EU, US). The major development is the strong increase in sanctions by regional organizations, which reflects a boost both in EU and non-EU RO sanctions, as shown in the lower panel of Figure 2.

Figure 2: Frequency of Sanctions Imposition by Sender



Source: Authors.

The trend of increasing sanctions by regional organizations has resulted in frequent joint action, or overlap, between sanctions senders against countries. Yet we know very little about this sanctions cooperation and the underlying mechanisms that generate it. In qualitative case studies, the interplay between different sanctions senders has been acknowledged (Bellamy/Williams 2011), but it remains unclear how generalizable individual cases are (e.g. Libya). Furthermore, much of the sanctions literature is limited

in their sender scope: it tends to focus on the practice of a single sender (Taylor 2009; Charron 2011) or interactions between two senders (Hazelzet 2001) rather than considering all major sanctions senders. In sanctions scholarship, most studies have focused on the onset (Crawford 2000; Del Biondo 2011, 2015) and effectiveness (Hufbauer et al. 2007) of sanctions. Yet these studies tend to pay scarce attention to interactions *between* different sanctions senders, potentially omitting an important element from the study of both outcomes.

To what *extent* does this cooperation between sanctions senders against identical targets exist, how can we account for it, how does it emerge, and what are its consequences? In this paper, we shed light on the first of these questions by mapping the empirical terrain of sanctions imposed by major senders from 1980 to 2014. We also begin to address the second question by evaluating one potential explanation to account for the overlap and suggesting several others. Finally, we outline avenues for future research on the emergence and consequences of sanctions cooperation.

In this paper, we examine the extent to which sanctions by regional organizations, the EU, and the US coincide. We do this by mapping patterns of sanctions distribution by region: identifying the extent of interaction in Africa, Asia, the Americas, the Middle East, and the broader Europe. Further, we consider the distinctive character of the EU as a sanctions sender, which – unlike any other regional organization – imposes sanctions primarily against *non*-members.

In our analysis, we explore sanctions cooperation among three entities: (1) regional organizations, which only impose sanctions against member states, (2) the EU, the international organization with the most active sanctions practice against non-members, and (3) the US as the principal unilateral sanctions sender. We examine to what extent opportunities for cooperation are seized by the relevant senders. Countries belonging to several organizations can see their membership suspended from more than one regional organization. In addition, sanctions cooperation becomes evident once we widen the scope to global senders (the EU and the US). In the present paper, we aim to identify the extent of such overlap and heterogeneity in patterns between world regions.

Our analysis points to three major findings. First, the extent of overlap between sanctions senders is extensive. In 66 percent of sanctions cases between 1980 and 2014, more than a single sender imposes sanctions against the same target for the same reason. The average sanction over the last 35 years has involved at least two different senders, and the average sanction today involves at least three senders. Second, regional patterns vary widely. Sanctions are heavily concentrated in sub-Saharan Africa, whereas other continents tend to be targeted less frequently. This is also reflected in sanctions cooperation: African target states are usually subject to sanctions by more than three senders, whereas targets in Asia and the Americas usually only face sanctions from one or two entities. For its part, the EU indeed plays a major role as sanctions sender for non-EU countries, especially in close cooperation with the US, but this too varies greatly by region. Third, we find that hegemonic stability theory cannot account for global patterns or most regional patterns. Only the patterns found in Europe, and the relationship between EU and US sanctions, can be explained with the help of hegemonic stability theory. The patterns found in Africa are weaker, while those found in Asia and Latin America refute the applicability of hegemonic stability theory.



These findings have implications for research on global governance, sanctions, and the role of IOs. The findings contribute to research on global and regional governance by illuminating the nature of the relationship between regional organizations (especially the EU) and the US, as well as their degree of autonomy. The results also shed light on regional attitudes towards sanctions as a punishment tool. The analysis of sanctions practices is particularly valuable in that it brings to the fore the differentiated patterns of regional governance across the globe. Moreover, the substantial variation in overlap between ROs and the US suggests that mainstream studies of sanctions onset and effectiveness have overlooked this important factor.

This paper proceeds as follows. In section 2, we provide an overview of sanctions measures and senders, highlighting the role of regional organizations. Section 3 reviews existing research on sanctions and the role of ROs. In the fourth section, we outline theoretical expectations of sanctions interactions and regional patterns in accordance with hegemonic stability theory, and specify hypotheses. The subsequent section outlines our research design and dataset. In section 6, we detail the extent of the overlap between senders and regional patterns, evaluating our hypotheses. The final section concludes with suggestions for future research on sanctions cooperation, onset, and effectiveness.

## 2. Sanctions, Senders, and Sanctions Cooperation

Sanctions are measures imposed by a sender, or group of senders, consisting in the interruption of normal relations or benefits that would otherwise be granted in response to perceived misconduct by the target (Portela 2010). Generally regarded as punishment tools, sanctions are frequently presumed to be imposed to influence target state's behavior: to compel it to cease or reverse the rule violation. Hufbauer et al. (1985: 2) define sanctions as the "deliberate government-inspired withdrawal of [...] trade or financial relations [to obtain] foreign policy goals."<sup>5</sup>

Sanctions encompass a range of measures, including the politically-motivated interruption of economic relations, finance, military links, cooperation programs, or aid, as well as diplomatic relations. The latter component deserves emphasis. While the popular understanding of sanctions often equates the term with trade restrictions, diplomatic sanctions are typical of the practice of states and international organizations (Doxey 2009). The League of Nations expelled the Soviet Union in 1939, the UN Charter foresees the interruption of diplomatic relations as a possible sanction measure (Article 41), and many regional organizations have adopted membership suspension clauses in their charters. Based on these legal provisions for diplomatic sanctions, suspensions of membership have been employed frequently by regional organizations.<sup>6</sup>

The same entity rarely uses the myriad of measures listed above in every case. Instead, different types of actors typically impose different types of sanctions. In this paper, we examine three sender *types*: individual

<sup>5</sup> In line with our definition and standard practice in sanctions research (Hufbauer et al. 1985), we exclude measures of commercial defense (e.g. anti-dumping duties).

<sup>6</sup> For example, both Turkey and Russia have seen their membership in the Council of Europe suspended at different points in time.

states (exemplified by the US as the major sender), regional organizations (imposing sanctions against member states), and the European Union (an RO imposing sanctions against non-members). Regional organizations senders include the Organization of American States, the League of Arab States, and the AU. Figures 3 and 4 below illustrate these sender types. Following standard practice, we refer to single-country sanctions as *unilateral* sanctions imposed by individual states (here the US), and RO/EU sanctions as *multilateral* sanctions. Below we list the three sender *types* examined in this paper – the US, ROs, and the EU – and their usual sanctions measures:

Sanctions imposed by *individual states* (e.g. the US) usually feature bans on armaments and proliferation-sensitive material, flight bans, visa bans, and asset freezes applicable on lists of individuals and entities, as well as selective embargoes prohibiting trade in specific commodities such as oil, timber, and diamonds. A range of financial sanctions are also available to states. Some sanctions are exclusive to state actors, such as the recall of ambassadors, the cancellation of military cooperation programs, the withdrawal of trade preferences, and development aid cut-offs. States can also impose full trade embargoes, although this measure is employed sparsely by a few senders only.

By contrast, sanctions by *regional organizations* (ROs)<sup>7</sup> are routinely membership suspensions. A growing number of ROs feature political conditionality clauses in their statutes providing for membership suspension in case of violation of core commitments (Closa 2013). However, even in the absence of such clauses, the suspension of members in breach of the principles of the organization is possible (von Borzyskowski/Vabulas 2015).<sup>8</sup> Occasionally, RO sanctions also include travel restrictions, weapons embargoes, suspension of financing for infrastructure projects, or full trade embargoes such as that imposed by ECOWAS on Sierra Leone in 1997.

Among RO sanctions senders, the European Union represents a special case in terms of its targets and measures. Unlike any other RO, the EU has imposed sanctions on non-member rather than member states (Hellquist 2014). In terms of measures, the EU has never used membership suspension against politically backsliding member states (von Borzyskowski/Vabulas 2015). Against non-members, the EU has used withdrawal of trade preferences, interruption of development aid, visa bans, arms embargoes, selective trade bans, and financial measures. The EU often imposes sanctions for human rights violations (Hazelzet 2001; Kreutz 2015), and it is especially sensitive to developments in its neighborhood (Portela 2005).

We understand sanctions *cooperation* as joint activity (Martin 1992: 10) among states or international organizations. As such, we use cooperation, joint action, and overlap synonymously and interchangeably

<sup>7</sup> Regional organizations (ROs) are inter-governmental organizations (IGOs) with a strong geographic or historical/cultural dimension. IGOs are formal organizations with a permanent secretariat and three or more state members (Pevehouse/Nordstrom 2003: 2; Pevehouse/von Borzyskowski 2015). This includes pan-regional organizations (e.g. AU), sub-regional organizations (e.g. Southern African Development Community), and trans-regional organizations (e.g. Commonwealth of Nations). Our definition also encompasses regional development banks (e.g. Islamic Development Bank).

<sup>8</sup> Suspension clauses in organizations' charters are *not* necessary for suspension. Even without such clauses, regional organizations have suspended member states in the past (e.g. the Organization for Security and Cooperation in Europe and the Pacific Islands Forum).

to describe the outcome of interest in this paper. Before developing and evaluating hypotheses about the extent and potential reasons for such cooperation, we review existing work in the next section.

### 3. Existing Literature on Sanctions and IO Interactions

The dramatic rise of RO sanctions has triggered interest in both legal studies and political science. Legal scholarship has documented the consolidation of mechanisms allowing regional arrangements to react to democratic backsliding (Cowell 2011; Wilson 2008; Magliveras 2011). Political scientists have addressed the adoption of democracy clauses by ROs (Closa 2013; van der Vleuten/Ribeiro Hoffman 2010; von Borzyskowski 2011) or of security functions (Kirchner/Dominguez 2011). There is also a growing research strand on RO sanctions (Jones 2007; Portela 2010; Eriksson 2010; Del Biondo 2011), with a few comparative perspectives (Hellquist 2014, 2015; Charron 2013; von Borzyskowski/Vabulas 2015; Charron/Portela 2015).

However, we know very little about the *interplay* (i) among ROs and (ii) between ROs and other sanctions senders towards certain targets. A few qualitative case studies of sanctions have pointed to interactions between ROs and other sanctions senders. The research focus here has been on their relationship with UN action (Bellamy/Williams 2011; Mehler 2011; Vines/Cargill 2010). Efforts to understand how the sanctions practices of different IGOs relate to each other are still very much in their infancy (Thakur/van Langenhove 2006) and often remain tentative (Hettne/Söderbaum 2005; Baert et al. 2012; Muller/Schoeman 2012; Langenhove et al. 2012).

Sanctions scholarship has primarily focused on the causes of onset (Hafner-Burton/Montgomery 2008; Beardsley/Schmidt 2012; Shannon et al. 2014) and effectiveness (Hufbauer et al. 1985, 2007; Pape 1997, 1998; Marinov 2005). This research has noted that IGO sanctions can be more effective than single country or multiple-country sanctions (Martin 1992; Drezner 2000; Bapat/Morgan 2009). Yet again, interactions between senders have rarely been explored in this research strand. A notable exception is Martin (1992), who examined how individual states can gain sanctions cooperation from other states or IOs. Other studies of third-party cooperation on sanctions have focused on *states*: Early (2012) claimed that third-party states cooperate with US sanctions when their commercial costs are low, while Falke (2000) discussed sources of discord in transatlantic sanctions cooperation.

Beyond the field of sanctions, research has noted the phenomenon of “international regime complexity” – i.e. the inter-connectedness of global governance (Alter/Meunier 2009; Drezner 2009). Prior research in this field has focused on the interplay between the UN and program decisions at the World Bank and International Monetary Fund (IMF) (Dreher et al. 2009a, 2009b) as well as the relationship between IGOs and NGOs (Tallberg et al. 2013). As far as we know, this paper is the first to examine patterns of sanctions cooperation among ROs and between ROs and the US.

#### 4. Explaining Sanctions Cooperation

Since the rise of RO sanctions – and with it the overlap between sanctions senders – is a relatively new phenomenon, theoretical explanations of these patterns have not yet been developed. Given this scarcity of theories on sanctions cooperation and the status of the US as the principal sanctions sender worldwide, we draw on hegemonic stability theory (HST) to develop some initial hypotheses.

Departing from the assumptions that international relations are anarchic and that states are rational actors, hegemonic stability theory argues that anarchy impedes international cooperation and that a single hegemon is required to resolve collective action problems and achieve cooperation and stability. A lack of global leadership can lead to a decline in international cooperation (Kindleberger 1951, 1973; Krasner 1976). Hegemonic stability theory posits that such cooperation often involves coercion (Lake 1993). HST has been criticized by the liberal camp. Keohane (1984) notably argued that economic cooperation can persist without the dominance of the US because international regimes can facilitate cooperation.

Hegemonic stability theory has been used to explain international economic order, the emergence of international cooperation, and the resolution of collective action problems, although it has sometimes also been applied to war (e.g. power transition theory). At times, HST has also been discussed in the context of sanctions. Falke (2000) discusses the transatlantic disputes over sanctions on Cuba and Iraq/Iran with the help of the concept of hegemony. The most central contribution is Lisa Martin's (1992) seminal study of "coercive cooperation," in which she criticized HST, showing that (i) international institutions have had a stronger impact on sanctions cooperation than hegemonic power; and that (ii) the US has been *more* successful over time in gaining cooperation from other potential sender states despite its relative decline over the Cold War period.

Inspired by these works, we evaluate the applicability of HST to patterns of sanctions cooperation with regional organizations across world regions. Comparative regionalism has availed itself of HST to account for the role of regional hegemons in promoting regional institutions (Börzel/Risse forthcoming). By contrast, our analysis explores the relationship between hegemony *at the global level* and sanctions practices at the *regional level*. While some authors contend that the age of hegemony ended in the 1990s and multipolarity prevailed since then (Acharya 2014), the US remains the *dominant* power in current international politics and thus constitutes the focus of our analysis. On this basis, we develop two observable implications from HST and specify hypotheses in order to test whether that theory can explain the extent and patterns of sanctions cooperation. First, if HST holds, then those instances in which the US imposes sanctions should be accompanied by sanctions by other actors, such as regional organizations. Thus, based on HST, the degree of cooperation between US and RO sanctions should be quite high, if not universal.

*H1: If the US imposes sanctions on a target, regional organizations also impose sanctions against the same target.*

Second, we introduce a nuance. While the hegemon has potentially global reach, its influence likely varies across ROs and regions. For example, Katzenstein (2005) argues that Europe and Asia have responded

differently to US leadership due to differences in the internal *structure* of these regions and their bi-/multilateral relationship with the US.

The US should gain more cooperation from those ROs that display (i) a higher degree of institutionalization and (ii) a higher degree of like-mindedness. Highly institutionalized ROs should be more likely to cooperate with outside partners (like the US) than weakly institutionalized ROs. For example, the level of institutionalization in Europe is much higher than in the Asia-Pacific.<sup>9</sup> The EU is one of the most institutionalized entities in the world, with some independent decision-making power, central monitoring and enforcement capacity. In contrast, ASEAN (Association of Southeast Asian Nations) and SAARC (South Asian Association for Regional Cooperation) have less decision-making power independent of member states and much lower enforcement capacity. The primary Latin American organization (OAS) occupies a middle position on the spectrum. Sanctions cooperation should be easier with lower barriers to the initial decision and implementation. Institutionalization refers to the level of integration that bounds a region as a whole. While Washington has faithful allies in Asia (Japan, South Korea, Taiwan), these are not organized as a region as such. Also note that the US (and Canada) have member/observer status in the Organization for Security and Cooperation in Europe (OSCE) and the Council of Europe (CoE), which constitutes another reason to expect a high degree of cooperation.

Apart from institutionalization, the US should also be more likely to gain cooperation from like-minded entities than entities which are fundamentally different in the values they cherish and the foreign policy goals they pursue. Of all the regional organizations examined here, the US is more similar to the European Union than other ROs, such as the African Union, League of Arab States, or Organization of American States (OAS). The US and member states of the EU have more similar levels of economic and political development (regime type, trade patterns) as well as foreign policy interests. Since the US shares more similarities with the EU than other ROs, the US might find it easier to gain cooperation from this organization rather than others, so joint punishment should be more likely. As a second hypothesis, we thus expect US-RO cooperation to vary along the following spectrum: Europe – Latin America – Africa/Middle East – Asia-Pacific. Thus, the following is the hypothesis we test:

*H2: If the US imposes sanctions on a target, cooperation gained in Europe should (i) be fairly high and (ii) exceed cooperation gained in Asia, with the remaining regions occupying middling positions.*

## 5. Research Design

We examine the extent of cooperation between sanctions senders against individual targets with new data on sanctions by regional organizations, the EU, and the United States from 1980 to 2014. The choice of 1980 as a starting point has two benefits: it allows us to capture the entire sanctions practice of the EU, a

<sup>9</sup> Data from Karreth/Tir 2013. On a scale from 1 to 3, where higher values denote higher institutionalization, the EU scores 3 and ASEAN scores 1.

pioneering organization in this policy realm, which started in 1981. In addition, the choice of 1980 discards very little data as RO sanctions were rare prior to 1979.<sup>10</sup>

The US is the only individual country included in our dataset.<sup>11</sup> All the other senders in the data are inter-governmental organizations (IGOs) of non-universal membership.<sup>12</sup> This includes regional and sub-regional organizations such as the Pacific Island Forum or the Southern African Development Community, as well as trans-regional organizations such as the Commonwealth of Nations and the Organisation Internationale de la Francophonie (OIF).<sup>13</sup> The EU occupies a special position in that it is the only regional organization which imposes sanctions externally (against non-members).<sup>14</sup> This feature makes its sanctions practice more comparable to that of actors like the US than to other regional arrangements. Therefore, we analyze the regional distribution of its sanctions practice first as a type of regional organization and then as a special sender type.

The dataset is unique in the way that it captures the three major types of sanctions senders. Currently available datasets are restricted to at most two IGOs or feature “only” diplomatic sanctions entailing the suspension of membership in the organization. Traditional sanctions datasets often ignore diplomatic sanctions, either because such measures do not match their definitional criteria or due to the difficulty of tracing these cases. However, IGO membership suspensions have become prominent: many diplomatic sanctions were imposed in the past 15 years, as shown in Figure 2. We thus combine several available datasets to get a more comprehensive collection of all IGO sanctions and US sanctions.

The data comprise a total of 261 sanctions episodes. Episodes are grouped by whether they respond to the same “trigger event,” often a norm violation, such as the coup d’état in Mali 2012-2013. Grouped by country-violation, the dataset features 101 total sanctions cases. Unless otherwise noted, our analysis concentrates on these 101 cases.

A first glance at our data reveals interesting trends. Sanctions are most frequently enacted by the US and the EU; each makes up about a third of the sanctions in the dataset, as shown in Figure 3. Within the subset of RO sanctions – the phenomenon of interest here – the EU makes up about half the cases. The other half of RO sanctions (27 percent of the total data) are imposed by organizations other than the EU, such as the AU, ECOWAS, the Commonwealth of Nations, the Francophonie, OSCE, League of Arab States, OAS, or the Pacific Islands Forum, as illustrated in Figure 4.

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10 In the pre-1980 period, there was an average of 0.4 new RO sanctions per year. Between 1945 and 1979 (i.e. 34 years), there were 15 total RO suspensions and only three of these related to political backsliding (Vabulas 2015).

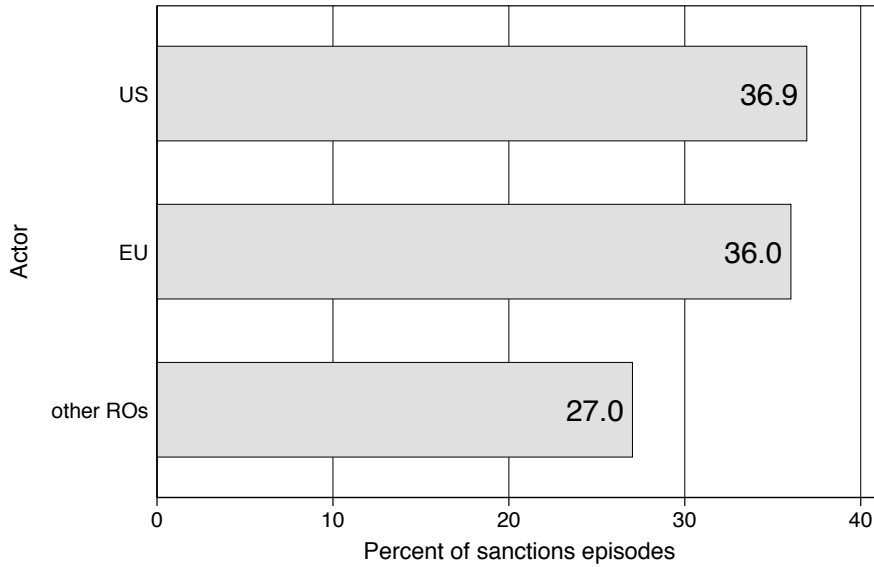
11 Data on US sanctions is sourced from Hufbauer et al. 2007, Hazelzet 2001, case study literature, and media resources.

12 Our data do not feature sanctions agreed by a plurality of states acting outside the context of a regional arrangement.

13 Data on non-EU IGO sanctions is sourced from von Borzyskowski/Vabulas 2015, Charron 2013, and media resources.

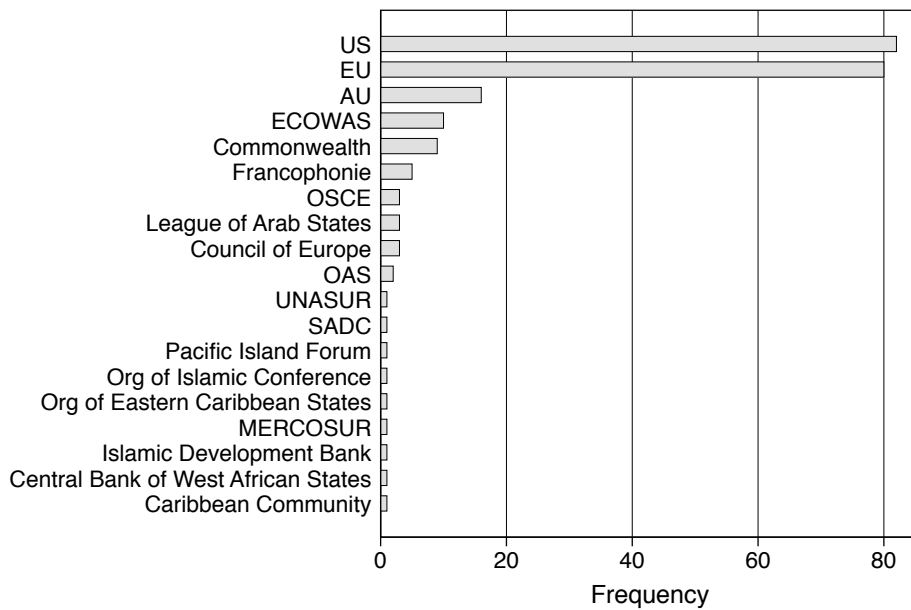
14 Data on EU sanctions is sourced from Portela 2010, Hazelzet 2001, Smith 2014, as well as legal documents and media resources.

Figure 3: Number of Sanctions Episodes by Sender Type



Source: Authors.

Figure 4: Number of Sanctions Episodes by Sender



Source: Authors.

## 6. Results

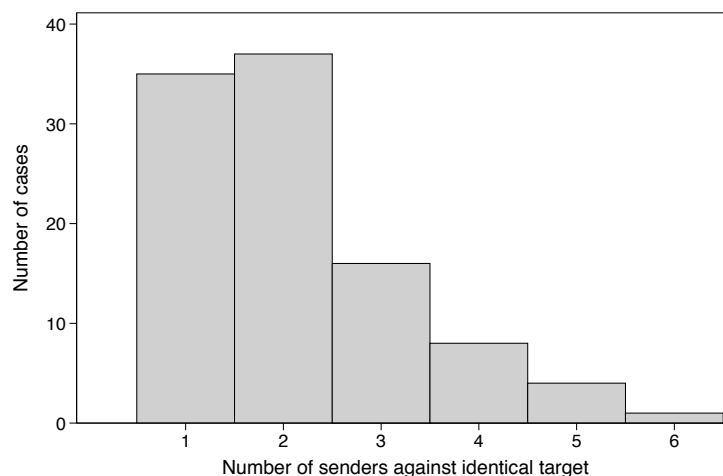
In this section, we evaluate the two hypotheses specified above. To what extent do the US and ROs take joint action, and does cooperation with the US vary across ROs/regions? We first identify the extent of cooperation among sanctions senders globally and then explore differences between ROs and regions.

### 6.1 The Extent of Sanctions Cooperation Globally (H1)

The first observable implication we test from HST is that if the US imposes sanctions against a target, then regional organizations should also wield sanctions against the same targets. This hypothesis implies a fairly high degree of joint action between the US and ROs. Our data do not provide support for this idea: while most sanctions involve more than a single actor, US-RO cooperation only exists in about half of all cooperation cases.

What is the extent of sanctions cooperation between sender types? How separate are the sanctions practices of different senders? Our data show that cooperation between senders generally is common: if sanctions are imposed, there are usually two or more senders. From 1980 to 2014, about 66 percent of sanctions cases (66 of 101) have involved more than a single sender, as shown in Figure 5. Further, sanctions cooperation exhibits a strong positive time trend: over the last three decades, cooperation has become much *more* common, as illustrated in Figure 1. While sanctions in the 1980s used to involve only one or two senders, this number has increased. Our data show that since the mid-2000s, there are *no* sanctions only involving a single actor. Instead, the average sanction today involves three senders, varying between two and six.

Figure 5: Frequency of Sanctions Cooperation by Target



Source: Authors.



However, sanctions cooperation specifically between the US and ROs has not become standard practice. US-RO cooperation exists in just over half of all sanctions cases (61 percent). Overall, the US has imposed sanctions in 75 cases between 1980 and 2014. Of these 75 US sanctions, ROs have teamed up in 46 cases (61 percent). This leaves 39 percent of US sanctions which were *not* joined by ROs. This rate of cooperation is quite similar when we look at the universe of RO sanctions rather than the universe of US sanctions.<sup>15</sup> That is, only half the time the US imposed sanctions did regional organizations do likewise. Many of the remaining cases of third-party cooperation involve multiple regional organizations, but not their cooperation with the US.

Thus, our data do not support H1. It is *not* the case that if the US imposes sanctions, ROs also impose sanctions against the same target. While cooperation among sanctions senders generally has increased over time and is common today (see Figure 1), specific US-RO cooperation is partial.

## 6.2 Regional Patterns in Sanctions Cooperation (H2)

The second hypothesis we evaluate is the extent to which US-RO cooperation varies across regions, and whether the level of cooperation is higher in Europe than in Asia. We proceed by evaluating variation across regions (since most ROs are tied to particular geographic areas) and examining the special case of the EU (which imposes sanctions globally).

We begin by examining the regional distribution of sanctions. Since most regional organizations are only active in certain geographic areas, the aggregate numbers in Figure 4 might hide high cooperation in one region and low cooperation in others. We thus take a closer look at variations between world regions.

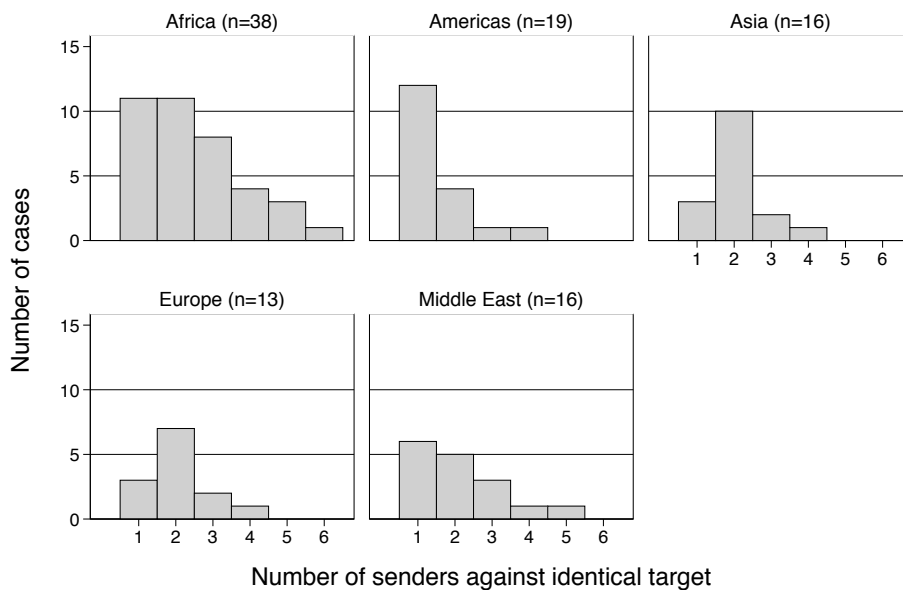
Figure 6 displays regional variation in terms of (i) the frequency with which countries in different regions are targeted and (ii) the extent of cooperation among sanction senders. Two key findings emerge from Figure 6.

First, sanctions are heavily concentrated in sub-Saharan Africa. This continent has been subject to the highest number of sanctions: sanctions regimes against African countries (38 in total) more than double those for any other region. At the other end of the extreme, the European continent has been least at the receiving end of sanctions (with only 13 sanctions regimes). The remaining regions – the Americas, the Middle East, and Asia-Pacific – register similar frequencies ranging from 16 to 18 sanctions cases.

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<sup>15</sup> Specifically, ROs have imposed sanctions in 72 cases between 1980 and 2014. Of these 72 RO sanctions, the US has acted jointly with ROs in 46 cases (64 percent).

Figure 6: Extent of Cooperation among Sanctions Senders by Region



Source: Authors.

Second, Africa stands out from other regions in terms of sender cooperation. The high-end cases of cooperation (involving five or six different sender *entities*) are limited to Africa and the Middle East. In contrast, a single sender of sanctions is the rule in Latin America (usually the US), while only two senders tend to be active against identical targets in Asia and Europe. Further, Africa also records the highest rate of simultaneous measures applied by all three *types* of actors explored here (the US, the EU, ROs). This high rate of cooperation among all three sender *types* in Africa (about 25 percent, or 10/38) stands in stark contrast to low rates of clustering elsewhere. For comparison, joint action against countries in Asia has only happened in one of 16 sanctions regimes in Asia, two or 18 in Latin America, two of 16 in the Middle East, and two of 13 in the broader Europe.

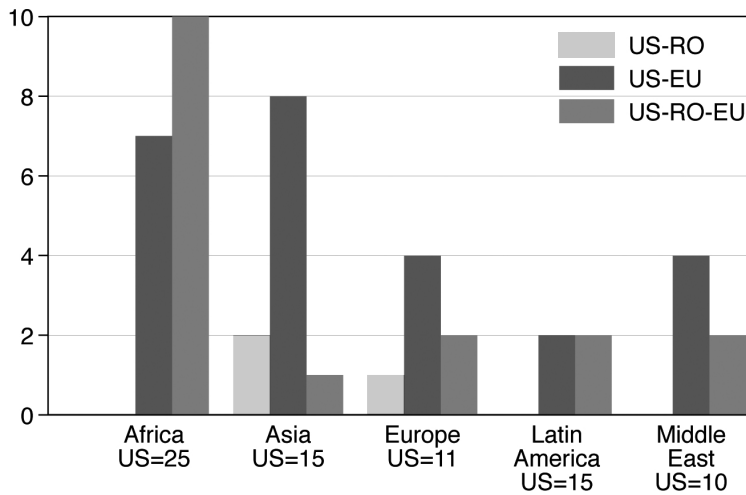
We now turn from sanctions cooperation between *any* senders to US-RO cooperation more specifically. According to Hypothesis 2, the hegemon's influence (and cooperation gained) might vary across regions depending on relevant RO's level of institutionalization and affinity with the US. While this suggests that Europe and the Asia-Pacific should find themselves at opposite ends of cooperation levels with the US (high and low, respectively), we find high levels of US sanctions cooperation in both Europe and Asia but low cooperation in Latin America.

In contrast to Hypothesis 2, sanctions cooperation with the US is high in the Asia-Pacific *and* in Europe, as illustrated in Figure 7.<sup>16</sup> Cooperation is moderately high in Europe, Africa, and the Middle East, where

<sup>16</sup> Concentrating on Hypothesis 2, we have excluded from Figure 7 data on single actor sanctions (EU only, US only, RO only).

between 60 and 68 percent of US sanctions gained third-party cooperation.<sup>17</sup> In these regions, US sanctions coincided with other efforts more than half of the time: 17 out of 25 US sanctions regimes in Africa, seven out of 11 in Europe, and six out of ten US sanctions regimes in the Middle East were accompanied by other senders. On the opposite end of the spectrum, cooperation with US sanctions is low in the Americas. US sanctions applied to Latin America were accompanied by regional measures in only one third of the cases, or four out of 15. In contrast, three quarters of US sanctions in the Asia-Pacific (11 of 15) were accompanied by other senders. This pattern of stronger cooperation in Asia *and* Europe holds true whether we look at the universe of RO sanctions or the universe of US sanctions.<sup>18</sup> We detail practices of sanctions cooperation in each region in turn.

Figure 7: Extent of Cooperation among ROs, the EU, and the US (with total US sanctions noted below regions)



Source: Authors.

17 There is also wide variation in the degree of US-EU cooperation *across regions*, with Latin America exemplifying particularly low degrees of cooperation between these two actors.

18 Looking at the universe of RO sanctions, again the Asia-Pacific region stands out, as almost all regional (i.e. RO or EU) sanctions imposed on this part of the world were accompanied by US measures, i.e. 11 out of 12. This contrasts strongly with patterns in the remaining regions, where US measures accompanied only about half of the RO sanctions imposed. In particular, US measures accompanied ROs' in about half of the cases in Africa (17 out of 30 sanctions regimes), the Americas (five out of eight), Europe (seven out of 16), and the Middle East (six out of 12). From the perspective of RO sanctions, Europe stands out because the volume of the sanctions practice by European organizations (EU, OSCE, CoE) surpasses that of the US. This means that European organizations have imposed sanctions where the US has not.

### 6.2.1 Asia

At first glance, cooperation with US sanctions is highest in Asia. In this region, 73 percent of US sanctions (11 of 15 cases) were accompanied by other sanctions senders, meaning imposed in combination with at least one other type of sender: RO, EU, or both. Most RO sanctions were accompanied by US measures (and most US sanctions were accompanied by RO measures) in Asia.

Yet a closer look at the data reveals that the high degree of sanctions cooperation in Asia comes with a twist. The *identity* of the regional arrangements active in Asia suggests that this is *not* a function of common interests between regional arrangements and the US. Instead, most sanctions regimes were imposed by an external regional organization, i.e. the EU. Regional organizations in Asia refrain from wielding sanctions. No provisions to that effect exist in their constitutive documents, and more importantly, they reject this tool in principle. One illustrative example is ASEAN's outspoken opposition to Western sanctions on Myanmar (Manea 2009; Portela 2014). In addition to rejecting sanctions as a tool, some member states in Asian ROs also contest the goal of democracy promotion, which often underlies sanctions in other regions, particularly Africa. Illustratively, the only two examples of regional sanctions in the Asia-Pacific come from the Commonwealth: it has suspended both Pakistan and Fiji for interrupting democratic rule. The Commonwealth is a union of former British colonies and thus tends to reflect Anglophone values rather than a specifically Asian worldview. The other exception to this rule is the Pacific Islands Forum (PIF), which also suspended Fiji from its membership.

In sum, what appears at first glance as high cooperation between local and external senders in the Asia-Pacific is in reality the opposite. Truly "indigenous" sanctions in Asia are virtually nonexistent. Sanctions efforts in the region emerge as an overwhelmingly Western exercise embodied in US-EU collaboration, largely deprived of regional support. What is perhaps most striking of the Asian pattern is that no indigenous suspension practice exists, neither in pursuance of universal nor regionally-agreed upon goals. The PIF is perhaps the exception that proves the rule, though it constitutes a Pacific rather than genuinely Asian organization.

Whether this absence of local sanctions in Asia indicates weak or strong regionalism is a matter of interpretation. On the one hand, it can be viewed as a sign of a weak regionalism in the sense that regional organizations fail to agree on joint action. On the other hand, it can be seen as strong regionalism due to the widespread agreement to uphold a strict interpretation of the principles of sovereignty and non-interference, even at the cost of leaving misbehavior unaddressed.

### 6.2.2 Europe & EU Activities across Regions

Cooperation with US sanctions in Europe has been moderately high – lower than in Asia but higher than in Latin America. In all, seven out of 11 US sanctions in Europe were accompanied by other senders. The US and the EU acted in concert in most security crises on the European continent. This collaboration existed already during the Cold War – in fact, the EU's sanctions practice originated as an accompaniment to

Washington's measures. Its predecessor, the EC, imposed sanctions alongside the US against Iran in 1980 following the Tehran hostage crisis and against the Soviet Union in reaction to the imposition of martial law in Poland in 1982 (De Wilde d'Estmael 1998).

In addition to this moderate level of cooperation with US sanctions in Europe, it is important to acknowledge the role of one particular organization in this region. The EU has been active across world regions, imposing sanctions against non-member states. This practice is more similar to that of the US than to other regional organizations in the world. We thus detail EU sanctions and its cooperation with the US in other regions as well.

While the EU has applied sanctions in all world regions, its main geographic focus is sub-Saharan Africa. The data reveal that of all 68 EU sanctions regimes since 1980, almost half (27) were imposed against sub-Saharan African countries, and mostly in response to democratic backsliding. In addition to sub-Saharan Africa, the EU has also been relatively active in its own vicinity. Given the small sample size of potential targets (i.e. there are few countries in this region which are *not* EU-member states), the absolute number of sanctions cases (13) is relatively high. The EU displays a moderate activity in the Middle East and Asia. By contrast, the EU has rarely acted in the Americas, where we observe the lowest frequency of its sanctions regimes, with only six cases.

The data point to close US-EU sanctions cooperation – with the important exception of Latin America. In Asia, sub-Saharan Africa, Europe, and the Middle East, about half of all sanctions are a joint EU-US endeavor. In Asia, more than half of the sanctions have been applied by the US and the EU acting in tandem (nine of 16 total sanctions regimes in that region), and only one of these has been accompanied by another RO. In sub-Saharan Africa, half of all sanctions have been imposed by the transatlantic partners (17 of 38), and many of these have been accompanied by at least one other RO. However, already in the 1990s, the EU applied sanctions even in the absence of similar measures by the US. In the broader Europe, six of 13 sanctions were joint activities by the EU and US, with the remaining sanctions being measures imposed by either actor alongside local organizations (OSCE and CoE). Similarly, in the Middle East, US-EU sanctions cooperation affects less than half of all cases (six of 16). However, each sender has also imposed an additional four sanctions of its own independently of the other.

Only in Latin America do we find that the US-only practice largely outnumbered all other categories of potential sanctions patterns. The US has “gone it alone” in ten cases, and has gained EU cooperation in only four other cases. In other words: not even the EU regularly supports US sanctions in that region. Further, there is not a single case of sanctions cooperation between the US and an indigenous RO as the only senders involved in the Americas. Taking into account that both the US and the EU are global sanctions senders, there seems to be stronger consensus among the EU and indigenous regional organizations than between the EU and the US in Latin America. Neither the EU nor Latin American organizations tend to apply sanctions in countries targeted by US measures in the Americas. Similarly, both in Africa and in the Middle East, regional arrangements tend to enact sanctions alongside the EU rather than with the US.

### 6.2.3 *The Americas, Middle East, and Africa*

The Americas, Middle East, and Africa are all characterized by low degrees of cooperation. This is most obvious in Latin America, where hardly any US sanctions are accompanied by ROs. Similarly, only half of RO sanctions are accompanied by US sanctions, and many of these include the EU rather than local organizations. Cooperation materialized only in rare cases: in condemning the Haitian coup d'état in 1992, which eventually led to UN sanctions, as well as in the democratic crises in Peru in 2000 and in Honduras in 2009. However, the most striking feature of the Latin American sanctions landscape is the abundance of US sanctions which lack backing from organizations in the region and, equally conspicuously, from the EU.

In contrast to Latin America, the Middle East and sub-Saharan Africa offer a more balanced picture at first glance. In both regions, about half of the regional sanctions are accompanied by US measures. There is, however, an important nuance to this 50 percent rate of sanctions cooperation: sanctions against countries in Africa are far more numerous than in other regions (see Figure 6 and Appendix Table 1). In the Middle East, cooperation among indigenous organizations and the US is much lower than in sub-Saharan Africa. Sanctions regimes combining measures by the US, local organizations, and the EU are far more frequent in sub-Saharan Africa than in other any region. This reflects the continent's propensity to democratic backsliding and violent conflict as well as its ambition to overcome instability and other hurdles to progress, particularly in West Africa. In addition, the high frequency of cooperation among the three different *types* of senders also indicates Europe's preoccupation with African governance.

The analysis provides only partial support for Hypothesis 2. Contrary to expectations derived from HST, sanctions cooperation with the US is higher in Asia than in Europe. However, an important caveat is that most of that cooperation in Asia comes from the EU imposing sanctions jointly with the US rather than indigenous Asian ROs (ASEAN, SAARC) acting together with the US. In short: While we do not find support for H2 across *regions*, we do find support for it across *ROs*. The EU is more institutionalized and affine to the US than other ROs, and it has been more prone to cooperate with the US than other ROs in the past.

Still, US-EU cooperation varies across regions, with about half of all US sanctions efforts gaining traction with the EU in the broader Europe, Asia, Africa, and the Middle East. In contrast, there are large gaps in US-EU sanctions cooperation – very low degrees of cooperation – in Latin America. The EU rarely applies sanctions against Latin American countries, regardless of whether the US imposed sanctions. Thus, our data only provide partial support for H2.

Overall, we find that ideas around US hegemonic power provide little leverage to explain variation in sanctions cooperation across world regions. Applying hegemonic stability theory to sanctions cooperation, we find only weak support. First, when the US has imposed sanctions on a target, cooperation by ROs varies considerably across organizations and regions. Second, the EU is generally more likely to engage in joint action alongside the US than other ROs, but even EU cooperation is not consistent and is fairly low in the case of Latin America.

Patterns of cooperation in Asia and Latin America cast doubt on the validity of hegemonic stability theory in the field of sanctions. Asian regional organizations are contrary to the use of sanctions, and openly deny

backing to US and other external sanctions. While the US is a key security actor in the region, it does not have sufficient traction to enlist support for its sanctions from Asian countries acting collectively. In the case of Latin America, the lack of traction is perhaps even more evident: regional organizations (both local and the EU) have adopted a practice of imposing sanctions, but their practice is almost entirely separate from that of the US. As shown in Figure 6, the Latin American sanctions landscape stands out due to the highest frequency of sanctions applied by just one actor (the US), an outlier in the world.

## 7. Conclusions

Our analysis has pointed to two major findings: (1) a high degree of cooperation between different entities in sanctioning the same target – yet (2) with markedly distinct regional patterns.

First, sanctions cooperation is common. In two-thirds of cases, more than a single sender imposes sanctions against the same target for the same reason. In fact, we have seen a proliferation of sanctions cooperation over the last three decades. While sanctions in the 1980s used to involve only one or two senders, this increased up to four senders in the 1990s, and up to six senders in 2011. The modal sanction today involves at least three different senders, up from one in 1980.

Second, US-RO cooperation varies widely across regions and remains partial. While it seems highest in Asia, this mostly reflects US-EU cooperation rather than cooperation with indigenous ROs from the Asia-Pacific. More importantly, cooperation among the US and regional organizations is only partial. Regional organizations in Asia and Latin America display a habit of not imposing sanctions alongside the US, while in the Middle East and Africa, US sanctions existed alongside regional measures in around half of the cases. Only Europe emerges as a case of affinity with US sanctions – but even here US-EU cooperation is moderate rather than high.

Taken together, with neither hypothesis receiving strong support in the empirical analysis, our findings lend little credence to the leverage of hegemonic stability theory in explaining sanctions cooperation.

A few regional patterns are worth noting. Africa clearly records the highest frequency of sanctions regimes overall as well as teaming up between the three major actors explored here (US, EU, ROs). Africa's relatively high degree of cooperation among all three senders (about 25 percent, or ten of 38 sanctions regimes) stands in stark contrast to low cooperation rates in the other regions. As hinted at above, joint action by external and indigenous senders against the same target for the same violation might be linked to the close partnership between African countries and their former European colonial powers, in turn culturally akin to the US. The belief that violent conflict and political backsliding should be addressed is shared by indigenous and external actors, as is the understanding that sanctions are appropriate tools to tackle crises of this nature. This manifests itself in a high degree of cooperation among all three sender types, a development partly explained by the recent adoption of strong governance instruments by African arrangements (Striebinger 2012). The Middle East occupies an intermediate position in terms of sanctions cooperation. It is characterized by a moderately frequent sanctions activity, mostly applied by the US in combination with the EU. Indigenous

sanctions activity is modest, but not completely absent like in Asia. In Asia, sanctions remain contested as a policy tool, as is the goal of democracy promotion. As a result, the imposition of sanctions by Western actors in Asia has not only been unaccompanied by indigenous regional measures, but has been a matter of bitter contestation in the past. By contrast, in Latin America, the instrument of sanctions is not questioned *per se*; indeed, some regional organizations have recently adopted conditionality mechanisms that foresee the activation of sanctions, approximating the African model (Closa 2013). However, the absence of regional measures accompanying the prolific sanctions activity of the US in the region evidences that Washington and its southern neighbors are not on the same page regarding the situations in which sanctions should be applied.

In sum, cooperation is observable between the US and Europe, certainly by comparison with other regions. Something similar can be said about Africa, where we observe increasing patterns of cooperation – not only between indigenous organizations and the US, but also between these actors and the EU. The Middle East occupies an intermediate position: it neither displays patterns of pronounced cooperation nor open resistance. On the opposite end of the spectrum are Asia and Latin America. Asian contestation of the use of sanctions as an instrument of influence denies the US of collective backing to its sanctions through its regional organizations. Latin American organizations, by contrast, have adopted objectives and instruments that are characteristic of a Western agenda and that coincide with US sanctions goals; however, Latin American organizations do not support US sanctions. Instead, Latin America has developed a sanctions practice of its own that is largely dissociated from that of the US. Our findings complement previous accounts documenting that Asia upholds a stricter interpretation of the principle of non-interference than Africa and Latin America (Coe 2015). While we clearly confirm that pattern, our analysis adds an important nuance: African regionalism *involves* external actors such as the US and Europe, while Latin American regional governance displays a preference for *excluding* the US.

Sanctions cooperation opens up a range of avenues for future research. As the present discussion has demonstrated, sanctions policy is part and parcel of the security role of regional organizations. Thus, the sanctions practice of ROs could be integrated in research on the security agency of these entities, which tends to focus on their role in peace operations. Indeed, both strands of action display a regionalization trend: military interventions by regional organizations proliferated in recent years, often operated by the same entities active in sanctions imposition. Furthermore, the extent to which peace operations have “regionalized” varies significantly across world regions (Jetschke 2014), a finding that dovetails nicely with the patterns identified here in the sanctions field.

Sanctions cooperation raises a number of interesting and important questions for sanctions onset, implementation, and effectiveness. Concerning onset, how does sanctions cooperation emerge? Is this cooperation generated through coercion or ‘soft’ means? Through which channels or actors does it emerge? Is joint action usually the result of purposeful coordination or also independent action? Perhaps most importantly, how do existing RO sanctions influence other senders’ decision to impose punishment? While the UN imposes sanctions less often than the US, the EU, and other ROs, it might consider actions by these senders as preludes for its practice (Brzoska 2015). Existing consensus on a crisis by external and regional entities might make the eventual “uploading” of sanctions to the UN level more likely than elsewhere (Charron/Portela 2015). Consequently, future research could explore whether and how pre-existing sanctions by other senders influence the onset or effectiveness of UN sanctions.



In addition, sanctions cooperation has implications for research on sanctions implementation and effectiveness, which has often focused on individual sender entities rather than interactions between them. What are the consequences of sanctions cooperation? The underlying logic suggests that joint action should generate higher degrees of implementation and perhaps effectiveness, but whether this is the case is an open empirical question. Future research could explore whether *multiple* senders, as opposed to single entities, increase the effectiveness of sanctions, and whether that effect is conditional on geography, trade dependence, or certain types of actors. Current approaches to sanctions research tend to explore the effects of sanctions by individual senders as if they were acting in isolation, while in reality they often act jointly with others.

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*Appendix Table 1: Classification of Countries by Region*  
(with sanctions targets marked in **bold**)

| Europe<br>(48 countries) | Middle East<br>(22 countries) | Sub-Saharan Africa<br>(47 countries) | Asia & Pacific<br>(44 countries) | Americas<br>(35 countries) |
|--------------------------|-------------------------------|--------------------------------------|----------------------------------|----------------------------|
| Albania                  | <b>Algeria</b>                | <b>Angola</b>                        | <b>Afghanistan</b>               | Antigua and Barbuda        |
| Andorra                  | Bahrain                       | Benin                                | Australia                        | <b>Argentina</b>           |
| <b>Armenia</b>           | <b>Egypt</b>                  | Botswana                             | Bangladesh                       | Bahamas                    |
| Austria                  | <b>Iran</b>                   | Burkina Faso                         | Bhutan                           | Barbados                   |
| <b>Azerbaijan</b>        | <b>Iraq</b>                   | <b>Burundi</b>                       | Brunei                           | Belize                     |
| <b>Belarus</b>           | Israel                        | <b>Central African Republic</b>      | <b>Cambodia</b>                  | Bolivia                    |
| Belgium                  | <b>Jordan</b>                 | <b>Cameroon</b>                      | <b>China</b>                     | Brazil                     |
| <b>Bosnia</b>            | Kuwait                        | Cape Verde                           | East Timor                       | Canada                     |
| Bulgaria                 | <b>Lebanon</b>                | Chad                                 | <b>Fiji</b>                      | Chile                      |
| <b>Croatia</b>           | <b>Libya</b>                  | <b>Comoros</b>                       | <b>India</b>                     | <b>Colombia</b>            |
| Cyprus                   | Morocco                       | Congo Brazzaville                    | <b>Indonesia</b>                 | Costa Rica                 |
| Czech Rep.               | North Yemen                   | Congo Kinshasa /<br><b>DRC</b>       | Japan                            | <b>Cuba</b>                |
| Czechoslovakia           | Oman                          | Djibouti                             | Kazakhstan                       | Dominica                   |
| Denmark                  | Qatar                         | <b>Equatorial Guinea</b>             | Kiribati                         | Dominican Republic         |
| East Germany             | Saudi Arabia                  | <b>Eritrea</b>                       | Kyrgyzstan                       | <b>Ecuador</b>             |
| Estonia                  | South Yemen                   | <b>Ethiopia</b>                      | Laos                             | <b>El Salvador</b>         |
| Finland                  | <b>Sudan</b>                  | Gabon                                | Malaysia                         | <b>Grenada</b>             |
| France                   | <b>Syria</b>                  | <b>Gambia</b>                        | Maldives                         | <b>Guatemala</b>           |
| Georgia                  | Tunisia                       | Ghana                                | Marshall Islands                 | Guyana                     |
| Germany                  | <b>Turkey</b>                 | <b>Guinea</b>                        | Micronesia                       | <b>Haiti</b>               |
| Greece                   | United Arab Emirates          | <b>Guinea Bissau</b>                 | Mongolia                         | <b>Honduras</b>            |
| Hungary                  | <b>Yemen</b>                  | <b>Ivory Coast</b>                   | Myanmar                          | Jamaica                    |
| Iceland                  |                               | <b>Kenya</b>                         | Nauru                            | Mexico                     |
| Ireland                  |                               | Lesotho                              | Nepal                            | <b>Nicaragua</b>           |
| Italy                    |                               | <b>Liberia</b>                       | New Zealand                      | <b>Panama</b>              |
| Latvia                   |                               | Madagascar                           | North Korea                      | Paraguay                   |
| Liechtenstein            |                               | <b>Malawi</b>                        | Palau                            | <b>Peru</b>                |
| Lithuania                |                               | <b>Mali</b>                          | <b>Pakistan</b>                  | St Kitts                   |
| Luxembourg               |                               | <b>Mauritania</b>                    | Papua New Guinea                 | St Lucia                   |
| <b>Macedonia</b>         |                               | Mauritius                            | Philippines                      | St Vincent                 |

|                        |  |                     |                  |                  |
|------------------------|--|---------------------|------------------|------------------|
| Malta                  |  | Mozambique          | Singapore        | Suriname         |
| Moldova                |  | Namibia             | Solomon Islands  | Trinidad         |
| Netherlands            |  | <b>Niger</b>        | South Korea      | USA              |
| Norway                 |  | <b>Nigeria</b>      | <b>Sri Lanka</b> | Uruguay          |
| <b>Poland</b>          |  | <b>Rwanda</b>       | Taiwan           | <b>Venezuela</b> |
| Portugal               |  | Sao Tome            | Tajikistan       |                  |
| Romania                |  | Senegal             | <b>Thailand</b>  |                  |
| Russia                 |  | Seychelles          | Tonga            |                  |
| Serbia<br>(Yugoslavia) |  | <b>Sierra Leone</b> | Sierra Leone     |                  |
| Slovakia               |  | <b>Somalia</b>      | Tuvalu           |                  |
| Slovenia               |  | South Africa        | Uzbekistan       |                  |
| Spain                  |  | Swaziland           | Vanuatu          |                  |
| Sweden                 |  | Tanzania            | Vietnam          |                  |
| Switzerland            |  | <b>Togo</b>         | Western Samoa    |                  |
| UK                     |  | Uganda              |                  |                  |
| Ukraine                |  | Zaire               |                  |                  |
| West Germany           |  | Zambia              |                  |                  |
| Yugoslavia             |  | Zimbabwe            |                  |                  |

Source: Authors.

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