Rhetoric vs. Reality: How Aid Sanctions Affect Funding for Local Actors in Aid-Recipient Countries

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Abstract

Economic sanctions have become a crucial statecraft tool for policymakers who seek to coerce or punish other states in the international system. However, the economic and humanitarian consequences of sanctions are borne not only by states but also by local actors such as non-governmental organizations (NGOs), civil society organizations (CSOs), and the citizens which they serve. Such is especially true in the case of aid withdrawal, a particularly prevalent form of sanctions instrument. Data from the EUSANCT database shows that over 75% of the sanctions imposed between 1989 and 2016 by the EU, US, or the UN included an aid sanction component. By reducing or cutting off the foreign funding on which NGOs and CSOs in developing countries rely to carry out advocacy work and deliver critical health, education, and other public services to citizens, aid withdrawal has the potential to disproportionately disrupt the operations of the third sector. Despite the ubiquity of aid withdrawal as a sanctions tool, we have little understanding of how the burden of aid withdrawal is shared by local implementing partners on which the US relies for aid delivery. How do aid sanctions impact funding for local actors in target countries? This research note offers an exploratory analysis of that question. Using the synthetic control method to establish causal inference, we analyze aggregate differences in US foreign assistance to local implementation partners in both sanctioned and non-sanctioned aid recipient countries for the years 2002-2020. We find that in the years following aid sanction imposition, local actors (in both nongovernmental channels and public sector channels) face a slight decrease in US funding, relative to their non-sanctioned counterparts. Finally, we couple this with additional analyses for Uganda and Madagascar, focusing on US foreign assistance to all funding channels (local actors, as well as international NGOs, multilateral organizations, and government actors). Our results show that following the implementation of aid sanctions, local public sector channels suffer the greatest decrease in funding relative to control countries. We draw on an original dataset of U.S. statements of aid withdrawal to augment these case reports for Uganda and Madagascar. Our analysis sheds light on the micro-impacts of sanctions on the local actors who carry out crucial humanitarian and advocacy work and provides insight into what channels are most affected by US aid withdrawal. This research note, which leverages causal inference, provides policymakers with an empirical overview of the unintended consequences of aid withdrawal for the third sector.
I. Introduction

In 2019 the United States halted assistance to various foreign aid-supported programs to highlight human trafficking concerns in the states in which the programs were located. Pursuing its agenda to combat human trafficking, the Trump administration stopped millions of dollars of aid in accordance with the Trafficking Victims Protection Act of 2000 (TVPA). Money intended to finance such diverse and vital ventures as alleviating the Ebola outbreak in the Democratic Republic of Congo, maintaining peacekeeping operations in South Sudan, and funding early education opportunities in Myanmar were all affected. The stoppage lasted at least six months, and it was only with mounting pressure from Congress and leaders and advocates of non-governmental organizations that foreign aid started flowing again. This freeze in foreign aid flow directly impacted humanitarian and civil rights organizations, including those that advocate for workers’ rights, public health access, and human rights, among others. While the somewhat haphazard way Washington carried out the aid suspension to the 18 Tier 3 human trafficking countries was unusual, the episode highlights the impact foreign aid sanctions could have not only on target states, but also on recipient organizations and the groups they serve.

Halting foreign aid, or implementing aid sanctions, is just one instrument in the toolkit of coercive economic foreign policies available to policymakers. Although economic sanctions can take many forms, including trade restrictions, arms embargoes, and visa bans, aid sanctions are among the most prevalent sanction tools. An analysis of the EUSANCT database, which covers episodes of economic sanctions from 1989 to 2016 spearheaded by the United States, the European Union, and the United Nations, shows that roughly 75% of sanctions implemented include an aid component. Over the period from 2002 to 2020, we identify 96 cases in which the US imposed sanctions with an aid component (see Figure 1). Yet, despite their relative prevalence, particularly compared with other sanction instruments, the impact and mechanisms of aid sanctions are not well-explored. This is true for both the consequences of aid sanctions on the population of the target state, as well as the impact of such sanctions on the intermediaries that carry out and bear the direct brunt of the terms of sanctions.
It is vital to gain further understanding of aid sanctions, not least because of their ubiquity. The broad category of aid sanctions can take many different forms. One, which is outlined in the motivating example in the first paragraph, is the outright withdrawal of funding, or the partial withdrawal of aid. However, aid sanctions could also encompass the redistribution of already committed funds. This could include reprogramming the money to another country, or redirecting resources from the government of the target state to the civil society. Aside from the various forms they take, aid sanctions could also affect different sectors of the target state that have been earmarked for receiving aid, such as the military, government, public health, or civil society. In this research note, we use synthetic control matching to examine the impact on local implementation partners in aggregate to understand how US project aid affects different funding channels (local government vs. local non-government partners).

Due to the complexity of aid sanctions, its effects are not easily captured as a binary variable in sanctions datasets. Indeed, as Figure 2 (constructed using our novel dataset) shows, there is a large variation in the stated intended utilization of aid sanctions. If the statements of how aid sanctions are to be carried out are reliable, then the differences between sanction cases should mean that the actors on the ground in the various target states experience the effects of aid sanctions differently. To see if this is the case, it is crucial to examine whether
aid sanctions are carried out in the way that is aligned with publicly made announcements. This research note highlights two case studies (Uganda and Madagascar) that experienced US aid sanctions with different stated intentions. For these cases we use country-specific synthetic control matching to reveal how these different types of aid sanctions impact the financial flows to five funding channels that span a broad range of implementation partners: local, US-based, and multilateral.

**Figure 2: Types of US Aid Sanctions, 2002-2020**
(According to official government statements at the time of imposition)

In sum, this research note seeks to broaden our understanding of the impact of aid sanctions through an examination of the flow of funds to local implementation partners (NGOs, CSOs, and the public sector) in the target states and through an exploration of all funding channels in two cases where aid sanctions were employed differently. To accomplish these objectives, we compiled a novel dataset comprised of original data on episodes of US imposed aid sanctions and the nature of the action threatened by the sanction’s aid component. We then pair these identified episodes of aid sanctions with US aid flows from 2002 to 2020 to the
target country. Employing the synthetic control method, we then estimate the average impact of US aid sanctions on US aid flows to local non-governmental actors and the public sector in target countries, providing a clear picture of the average effect of sanction imposition on local actors in both the immediate term and several years after the imposition. Finally, to highlight the ways in which different types of aid sanction components shape the availability of aid funding for local actors, we augment these aggregated empirical findings with country-specific results for two very different cases of aid sanctions: Uganda, a case where aid sanctions were designed to entail a reprogramming of aid from the public sector to civil society, and Madagascar, a case where sanctions imposed a partial cancellation of committed aid as well as a partial suspension of future aid. Together, the results of this research note aim to provide a deep description of the reality of aid sanctions for local actors in the countries in which they are imposed. In this regard, we seek to reconcile the rhetoric surrounding sanctions as a diplomatic tool and the reality of how such tools are implemented in a complex world.

The research report is organized as follows: Section II examines the current literature on aid and economic sanctions and highlights the need for a deeper understanding of the causes and consequences of aid sanctions; Section III describes our data and methodology by introducing our novel dataset on episodes of aid sanctions and explaining the synthetic control matching method we employed to achieve causal inference; Section IV presents our aggregated results along with case studies for Uganda and Madagascar. Lastly, Section V concludes with a discussion of the policy implications of our findings, as well as directions for future research.

II. The Causes and Consequences of Aid Sanctions

The Impact of Economic Sanctions

Economic sanctions have long been part of the foreign policy toolkit. Although sanctions are generally equated with trade restrictions, be they import and export controls or broader embargoes, sanction instruments come in many forms. Outside of trade-related coercive instruments, however, the impact of individual tools associated with economic sanctions, such as financial restrictions, visa bans, and aid sanctions, have not been as well-explored.
This is particularly true when considering the consequences that economic sanctions inflict upon the target state and the mechanisms through which they do so.

Civilians in the target state often bear the brunt of economic sanctions. From the literature, we know that economic sanctions often lead to worse human rights outcomes broadly, and to decreased women’s rights more narrowly (Drury & Peksen, 2014; Lucena Carneiro & Apolinário, 2016). Other studies find that access to public health is negatively impacted (Peksen, 2011). Those living in the target state could also see exacerbated inequality, decreased life expectancy, and an increased rate of HIV/AIDS (Gutmann et al., 2021; Jeong, 2020; Kim, 2019).

While the sanctions literature helps us understand the negative effect of economic sanctions, most of the research to date focuses on average effects. Yet, more recent articles demonstrate that the specific characteristics of the sanctions themselves play a role in the type of impact the instrument has on the target state’s population. For example, Gutmann et al. (2021) found that multilateral sanctions, particularly those implemented by the United Nations, have a greater negative effect on life expectancy than unilateral sanctions imposed by the United States. Similarly, Peksen & Drury (2010) found that states targeted by comprehensive sanctions tend to experience a greater decline in democratic freedoms than those beset by targeted sanctions. If a wider or narrower scope of economic sanctions can lead to differential impacts in the target state, as demonstrated by these studies, then we posit that the sanction type and method of implementation can impact the target state’s outcome as well. For example, Jeong (2019) found that the employment of foreign aid sanctions tend to increase the probability of target state capitulation compared to other forms of sanction tools. This effectiveness carries over to sanction threats, as well (Early & Jadoon, 2019).

The Many Forms of Aid Sanctions
Aid sanctions are often viewed as a monolith. As previously mentioned, we know aid sanctions take on various forms (complete vs. partial immediate suspension; partial vs. complete cancellation of committed future aid; diverting funds via reprogramming to other countries or redirecting to other sectors) and occur through different funding channels. We
would expect an outright halt of foreign aid to affect the target state differently than a re-channeling of resources to the target state’s civil society. Similarly, aid sanctions implemented against the target state’s government budget should look quite different from those halting the flow of resources to society-level projects. However, currently available sanctions datasets do not differentiate between different kinds of aid withdrawal, leading scholars to draw direct comparisons between cases with distinctive funding mechanisms and purposes. The case outlined at the start of the paper, where the aid cut primarily impacted on-the-ground NGOs that had already been receiving funds, has a distinctively different impact than the U.S.’s cessation of $700 million in emergency assistance to Sudan amidst a military coup in late 2021. The latter directly impacted the Sudanese government, the intended recipient of the earmarked, but not yet distributed funds. Despite these different circumstances, following the inclusion criteria of currently available sanction databases, the Sudan aid withdrawal case clearly would be coded as a sanction episode even though the aid had merely been committed and not yet disbursed. This example illustrates the need to explore the nuances of aid sanctions further, yet current databases preclude a more nuanced examination by lumping these cases into the same broad category. Although there are similarities in how aid sanctions could be and are utilized, a full analysis of aid sanctions and their impact cannot be complete until we are able to disentangle the different types of aid sanctions.

Aid Sanctions and the Third Sector
To understand what leads to the impact of aid sanctions on target state populations, it is imperative to discuss how aid sanctions impact the intermediaries on the ground. Foreign aid could be distributed through a variety of ways, including those that are directly transferred to the recipient state government. However, specifically in the case of the United States, direct transfer of foreign aid to the government of the recipient state is but a small part of total aid given. According to USAID, more than 95% of the foreign aid is given to multinational organizations, nonprofits, or NGOs.

Much of the prior work on NGOs and aid withdrawal notes that while aid reduction has increased over time, it is typically attributed to changing economic status in the target state or NGOs’ failure to meet donor preferences (Pallas, Anderson, Sidel 2018). As states become
more economically developed, their need for aid is reduced and donors act accordingly. Donors can also withdraw aid when individual NGOs fail to meet donor expectations. However, these common explanations ignore the instances when aid withdrawal is the result of a sending state’s economic statecraft policies. Investigating global trends in aid flows or even country-specific aid reduction lacks the granularity that our approach offers. By combining aid sanction data with funding channels targeting local actors, we employ a more micro-level analysis investigating how aid withdrawal from the US for political purposes impacts implementation partners within countries.

Since the third sector plays such a large role in the management of foreign aid, we ask: how do aid sanctions affect local implementation partners such as NGOs, CSOs, and public sector parties that carry out the crucial work on the ground in recipient states? On one hand, a drop in funding is to be expected. Even though aid sanctions often have built-in waivers for humanitarian aid, the scopes of the waivers are quite narrow. Most of the humanitarian provisions only allow for exports of medical supplies, clothing, and food that directly help alleviate human suffering (such as in the case with North Korea, Syria, Iran, etc.) or services, particularly medical ones, provided by NGOs. Allowances are also usually made for payment processing needed to support NGO-led projects or for specific purposes (such as containing the spread of COVID-19 in the past two years). All these, however, do not alleviate the burden that the stoppage of aid has on foreign aid projects. On the other hand, aid sanctions do not necessarily herald disaster. In a recent article, Jeong (2020) looked specifically at the effect of aid sanctions, demonstrating that while sanctions generally increase inequality, aid sanctions actually decrease inequality in target states. Pre-sanction distribution of foreign aid and the preference for the sender to cut off government-to-government aid contribute to the outcome. Moreover, Early & Jadoon (2016) even found that in cases where the U.S. imposed unilateral sanctions, the target state experienced increased aid flow due to either altruistic or self-serving reasons from other donors. Though the paper tests a signaling mechanism of stigmatization, it shows that the impact of sanctions is complex and nuanced.

A new approach
In this research report we address some of these common issues in aid sanctions research. First, we develop and utilize a novel dataset that teases out the various types of aid sanctions, allowing us to focus on and understand politically-motivated aid withdrawal. The dataset also allows for a greater comprehension of the details of aid sanctions and will be useful for future analysis of sanctions’ impact. Our case studies of Uganda and Madagascar rely on these data to highlight how different types of aid sanctions impact the flow of US aid through various channels. Second, our aggregate analysis of funding channels offers a “on-the-ground” look at the influence of aid sanctions on local implementation partners, including NGOs, CSOs, and local government partners. This is important because a) it helps us understand whether the stated mechanisms through which aid sanctions are carried reflect the reality, and b) it highlights how aid sanctions could influence NGO and CSO operations, which in turn could affect the population of the target state (though the latter is currently outside the scope of the paper).

Of course, possible noise exists in this analysis. Sanctions and foreign aid policies are complex and require time to implement. The effect may not be immediately felt. Moreover, depending on the administration, aid sanctions could also be carried out haphazardly. Research in this field relies on observational data, making it notoriously difficult to establish causality. However, we have addressed this issue by employing statistical methods that allow for causal inference. This paper represents an effort to understand the impact of various aid sanctions on the third sector.

III. Data and Methods

**Estimating the Effect of Sanctions with the Synthetic Control Method**

To determine the effect of the imposition of aid sanctions on US aid flows to local NGOs and other actors, we employ the Synthetic Control Method (SCM). Unlike most panel models, the SCM does not restrict variation in the treatment effect across the post-treatment period (Abadie & L’Hour, 2021, p. 410). This allows us to estimate the magnitude of the effect of

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1 For a technical explanation of SCM, its identifying assumptions, and its recent modifications, see Abadie et al. (2011, 2015), and Becker and Klößner (2018). For recent applications, see Xu (2017), Ben-Michael et al. (2019), and Dube and Zipperer (2015).
sanctions for each year after they were imposed. As a result, we can discern whether the effect of sanctions on various actors is lagged, and how the effect grows or decays over time.

In recent years, SCM has become a popular tool to evaluate the impact of policy changes on one or more treated units when no single suitable comparison unit exists. In contrast to the regression approach that draws on all untreated units equally to estimate the treated unit’s counterfactual outcome, SCM assigns different weights to untreated units to construct a single, optimal control unit that closely matches each treated unit’s pre-treatment trends in the outcome variable and pre-treatment values on select covariates. The effect of treatment is then obtained by comparing the actual outcomes of the treated unit in the post-treatment period to the projected post-treatment outcomes of the synthetic counterfactual unit.

We begin by partitioning our data into treated countries, $J$, and never-treated, or control, counties, $K$, where the “treatment” is the imposition of a sanction. The unit of analysis is the country-year. $J$ thus consists of the observations from 2002 to 2020 for all countries on which the US imposed an aid sanction, and $K$ consists of all observations from 2002 to 2020 for aid-recipient countries that were not sanctioned by the US during the period under study. For each treated unit, $j = 1, \ldots, J$, the timing of treatment $T_{j,0}$ varies within the range $2002 \leq T \leq 2020$. Each treated country has a pre-treatment period $2002 \leq t < T_{j,0}$ and a post-treatment period $T_{j,0} < t \leq 2019$. In order to ensure we have sufficient pre-treatment observations to construct a synthetic control and at least one post-treatment observation to detect the effect of treatment, we restrict $J$ to include only those treated countries in which $2006 \leq T_{j,0} \leq 2019$.\(^2\)

For each treated country in J, we create a counterfactual unit from a weighted combination of the countries in K. $X_j$ is a vector of the mean values of the outcome of interest $Y$ and select “predictor” covariates for treated unit j in the four-year period $T_{j,-5} \leq t \leq T_{j,0}$, and $X_K$ is a matrix of the predictors and outcome of interest for all untreated units in K over the same four-year period. Weights are assigned to each variable in $X_K$ and $X_j$ based on the variable's predictive power in forecasting $Y$. The optimal choice of these weights, given by the non-negative diagonal matrix $V$, minimizes the mean square error of the synthetic control estimator. $V$ can be determined a priori or derived from the data. We follow the improved optimization method proposed by Becker and Klößner (2018) to compute $V$, minimizing the mean square error over the four-year period prior to treatment. The synthetic control unit is then constructed by finding the vector of weights $W = w_1, \ldots, w_K$ which minimizes the pseudo-distance, $|X_j - X_K W| V$, where weights $w_1, \ldots, w_K$ are non-negative and sum to one (Abadie et al., 2011).

In line with the literature on the determinants of aid flows, we use the following variables as predictors: logged trade flows between the United States and the aid-recipient country, from BACI; logged GDP per capita and logged population of the aid-recipient country, from the World Bank Development Indicators; logged deaths from natural disasters in the recipient country from EM-DAT; the average of the Freedom House Civil Liberties and Political Rights scores for the aid recipient; and an indicator equal to 1 if the recipient was formerly colonized by the US, also from BACI.

Our outcomes of interest are the logged value of annual foreign assistance flows from the United States to the aid-recipient country through each of the following five implementation channels: US nongovernmental actors, local nongovernmental actors, US public sector actors, local public sector actors, and multilaterals and international organizations. We construct synthetic control units for each of the 20 treated countries in our sample from a

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3 We use the msclt package (Becker & Klößner, 2019) to execute the analysis.
5 Due to the inability of the SCM approach to accommodate units with complete missingness in one of the predictor variables, we remove from the analysis any countries with missing values on a predictor from 2002 to 2020. This removes two countries (Botswana and Eswatini).
pool of 52 countries that were not sanctioned from 2002 to 2020, and obtain the outcomes for the synthetic control unit in the three years prior to treatment, the treatment year, and the five years after treatment. We then take the average outcome for all 20 treated units and their corresponding synthetic controls, respectively, in each period and plot the average outcomes against the year relative to sanction imposition (Abadie et al., 2011). For the averaged results, we focus on the impact of sanction imposition on local implementation partners specifically, reserving the results for US-based and international implementation partners for the Appendix.

While offering a compelling way to conduct comparative case studies in the absence of suitable comparison units, there are several disadvantages to the SCM approach worth noting. First, standard methods of statistical inference cannot be used to determine the significance of SCM estimates. To assign a level of confidence to the results obtained using SCM, researchers often conduct falsification in which the effect of a “placebo” intervention on the outcome of interest is estimated for never-treated units, providing a distribution of placebo effects against which the real treated unit estimate can be assessed.

Second, to achieve causal identification, there must be a close correspondence in outcomes between the treated unit and synthetic control unit in the pre-treatment period. Fortunately, we can assess the correspondence between the treated unit and its synthetic counterfactual empirically and visually. Finally, many of the same assumptions imposed in standard analyses of policy interventions also apply to SCM, including the assumption that sanction imposition in the treated country does not affect US aid flows to never-treated countries, and that the imposition of a sanction is the only event to affect the treated country in the year of sanction imposition.

**Data**

To determine the sanctioned status of aid recipient countries across our study period, we draw on an original dataset of all US sanctions imposed between 2002 and 2020 that include an aid component. The dataset consists of all cases of aid sanctions involving the United

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6 This is different from standard recordings of economic sanctions, which have start dates coded as the dates when sanctions were threatened or relevant legislation passed.
States, whether unilateral or multilateral, as identified by the EUSANCT database, from 2002 to 2016. To increase the coverage of the dataset, we use news coverage, White House, government press releases, and public statements to identify cases from 2017 to 2020 in which the United States imposed sanctions containing an aid component, and code these cases in accordance with the EUSANCT codebook. Altogether, the dataset identifies 96 separate instances where a country was targeted by aid sanctions from the United States during the time period. Of the 96, there are 75 individual countries (not counting the three cases we dropped due to data availability), 19 of which were sanctioned more than once. The cases are coded dyadically, rather than clustered by legislation or sanction program.⁷ We use the year in which an aid sanction was first imposed to indicate the beginning of “treatment” in the synthetic control analysis. In cases where a country might undergo more than one sanction over the course of the study period, we take the year that the first aid sanction was imposed as the beginning of treatment.

While the 96 instances of sanction imposition in the dataset all consist of some aid component, aid sanctions can take on a variety of forms, ranging from outright suspension of all aid to the redirection of aid to different sectors or actors. To capture this variation in the severity and nature of the imposed sanctions, we draw on news articles, press releases, government reports and white papers, and statements from government officials to code the intended implications of the imposed sanctions. Specifically, we look for whether the sanctions threaten to undertake one of more of the following actions regarding US aid flows to the target state: the suspension of future aid, the partial suspension of future aid, the cancellation of committed aid, the partial cancellation of committed aid, the reprogramming of aid to another country, and the reprogramming of aid to other sectors or actors within the target state.⁸ A complete list of the sanctions covered by the dataset, including the terms of the sanction’s aid component, can be found in Appendix II. In this research note, we draw on

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⁷ The dataset includes four sanction programs where multiple countries were sanctioned for the same issue or under the same legislation: the sanctioning of the Northern Triangle Countries by the Trump administration in 2019 for disputes over illegal migration, the withdrawing of aid for Tier 3 countries in 2019 under the Trafficking Victims Protection Act of 2000, the sanctions against countries that were found to use child soldiers under the Child Soldiers Prevention Act of 2008, and the sanctions implemented against states that refused to grant U.S. citizens immunity from the International Criminal Court in 2003. Altogether, these four programs encompass 62 sanction episodes in the data, while the other 34 sanction cases are “stand alone” episodes.
⁸ For coding rules and definitions, see Appendix I.
these data only to select countries characterized by starkly different terms of the aid sanction for our empirical case studies.

To obtain an annual measure of US aid flows to local actors, we aggregate project-level disbursement data from over 2,500,000 projects funded by the US in OECD aid-recipient countries from 2002 to 2020. Project level data were obtained from the US Foreign Assistance dataset. To determine the immediate and real effect of sanctions on the financial resourcing for NGOs and CSOs, we use disbursement, rather than commitment, amounts in constant USD.

The Foreign Assistance dataset distinguishes project assistance channeled through 20 different categories of implementing partners. For ease of interpretation, we condense these categories to obtain five distinct channels through which assistance is disbursed: Public Sector - US, Public Sector - Non-US, Non-governmental - US, Non-governmental - Non-US, and Multilateral and International Organizations. While the Foreign Assistance dataset does not contain a category for aid channeled specifically to recipient country NGOs and CSOs, we use the category of “Non-governmental - Non-US” implementation partners as a proxy for aid to local civil society actors. As this category excludes both US-based nongovernmental actors and international NGOs, we contend that interpreting “non-US” partners as local partners is a reasonable assumption to make. Similarly, we consider aid channeled to the category “non-US public sector” to have been channeled to the recipient country’s public sector; again, we believe this is a reasonable assumption to make, although we cannot rule out the possibility that some aid in this category might be channeled through a third country’s government institutions.

As discussed above, in constructing the sample, we are required to omit any sanctioned countries without three years of observations prior to treatment (countries which were sanctioned prior to 2006) or at least one year after treatment (countries which were sanctioned in 2020). To reduce noise in the data, we also remove from the analysis any countries whose population is below 1 million people for at least half of the years in our

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9 The dataset can be downloaded here: https://foreignassistance.gov/data.
10 See Appendix III for complete coding details.
Finally, we further omit from the sample any countries not considered by the OECD to be an “aid recipient country” at any point over the study period. As a result, we are left with 20 treated countries in our sample. Figure 3 below provides a visualization of the timing of sanction imposition in the 20 treated countries included in the analysis.

**Figure 3: Treated Countries in SCM Analysis**

IV. **Effect of Aid Sanctions on Local Actors**

**Aggregate Results**

Recall that to conduct the synthetic control analysis, we construct a synthetic control unit from the pool of never-sanctioned countries for each sanctioned country in our sample, and

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11 This removes 31 countries from the analysis: Anguilla, Antigua & Barbuda, Barbados, Belize, Bhutan, Cape Verde, Comoros, Djibouti, Dominica, Equatorial Guinea, Fiji, Grenada, Guyana, Kiribati, Maldives, Marshall Islands, Micronesia, Montenegro, Palau, Samoa, São Tomé & Príncipe, Seychelles, Solomon Islands, St. Kitts & Nevis, St. Lucia, St. Vincent & Grenadines, Suriname, Tonga, Turks & Caicos Islands, Tuvalu, and Vanuatu.
then compare the effect of the imposition on post-sanction US aid flows to the treated (sanctioned) country to US aid flows to its synthetic counterfactual over the same period. We do this for a total of 20 countries, producing 20 individual synthetic control units and, thus, producing 20 individual results. While looking at the results of the SCM analysis for a single case can lend insight into the dynamics of a particular case, as discussed in greater detail below, we are first interested in understanding the general effect of aid sanctions on US assistance flows. As such, in this section, we report and discuss the average results of the SCM analysis across all treated countries in the sample. For the sake of clarity, we report only the SCM results for US aid flows to local implementation partners; however, the results for aid flows to other implementation actors can be found in Appendix IV.

**Figure 4: Effect of Sanction Imposition on US Aid to Local Actors**

![Figure 4](image)

The red line plots the average amount of US aid (logged) disbursed to the specified channel in sanctioned countries (n = 20) in the three years prior and five years following the imposition of sanctions, while the black dashed line plots the average of US aid (logged) of the corresponding synthetic controls. The gray shaded region indicates the pre-treatment period across which the mean values of the predictors and outcome variable were used to construct the synthetic control units. The dashed gray line indicates the year of sanction imposition.

Figure 4 plots the average of the dependent variable, logged US aid disbursed to local non-governmental channels (4a) and local public sector channels (4b), for the treated and synthetic control countries against the time relative to sanction imposition. The dotted line at $x = 0$ indicates the year of sanction imposition, while the gray shaded area indicates the pre-treatment period over which the outcome and predictors were used to construct the synthetic control units. The extent to which the lines within the shaded area overlap indicates how well the synthetic control units approximate the treated units in the pre-treatment period. In both Figure 4a and Figure 4b, we see a close correspondence
between treatment and synthetic control unit in the pre-treatment period, suggesting in both cases that the synthetic control units are, on average, an appropriate counterfactual for the average of the treated units.

Provided there is a good fit in the pre-treatment period between the treatment and synthetic control unit, any divergence between the treated unit and the control unit in the post-treatment period can be interpreted as the treatment effect of sanction imposition on treated countries. Surprisingly, in Figure 4a we see very little divergence between the average treatment unit and the average control unit in the year following the imposition of sanctions. In fact, by the third year of the post-treatment period, US aid flows to local nongovernmental actors are nearly identical to that of the synthetic control unit. This suggests that the imposition of aid sanctions has little effect on the amount of US aid channeled to local partners. Contrary to anecdotal evidence, such as news reports about the hardship born by NGOs in the wake of the Northern Triangle sanctions in 2019, the results seem to show that, on average, the imposition of aid sanctions does not cause a sudden shock in the financial resources made available to local civil society. This has interesting implications for the sanctions literature, particularly those on the unintended consequences of sanction imposition, which presupposes the removal of resources from the target state.

The results presented in Figure 4b are unsurprising - we see a sudden and steep decline in the disbursement of US aid to the sanctioned country’s government institutions in the immediate aftermath of sanction imposition, with aid dropping to nearly zero in the year following sanctions. Local public institutions in treated countries prior to sanction imposition do receive a substantial amount of aid (though less than the local NGO partners)-- average aid to the public sector peaks three years prior to sanction imposition at 6.9 logged US dollars, corresponding to $9,000,000. Thus, the sharp decline that we see corresponds to the arguments that government-to-government aid experiences the sharpest decline in the event of aid sanctions.

Overall, the results from Figure 4 are somewhat surprising, in that they suggest that despite the rhetoric surrounding aid sanctions, the actual imposition of such sanctions has a very minimal effect on the US funding made available to local actors: on average, local NGOs and
non-public sector actors experience a very minor immediate decline in US funding, with no lasting effects, while the local public sector sees US aid drop sharply. However, the aggregate analysis provides only a look at the impact of aid sanctions in general. In the section below, we take a more detailed look at two cases of aid sanctions characterized by different terms. We chose to examine one of the more unique sanction cases, Uganda in 2014, and compare it with a somewhat typical case of sanctions imposed post-coup designation. The former specifically targets Uganda’s health and security institutions, while the latter is an example of sweeping aid sanctions in the wake of Madagascar’s 2009 coup d’etat.

Case Studies

Uganda: A Case of Reprogrammed Aid

On 28 February 2014, the US imposed aid sanctions in Uganda, which as of 2022 are ongoing. The sanctions were in response to anti-gay legislation, which imposes harsh penalties for homosexuality, signed into law by President Yoweri Museveni earlier in the month. In reaction, Washington announced that it would impose aid sanctions, in addition to halting military exercises and implementing travel bans. The Obama administration said that it would halt $2.4 million in funding for a community policing program, redirect budgetary support for salaries of Ugandan health ministry officials to health-related NGOs, and reprogram the $3 million funding originally intended to build a public health institute to an unnamed African state. Uganda poses an interesting case. It is one of the few in our dataset that explicitly states Washington’s intention to redirect aid away from the public sector and re-funnel it to civil society. Second, it is also one of the few cases where specific programs were named as targets of sanction. Given that the anti-gay legislation weaponizes both the public security and health apparatuses, this case is one of two (the other being Yemen in 2019) where health institutions are subject to aid suspension.

From the announcements, we would expect that the Obama administration would slash aid to Uganda by at least $5.4 million. In fact, foreign aid disbursed by the United States dropped by over $74.5 million (in 2014 dollars). Foreign aid designated for the health sector took a particularly large hit, with aid disbursement dropping by $95.3 million in 2015 from the previous year. Similarly, development aid saw a decrease of approximately $7 million. However, distributed humanitarian aid and aid targeted towards education and
social services increased. Given Washington’s objectives, it is anticipated that there will be an observable decrease in aid flowing to the local public sector. Moreover, with the redirection of some funding originally intended for Kampala to civil society, we expect to see no decrease, and perhaps even a slight increase, in the other aid channels. It should be noted that the U.S., along with other Western aid donors, had already started reducing foreign aid prior to the imposition of sanctions in anticipation of the passage of the legislation, though the exact amount of the U.S.’s anticipatory aid was not specified.

As we see in the plots below, the data reflect the stated intent of the US government to redistribute aid from the Ugandan government into local NGOs and CSOs. Aid sanctions in Uganda clearly negatively impacted local public sector channels. Beginning shortly after aid sanctions were imposed and continuing through year 3, there is a decrease in the amount of US aid provided to the local public sector, especially relative to the aid amounts received by the local public sector in the non-sanctioned countries. However, when examining the local non-governmental channels, the difference between treatment and control groups was negligible. This implies that among local implementation partners, the US may have redistributed funds from public sector channels to the NGOs and CSOs. Funds to US-based NGOs and multilaterals were not noticeably impacted by the aid sanctions, and funds to US-based public sector partners slightly increased after aid sanctions were imposed.

Figure 5: Effect of Sanction Imposition on US Aid to Uganda
Madagascar: A Case of Aid Cancellation and Suspension

In response to the Malagasy coup d'etat on March 20, 2009, the US placed economic sanctions (including aid sanctions) on Madagascar that lasted for over 5 years, until May 27, 2014. Since FY 1985, in the wake of a designated coup, the US has been legally required to enforce harsh sanctions, withdrawing and suspending most aid (potentially even aid earmarked for humanitarian purposes) under coup appropriation restrictions. At the time of imposition, some of the committed aid was allowed to flow into the state, some was immediately canceled, and future aid was partially suspended, though depending on the iteration of the coup restriction, waivers may be granted to certain categories of foreign assistance.

As the Obama administration regarded opposition leader Andry Rajoelina’s actions to seize power as a coup, it accordingly announced that it would cut all non-humanitarian aid to the country. The Millennium Challenge Corporation also noted that it would freeze $110 million in poverty-reduction grants, which was to have been distributed over five years, to the country. Indeed, Madagascar saw a $12.9 million (in current dollars) decline in disbursed foreign aid from the United States the year after the coup. Every single category of aid, ranging from peace and security to environment, dropped. As the scope of the sanctions are wide, we should see a drop across all channels, particularly for public sectors. Nongovernmental channels should also be impacted negatively, though perhaps less sharply than public sector channels given Washington’s desire to not cut humanitarian aid.

Similar to the impacts in Uganda, the steepest decrease in US aid flows occurred to the local public sector channels. Unlike in Uganda, the aid flows to the local public sector channels did not catch up with funding levels enjoyed by the control countries, nor did they rebound to pre-aid sanction levels. This could be attributed to the length of time the sanctions were in effect, or the severity of the sanctions. Comparing the treatment to the control groups, we see that US funding levels to most channels in Madagascar remained slightly depressed, consistent with the overall decrease in funding that would be expected from the imposition of aid sanctions.
Figure 6: Effect of Sanction Imposition on US Aid to Madagascar
(All Channels)

(a) Aid to Local Nongovernmental Channels

(b) Aid to Local Public Sector Channels

(c) Aid to US Nongovernmental Channels

(d) Aid to US Public Sector Channels

(e) Aid to Multilateral Channels
V. Conclusion

Aid sanctions are typically viewed as a diplomatic tool of economic statecraft. In this research note we have shown that the implementation of this tool has consequences for some local actors in the target countries. The methodological approach we employ in this report allows us to infer causality from the imposition of aid sanctions. Our results indicate that on aggregate, the US’s local implementation partners do not experience a sudden shock when aid is withdrawn compared with control countries that do not experience aid sanctions. However, when examining individual countries, we see that some channels are impacted more than others; namely the local public sector experiences sharp decreases in aid as the US redistributes its allocation away from the local public sector toward local NGOs and CSOs.

The results, and the data we collected, highlight the importance of disaggregating sanction types further. Not all aid sanctions are created the same, and while one channel in the target may see a decrease in funding, another may not experience much change at all. In fact, the country specific analysis (included in Appendix V) shows that implementation partners in some targets, particularly those that experience military assistance sanctions, do not seem to experience a worse outcome. This has implications for sanctions literature, particularly on the consequences of economic sanctions.

This report is the first step in a research agenda we have outlined to produce more work on aid sanctions and their impact on local entities and populations. We introduce a novel dataset that collates information on episodes of US aid sanctions from a variety of original sources, thereby opening up new lines of inquiry. We include data on stated outcomes as well as, when available, their realized outcomes. As such, the data allows for a more systematic study of how aid sanctions are carried out, which could then in turn impact how target state civilians are affected by such sanctions. Though the latter is outside of the scope of this research report, we believe that it is important to have greater understanding of the former to be able to ascertain the full effect of aid sanctions. With this dataset we will be able to answer future research questions about how aid withdrawal differs from other sanction types, what types of funding channels and sectors are impacted by US aid
sanctions, how aid projects fare under US sanctions, and whether stated US government intentions and claims for aid sanctions match realized outcomes in the target countries.

Works Cited


Appendix

I. Coding rules for terms of aid sanctions

We code whether each case states one or more of the following terms for the aid component of the sanction. The terms are not mutually exclusive; that is, a sanctions package can implement more than one of the following actions with regard to future US aid flows.

- **Suspension of Future Aid** denotes cases where committed aid is allowed to flow into the target state, but future aid is suspended.
- **Partial Suspension of Future Aid** denotes cases where already committed aid is allowed to flow into the target state, but future aid is partially suspended.
- **Cancellation of committed aid** denotes cases where all committed aid flows are canceled upon the imposition of sanctions.
- **Partial Cancellation of Committed Aid** denotes cases where some of the committed aid flows are canceled upon the imposition of economic sanctions.
- **Reprogrammed aid to another country** denotes cases where it was specifically announced that the remaining aid from the sanction would be given to another country. Whenever possible, we code for which country or countries are the recipients of reprogrammed aid. This category is different from cancellation of aid. Canceled aid may still be earmarked and made available to the target upon target capitulation, while reprogrammed aid is not.
- **Redirected aid within country** denotes cases where aid is redirected to different sectors or actions within the target state. For example, aid previously earmarked for the public sector may be redirected to NGOs, or aid previously allocated toward public services may be redirected to democratic movements. Whenever possible, we identify the sector(s) or actor(s) to which the aid is redirected.
- **Unknown** denotes cases where there is insufficient evidence to classify the terms of the aid component of the sanction.

II. Aid Sanction Cases

Table A1. Aid Sanctions Covered by the Dataset, 2002-2020

<table>
<thead>
<tr>
<th>Imposition Year</th>
<th>Target State(s)</th>
<th>Sanction Program/Reason/Legislation</th>
<th>Stated aid component of sanction</th>
</tr>
</thead>
<tbody>
<tr>
<td>2002</td>
<td>Ukraine</td>
<td>Sale of weapons to Iraq.</td>
<td>Suspension of Future Aid</td>
</tr>
<tr>
<td>2002</td>
<td>North Korea</td>
<td>Nuclear program.</td>
<td>Unknown</td>
</tr>
<tr>
<td>2003</td>
<td>Central African Republic</td>
<td>Coup.</td>
<td>Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2003</td>
<td>Nigeria</td>
<td>Human rights concerns.</td>
<td>Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2003</td>
<td>Turkey</td>
<td>Failure to allow US troops access to bases.</td>
<td>Partial Suspension of Future Aid</td>
</tr>
<tr>
<td>Year</td>
<td>Country</td>
<td>Reason</td>
<td>Action</td>
</tr>
<tr>
<td>------</td>
<td>------------------</td>
<td>------------------------------------------------------------------------</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>2003</td>
<td>Israel</td>
<td>Illegal settlements in the West Bank.</td>
<td>Unknown</td>
</tr>
<tr>
<td>2003</td>
<td>Guinea-Bissau</td>
<td>Coup.</td>
<td>Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2003-2006</td>
<td>Mexico, Kenya, Congo, Guinea, Lithuania, Barbados, Zambia, Malawi, Samoa, Tanzania, Colombia, Uruguay, Latvia, Namibia, Brazil, Niger, Bulgaria, Cambodia, Slovakia, Cyprus, Dominica, Ecuador, Estonia, Benin, Peru, Central African Republic, Antigua and Barbuda, Costa Rica, Croatia, Paraguay, South Africa, Lesotho, Mali, Trinidad and Tobago, Bolivia, Fiji, Venezuela, Belize</td>
<td>Refusal to pledge immunity for American citizens before the International Criminal Court. Partial Cancellation of Committed Aid</td>
<td></td>
</tr>
<tr>
<td>2004</td>
<td>Syria</td>
<td>Failure to act against terrorists.</td>
<td>Unknown</td>
</tr>
<tr>
<td>2004</td>
<td>Uzbekistan</td>
<td>Human rights concerns.</td>
<td>Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2005</td>
<td>Nepal</td>
<td>King overthrew government and seized power.</td>
<td>Partial Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2005</td>
<td>Togo</td>
<td>Coup.</td>
<td>Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2006</td>
<td>Fiji</td>
<td>Coup.</td>
<td>Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2007</td>
<td>Iran</td>
<td>Development of nuclear program.</td>
<td>Partial Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2008</td>
<td>Mauritania</td>
<td>Coup.</td>
<td>Partial Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2009</td>
<td>Guinea</td>
<td>Massacre of peaceful protestors.</td>
<td>Unknown</td>
</tr>
<tr>
<td>2009</td>
<td>Madagascar</td>
<td>Coup.</td>
<td>Partial Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2009</td>
<td>Honduras</td>
<td>Coup.</td>
<td>Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2009</td>
<td>Niger</td>
<td>Coup.</td>
<td>Partial Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>Year</td>
<td>Country</td>
<td>Reason for Sanction</td>
<td>Action Taken</td>
</tr>
<tr>
<td>------</td>
<td>---------</td>
<td>---------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>2011</td>
<td>Syria</td>
<td>Violence against demonstrators.</td>
<td>Unknown</td>
</tr>
<tr>
<td>2011</td>
<td>Pakistan</td>
<td>Sheltering Osama Bin Laden.</td>
<td>Partial Suspension of Future Aid</td>
</tr>
<tr>
<td>2012</td>
<td>Yemen</td>
<td>Election obstruction.</td>
<td>Partial Suspension of Future Aid</td>
</tr>
<tr>
<td>2012</td>
<td>Mali</td>
<td>Coup.</td>
<td>Partial Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2012</td>
<td>Guinea-Bissau</td>
<td>Coup.</td>
<td>Partial Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2013</td>
<td>Bolivia</td>
<td>Dispute with Bolivian government.</td>
<td>Partial Cancellation of Committed Aid, Reprogrammed Aid to Other Country</td>
</tr>
<tr>
<td>2013</td>
<td>Egypt</td>
<td>Coup.</td>
<td>Partial Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2014</td>
<td>Uganda</td>
<td>Anti-gay legislation.</td>
<td>Partial Cancellation of Committed Aid, Reprogrammed Aid to Other Country, Redirected Aid within Country</td>
</tr>
<tr>
<td>2017</td>
<td>Myanmar</td>
<td>Treatment of Rohingya (not including later coup-related sanctions).</td>
<td>Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2018</td>
<td>Cambodia</td>
<td>Democratic backsliding.</td>
<td>Suspension of Future Aid, Partial Cancellation of Committed Aid, Redirected Aid within Country</td>
</tr>
<tr>
<td>2019</td>
<td>Honduras, El Salvador, Guatemala</td>
<td>Migration disputes (Northern Triangle aid suspension and reprogramming).</td>
<td>Suspension of Future Aid, Reprogrammed Aid to Other Country</td>
</tr>
<tr>
<td>2019</td>
<td>Belarus, Belize, Bolivia, Burundi, China, Comoros, Democratic Republic of the Congo, Equatorial Guinea, Gabon, Iran, Laos, Mauritania, Myanmar, Papua New Guinea, South Sudan, Turkmenistan, Venezuela</td>
<td>Trafficking Victims Protection Act Tier 3 Countries.</td>
<td>Reprogrammed Aid to Other Country</td>
</tr>
<tr>
<td>2019</td>
<td>Cameroon</td>
<td>Human rights violations.</td>
<td>Suspension of Future Aid, Partial Cancellation of Committed Aid</td>
</tr>
<tr>
<td>2019</td>
<td>Pakistan</td>
<td>Failure to act against the Taliban and Haqqani militants.</td>
<td>Reprogrammed Aid to Other Country</td>
</tr>
<tr>
<td>2020</td>
<td>Afghanistan</td>
<td>Political impasse in Afghanistan.</td>
<td>Unknown</td>
</tr>
<tr>
<td>2020</td>
<td>Yemen</td>
<td>Houthis rebel interference in aid delivery.</td>
<td>Partial Cancellation of Committed Aid</td>
</tr>
</tbody>
</table>
### III. Channel Coding of US Foreign Assistance Data

#### Table A2. Channel Coding of US Foreign Assistance Data

<table>
<thead>
<tr>
<th>Implementing Partner Subcategory Name</th>
<th>Channel</th>
</tr>
</thead>
<tbody>
<tr>
<td>Government - Non United States</td>
<td>Public Sector - Non-US</td>
</tr>
<tr>
<td>Government - United States</td>
<td>Public Sector - US</td>
</tr>
<tr>
<td>Public and Private Partnerships</td>
<td>Public Sector - US</td>
</tr>
<tr>
<td>Multilateral - European Commission</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>Multilateral - International Monetary Fund</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>Multilateral - Other</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>Multilateral - Regional Development Banks</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>Multilateral - United Nations</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>Multilateral - World Bank Group</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>Multilateral - World Trade Organization</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>Networks</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>NGO - International</td>
<td>Multilateral &amp; International Orgs</td>
</tr>
<tr>
<td>Church and Faith Based - Non United States</td>
<td>Nongovernmental - Non-US</td>
</tr>
<tr>
<td>Enterprises - Non United States</td>
<td>Nongovernmental - Non-US</td>
</tr>
<tr>
<td>NGO - Non United States</td>
<td>Nongovernmental - Non-US</td>
</tr>
<tr>
<td>Universities and Research Institutes - Non United States</td>
<td>Nongovernmental - Non-US</td>
</tr>
<tr>
<td>Church and Faith Based - United States</td>
<td>Nongovernmental - US</td>
</tr>
<tr>
<td>Enterprises - United States</td>
<td>Nongovernmental - US</td>
</tr>
<tr>
<td>NGO - United States</td>
<td>Nongovernmental - US</td>
</tr>
<tr>
<td>Universities and Research Institutes - United States</td>
<td>Nongovernmental - US</td>
</tr>
</tbody>
</table>
IV. Aggregate Results: Aid to US and International Actors

Figure A1. Aggregate Results for US Aid channeled to Non-local Implementers

(a) Aid to US Nongovernmental Channels

(b) Aid to US Public Sector Channels

(c) Aid to Multilateral Channels
V. Country-Specific Result Plots

(a) Aid to Local Nongovernmental Channels
(b) Aid to Local Public Sector Channels

(c) Aid to US Nongovernmental Channels
(d) Aid to US Public Sector Channels

(e) Aid to Multilateral Channels

Year Relative to Sanction Imposition
China

(a) Aid to Local Nongovernmental Channels

(b) Aid to Local Public Sector Channels

(c) Aid to US Nongovernmental Channels

(d) Aid to US Public Sector Channels

(e) Aid to Multilateral Channels

Year Relative to Sanction Imposition

US Aid (logged)
Gabon

(a) Aid to Local Nongovernmental Channels

(b) Aid to Local Public Sector Channels

(c) Aid to US Nongovernmental Channels

(d) Aid to US Public Sector Channels

(e) Aid to Multilateral Channels
Laos

(a) Aid to Local Nongovernmental Channels

(b) Aid to Local Public Sector Channels

(c) Aid to US Nongovernmental Channels

(d) Aid to US Public Sector Channels

(e) Aid to Multilateral Channels

Year Relative to Sanction Imposition
El Salvador

(a) Aid to Local Nongovernmental Channels

(b) Aid to Local Public Sector Channels

(c) Aid to US Nongovernmental Channels

(d) Aid to US Public Sector Channels

(e) Aid to Multilateral Channels

Year Relative to Sanction Imposition

US Aid (logged)
VI. Sanction Imposition chart

Aid Sanctions in Target Countries, 2002 - 2018

Legend:
- Not Sanctioned
- Sanctioned