

US Economic Sanctions: New List-Based Programs

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While economic sanctions against Iran, Russia and Cuba have dominated the headlines over the past year, sanctions remain a dynamic component of U.S. foreign policy on other fronts. In 2015, President Barack Obama issued three executive orders that established new list-based sanctions programs: one related to the political and human rights situation in Venezuela, another targeting actors behind the violence in Burundi and a third intended as a new tool to combat threats posed by malicious cyber actors. The Venezuela sanctions implement, and expand upon, the Venezuela Defense of Human Rights and Civil Society Act of 2014.

Each of the three new sanctions programs targets specific individuals and entities engaged in enumerated activities. Unlike U.S. sanctions imposed on Crimea, Cuba, Iran, Sudan and Syria, the executive orders issued with respect to Venezuela and Burundi do not impose broad sanctions. To date, seven individuals have been listed under the Venezuela program and eight under the Burundi program. Any entity that is 50 percent or more owned, whether individually or in the aggregate, directly or indirectly, by one or more sanctioned persons also is subject to the same sanctions, even if the entity is not itself listed. No individual or entity has yet been included in the cyber sanctions program.

Also in 2015, in response to improvements in the political situation in Liberia, President Obama terminated the sanctions program put in place in 2004 with respect to the actions and policies of former Liberian President Charles Taylor.

The executive branch continues to use economic sanctions as an agile and active tool to advance specific foreign policy goals. We expect this approach to continue in the coming year.

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