



Security Council

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Implementation of Security Council resolution 2664 (2022)

Report of the Secretary-General

I. Introduction

1. The present report is submitted pursuant to paragraph 7 of Security Council resolution 2664 (2022), in which the Council requested the Secretary-General to issue a written report on unintended adverse humanitarian consequences of sanctions measures adopted by the Council. Such measures include travel bans and arms embargoes, as well as measures that are sui generis to specific sanctions regimes. The Council also requested that the report contain recommendations on ways to minimize and mitigate such unintended adverse humanitarian consequences of sanctions, including via the promulgation of additional standing exemptions to such measures.

2. In its 2023 Global Humanitarian Overview, the Office for the Coordination of Humanitarian Affairs reported that 339 million people were in need of humanitarian assistance in 2023 and that one third of those populations lived in countries where United Nations sanctions measures were in place. They included countries where individuals, groups and entities were subject to measures under the sanctions of the Security Council Committee pursuant to resolutions 1267 (1999), 1989 (2011) and 2253 (2015) concerning Islamic State in Iraq and the Levant (Da'esh), Al-Qaida and associated individuals, groups, undertakings and entities, which is a global regime imposing targeted measures against the two major terrorist groups. The Office noted that all those countries accounted for 67 percent of the total humanitarian appeals for 2023 (as at 10 August 2023), including 7 of the 10 largest inter-agency coordinated humanitarian appeals.

3. Sanctions measures are often applied in highly complex political and security environments marked by protracted conflict, chronic insecurity, and economic and governance challenges, which are frequently aggravated by dire humanitarian situations. In such environments, humanitarian actors often face multiple intertwined challenges. In these contexts, sanctions imposed by the Security Council may present additional challenges to the humanitarian response, both directly, through the sanctions measures themselves, or indirectly, through overcompliance (compliance beyond what is legally necessary) or de-risking (the act of removing or avoiding, rather than managing, risk) by various actors in the humanitarian delivery chain, such as States that are obliged to give effect to Council sanctions measures, donors, international vendors and financial sector actors. The extent to which challenges to humanitarian operations can be attributed solely to United Nations sanctions is



difficult to measure, as there are other factors, including sanctions imposed unilaterally by Member States or by regional or subregional organizations.

4. In the present report, the ways in which United Nations sanctions may contribute to unintended adverse humanitarian consequences are examined, including their direct and indirect impact on the ability of humanitarian organizations to deliver assistance in line with humanitarian principles, the private sector companies and banks that work with humanitarian organizations, the practices of donors, and the impact on Member States where sanctions are applied. The report also provides an examination of incidental benefits that can be accrued by sanctioned individuals or entities in the context of humanitarian response, and the risk management and due diligence processes put in place to minimize these negative effects. Overall, the report offers a framework for considering the impact of United Nations sanctions measures on humanitarian response and mitigating steps taken to address these impacts by the Security Council, Member States, humanitarian actors and other stakeholders.

5. The report is based on information compiled by the United Nations system, primarily the Office for the Coordination of Humanitarian Affairs and the Department of Political and Peacebuilding Affairs. It also contains information obtained during consultations with the panels and groups of experts that support the Security Council sanctions committees, humanitarian agencies and other relevant sources, including academic research.

II. United Nations sanctions framework

6. Sanctions are imposed by the Security Council in the exercise of its Chapter VII authority to take such measures as it deems necessary to maintain or restore international peace and security. Designations of individuals for an asset freeze, travel ban or other measure constitute preventive action by the Council intended to bring about a change in behaviour, for example in support of peaceful transitions, to deter violence, counter terrorism, protect human rights, deter unconstitutional changes of government or promote non-proliferation.

7. The establishment of a United Nations sanctions regime entails the establishment of a sanctions committee, composed of all Security Council members, which is tasked, in general, to oversee the implementation of the sanctions measures, consider and decide upon notifications and requests for exemptions from the measures, and designate individuals and entities who meet the listing criteria as contained in the relevant resolutions. To facilitate implementation of sanctions measures, sanctions committees may issue Implementation Assistance Notices as guidance to Member States and other stakeholders on carrying out their obligations under Council resolutions. The Council also often establishes expert groups (frequently called panels or groups of experts) that support the work of sanctions committees.

8. United Nations sanctions regimes have undergone substantial transformation since their first deployment, in 1966 in the context of Southern Rhodesia, which was followed by a number of other comprehensive sanctions regimes. For example, in Iraq, comprehensive United Nations sanctions initiated in 1990 curtailed trade, which significantly affected civilian populations, resulting in hardship and increased infant and child mortality rates. In response, the Security Council limited the use of comprehensive sanctions and introduced more targeted sanctions in 2003, designed to reduce unintended humanitarian consequences. Since 2004, all United Nations sanctions regimes have consisted of restricted and targeted measures that are intended to have a limited, strategic focus on certain individuals, entities, groups or undertakings.

9. Of the 31 sanctions regimes that have been established by the Security Council as at 1 September 2023, 14 remain in place, against Al-Qaida, Al-Shabaab and ISIL (Da'esh), the Central African Republic, the Democratic People's Republic of Korea, the Democratic Republic of the Congo, Guinea-Bissau, Haiti, Iraq, Lebanon, Libya, South Sudan, the Sudan, Yemen and the Taliban. The Council has repeatedly stressed that sanctions measures are not intended to have adverse humanitarian consequences for the civilian population. This principle was reiterated in the context of resolutions related to the sanctions regime on the Democratic People's Republic of Korea, as well as those related to the sanctions regimes on the Central African Republic, the Democratic Republic of the Congo, Haiti, Libya, Mali and South Sudan and Al-Qaida and ISIL (Da'esh). Nevertheless, notwithstanding this longstanding principle, targeted United Nations sanctions have had positive impacts in support of United Nations humanitarian activities while sometimes also having unintended adverse humanitarian consequences.

III. United Nations sanctions and humanitarian activities

A. Intended impact of United Nations sanctions measures

10. While the impact of United Nations sanctions has been widely debated, targeted United Nations sanctions have in many cases led to constraining negative behaviour and signalling support for international normative frameworks. According to academic research, the use of sanctions to influence the behaviour of parties has proved effective at times, including in Angola, Liberia and Sierra Leone. In the Democratic Republic of the Congo, for example, the threat of United Nations sanctions has been a decisive factor in the release of children by some armed groups. In South Sudan, it has contributed to the adoption of military directives prohibiting sexual violence and to the release of women abused by soldiers. In a survey conducted by the United Nations University, some humanitarian organizations acknowledged the potential for positive impact of United Nations sanctions, including their serving as a deterrent to violations of international humanitarian law and raising the profile of specific humanitarian issues (through reports of expert groups on sanctions).

11. The Security Council has also adopted sanctions criteria designed to actively promote humanitarian standards. Eight active United Nations sanctions regimes, on the Central African Republic, the Democratic Republic of the Congo, Libya, South Sudan, the Sudan and Yemen, Al-Qaida and ISIL (Da'esh), and Al-Shabaab, provide protection-related listing criteria, including for perpetrators of sexual violence; attacks against civilians, humanitarian actors and assets; and obstructions to humanitarian access. Individuals and entities have been designated under such criteria, including in relation to the Central African Republic, South Sudan and Yemen.

12. The sanctions committees of the Security Council have applied the listing criteria to constrain individuals hampering humanitarian operations. In the context of Mali, the Sanctions Committee listed an individual in July 2019 for actions obstructing humanitarian access and the delivery of humanitarian assistance and undermining the legitimate local authorities in their role as a focal point for humanitarian organizations (thus also threatening the implementation of the peace agreement). Following his designation, the individual was removed from his position. This listing is an illustration of how United Nations sanctions measures can be used in support of humanitarian response and to protect the humanitarian space.

B. Unintended adverse impact of United Nations sanctions on humanitarian activities

13. United Nations sanctions measures create direct obligations for United Nations entities involved in humanitarian response, mandating them to ensure that no funds or other economic resources are made available, directly or indirectly, to or for the benefit of actors designated by the Security Council in the context of their operations. The risk of violating this obligation has in some cases inhibited United Nations entities, their partners and service providers involved in humanitarian response.

14. The complexity of compliance with sanctions measures is compounded by the adoption of various types of domestic legislation that give effect to United Nations sanctions measures, with which non-United Nations humanitarian organizations are legally obliged to comply. Some jurisdictions extend measures implementing United Nations sanctions to actors that they designate unilaterally and who are not designated by the Security Council. In some contexts, restrictive measures of a different type than those prescribed under relevant Council sanctions regimes apply in addition to Council sanctions measures. As United Nations sanctions measures generally are not applied or implemented in a vacuum, but rather interact with other policy, economic and legal factors, such as unilateral sanctions or domestic legislation, the complex overlap of restrictive measures makes it challenging to attribute specific types of impact to United Nations sanctions measures exclusively. The extent to which harmful impact can be attributed, at least in part, to United Nations sanctions measures remains uncertain. For example, the Panel of Experts established pursuant to resolution 1874 (2009) has reported that the deteriorating humanitarian crisis in the Democratic People's Republic of Korea has had a disproportionate impact on women, children and other vulnerable groups, in particular in gaining access to food and health care. However, the Panel has likewise noted that it is difficult to disaggregate United Nations sanctions measures from other factors (see [S/2022/668](#)).

Constraints on humanitarian activities

15. According to several studies, fear of violating sanctions measures, including United Nations sanctions (and the concomitant fear of being cited for non-compliance) has reportedly caused humanitarian activities to be circumscribed across multiple humanitarian contexts. According to academic research, several humanitarian actors in Somalia have reported that fear of violating sanctions measures or of losing funding (in case their activities would indirectly generate incidental benefits to United Nations-designated actors) often resulted in a decreased willingness to engage with specific individuals or groups, as well as to operate in certain areas. A similar impact has been reported in several other contexts over the past 10 years, including the Middle East, the Great Lakes region, Afghanistan and others.

16. In some cases, facilitating the delivery of humanitarian assistance to people in need implies various types of direct or indirect interactions with United Nations-sanctioned individuals and entities. In some areas, such actors have effective control, serve as the de facto authority and perform governmental functions, such as controlling public security and structures, or movements into, within or through these areas. Where assistance is provided to communities residing in areas under the control of such actors, humanitarian actors may require the services of local vendors indirectly linked to United Nations-sanctioned actors, or under the de facto jurisdiction of such actors, for lack of alternatives. Such services may include, but are not limited to, services related to public utilities, transportation, money transfers and/or security services. In some cases, there may be no alternative to relying on structures acting under the direction of United Nations-sanctioned actors to

implement humanitarian programmes that reach vulnerable populations on the scale and with the urgency required. For example, humanitarian actors in Afghanistan have had to pay utility fees to public companies reporting to the de facto ministries that may be under the control of sanctioned individuals. Also in Afghanistan, local contractors are required to pay taxes to the de facto authorities, which are also acting on behalf of listed individuals or as a civilian face of a listed group.

Administrative burdens and delays

17. The objective of an arms embargo is to prevent the import or export of arms to the government or an armed group as a conflict prevention measure. It can also have a negative impact on humanitarian activities by hindering the importation of items that have dual-use applications (e.g. goods and technologies that may be used for both civilian and military purposes). For example, equipment and materiel (such as explosives and detonators) that are essential in demining and the on-site disposal of explosive remnants of war may be subject to an arms embargo. While exemptions may be provided to the relevant mine action actor, the process is time-consuming and may delay humanitarian demining activities. Other dual-use items, such as protective clothing and non-lethal military equipment, that are needed for the protection of humanitarian actors may be subject to more scrutiny during the procurement process because of an existing arms embargo. International vendors frequently require more information on the final destination of goods and items, especially for dual-use items, medical items and new technologies.

18. In the Democratic People's Republic of Korea, the requirement to obtain a specific authorization from the Security Council Committee established pursuant to resolution 1718 (2006) prior to the export of a range of items necessary to the operations of humanitarian organizations in the country, which has reportedly generated significant administrative burdens and delays, has affected those activities. Such items include metals contained in hygiene or reproductive health kits, fertilizers, certain types of medical and telecommunications equipment, and water sanitation equipment.

19. The ability of humanitarian organizations to transfer funds within the Democratic People's Republic of Korea continues to be affected by the sectoral restrictions on the country's financial sector imposed by the Security Council. The Council's prohibition on maintaining any correspondent banking relationships between the Democratic People's Republic of Korea and foreign financial institutions (see para. 33 of resolution 2270 (2016)), unless approved on a case-by-case basis by the Security Council Committee established pursuant to resolution 1718 (2006), has made it difficult for humanitarian organizations, among others, to find financial institutions able or willing to carry out financial transactions with local staff and other stakeholders. In the absence of a banking channel, humanitarian organizations in the Democratic People's Republic of Korea have resorted to bringing cash physically into the country, which contributes to an increased risk. The United Nations humanitarian agencies continue their efforts to re-establish a durable and efficient banking channel to fund United Nations humanitarian activities in the Democratic People's Republic of Korea and to explore interim solutions with the assistance of concerned Member States and financial institutions.

Overcompliance and de-risking by humanitarian actors and other stakeholders in the assistance delivery chain

20. A concern both described by humanitarian actors and reflected in academic research is overcompliance by humanitarian actors, the banking sector and other stakeholders. In such cases, humanitarian actors may choose not to engage with a certain individual or entity out of fear that such interaction could lead to legal,

financial or reputational risks. Such concerns may be expressed by United Nations and non-United Nations entities alike. In that regard, the Secretariat, where appropriate, could address this potentially widespread phenomenon by raising awareness of the unintended adverse humanitarian consequences of overcompliance and de-risking.

21. Overcompliance and de-risking have been observed with regard to humanitarian operations in many contexts. Several humanitarian organizations in a number of regions have reported the fear of violating sanctions, including United Nations sanctions. In addition to humanitarian organizations, various stakeholders are involved in the delivery of humanitarian assistance to civilian populations, including donor agencies, banks and other financial institutions, suppliers and service providers. Stakeholders in the assistance delivery chain may engage in overcompliance or de-risking activities to minimize the legal, financial and reputational risks that they run in conducting transactions linked to the activities of humanitarian organizations in countries where sanctioned actors operate.

22. For example, banks and money transfer operators have refused to provide or abruptly ceased providing services to humanitarian organizations for their operations in certain countries for fear of breaching United Nations sanctions measures or other regulations. In Somalia and Afghanistan, the adoption of standing exemptions known as humanitarian carveouts has proved to be a condition necessary to maintain a limited financial lifeline for humanitarian operations within the formal financial sectors. In the case of Somalia, in 2010, the adoption of such a carveout triggered action at the domestic level that included dialogue between government authorities, banks and humanitarian organizations, which proved to be effective in that transactions that had been on hold for weeks were unlocked within days. Similarly, in Afghanistan, the adoption of Security Council resolution [2615 \(2021\)](#) made it possible for humanitarian organizations to receive limited amounts of funds in-country, although they still needed to be supplemented by the United Nations cash facility to fully support humanitarian operations.

23. To minimize the risk that humanitarian funds may end up benefiting individuals or entities on United Nations sanctions lists, donor agencies that fund humanitarian operations may likewise engage in monitoring and de-risking activities, some of which are passed on to recipient organizations. For example, some donors may request that potential grantees have dedicated risk management teams in areas with a high risk of aid diversion, which results in overhead costs that reduce the proportion of programme budgets going directly to assistance to people in need. Some humanitarian organizations have reported that donors have been hesitant to fund training on international humanitarian law on the ground, a form of training associated with the use of arms and hence in their view a violation of Security Council arms embargoes. Bank de-risking has a clear impact on the design and implementation of humanitarian programmes, as humanitarian organizations have had to deprioritize certain programmes to avoid any unintended sanctions violations.

24. In some contexts, the designation of non-State armed groups under a Security Council sanctions regime has been used by Member States to justify restrictions on the engagement of humanitarian organizations with these groups for humanitarian purposes (such as facilitating access), including by proscribing access to areas where the groups have a presence and an influence. Such overcompliance has included the designation of no-go zones for humanitarian actors, as well as strict no-contact policies with designated groups.

Unintended benefits for sanctioned individuals and entities

25. In paragraph 3 of its resolution 2664 (2022), the Security Council requested that humanitarian actors use reasonable efforts to minimize the accrual of any benefits prohibited by sanctions, including by strengthening risk management and due diligence strategies and processes. The activities of humanitarian organizations can, in fact, generate incidental benefits for United Nations-sanctioned entities and individuals notwithstanding the implementation of due diligence and risk mitigation measures. Such incidental benefits may be derived, for example, from: (a) the payment of public utility or administrative fees, or taxes, to de facto authorities under the control of United Nations-designated individuals or groups; (b) transfers of goods or funds to structures (e.g. hospitals, foundations, de facto administrations and local service providers) under the direction of United Nations-designated individuals or armed groups for the implementation of humanitarian programmes through these structures; (c) the provision of assistance to communities vulnerable to confiscation, taxation or extortion by United Nations-designated entities and individuals; and (d) resorting to local contractors, vendors or money transfer companies that are vulnerable to taxation by United Nations-designated entities and individuals.

26. In these situations, which include but are not limited to Somalia, the ability of humanitarian organizations to engage directly with United Nations-sanctioned entities and individuals on assistance delivery modalities is essential to minimize any incidental benefits. Critically, it allows humanitarian organizations to articulate red lines and negotiate conditions. There are many examples of humanitarian organizations rejecting unacceptable conditions from United Nations-sanctioned actors, such as the use of designated service providers when alternatives exist and the payment of exorbitant “visa entry taxes” by international staff. Humanitarian engagement has often put an end to emerging practices such as systematic requirements for payment at checkpoints.

27. Measures are in place to minimize the risk of funds or assets being diverted or otherwise misappropriated during the process of providing humanitarian assistance to people in need. While these measures could potentially delay the delivery of humanitarian assistance and contribute to an overall increase in costs, they serve as guardrails to ensure that the risk of diversion is minimized. Increasing resort to digital technology and innovative aid delivery modalities is also improving the remote traceability of both in-kind and cash-based assistance. For example, the Office for the Coordination of Humanitarian Affairs has implemented digital payment and new technologies for its cash and voucher assistance programme, while the World Food Programme has established the Payment Instrument Tracking application in at least 15 countries to replace manual card distribution and identity verification.

Perceptions, reputation and risk management

28. The implementation of United Nations sanctions that target entities and individuals in areas where United Nations-coordinated humanitarian operations take place can also have an impact on the perception of humanitarian actors and action and, consequently, on their acceptance, safety and ability to gain access to all people in need. In some contexts, humanitarian actors have reportedly been perceived as acting as agents or advocates of United Nations sanctions measures. Multiple factors may generate or reinforce such a perception, including factors that are not specific to contexts in which United Nations sanctions measures apply, such as security imperatives implying physical proximity to United Nations peacekeepers or State forces. United Nations entities have taken steps to address this issue.

29. Humanitarian organizations have thorough processes in place through which to select their implementing partners and monitor their activities. Rules and processes

are also in place through which to report and investigate cases or suspicions of fraud, including the suspension of programmes during investigations. These rules and procedures also provide for corrective measures, such as the termination of contractual relationships and the recovery of unspent grant money.

30. Risk management units used by humanitarian agencies on the basis of the model in Somalia have been established to reinforce risk mitigation in the context of international assistance activities – including humanitarian response – in Afghanistan. These units provide services, including risk management tools and risk management capacity-building, as well as the fostering of regular exchanges of information, to all organizations involved in humanitarian activities.

IV. Security Council response to unintended adverse humanitarian consequences

31. Responding to challenges reported by the humanitarian community, the Security Council and its subsidiary organs have over the years adopted regime-specific exemptions to asset freeze measures, embargoes, travel bans and sectoral restrictions to facilitate the delivery of humanitarian activities. As one example, the Council emphasized the importance of facilitating humanitarian assistance when it decided that the Security Council Committee established pursuant to resolution [2140 \(2014\)](#) (regarding Yemen) could exempt, on a case-by-case basis, any activity that may violate any of the measures in the Yemen sanctions regime if it determined that it was necessary to facilitate the work of humanitarian organizations. Further examples in the context of regime-specific humanitarian exemptions to individual sanctions measures are provided below.

A. Humanitarian exemptions to asset freeze measures

32. In order to ensure that the flow of humanitarian assistance is not unduly disrupted, the Security Council has progressively made changes to the framework of asset freeze measures. A limited humanitarian carveout was introduced in 2010 to facilitate the unhindered and timely delivery of humanitarian assistance in the context of Somalia under Council resolution [1916 \(2010\)](#). In paragraph 4 of the resolution, the Council underscored the importance of humanitarian aid operations, and condemned the politicization, misuse and misappropriation of humanitarian assistance by armed groups.

33. The Security Council decided in its resolution [2615 \(2021\)](#) that humanitarian assistance and other activities that supported basic human needs in Afghanistan were not a violation of the asset freeze, and that the processing and payment of funds and other financial assets or economic resources, and the provision of goods and services necessary to ensure the timely delivery of such assistance or to support such activities, were permitted.

B. Humanitarian exemptions to arms embargo measures

34. A common feature of United Nations sanctions regimes includes the following exemptions to arm embargoes: (a) standing exemptions for protective clothing, including flak jackets and military helmets, temporarily exported by the United Nations for the personal protection of its personnel, representatives of the media, and humanitarian and development workers and associated personnel for their personal use only (some of which requires notification to the relevant sanctions committee);

and (b) standing exemptions for the export of supplies of non-lethal military equipment intended solely for humanitarian or protective use and related technical assistance or training (some of which requires notification to the relevant sanctions committee).

35. The standing exemptions to the arms embargoes cited above were included when the Security Council imposed arms embargo measures in South Sudan in 2018 and were also included in the first tranche of adjustments to the arms embargo imposed in the Central African Republic when the Council adopted resolution [2488 \(2019\)](#).

C. Humanitarian exemptions to travel ban measures

36. Humanitarian exemptions to travel ban measures that prohibit the travel of designated individuals outside their countries have been established to allow travel to take place for specific purposes, including medical reasons, fulfilment of religious obligations and participation in judicial and peace and reconciliation processes. Some humanitarian actors have expressed concern that seeking a travel ban exemption to allow the transit or entry of sanctioned individuals into Member States' territories may delay the urgent transfer of combatants wounded in armed conflicts to the closest medical facility. In particular, they expressed concern that medical transport could be interpreted as being prohibited under United Nations sanctions, which could impede the work of humanitarian actors. In cases of emergency, sanctions committees generally allow for post facto notification, which obviates the need for prior approval for medical or humanitarian needs and, in some cases, owing to force majeure.

D. Humanitarian exemptions to sectoral sanctions

37. To facilitate the work of the United Nations and humanitarian organizations in the Democratic People's Republic of Korea, the Security Council provided standing exemptions to select transportation-related restrictions, export restrictions and sectoral financial restrictions, applicable under the sanctions regime. The Council also gave the Security Council Committee established pursuant to resolution [1718 \(2006\)](#) the authority to exempt, on a case-by-case basis, activities otherwise prohibited under selected export restrictions, transportation-related restrictions and sectoral financial restrictions.

38. Furthermore, the Security Council Committee established pursuant to resolution [1718 \(2006\)](#) streamlined the process for requesting exemptions and obtaining authorizations to engage in humanitarian activities in the Democratic People's Republic of Korea and committed to expediting the decision-making time frame, with Committee decisions being made within five days, or fewer in the case of emergencies. The Committee also extended the standard duration for exemptions from six to nine months to allow for greater flexibility in the shipment process.

E. Humanitarian carveout in Security Council resolution [2664 \(2022\)](#)

39. In recognition of the limitations of piecemeal approaches to humanitarian exemptions implemented on a committee-by-committee basis and of some humanitarian measures, and drawing on the impact of broader humanitarian exemptions for the Al-Shabaab and Taliban sanctions regimes, the Security Council undertook deliberations on a cross-cutting exemption. On 9 December 2022, the Council adopted resolution [2664 \(2022\)](#) to address unintended adverse humanitarian consequences by establishing a humanitarian carveout in all contexts in which asset

freeze measures are in place, with the exception of the 1988 sanctions regime, under which paragraph 1 of resolution 2615 (2021) remains in effect. This permits relevant humanitarian organizations listed in paragraph 1 of resolution 2664 (2022) and their donors, banks, suppliers and others to make or process payments or to provide economic resources, goods and services, as they are allowed under paragraph 1 of the resolution and are no longer considered a violation of the asset freezes imposed by the Council or its sanctions committees.

40. Following the adoption of resolution 2664 (2022), some humanitarian organizations have reported progress in their ability to operate efficiently and in line with humanitarian principles in some countries where sanctioned entities and individuals are based. They have noted more donor flexibility regarding certain programmes, increased risk tolerance by some donors and easier access to financial services by international banks to transfer funds for their operations. Some Member States have incorporated the humanitarian exemption into their domestic legislation, while others are in the process of elaborating similar legislative measures. The adoption of resolution 2664 (2022) will facilitate the implementation of the humanitarian exemption and the delivery of humanitarian assistance, which may have been negatively affected by United Nations sanctions measures.

V. Recommendations

41. The implementation of resolution 2664 (2022) is intended to address many of the concerns reported most frequently by humanitarian actors relating to the actual and perceived risks of sanctions violations in connection with transfers of assets. In paragraph 1 of the resolution, assurances are provided to a wide range of humanitarian actors operating in contexts in which there is no alternative to transacting with sanctioned individuals and entities that such transactions, transfers of resources and other engagement do not constitute violations of United Nations asset freeze measures. However, it appears too early to determine the impact of resolution 2664 (2022) on humanitarian action. In accordance with paragraph 5 of the resolution, the Emergency Relief Coordinator will give a briefing to relevant sanctions committees on its impact within 11 months of the adoption of the resolution and every 12 months afterwards on the delivery of humanitarian assistance and other activities that support basic human needs provided consistent with the resolution.

42. United Nations sanctions, as well as unilateral and regional sanctions, are applied in complex political and security environments and may continue to have unintended adverse humanitarian consequences notwithstanding the humanitarian carveout provided in resolution 2664 (2022). As a result, humanitarian actors may still face financial hurdles and operational delays, including owing to overcompliance and de-risking by banks and the private sector. To the extent that United Nations sanctions may contribute to these challenges, the Security Council may need to make further adjustments to the design and scope of the humanitarian carveout. Tailoring United Nations sanctions and implementing them in such a way as to reduce any adverse humanitarian consequences will remain a key priority. The following recommendations on ways to minimize and mitigate such unintended adverse consequences are made with that objective in mind.

43. Member States are encouraged to ensure the effective implementation of the Security Council's resolutions and to cooperate fully with relevant sanctions committees. Member States are also encouraged to consider expediting the adoption of measures to ensure the full implementation of resolution 2664 (2022) and other existing humanitarian carveouts in their domestic legislation. Member States are reminded that, in paragraph 2 of the resolution, States are expressly called upon to

cooperate with the Security Council Committee pursuant to resolutions [1267 \(1999\)](#), [1989 \(2011\)](#) and [2253 \(2015\)](#) concerning Islamic State in Iraq and the Levant (Da'esh), Al-Qaida and associated individuals, groups, undertakings and entities.

44. Member States are encouraged, including through guidance and dialogue with their donor agencies and the private sector (notably the banking sector), to adopt risk management policies that create an environment that is conducive to principled humanitarian action.

45. The Security Council and its subsidiary organs may wish to consider encouraging Member States and other stakeholders to report on impediments to the implementation of the humanitarian carveout to supplement the briefings by the Emergency Relief Coordinator.

46. The Security Council and its subsidiary organs may wish to consider promoting consistent interpretation and application of the humanitarian carveout, including through the adoption of the Implementation Assistance Notices required in paragraph 6 of Council resolution [2664 \(2022\)](#).
