

# THE SOUFAN CENTER

## ISSUE BRIEF 1

### DETERRENCE AND DENIAL: THE IMPACT OF SANCTIONS AND DESIGNATIONS ON VIOLENT FAR-RIGHT GROUPS

#### Lessons Learned from the 1267 Sanctions Regime against Al-Qaeda and Islamic State in Iraq and Syria (ISIS)

##### Foreword from the Executive Director

This Issue Brief is part of a project undertaken by The Soufan Center, with the support of the Airey Neave Trust in London, United Kingdom, to deepen understanding about the impact of sanctions and proscriptions on terrorist groups, with a focus on violent far-right actors. Through research, interviews, and consultations with key stakeholders, TSC considered whether the measures taken by several states – in particular, the U.K., Canada, and other “Five Eyes” members – have had the desired impacts, whether on a legal, political, or operational level. Throughout the process, the team has had the opportunity to speak with government officials representing several countries, both “Five Eyes” states and others, who have grappled with the challenge of far-right terrorism, as well as UN officials, experts, and practitioners. To facilitate some discussions, TSC organized two roundtables, one in Washington D.C. and one engaging participants from the United Kingdom, and benefitted greatly from the insights shared. We are grateful to all these interlocutors for their time and feedback.

The Issue Briefs developed for this project each consider different aspects of the challenge – lessons learned from the sanctions measures developed to address Al-Qaeda and ISIS; how the violent far-right movement has evolved and what, if any elements may be amendable to sanctions; and lessons learned from proscriptions and designations taken to date in several states to designate violent far-right extremist groups as terrorists. Each contributes to informing a wider question on whether sanctions are an appropriate tool for the transnational dimensions of far-right terrorist groups, and whether there is a role for international actors like the U.N. in responding to these developments. We hope that the findings and policy recommendations will provide a useful basis for policymakers and practitioners as they consider how to address an increasingly diverse and complex terrorist threat.

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SUPPORTED BY



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*Lessons Learned from the 1267 Sanctions  
Regime against Al-Qaeda and Islamic State  
in Iraq and Syria (ISIS)*

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THE SOUFAN CENTER

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## KEY FINDINGS

- Because terrorist groups like al-Qaeda and Islamic State in Iraq and Syria (ISIS)<sup>1</sup> have been successful in adapting and innovating in response to counterterrorism measures, it is important to develop a flexible, responsive sanctions regime similar to the 1267 regime, but that can include new organizations and bodies designed to keep it relevant and applicable—and any new regime considered for violent far-right groups should be similarly flexible—both in terms of the various measures employed, but also with respect to the individuals and assets to be targeted.
- Due to ISIS' relatively unique ability to capture and administer large swaths of territory as it built a proto-state and diversified its funding portfolio, it is somewhat difficult to assess how effective sanctions were against the group.
- If certain terrorist threats concern only a limited number of states—for example, the right-wing threat is likely to be more prominent in North America, Europe, and Oceania, though it certainly exists elsewhere—there may be less of an impetus, or little sense of urgency, for states outside of those immediately impacted to act. In that sense, the threats posed by al-Qaeda and ISIS were more transnational in nature, and as a result, generated global consensus more easily. Therefore, it will be crucial to work toward creating consensus, as well as to explore other applications of sanctions to counter the violent far-right threat.

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<sup>1</sup> This issue brief uses the terminology and spelling of al-Qaeda and Islamic State (IS), or Islamic State in Iraq and Syria (ISIS) more specifically; please note that the official UN names for the groups are *Al-Qaida* and *Islamic State in Iraq and the Levant (Da'esh)*; UN Security Council Resolution 1267 (1999): <http://unscr.com/en/resolutions/doc/1267>; see also, United Nations Security Council Consolidated List, <https://www.un.org/securitycouncil/content/un-sc-consolidated-list>.

- One of the primary challenges to evaluating the impact of sanctions against terrorist groups is the lack of an effective assessment framework, in addition to data gaps. The sensitive nature of data related to terrorism and counterterrorism is one of the primary reasons why it has been difficult to provide a comprehensive assessment of the United Nations' overall impact in this area.
- **Recommendations** include: focus on tailor-made sanctions regimes that can adapt to the terrorist threat, considering both multilateral and national options; establish metrics to assess implementation and impact of sanctions regimes; and invest in international cooperation for implementation.

## INTRODUCTION

To fully understand what impact sanctions could have on violent far-right extremist groups it is essential to have a firm grasp on how sanctions have impacted other terrorist groups, particularly those with a transnational scope, including al-Qaeda, Islamic State, and their respective affiliates, franchise groups, and branches worldwide. These groups were the first to be deemed “threats to international peace and security” and subjected to a global sanctions regime established by the United Nations Security Council (UNSC).<sup>2</sup> The sanctions regime pursuant to UN Security Council Resolution (UNSCR) 1267 (henceforth, 1267 regime) was established in the aftermath

of the August 1998 East Africa Embassy bombings in Dar es-Salam, Tanzania and Nairobi, Kenya, perpetrated by al-Qaeda. One year later, in 1999, the Afghan Taliban, which was providing safe haven and sanctuary to al-Qaeda leader Osama bin Laden, refused to heed the Security Council's warnings that it must take action against al-Qaeda and bin Laden. The Taliban refused, and the terror attacks continued, with the October 2000 *USS Cole* bombing in Yemen.

As it became clear that more needed to be done to constrain al-Qaeda, the UN Monitoring Group (MG) was established just prior to the attacks of September 11, 2001. Its mandate was extended once, and the Monitoring Group produced five reports over two and a half years, before being dissolved in January 2004 and replaced by the Monitoring Team (MT).<sup>3</sup> The MT was established by the UNSC as a subordinate element of the 1267 Committee. The 1267 MT works closely with intelligence agencies and other national security entities across the globe. These partner organizations provide the MT with information that inform its global understanding of the threat landscape. Moreover, the Monitoring Team frequently accompanies the UN Counter-Terrorism Executive Directorate (CTED) which conducts country specific assessment visits to monitor implementation of a wide array of Security Council counterterrorism obligations. In addition to providing threat analyses, the MT supports states in building case files for proposed listings and also works with the UN and the office of the Ombudsperson, which

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<sup>2</sup> Howard Wachtel, “Assessing the Utility of the UN’s Terrorism Sanctions Regime 20 Years after 9/11,” Securing the Future Initiative, forthcoming, <https://sfi-ct.org/publications/>.

<sup>3</sup> Barak Mendelsohn, “Threat Analysis and the UN’s 1267 Sanctions Committee,” *Terrorism and Political Violence* 27, no. 4 (April 2014): 609-627. <https://doi.org/10.1080/09546553.2013.838157>.

was established as a liaison between the Council and listed individuals who wish to challenge their designation or otherwise communicate with Council members.<sup>4</sup>

Effective implementation of the 1267 regime requires understanding the means used by al-Qaeda to generate material support and move sums of money and personnel across borders. Consequently, reflecting these dynamics, the measures initially adopted as the 1267 framework were asset freezes, travel bans, and arms embargoes against al-Qaeda and Islamic State members. Before assessing and evaluating these measures, it is therefore important to first understand how groups like al-Qaeda and Islamic State derived their respective revenue streams and, equally as crucial, how these resources were allocated to buttress operational and organizational capabilities.

## AL-QAEDA

Since its inception in the mid-1980s, al-Qaeda raised funds through a variety of ways, including charities, donations from diaspora communities, kidnapping for ransom

(KFR), smuggling and trafficking, and a host of other revenue generating activities.<sup>5</sup> From the start, al-Qaeda maintained a global footprint, drawing recruits from dozens of countries. For Osama bin Laden, targeting the so-called “far enemy” required a transnational presence and the financial backbone to sustain it. The group’s fundraising methods evolved over time, beginning with the Soviet Afghan War from 1979 to 1989 and adapting with each subsequent conflict in which al-Qaeda operatives fought—Bosnia, Chechnya, Tajikistan, Afghanistan, Iraq, and Syria. Some of these methods were crude, while others were more sophisticated. As it did for many other terrorist groups, the internet offered al-Qaeda new opportunities to raise, send, and store funds. This cross-border connectivity also provided efficient means for facilitating logistical support that enhanced the group’s operational and organizational capabilities.<sup>6</sup>

This is not to suggest that al-Qaeda maintained a consistent, steady supply of funding. On the contrary, like most terrorist or insurgent groups, its funding ebbed and flowed, and the 1267 sanctions regime was designed to make raising and moving money more difficult.<sup>7</sup> Once al-Qaeda leadership and the organization’s chief financiers, facilitators, and logisticians were identified and

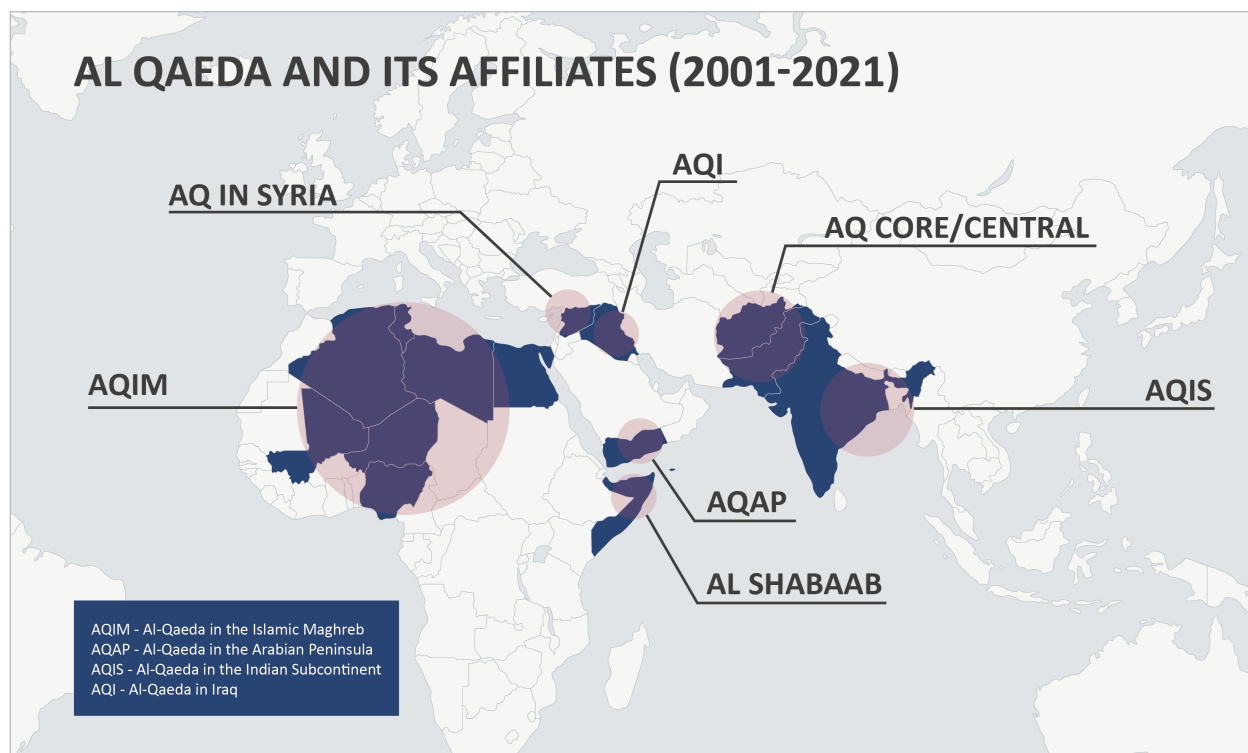
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<sup>4</sup> “Ombudsperson to the ISIL (Da’esh) and Al-Qaeda Sanctions Committee, <https://www.un.org/securitycouncil/ombudsperson>.

<sup>5</sup> Although both al-Qaeda and Islamic State are active terrorist groups, they are constantly evolving, and their present forms are not necessarily reflective of their historical selves. This report is concerned with their past behaviours and as such refers to their activities in the past tense.

<sup>6</sup> Matthew Levitt, “Al-Qa’ida’s Finances: Evidence of Organizational Decline?” *CTC Sentinel* 1 no. 5, (April 2008): 7. <https://www.ctc.usma.edu/wp-content/uploads/2010/06/Vol1Iss5-Art3.pdf>.

<sup>7</sup> Speakers at a virtual roundtable organized by The Soufan Center with the Airey Neave Trust highlighted the importance of the different implications of designations and proscriptions, with the latter making mere membership in the group a criminal offense; many designations processes, such as that under 1267, for example, did not make mere membership in al-Qaeda or ISIS illegal. For more, see: <https://thesoufancenter.org/projects/deterrence-and-denial-the-impact-of-sanctions-and-designations-on-violent-far-right-groups/>.



sanctioned, scrutiny of al-Qaeda's activities grew, making it a major risk to be caught with connections to the group. In 2005, al-Qaeda's then number two, Ayman al-Zawahiri, reached out to al-Qaeda in Iraq (AQI) leader Abu Musab al-Zarqawi to request \$100,000 in financial assistance.<sup>8</sup> In 2008, al-Qaeda was struggling to raise money and sustain a high operational tempo.<sup>9</sup>

Sanctions, including asset freezes and travel bans, made access to formal banking more difficult, and thus, it seems likely such sanctions could have been responsible, at least in part, for al-Qaeda's push to diversify its fundraising portfolio to include money

raised using a bottom-up approach. This meant that at least some of the onus for donating money shifted from wealthy donors and organizations to local efforts, supported by grassroots financing.<sup>10</sup> Despite this adaption, al-Qaeda still depended on money from a worldwide network of supporters and sympathizers. This global network raised money through a variety of legal and illegal activities and channeled the funds to al-Qaeda through charity organizations to circumvent sanctions. To keep funds flowing from deep-pocketed donors al-Qaeda pursued a sectarian agenda that resonated with hardliners in the region. Just as other groups have done, al-Qaeda's leadership consistently

<sup>8</sup> Ibid. 8.

<sup>9</sup> Hearing of the House Permanent Select Committee on Intelligence, "Annual Worldwide Threat Assessment," February 7, 2008. [https://www.dni.gov/files/documents/Newsroom/Testimonies/20080207\\_transcript.pdf](https://www.dni.gov/files/documents/Newsroom/Testimonies/20080207_transcript.pdf).

<sup>10</sup> Jodi Vittori, "Terrorist Financing and Resourcing," (New York: Palgrave Macmillan, 2011), 26.

appealed to the global *ummah*, or Muslim community, for financial assistance, ostensibly to help sustain the families of those al-Qaeda members imprisoned or dead.<sup>11</sup> In Syria, al-Qaeda-linked jihadists connected to Jabhat al-Nusra received a steady provision of financial contributions from wealthy individuals throughout the Persian Gulf.<sup>12</sup>

Al-Qaeda established, co-opted, and exploited charities and not-for-profit entities, including humanitarian groups and religious associations, to help finance itself.<sup>13</sup> Indeed, according to the EUROPOL Terrorism Situation and Trend Report 2022, “there are instances of terrorist groups using non-profit organizations to collect donations under the guise of charitable collections.”<sup>14</sup> This highlights that even in 2021, this is a clear example of the challenges associated with de-risking, as “good” charities are difficult to separate from “bad” ones and therefore measures taken to prevent terrorist abuse of the non-profit sector have had the unintended consequence of financial exclusion for many

civil society organizations.<sup>15</sup> These organizations collected, co-mingled, masked, maintained, transferred, and distributed the funds necessary to support the organization.<sup>16</sup> The network was global, with links to Albania, Bosnia, Croatia, Ethiopia, Indonesia, Kenya, Kosovo, Pakistan, Somalia, and Tanzania, among other countries.<sup>17</sup> These linkages extended beyond al-Qaeda to other jihadist groups, including Jemaah Islamiya, Lashkar-Taiba (LeT), and Tehrik-i-Taliban Pakistan (TTP).<sup>18</sup> As terrorism financing expert Matthew Levitt observed in 2008: “Even with the proliferation of local and self-led terrorist cells, traditional methods of terrorist financing—such as the abuse of charities, individual major donors and organized facilitation and financial support networks—remain a mainstay of al-Qa’ida financing.”<sup>19</sup> Still, al-Qaeda’s abuse of charities has been greatly diminished, a likely result of a combination of factors: Financial Action Task Force (FATF) recommendation 8, sanctions measures as discussed throughout this paper, the overall counter-terrorism pressure on the

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<sup>11</sup> Reuters, “Saudi Says Arrests Qaeda Suspects Planning Attacks,” *Reuters*, March 3, 2008, <https://www.reuters.com/article/us-saudi-qaeda/saudi-says-arrests-qaeda-suspects-planning-attacks-idUSL0335531920080303>.

<sup>12</sup> Bruce Hoffman, “Al-Qaida’s Uncertain Future,” *Studies in Conflict & Terrorism* 36, no. 8 (June 2013): 644. <https://doi.org/10.1080/1057610X.2013.802973>.

<sup>13</sup> Rohan Gunaratna, “The Post-Madrid Face of Al-Qaida,” *The Washington Quarterly* 27, no. 3 (June 2004): 95. <https://doi.org/10.1162/016366004323090278>.

<sup>14</sup> EUROPOL, Terrorism Situation and Trends Report 2022: [https://www.europol.europa.eu/cms/sites/default/files/documents/Tesat\\_Report\\_2022\\_0.pdf](https://www.europol.europa.eu/cms/sites/default/files/documents/Tesat_Report_2022_0.pdf)

<sup>15</sup> See for example: <https://web.law.duke.edu/sites/default/files/humanrights/tighteningpursestrings.pdf>.

<sup>16</sup> “The Role of Charities and NGO’s in the Financing of Terrorist Activities,” Hearing before the Subcommittee on International Trade and Finance of the Committee on Banking, Housing, and Urban Affairs. United States Senate, August 1, 2002. <https://www.govinfo.gov/content/pkg/CHRG-107shrg89957/html/CHRG-107shrg89957.htm>.

<sup>17</sup> Victor Comras, “Al-Qaida Finances,” in Giraldo and Trinkunas, eds., *Terrorism Financing and State Responses*, (Stanford: Stanford University Press, 2007), 121.

<sup>18</sup> Juan Miguel del Cid Gomez, “A Financial Profile of the Terrorism of Al-Qaeda and its Affiliates,” *Perspectives on Terrorism* 4, no. 4 (October 2010): 8-9.

<sup>19</sup> Levitt, “Al-Qa’ida’s Finances,” 7.



group, and greater international cooperation to counter its financing.

Another challenge to the 1267 sanctions regime was al-Qaeda's ability to earn money through difficult to monitor activities like fraud, in which small cells of sympathizers not directly connected to the group raised funds while attempting to avoid the scrutiny of authorities.<sup>20</sup> This shift may have accelerated following the advent of sanctions. Al-Qaeda cells have also raised money through the abuse of government welfare benefits and other methods seemingly unrelated to terrorist activity. One of the British perpetrators, who conducted the suicide attacks of July 7, 2005, committed bank fraud by deliberately defaulting on a £10,000 loan and overdrawing on his multiple bank accounts.<sup>21</sup> In Italy, tax fraud has generated funding for al-Qaeda-linked militants,<sup>22</sup> while in France, stolen credit card information has been used by Islamist militants to commit fraud online and finance attacks with the proceeds.<sup>23</sup> Armed robbery and theft are other small-dollar fundraising ventures that have made it possible for al-Qaeda militants to raise money outside of the reach of most sanctions measures. The same is true for smuggling and trafficking of illicit goods, including narcotics, and extortion

and protection payments demanded from individuals and businesses.

While based in Sudan, al-Qaeda was able to earn money through a range of legal businesses, including construction, manufacturing, currency trading, import-export companies, and agriculture.<sup>24</sup> At one point, it was believed that bin Laden owned 80 companies scattered across the globe.<sup>25</sup> Al-Barakaat, for example, was a network of companies founded in Mogadishu and headquartered in Dubai, used by al-Qaeda in as many as 40 different countries, with services as diverse as telecommunications, construction, remittances, and other banking services. Al-Barakaat, which became a sanctioned entity in 2001, managed, invested, and distributed funds for al-Qaeda, while simultaneously functioning as a source of financing and cash transfers.<sup>26</sup> Another workaround to avoid sanctions was the use of "mules," couriers that would physically transport large quantities of bulk cash, valuable commodities (gemstones, precious metals), and other items that could be converted to cash or used in nonmonetary transactions to create a complex series of exchanges used to obfuscate both the origin and final destination of the money. In Europe, terrorists and their supporters have exploited the interconnectivity of the bus and

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<sup>20</sup> Angel Rabasa, Peter Chalk, Kim Cragin, et al, "Beyond al-Qaeda: Part 1, The Global Jihadist Movement," (Santa Monica, CA: RAND Corporation, 2006), 57.

<sup>21</sup> "Terrorist Financing," Financial Action Task Force (FATF). February 2008, 14. <https://www.fatf-gafi.org/media/fatf/documents/reports/FATF%20Terrorist%20Financing%20Typologies%20Report.pdf>.

<sup>22</sup> del Cid Gomez, "A Financial Profile of Al-Qaeda and its Affiliates," 13.

<sup>23</sup> Timothy L. Thomas, "Al-Qaida and the Internet: The Danger of 'Cyberplanning,'" *Parameters* 23, no. 1 (Spring 2003): 117.

<sup>24</sup> Peter Bergen, "Holy Terror, Inc.: Inside the Secret World of Osama bin Laden," (New York: Free Press, 2001), 47-49.

<sup>25</sup> Hoffman, "Al-Qaida's Uncertain Future," 553.

<sup>26</sup> del Cid Gomez, "A Financial Profile of Al-Qaeda and its Affiliates," 10.

rail system within the Schengen Area to transport cash throughout the continent, a phenomenon with obvious implications for far-right terrorists and extremists operating in the same space.

Al-Qaeda's criminal activities also provided a significant portion of its operating budget, adopting an approach to fundraising that has been described as "eclectic and opportunistic."<sup>27</sup> In Afghanistan and Pakistan, al-Qaeda worked closely with the Haqqani Network to raise funds through a range of criminal activities.<sup>28</sup> In Yemen, al-Qaeda in the Arabian Peninsula (AQAP) colluded with local tribes to earn money through kidnapping.<sup>29</sup> Criminal gangs worked on commission for AQAP, scouring the streets of Sanaa searching for foreigners to abduct.<sup>30</sup> Al-Qaeda in the Islamic Maghreb (AQIM) militants regularly kidnapped Westerners, especially European citizens, and exchanged them for hefty ransoms paid by governments including Germany, Switzerland, Austria, Sweden, Holland, France and Spain. Al-Qaeda and its affiliates earned at least \$125 million from kidnapping between 2008-2014.<sup>31</sup>

In addition to the sanctions imposed by the UN 1267 sanctions regime, a broader crackdown on al-Qaeda financing included a

series of U.S. federal regulations that were designed to impose stricter requirements on financial institutions. These measures included implementation of rules and guidelines by national and international regulatory and standards-setting organizations, which stressed the importance of due diligence Know Your Customer (KYC) requirements, as outlined by the FATF's recommendations.<sup>32</sup> Government-regulated financial systems tightened controls on international bank-based money transfers, and charitable organizations supporting al-Qaeda were shuttered, while others were hampered after being added to the UN list of organizations that support terrorism. As described earlier, charities more broadly were impacted, generating longer term concerns about the impacts of counterterrorism measures on other policy priorities, including supporting a vibrant civil society sector and the protection of civil liberties. Under pressure from the United States, several Gulf countries were moved to regulate *hawala* transactions, requiring users to register and provide background information about the identity of the remitters and beneficiaries. In countries like Somalia, this placed many individuals at great risk, which in turn, may have inadvertently led them to become more dependent on illicit financial transfer

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<sup>27</sup> Phil Williams, "Terrorist Financing," in Paul Shemella ed., *Fighting Back: What Governments Can Do About Terrorism*. (Stanford, CA: Stanford University Press, 2011), 45.

<sup>28</sup> Vahid Brown, and Don Rassler, "Fountainhead of Jihad: The Haqqani Nexus, 1973-2012" (Oxford: Oxford University Press, 2013).

<sup>29</sup> Gregory D. Johnsen, "The Last Refuge: Yemen, Al Qaeda, and America's War in Arabia" (New York: W.W. Norton & Co., 2013).

<sup>30</sup> Ellen Knickmeyer, "Al Qaeda-Linked Groups Increasingly Funded by Ransom," *Wall Street Journal*, July 29, 2014, <https://www.wsj.com/articles/ransom-fills-terrorist-coffers-1406637010>.

<sup>31</sup> Rukmini Callimachi, "Ransoming Citizens, Europe Becomes Al Qaeda's Patron," *New York Times*, July 29, 2014, <https://www.nytimes.com/2014/07/30/world/africa/ransoming-citizens-europe-becomes-al-qaedas-patron.html>.

<sup>32</sup> Scott Helfstein, with John Solomon, "Risky Business: The Global Threat Network and the Politics of Contraband" (West Point: Combating Terrorism Center, 2014), [https://ctc.westpoint.edu/wp-content/uploads/2014/05/RiskyBusiness\\_final.pdf](https://ctc.westpoint.edu/wp-content/uploads/2014/05/RiskyBusiness_final.pdf).



networks.<sup>33</sup> In other cases, businesses that offered *hawala* services were required to obtain a license and report transactions to financial intelligence units, some of which were operating as part of central banks.

extortion, which garnered approximately \$360 million in 2015; and the 2014 looting of Mosul, during which ISIS stole about \$500 million from bank vaults.<sup>35</sup>

## ISLAMIC STATE

Having learned the lessons of dealing with al-Qaeda and its evolution, the 1267 sanctions regime seemed to be more prepared for the rise of Islamic State and its global network of affiliates. Islamic State's control of vast swaths of territory meant that the organization posed a different challenge than al-Qaeda had, since ISIS could raise money within the borders of its so-called caliphate without having to rely extensively on external actors or activities. Unlike other terrorist groups that relied almost exclusively on external state support, ISIS funded its operations through various crimes, ranging from oil theft to bank robbery to extortion.<sup>34</sup> As former Assistant Secretary for Terrorist Financing at the Department of the Treasury Daniel Glaser has noted, ISIS generated its wealth from three primary sources: oil and gas, which generated about \$500 million in 2015, primarily through internal sales; taxation and

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Soon after ISIS announced its state-building project in 2014, some estimates pegged the group's income at \$1 million per day.<sup>36</sup> The group was described as having "built its organization using a financial strategy characterized by ruthless efficiency and pragmatism," and alternative assessments

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<sup>33</sup> James Cockayne and Liat Shetret, "Capitalizing on Trust: Harnessing Somali Remittances for Counterterrorism, Human Rights and State Building," Center on Global Counterterrorism Cooperation, 2012, <https://www.globalcenter.org/wp-content/uploads/2012/07/CapitalizingOnTrust.pdf>.

<sup>34</sup> Phil Williams and Colin P. Clarke, "Iraqi and Syrian Networks," in Kim Thachuk and Rollie Lal, eds., *Terrorist Criminal Enterprises*, (Santa Barbara, CA: ABC-CLIO, 2018), 27-46.

<sup>35</sup> Daniel L. Glaser, "The Evolution of Terrorism Financing: Disrupting the Islamic State," in Matthew Levitt, ed., *Neither Remaining Nor Expanding: The Decline of the Islamic State*, Washington Institute for Near East Policy, Counterterrorism Lectures 2016–2017, August 2018, 43–7; Daniel L. Glaser, Testimony before the House Committee on Foreign Affairs Subcommittee on Terrorism, Nonproliferation, and Trade, and House Committee on Armed Services Subcommittee on Emerging Threats and Capabilities, June 9, 2016; "ISIS Financing 2015," Center for the Analysis of Terrorism, Paris, May, 2016.

<sup>36</sup> Vivienne Walt, "How Guns and Oil Net ISIS \$1 Million A Day," *Fortune*, July 24, 2014, <https://fortune.com/2014/07/24/isis-guns-oil/>.

forecasted its annual income to be between \$100 to \$200 million per year.<sup>37</sup> These estimates proved too conservative, as ISIS went on to become the wealthiest terrorist group in history.<sup>38</sup> At the height of its territorial control in 2015-2016, the Islamic State had generated over \$6 billion—the equivalent of the gross domestic product of Liechtenstein.<sup>39</sup> The Global Coalition to Defeat Daesh, led by the United States, launched a devastating military campaign against ISIS, specifically attacking its financing efforts. Even as ISIS' territorial control declined, it still retained financial power. After its last territory was retaken in Baghouz, Syria, in the spring of 2019, the group's surviving leadership is alleged to have smuggled as much as \$400 million out of Iraq and Syria and used it to invest in legitimate businesses—hotels, hospitals, farms, and car dealerships—throughout the region, including in Turkey, where some militants also reportedly made large purchases of gold.<sup>40</sup> This is a significant amount of money to raise despite the sanctions regime, raising questions about the impact of the regime itself. ISIS was adept at using financial facilitators, who were able to move money into and out of conflict zones through a range

of techniques, including smuggling networks and cash couriers.<sup>41</sup>

The consequences associated with UN listings tend to focus on the more formalized fundraising methods used by terrorist groups—banks, travel, trade—rather than those utilizing illicit and informal economies. Moreover, when ISIS was able to establish a state, it raised and spent its money mostly within that state-building system, even attempting to mint its own currency at one point. As UN 1267 sanctions expert Jacqueline Shire commented, “ISIS-controlled territory in a way that al-Qaeda never did, so in many ways, it was an entirely different problem set.”<sup>42</sup> Given the civil war in Syria and ongoing insurgency throughout parts of Iraq, states were unable to do much to restrict ISIS' financing juggernaut, and the UN also had limited means at its disposal that could have a tangible impact.

ISIS was different from previous terrorist groups because the territory it controlled provided extremely lucrative resources, such as oil, and a renewable funding source in the form of a taxable population. One of the core difficulties in degrading ISIS' considerable material wealth was that much of what it

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<sup>37</sup> Patrick B. Johnston and Benjamin Bahney, “Hit the Islamic State's Pocketbook,” *Newsday*, October 5, 2014, <https://www.newsday.com/opinion/commentary/hit-the-islamic-state-s-pocketbook-opinion-p96322>.

<sup>38</sup> Patrick B. Johnston, Mona Alami, Colin P. Clarke, and Howard J. Shatz, “Return and Expand? The Finances and Prospects of the Islamic State After the Caliphate,” (Santa Monica, CA: RAND Corporation, 2019), [https://www.rand.org/pubs/research\\_reports/RR3046.html](https://www.rand.org/pubs/research_reports/RR3046.html); see also: Colin P. Clarke, “ISIS's New Plans to Get Rich and Wreak Havoc,” *Foreign Policy*, October 10, 2018, <https://foreignpolicy.com/2018/10/10/isiss-new-plans-to-get-rich-and-wreak-havoc/>; and Colin P. Clarke, “After the Caliphate,” (Cambridge, UK: Polity Press, 2019).

<sup>39</sup> “Islamic State Has Been Stashing Millions of Dollars in Iraq and Abroad,” *The Economist*, February 22, 2018, <https://www.economist.com/middle-east-and-africa/2018/02/22/islamic-state-has-been-stashing-millions-of-dollars-in-iraq-and-abroad>.

<sup>40</sup> Renad Mansour and Hisham al-Hashimi, “ISIS Inc.,” *Foreign Policy*, January 16, 2018, <https://foreignpolicy.com/2018/01/16/isis-inc-islamic-state-iraq-syria/>.

<sup>41</sup> Jessica Davis, “Illicit Money: Financing Terrorism in the 21<sup>st</sup> Century,” (Boulder, CO: Lynne Rienner, 2021), 87.

<sup>42</sup> Interview, Jacqueline Shire, May 2022.

amassed was collected within its controlled territory. Indeed, as much as 80 percent of its fortune was acquired by mimicking one of the central functions of modern nation-states—that is, collecting taxes and tariffs from the local population.<sup>43</sup> Like many other contemporary terrorist groups, ISIS relied on a range of criminal activities, including, but not limited to, extortion, KFR, robbery and theft, and antiquities smuggling. ISIS may also have been involved with narcotics trafficking.<sup>44</sup> There is little evidence to suggest that foreign donations from nation-states were a significant funding source for ISIS, although wealthy individuals from the Gulf have been accused of financing terrorists in Syria.<sup>45</sup> The internal nature of ISIS' revenue streams made sanctions even more challenging as a means of combating its expansion and external operations. In this sense, ISIS is relatively unique in recent history as one of the few terrorist groups to generate most of its funding from the territory it held—revenue amassed from taxation and extortion, the sale of oil and various oil-related products, looting, confiscation of property and cash, and fines levied against the

population by the religious police for a litany of offenses.<sup>46</sup> ISIS' reputation as financially incorruptible—a defining characteristic inherited from its predecessors al-Qaeda in Iraq (AQI) and Islamic State of Iraq (ISI)—helped boost popular support for it, despite the savage and draconian manner in which it administered its territory.<sup>47</sup> This was especially true when ISIS was juxtaposed to the Iraqi government, considered rapacious and highly corrupt by large segments of the population.

ISIS was entrepreneurial and, to a large extent, able to sustain itself through a diverse portfolio of investments and ventures that were difficult for the international community to disrupt. As an upshot of this there is scant evidence to suggest that foreign donations were ever a significant source of funding for it, and the money it gained from KFR operations was never a “major” source of income.<sup>48</sup> As ISIS evolves and continues to establish global affiliates, these revenue streams will probably change; indeed, external funding from sympathetic state and non-state donors could one day comprise a much larger proportion of its coffers.<sup>49</sup> But

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<sup>43</sup> Mansour and al-Hashimi, “ISIS Inc.”

<sup>44</sup> Colin P. Clarke, “Drugs & Thugs: Funding Terrorism Through Narcotics Trafficking,” *Journal of Strategic Security* 9, no. 3 (Fall 2016); for more on how involvement in narcotics trafficking impacts terrorist groups, see Svante Cornell, “Narcotics and Armed Conflict: Interaction and Implications,” *Studies in Conflict and Terrorism* 30, no. 3 (2007): 207-227.

<sup>45</sup> Scott Bronstein and Drew Griffin, “Self-Funded and Deep-Rooted: How ISIS Makes its Millions,” *CNN*, October 7, 2014.

<sup>46</sup> Stefan Heibner, Peter R. Neumann, John Holland-McCowan, and Rajan Basra, “Caliphate in Decline: An Estimate of Islamic State's Financial Fortunes,” (London: The International Centre for the Study of Radicalisation and Political Violence, 2017); see also Rukmini Callimachi, “The Case of the Purloined Poultry: How ISIS Prosecuted Petty Crime,” *New York Times*, July 1, 2018.

<sup>47</sup> Patrick B. Johnston, Jacob N. Shapiro, Howard J. Shatz, et al, “Foundations of the Islamic State: Management, Money, and Terror in Iraq, 2005–2010,” (Santa Monica, CA: RAND Corp., 2016), [https://www.rand.org/pubs/research\\_reports/RR1192.html](https://www.rand.org/pubs/research_reports/RR1192.html).

<sup>48</sup> Heibner, et al, “Caliphate in Decline.”

<sup>49</sup> Colin P. Clarke, Kimberly Jackson, Patrick B. Johnston, et al, “Financial Futures of the Islamic State of Iraq and the Levant,” (Santa Monica, CA: RAND Corp., 2017), [https://www.rand.org/pubs/conf\\_proceedings/CF361.html](https://www.rand.org/pubs/conf_proceedings/CF361.html).

for the duration of IS' reign in Iraq and Syria, it remained incredibly difficult for the sanctions regime to limit ISIS revenue streams. In turn, the group's funding was directly tied to its ability to wage war.

The war against ISIS demonstrated that sanctions, one of the principal traditional tools for this area of policy, were demonstrably insufficient. Even the impact of the Counter-ISIS Coalition's targeted, strikes on oil operations and cash stores in Iraq and Syria in 2015 proved to be impermanent. A combination of civilian and military measures was required, with global backing, to target its material wealth and sustain the impact. ISIS will continue to seek both licit and illicit revenue streams to fund its operations.

Having covered the way these groups financed their operational and organizational capabilities, this brief will evaluate the sanctions measures themselves, as well as the strengths, weaknesses, and challenges associated with these measures over time.

## SANCTIONS MEASURES

Three primary sanctions measures formed the core of the 1267 sanctions regime—asset freezes, travel bans, and arms embargoes. Each was an important pillar of the sanctions regime and should be considered in combination with the others, not in isolation.

The assets freeze pillar meant that states were required to freeze the finances and assets of any and all individuals and entities designated by the sanctions regime. While proving causation between asset freezes and a decline in terrorist financing is impossible, these measures were believed to be a highly effective mechanism in preventing terrorist

groups from launching large-scale terrorist attacks. The aim of this pillar is to limit the access of terrorist financiers to the formal banking system, thus constraining their ability to make and move money, while also preventing them from engaging in legitimate business transactions.



The travel ban was devised to prevent designated terrorists from entering and transiting through territories that would facilitate their ability to plan, plot, and execute attacks. Preventing face-to-face meetings and interactions is an important part of limiting the growth of terrorist networks. When al-Qaeda and ISIS terrorists are unable to meet with fellow militants and other intermediaries, it inhibits operational planning and makes operational security more difficult. The travel ban is perceived as a deterrent, but also as a persuasive measure to dissuade known associates or “second-line supporters” of these groups from crossing international borders. Given that terrorists do frequently cross borders and would thus be vulnerable to these measures, it behooves the international community to focus capacity building and train and equip efforts for border security, to include implementation of technologies like biometrics.

The arms embargo requires each state to take measures to prevent the supply (direct or indirect), sale, and transfer of various types of arms, vehicles, and weapons from its territory to designated individuals and

entities. The arms embargo is designed to deny al-Qaeda and ISIS members the ability to acquire the materials necessary to execute terrorist attacks. Terrorist training is also a component, as the travel ban also plays a role in limiting the ability of terrorists to travel to and join existing training camps in weak states and ungoverned territories. By increasing the risk premium for weapons traffickers, the arms embargo seeks to restrict illegitimate sources of weapons, ammunition, and the components needed for bombmaking. Still, data on the effectiveness of arms embargoes are only as good as the reporting provided by states, many of which have struggled in this particular area.

### **Strengths**

Even though one of the major and relatively consistent criticisms from an array of stakeholders about the sanctions regime has been the lack of rigorous metrics to measure impact, experts note that the regime has yielded some benefits.<sup>50</sup> Namely, developing international consensus likely had knock-on effects in terms of effective counterterrorism, and by establishing international norms, resultant political signaling indicated what actions were considered beyond the pale. To enhance the effectiveness of measures, improvements in the Consolidated List development were undertaken, with many names being added in a more timely manner. For example, Jabhat al-Nusra and associated militants were added to the list mere months after being designated by the United States. Still, the expedited manner of some additions to the List has raised due process concerns in some cases. Nonetheless, 1267 sanctions are

binding under international law for all states and are an important tool of the international community that does not involve military force. The sanctions regime generally enjoys a broad base of political support among states and Security Council members, and in terms of symbolism, the Consolidated List in particular demonstrates a groundswell of international condemnation of the actions, means, and objectives of terrorist groups like al-Qaeda and IS.

The *Kadi* case had a significant impact on the UN 1267 regime. It was a European Union (EU) related case that went up to the European Court of Justice to deal with the issue of human rights and due process concerns regarding the delisting of an individual associated with al-Qaeda. As a result of the ruling, the EU was forced to remove him from the sanctions list and helped demonstrate the need for the creation of the Ombudsperson, an entity at the UN 1267 Committee that now reviews delisting petitions in an impartial manner. The appointment of an Ombudsperson demonstrated the regime's ability to adapt to legal and public opinion, thus enhancing the credibility of the regime. As noted by Christopher Michaelsen in 2010: "The establishment of the Ombudsperson office constitutes a significant improvement to the existing listing and de-listing procedure."<sup>51</sup>

While the efficacy and reliability of assets freeze measures can vary widely between states, this has not limited the private sector in making significant progress. Indeed, the global formal financial sector has continued to refine policies and develop stricter KYC rules, while also becoming more reliable in

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<sup>50</sup> Discussions with U.S. officials and sanctions experts, roundtable organized by The Soufan Center, Washington, D.C., May 2022.

<sup>51</sup> Christopher Michaelsen, "The Security Council's Al Qaeda and Taliban Sanctions Regime: 'Essential Tool' or Increasing Liability for the UN's Counterterrorism Efforts?" *Studies in Conflict and Terrorism* 33, no. 5, (2010): 457.

filing suspicious activity reports (SARs). Financial intelligence (FININT) can be an extremely effective tool in the arsenal of states and governments working to counter terrorism, if afforded priority and wielded in the right way.<sup>52</sup>

It is also important to recognize ancillary benefits associated with some of the measures.<sup>53</sup> For example, the travel ban has provided certain states the ability to leverage the UN regime to encourage other, sometimes recalcitrant states, to improve border and port security, focusing on building capacity in these areas and making strides to integrate new technologies into their respective approaches. This includes biometrics and the installation of technical equipment, while also enhancing the sophistication of national identity documents to minimize fraud and counterfeiting. Concurrently, many states have strengthened cooperation with international and regional entities such as INTERPOL, which maintains a database of lost and stolen travel documents and other useful tools. Monitoring Team reports have discussed the impact of arms embargoes, which forced al-Qaeda militants to improvise on weapons and ammunition, making it more difficult for the group to launch terrorist attacks or, when they occurred, to minimize the resultant damage. Progress in this area was also a likely driver for the passage and implementation of UNSCR 2253 (2015), which specified that sanctions already in force against al-Qaeda would also apply to ISIS.

## **Weaknesses**

There are a number of weaknesses associated with the 1267 regime which should be borne

in mind when discussing the use of a tool like sanctions toward other types of terrorist threats, to include violent far-right actors. Although it has made some strides, the Consolidated List itself has frequently been the target of intense criticism. Some states have expressed concern that the Consolidated List had unclear procedures for listing and delisting individuals, implying a lack of flexibility and agility for adding or removing names, while others note that their reluctance to put forth names to be considered has been due to lingering human rights concerns. Furthermore, states have complained that certain basic protections, afforded defendants in both criminal and civil matters (e.g. due process) are unavailable to listed and designated individuals. This is in addition to the challenges inherent in having countries employ their own national standards for evidence requirements needed for listings and de-listings.

Private sector entities that rely on the 1267 Consolidated List, including banks and financial institutions, find that many entries often lack necessary information required to properly identify an individual. Other criticisms include that the List remains a limited or distorted picture of the actual threat. Moreover, due to the intense political nature of the activity, listing individuals is not objective, and stronger states have more bargaining power than weaker or smaller states, which lack tangible leverage. Overall, political and legal controversies are seen as limiting the potential of the Consolidated List and, to a lesser extent, the 1267 regime more broadly.

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<sup>52</sup> Juan Zarate, "Treasury's War: The Unleashing of a New Era of Financial Warfare," (New York: Public Affairs, 2013).

<sup>53</sup> There are also costs, including constraining financial inclusion and increasing de-risking, among other issues.

Accordingly, some states have complained that the Consolidated List is not a useful operational tool, as it proved too cumbersome to adapt to changes in the nature of terrorist groups like al-Qaeda and IS. Without a clear understanding of the links between some of the individuals included on the List and these groups, there have been questions surrounding the intent or objective of the designations. There will also be some level of skepticism attached to the process or accusations of bad faith, with concern that some states could seek to include domestic political enemies on the List as a way to minimize political opposition, tainting these individuals with the title of “international terrorist” when the relationship or connection between that individual and a foreign terrorist groups is murky at best.

In other cases, like that of high-ranking al-Qaeda member Abu Yahya al-Libi, there have been serious lags between developments on the ground and the designation process. This happened with franchise groups and affiliates, including AQAP. To remedy this, analysts argue, the List should be viewed as a “live document” that can be changed frequently in line with the nature of the threat, which is never static. It should be noted, however, that working methods make change difficult and require consensus among most member states to change, a standard which is difficult to achieve. This issue partly stems from the dearth of analysis in some cases regarding the organizational structure of al-Qaeda and ISIS and how these groups have evolved over time. According to terrorism scholar Barak Mendelsohn, the shortcomings of the Consolidated List and associated measures demonstrate a “surprising neglect of what one would assume should be

a central aspect of its work: the identification and analysis of the threat against which the sanctions are directed.”<sup>54</sup>

### ***Additional Considerations***

While some of the critiques about the inherent weaknesses of the 1267 sanctions regime are fair, others fail to take account for the myriad challenges that are neither straightforward nor easily solved. For example, the decentralized nature of transnational terrorist groups like al-Qaeda and ISIS lead to a lack of clarity about who is, and who is not, associated with the various splinters and offshoots of the groups, a point especially relevant as greater international attention turns to their affiliates rather than the “core” organization. There is a clear lesson here for sanctions that might be designed to deal with violent far-right extremists and far-right terrorist groups. The sanctions regime has been challenged by several issues that have been counterproductive and worked at cross purposes to effective implementation. While some states lack the capacity to enforce the range of sanctions measures, others lack the political will. For others, it is simply not a priority, given other issues considered far more urgent. As the 1267 Monitoring Team has noted, “It will always be difficult to design, let alone enforce, sanctions against diverse groups of individuals who are not in one location, who can adopt different identities, and who need no special equipment to launch their attacks.”<sup>55</sup> Even in the face of all these challenges, it remains worthwhile to pursue sanctions because their impact, while admittedly difficult to measure, can reduce

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<sup>54</sup> Mendelsohn, “Threat Analysis and the UN’s 1267 Sanctions Committee,” p.610.

<sup>55</sup> “Recent Attacks Tragic Reminders Fight Against Terrorism far from Over, Security Council Told,” United Nations Security Council: Press Release, 13 September, 2004, <https://www.un.org/press/en/2004/sc8184.doc.htm>.



the frequency and lethality of terrorist attacks.

During the course of the two decade-long “Global War on Terrorism”, the UN Security Council often found itself lacking critical data regarding implementation efforts following on the resolutions adopted or the impact of its counterterrorism measures.<sup>56</sup> Indeed, the sensitive nature of data related to terrorism and counterterrorism is one of the primary reasons why it has been difficult to provide a comprehensive assessment of the UN’s overall impact in this area.<sup>57</sup> Some of this was directly related to a lack of reporting from states, because not all states consider this international obligation to be important. More consequentially, there was little concept of how to measure progress, other than anecdotally, along the three primary sanctions measures—asset freezes, travel bans, arms embargoes. By their nature, states are more bureaucratic, vertically structured, and cumbersome than decentralized networks of non-state actors. Nevertheless, measures like arms embargoes need to be more adroit in responding to the constant evolution of terrorists’ tactics. This includes anticipating or quickly adapting to changes in terrorist behavior, while offering states a clear-cut definition of what their respective obligations are and how these can be consistently met, a function that the UN Security Council Counter-Terrorism Executive Directorate (CTED) seeks to perform with regard to a wider set of UNSC counterterrorism obligations.<sup>58</sup>

*Even in the face of all these challenges, it remains worthwhile to pursue sanctions because their impact, while admittedly difficult to measure, can reduce the frequency and lethality of terrorist attacks.*

Lastly, the Monitoring Team struggled with sustaining momentum for the sanctions regime after initial interest in the program began to wane. Political will always plays an important role in whether states will be able to make progress once the threat begins to fade, change shape, or is overshadowed by other national priorities or international events—for example, Russia’s ongoing war in Ukraine. Moreover, there are powerful states, to include Russia, that benefit from (and indeed promote, even if surreptitiously) the proliferation of far-right extremism, as it keeps countries like the United States preoccupied and forced to expend crucial resources countering a domestic threat. If the threat is believed only to concern a limited number of states—for example, the right-wing threat is likely to be more prominent in North America, Europe, and Oceania—there may be less of an impetus or little sense of urgency for states outside of those

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<sup>56</sup> For more on this, visit the Securing the Future Initiative at [www.sfi-ct.org](http://www.sfi-ct.org).

<sup>57</sup> Naureen Chowdhury Fink, “Looking Back to Move Forward: The Role of the UN in Addressing Evolving Terrorist Threats,” IPI Global Observatory, June 7, 2021, <https://theglobalobservatory.org/2021/06/looking-back-to-move-forward-the-role-of-the-un-in-addressing-evolving-terrorist-threats/>.

<sup>58</sup> United Nations Security Council Counter-Terrorism Committee, <https://www.un.org/securitycouncil/ctc/>.

immediately impacted. In that sense, the threat posed by al-Qaeda and ISIS were perhaps more transnational in nature, and therefore perhaps more easily generated broader-based consensus globally, instead of by region.

## RECOMMENDATIONS

1. **Focus on tailor-made regimes that can adapt to the terrorist threat:** Threat analysis to drive effective counterterrorism strategies is not a direct comparison between al-Qaeda and ISIS on one hand, and far-right extremist groups on the other. There will be some similarities, but also many differences, so those designing potential sanctions to address the threat of violent far-right actors need to consider: how these networks are structured, how they raise, move, store, obscure, manage, and use funds; where they derive arms and ammunition; and how they seek to travel across borders to recruit new members and spread propaganda. Moreover, since many travel and logistical networks have been impacted by the COVID-19 pandemic, it could take time to identify patterns and trends being exploited by violent far-right actors in this space. It could be revelatory to conduct a comparative analysis of the groups sanctioned under the 1267 sanctions regime, and those violent far-right actors that might be eligible based on their individual profiles.<sup>59</sup>
2. **Establish metrics to assess implementation and impact of sanctions regimes:** Any future sanctions regime is going to suffer similar challenges as the 1267 regime unless it devotes resources and capacities to devising appropriate metrics that can provide a comprehensive overview of impact. It is important to be explicit about a theory of change in the design of sanctions, and the UNSC should ensure that assessment is conceptualized in the earliest stages of a sanctions regime, but also that assessment is robustly resourced. Presenting metrics in a way tailored to specific stakeholders and ensuring that data collection, and results are as transparent as possible will help gain multi-stakeholder buy-in from states. Since metrics can drive decision-making, the ways in which assessment results will be used by decision-makers must be a consideration throughout the assessment process. For this recommendation to fulfill its potential, it is essential that UN member states take it upon themselves to pay close attention to the collection and analysis of data.
3. **Invest in international cooperation for implementation:** Similar to the difficulty in sustaining momentum for a sanctions regime against al-Qaeda and IS, terrorist organizations with global reach, it will likely also be challenging to maintain a sanctions regime against violent far-right terrorists, particularly white supremacists and neo-Nazis. Many countries may consider this a “Western” issue, with Five Eyes (FVEY) countries and other European nations facing the lion’s share of the

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<sup>59</sup> For more on this topic, see the other Issue Briefs in this series, and in particular: Mollie Saltskog, “Trends in Violent Far-Right Extremism,” The Soufan Center, July 28, 2022, <https://thesoufancenter.org/projects/deterrence-and-denial-the-impact-of-sanctions-and-designations-on-violent-far-right-groups/>.

threat.<sup>60</sup> Even if political will in non-Western countries is lacking, FVEY countries and other allies should capitalize upon pre-existing information sharing and intelligence cooperation best practices, seeking to disrupt violent far-right networks through the same (and potentially additional) sanctions measures such as arms embargoes, travel bans, asset freezes, and a Consolidated List that builds upon and improves some of the shortcomings facing the 1267 sanctions regime. This could include building groups of like-minded states (“FVEY and friends,” or Fourteen Eyes) to champion mechanisms that build a comprehensive sanctions regime that is less piecemeal and thus, serves as a force multiplier.

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<sup>60</sup> While the lion’s share of the incidents of far-right extremist and terrorism occur in the West, there was an arrest made in Singapore in December 2020 of a far-right extremist who had been planning an attack inspired by Christchurch. <https://www.scmp.com/week-asia/politics/article/3120789/far-right-vs-islamists-vicious-circle-extremism-southeast-asia>; there is also the issue of how to interpret “ethnically-motivated” violent extremism and whether this category applies to some of the violence occurring in India.

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### Project Resources, Publications, and Events

For all materials relating to this project, including events summaries, publications, and related resources, please visit the TSC website at [www.soufancenter.org](http://www.soufancenter.org):





# THE SOUFAN CENTER

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The Soufan Center (TSC) is an independent non-profit center offering research, analysis, and strategic dialogue on global security challenges and foreign policy issues, with a particular focus on counterterrorism, violent extremism, armed conflict, and the rule of law. Our work is underpinned by a recognition that human rights and human security perspectives are critical to developing credible, effective, and sustainable solutions. TSC fills a niche role by producing objective and innovative reports and analyses, and fostering dynamic dialogue and exchanges, to effectively equip governments, international organizations, the private sector, and civil society with key resources to inform policies and practice.