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ABSTRACT

The decisions to impose sanctions on Russia and to lift them on Iran, in opposition to the wishes of the United States, contributed to the elevation of the profile of the European Union among the main global actors in international politics. However, the EU imposes sanctions since the spring of 1994, shortly after the entry into force of the Treaty of Maastricht. Even though the EU consequently has 26 years of experience herewith, EU sanctions have been mostly studied only on a case-by-case basis. The aim of this article is to provide an up-to-date and comprehensive overview of the experience of the EU with sanctions. Specifically, it presents the results of a newly constructed database of EU autonomous sanctions constituted by 48 cases of these restrictive measures, which have been subdivided in 85 episodes. The analysis revolves around four questions that we asked in each case: when sanctions were in force, what type(s) were used, where the targets were located and why restrictive measures were imposed. The analysis of the empirical database leads to observations about the EU as an international actor and, more generally, on the trends vis-à-vis the utilisation of sanctions as a foreign policy instrument.

Introduction

The decisions to impose sanctions on Russia and to lift them on Iran have contributed to the elevation of the profile of the European Union among the main global actors in international politics. Russia is a large economy and a major security player in the international system (Giumelli 2017), while the EU's confrontational attitude towards the United States regarding sanctioning Iran was certainly a blow to traditional transatlantic cooperation (Aggestam and Hyde-Price 2019). However, the EU has been practising sanctions ever since the entry into force of the Treaty of Maastricht in November 1993, in a number of circumstances and under different scenarios that have been investigated from a variety of angles (de Vries and Hazelzet 2005, Portela 2010, Eriksson 2011, Giumelli 2013a, Kreutz 2015). At the same time, while comprehensive overviews of sanctions already exist for the US and the United Nations (Hufbauer *et al.* 2007, Clifton *et al.* 2014, Biersteker

et al. 2016), the sanctioning activity of the EU has not been systematically collected into a coherent database even in light of its 26 year-long experience therewith.

The aim of this article is to present a comprehensive EU sanctions database (EUSD) of the experience of the EU in using sanctions – or "restrictive measures" as they are known in its own jargon – under its Common Foreign and Security Policy (CFSP).[1] EUSD covers the time frame from the entry into force of the Maastricht Treaty until 2019, which is a substantially longer time period than for existing data sets which end in 2005 (TIES), 2008 (Kreutz 2015) or 2018 (SIPRI 2020). EUSD also adopts the concept of "episode" (Eriksson 2011, Biersteker *et al.* 2016), which is a theoretical innovation that helps enhance the understanding of the EU as an international actor – as it allows us to subdivide the 48 cases of the database into a total of 85 episodes. Each episode is accompanied by a summary that is constructed around four main questions: when, what, where and why. The "when" refers to the timing of sanctions. The "what" addresses the types of sanctions adopted; we considered six forms hereof: arms embargoes, travel bans, asset freezes, financial restrictions, trade restrictions and diplomatic restrictions. The "where" denotes the geographical locations of targets; we have classified them according to continents and macro regions. Finally, the "why" focuses on the triggering cause for the imposition of sanctions; we considered seven different possibilities here: democracy promotion, crisis management, post-crisis management, terrorism, non-proliferation, EU interests and support of international norms. Of the four questions, the systematic analysis of the triggering causes (why) of sanctions represents a further unique feature of EUSD compared to existing databases.

This database contributes to the wider debate on the EU as an international actor, and offers insights on the attempt to understand the "nature" of the supranational body. First, sanctions have significantly contributed to the consolidation of the international actorness of the EU. Due to the shortcomings in creating its own military force, the EU has relied on sanctions to play a role in international crises – and this dependence has only increased over time. The utilisation of sanctions contributes to the consolidation of the autonomy, capability and coherence/cohesion of the EU as an international actor. Regarding the "nature of the beast" (Risse-Kappen 1996), the practice of restrictive measures provides partial confirmation of the EU as a "normative power". For instance, the related literature finds partial confirmation for the EU being such a power insofar as it adopts sanctions mainly with the intention to promote democracy, to sustain post-crisis transitional arrangements and to uphold non-proliferation regimes. However, the explicit referrals to EU security in the more recent restrictive measures imposed, such as the horizontal regime on chemical weapons, indicates a normalisation process of the EU as an actor in the international system.

The article is divided into six sections. First, we present the existing literature on EU sanctions and the few attempts to consolidate a comprehensive database of the latter. Second, we discuss how enhanced knowledge of sanctions contributes to the debates on the EU's international actorness. Third, we describe EU sanctions policy and its historical evolution since the 1970s. Fourth, we introduce the database and the main categories that were used to construct it. Fifth, we present a descriptive overview of the when, what, where and why questions and we discuss what the analysis of the database tells us about EU international actorness. Finally, the conclusion summarises the findings and suggests ways in which sanctions research could benefit from the presented database.

What do we know of EU sanctions?

The experience and practice of the EU as a sanctioning actor have been investigated at length in the literature (de Vries and Hazelzet 2005). In the meantime, the evolution from comprehensive to targeted sanctions as led by the UN since the end of the 1990s (Cortright and Lopez 2002, Biersteker and Eckert 2006) has created the environment wherein EU sanctions developed. Therefore, although recent events regarding Iran have led some to wonder whether this is still the case (Portela 2016), the EU has officially adopted a targeted-sanctions approach (European Union 2004).

The central focus of the literature on sanctions is on effectiveness; studies on the EU are no exception to this rule (Portela 2010, Giumelli 2011, 2013a, 2013b, Vines 2012, Giumelli and Ivan 2013). Already in 2002, de Vries drew attention to the potential ineffectiveness of targeted sanctions. Studying the case of the Federal Republic of Yugoslavia (FRY), he contends that targeted sanctions against the FRY's political leadership were impotent due to the latter being able to circumvent them effectively (de Vries 2002). More recent studies have focused on Russia (Jones and Whitworth 2014, Secrieru 2015), Belarus (Jarábik 2011, Bosse 2012), Iran (Giumelli and Ivan 2013, Bergeijk van 2015), Syria (Biersteker and Portela 2015, Seeberg 2015, Hellquist 2016) and Zimbabwe (Grebe 2010), to mention just some of the countries studied.

The effectiveness debate has been informed by classical variables such as the multilateralism of sanctions, their impact and the clarity of the demands (Giumelli 2013a, Biersteker *et al.* 2016). More specifically in relation to the EU context, Boogaerts (2020) investigated the domestic coherence in action as defined by EU actorness and Kranz (2016) analysed the normative consensus that supports the sanctions regime in the first place (Eriksson and Giumelli 2011, Moret 2015). The unintended consequences hereof have also been analysed, both in their humanitarian impact (Moret 2015) and in the externalities that contribute to the strengthening of the targets of such measures (Jones and Whitworth 2014).

The debate on effectiveness has often overlapped with discussion of what the aims in resorting to sanctions ultimately are. Official EU documents suggest that sanctions are imposed with the objective to change the behaviour of targets, which is also in line with the findings of the academic literature. However, behavioural change has been complemented by other *logics*, such as the constraining and the signalling (or, stigmatising) ones (Giumelli 2011). These logics show that sanctions can be triggered by a number of causes and that, especially, the signalling one has a direct implication for the analysis of the EU's international actorness as described later. For instance, restrictive measures have been justified on the basis of the need to express concern about what is deemed acceptable behaviour or to reaffirm EU values internationally (Biersteker and Portela 2015). Jaeger (2016) provides evidence in this regard, arguing that EU sanctions have an important constructive and discursive dimension influencing the effectiveness of a given sanction regime. In general, the EU's record in imposing sanctions does not vary from other actors in the international system responding to humanitarian crises (Binder 2009), autocratic practices (Soest van and Wahman 2015) and violations of international norms (Hazelzet 2001, Erickson 2020), among other things.

As is evident from reviewing the literature, EU sanctions have increasingly become subject to scholarly analysis. Yet while comprehensive studies on EU sanctions already

exist, these are only limited in scope and hence insufficient for obtaining a complete picture of the supranational body's related experience. EU sanctions are included in the database of Hufbauer, Schott and Elliott (1990), but beyond ending in the year 2000 it also does not include all of them – while the analytical framework is still heavily embedded in the pre-targeted-sanctions narrative too. The Threat and Imposition of Economic Sanctions (TIES) data set makes the important analytical contribution of including cases also of threatened sanctions, but the temporal scope is limited to only 2005 and the EU is not treated as an individual case (Clifton et al. 2014).

The first analysis of EU sanctions dates back to the early years of the new century (Anthony 2002), while an initial attempt to present a full overview hereof would be conducted a few years later on the basis of 19 such cases (Kreutz 2005). The EU's increasing relevance in the international system led to three books dealing directly with its sanctions, which contained in their analyses basic overviews hereof (Portela 2010, Eriksson 2011, Giumelli 2011). However, these studies are not up to date and they did not produce an available database with the notable exception of the GIGA Sanctions Dataset (Portela and Soest van 2012). This lack of a comprehensive overview was eventually picked up on by European institutions, leading to the crafting of a "Sanctions Map" – an online database created under the auspices of the Estonian presidency of the Council in 2017. This is the most up-to-date and comprehensive database in existence on EU sanctions. However, it has two main shortcomings. First, the database is rather descriptive and does not endeavour to deliver any analysis. Second, the case narrative is prepared assuming that sanctions had the same role in the crisis in question over time. The Sanctions Map is currently used to formulate policies as well as to present EU sanctions to other EU institutions (Russell 2018). So while comprehensive overviews exist regarding the UN experience (Biersteker et al. 2016) and other large data sets are largely reliant on the US experience (Hufbauer et al. 2007, Clifton et al. 2014), efforts to create a comprehensive database of the EU's own restrictive measures have been so far limited.

Sanctions and the EU's international actorness

This article aims to fill this gap by providing a comprehensive database of EU autonomous sanctions imposed since the entry into force of the Maastricht Treaty in November 1993. Enhanced knowledge of the EU's imposition of restrictive measures contributes directly to the broader debates about its international actorness and what kind of power the supranational body is. Due to the confines of space, other debates on sanctions – such as how sanctions work, why sanctions are used and how we can understand their effectiveness – will not be further discussed in this article.

The debate on EU international actorness (Cosgrove-Sacks and Twitchett 1970, Sjöstedt 1977, Ginsberg 1999, Gegout 2009, Koops 2011) can draw on the analysis of how it has adopted restrictive measures with clear implications for the dimensions of autonomy, actor capability and coherence/cohesion (Koops 2011, p. 162). The frequency and quality of how the EU has used sanctions over the past three decades can also provide empirical support for those who held that its visibility and profile as an international actor would increase by the mere adoption of sanctions – regardless of any material impact on the actual crises at hand (Howorth 2007, Kurowska and Pawlak 2009).

The aspect of autonomy/authority focuses on the capacity to act independently from the respective member states. The presentation of the legal framework and the practice of sanctions will provide indications on the degree to which EU institutions and member states can act independently from each other in the utilisation of such measures (Koops 2011, pp. 97–101). The capability assessment considers "the capacity to act on the global scene" (Cosgrove-Sacks and Twitchett 1970, p. 12). Such an overview can confirm to what extent the EU has relied on sanctions as well as the extent of its global reach too. This is also linked to the internal discussion within the EU, namely "the ability to formulate effective policies" in order to respond to "opportunity and/or to capitalize on presence" (Bretherton and Vogler 2006, pp. 24–35). Looking at sanctions imposed can provide only a partial picture of EU action/inaction, but the increase in sanctions adoptions is certainly a strong indicator of the greater impact and reach of its international actorness.

The coherence/cohesion aspect means, aside from a shared intention and uniform implementation, also a "contradiction-free foreign policy" – wherein, more generally, the means are compatible with the objectives. The diachronic analysis of sanctions will reveal whether EU institutions are learning from previous experience and, consequently, adapting and shaping their decisions around changing conditions on the ground. Scrutinising the institutionalisation of the process over time can also provide insight on whether the "expectations–capability gap" – which had been earlier identified in the analysis of the EU as an international actor (Hill 1994) – has been bridged over the years.

Empirical analysis of how the EU has used the foreign policy instrument that is closest to the use of force can certainly shed light on what type of actor the supranational body is. Although the debate has offered a number of perspectives on what the EU is – "civilian power" (Duchene 1972, Orbie 2016), "normative power" (Manners 2002), "transformative power", "superpower" (Whitman 1998), "comprehensive security actor", "diplomatic actor" (Koops and Macaj 2015), "collective actor" (Bodenstein and Kemmerling 2017) up to a "normal power" (Pardo 2012) –, most definitions would converge on two features. First, the EU appears to be a unique actor in the international system. Second, the behaviour of the EU seems to be inspired predominantly by norms and not by interests, as self-evident from the labels "civilian" or "normative" power. This perspective would suggest that the adoption of sanctions is justified by norms and values rather than by particular interests that the EU holds.

An overview of the EU sanctions process

Sanctions have been part of the European diplomatic toolkit for decades now. The first attempts to cooperate on foreign policy date back to the creation of the European Political Cooperation (EPC) in 1970. The inability to act together in the late 1970s led to the "London Report" adopted in 1981, with one author suggesting that the first "sanctions" imposed by the European Economic Community – against the Soviet Union in 1981 and Argentina in 1982 – were a consequence of this new agreement (Kreutz 2005). However, these were not the only instances of sanctions being imposed by the EEC. The arms embargo on Myanmar for the military coup in 1988 and on China after the events of Tiananmen Square in 1989 became known about also because their impacts are still ongoing. The restrictive measures imposed on the Democratic Republic of Congo (DRC) in April and on Nigeria in July of 1993 (European Union 1993, para. 1.4.6)

were the last instances hereof before the entry into force of the Maastricht Treaty in November of the same year, which established the earlier-mentioned CFSP – equipping the EU with the authority to impose sanctions.

Sanctions are adopted on the basis of Chapter Two of the Treaty of the European Union (TEU), which contains specific provisions on the CFSP. Article 29 is the legal basis for Council decisions setting up sanctions regimes. Given the direct implications for the common market, economic and financial measures are adopted via Council decisions (CFSP) and implemented on the basis of Council regulations as per Article 215 of the Treaty on the Functioning of the European Union (TFEU). There are three main documents that discipline the use of sanctions by the EU. First, sanctions are imposed according to tenets illustrated in the "Basic Principles" adopted in 2004 (European Union 2004). Second, sanctions are designed and imposed according to ideas that are listed in the "Guidelines" adopted in 2018. This document states that the EU has adopted a "targeted" approach, meaning that sanctions are designed so as to minimise the impact on civilians while increasing the burden on certain actors – namely, targeted individuals, political parties and governmental leaders (European Union 2018a). Finally, given that imposing sanctions on individuals is an extremely detailed process, the third document – entitled "Best Practices" – oversees the uniform implementation of EU decisions across member states. It has been updated over time, with its most current version being from May 2018 (European Union 2018b).

The proposal of new restrictive measures comes from the High Representative of the Union for Foreign Affairs and Security Policy (HR/VP), but such measures can be considered and discussed from the European Council down to several working groups thereof – such as Coreper, the Political and Security Committee (PSC), the regional subgroups and, especially, the Working Party of Foreign Relations Counsellors (RELEX) (Portela 2010, Giumelli 2013a). However, the decision to impose sanctions – like any other CFSP decision – needs the unanimous support of the Council of Ministers. Sanctions would normally have a "sunset clause", meaning that they are to be automatically lifted after a certain amount of time – typically 12 months (but this can vary), unless the Council decides to extend them. The European External Action Service (EEAS) and the Commission assist the Council in the preparation of the legal texts, and they also support member states in the implementation of sanctions. The Court of Justice of the European Union (CJEU) also plays a crucial role in the process, because targeted individuals and entities can appeal against Council decisions. Although this possibility was not considered in the treaties, the number of complaints grew after 9/11 and they led to the ground-breaking Kadi judgement in 2008 (Eckes 2008). Whereas the ruling of the Court was about specific proceedings linked to the implementation of UN sanctions, the Kadi case raised awareness of the possible human rights violations embedded in sanctions policies. Thus even if CFSP decisions were not subject to the jurisdiction of the Court, the requirement to observe due-process principles – such as effective remedy and the right to be informed – ensured that the CJEU would always undertake a judicial review of EU decisions in the realm of sanctions (Giumelli 2019).

Restrictive measures mainly consist of arms embargoes, travel bans and of diplomatic and economic restrictions (namely, asset freezes; financial and trade restrictions). Economic measures are adopted via Council decisions and implemented per Council regulations based on Article 215, as mentioned above. When Council decisions impose arms embargoes and travel bans, then national legislation is also needed because the arms

trade and access to territory are areas wherein the Treaty of Rome granted special authority to member states. The prohibition on selling arms was initially limited to military items, but it was soon evident that several goods and technologies produced for civilian use could also serve military objectives. Initially, the EU asked member states to consider this issue; a list of dual-use goods was then adopted in 2009, so as to harmonise the activities of the national authorities of EU member states. The most recent version of the list was adopted in 2017.

The database of EU sanctions

The complete database consists of 48 cases of sanctions imposition in the time period from November 1993 until December 2019. The cases have, as noted, been further divided into episodes – the database thus consists of 85 episodes related to EU restrictive measures (see Appendix 1 for the complete list of cases and episodes). In this section, we present the process of compiling the database, the analytical choices that were made in its completion and the key questions that the database focuses on: namely, the when, the what, the where and the why of EU sanctions.

First, the database includes all CFSP sanctions imposed by the EU since the Treaty of Maastricht as well as the politically binding arms embargo on China. The sender, which is conventionally the actor who enacts sanctions, is the EU when acting autonomously, while targets are the actors against whom sanctions are enacted. The database also includes information regarding cases where the EU acted before the UN did, "on top" of the UN and even when the UN itself did nothing.

Second, the unit of analysis of the database is a sanctions case. Conventionally, the name of the country or the regional entity will be used to identify an instance of sanctions imposition on targets either linked to the policy of a country or that are hosted by the latter. A case is issue-specific, therefore a country can be involved in multiple ones if the causes and whereabouts of sanctions are different. The establishment of a case is determined by the adoption of a Council decision (common position before 2009), with the Council establishing a sanctions regime under Article 29 of the TEU and Article 215 of the TFEU. The database comprises only cases formalised in this way, with one exception to this rule. The case of China has been labelled an anomaly by EU officials, since it was never actually formalised (Portela 2010, p. 104). The EU has also resorted to so-called horizontal regimes, namely restrictive measures against acts potentially committed by individuals anywhere; we refer to the banned sector or the proscribed activity in labelling these. The database includes only cases of autonomous sanctions imposed by the EU either going beyond UN regimes, elsewhere called "gold-plating" (Taylor 2010), or acting independently from the latter.

Third, due to the fact that some sanction regimes span decades and are significantly altered in the course of their existence, each case is subdivided into phases called episodes. An episode is a phase in the sanctions case that is qualitatively different from the previous and the following one, thus allowing for the analysis of transformations within the sanctions regime. This occurs when the triggering cause for sanctions regime changes over time, such as in the case of the utilisation of sanctions during a crisis or after it, or when the form of sanctions substantially changes, for instance when sanctions target either very sensitive political actors or a crucial economic sector.

The empirical analysis was constructed around four key questions concerning EU sanctions: the when, the what, the where and the why. The when refers to the time dimension of the EU sanctions regimes, and addresses the length of individual cases but also the number of active ones at each point in time. The beginning and the end of an episode in the database refers to EU autonomous sanctions exclusively. It is possible that the end of a case in the database does not mean that restrictive measures were lifted, but it could mean that the UN decided to impose sanctions that had been previously adopted by the EU (see Appendix 2 for a summary). Additionally, it is also possible that while sanctions have been suspended the case is still ongoing. This is due to the fact that suspension is treated differently to the lifting of sanctions. The suspension of sanctions means that the case continues.

The what concerns the types of measures adopted by the EU. A parsimonious classification of six types of measures is used here: arms embargoes, travel bans, asset freezes, financial restrictions, trade restrictions and diplomatic restrictions. In each case one or more of each type of measure might be present. This classification largely originates from EU terminology, and is based on the Council decisions – which normally devote one specific article to each of the measures. *Arms embargoes* refer to cases where the sale, supply, transfer or export of arms and related materials of all kinds are prohibited, and involves also cases of bans on dual-use goods. *Travel bans* identify situations in which the targeted individuals are prevented from entering or transiting through the territories of the member states, and are considered to be synonymous with visa bans. *Asset freezes* relate to all funds and economic resources belonging to, owned, held or controlled by the sanctioned individuals or entities. *Financial restrictions* encompass measures honing in on interactions with the financial sector of the target country, such as a ban on payments. *Trade restrictions* are a broad category for all sanctions related to import or export activity as imposed on the target country, or parts of it. They also include flight bans, which can be considered restrictions on trade via restrictions on services. Finally, *diplomatic restrictions* refer to instances of the suspension or scaling-back of diplomatic relations. While it is natural that imposing sanctions hinders diplomatic relations, this category in the database tracks only officially mandated interruptions of diplomatic contact. The database also includes the number of individuals and entities targeted by the EU in each episode – relevant to identify the scope of the measures – and the number of individuals and entities targeted by the UN – allowing assessment of the EU's degree of autonomy from the latter as well as of the targeted level of EU sanctions.

The where denotes the geographical distribution of sanctions targets, namely where they are located. We have classified cases across four continents – namely, Europe, Asia, Africa and the Americas – and globally – the so-called horizontal regimes. As well, we looked at three macro subcategories relative to the EU: its vicinity, its outer circle and the rest of the world. We have used these three categories instead of any EU terminology – such as the Neighborhood Policy and/or Enlargement – because we intend to emphasise the mere geographical distance over other political considerations. To this end, we classified countries bordering directly with the EU (EU;s vicinity), countries bordering with the countries bordering with the EU (other circle) and all others (the rest of the world).

Lastly, the why relates to the types of crises that triggered the imposition of EU sanctions. Seven categories are identified herein: democracy promotion, crisis management, post-crisis management, non-proliferation, terrorism, EU interests and

international norms. The triggering cause is coded by looking at the preamble of the Council decision that established the sanctions regime or the decision/implementing decision that determined the commencement of the episode. As indicated in the Codebook, there are specific sentences that have been "assigned" to each of the following categories. *Democracy promotion* involves instances where the EU has adopted restrictive measures in response to human right violations in a given country. *Crisis management* refers to a situation of crisis or conflict in which the EU either intervenes to mitigate the negative consequences hereof or relies on sanctions to solve an international disagreement. *Post-crisis management* marks cases where a crisis has ended and the EU acts to support either the implementation of the agreement or to sustain the consolidation of the new government (be it one elected or that has been recognised by the EU as legitimate) by targeting potential spoilers of the conflict settlement – such as rebels and former government officials. *Terrorism* cases, meanwhile, reveal clear elements of the EU's intent to inhibit such activity. *Non-proliferation* concerns the EU's intention to contribute to international regimes that help counter the proliferation of weapons of mass destruction (WMDs). *EU Interests* indicates the intention of the supranational body to adopt sanctions to address a direct challenge to its own interests. Finally, *international norms* refer to upholding those that have not already been mentioned above (i.e. terrorism and non-proliferation), such as "territorial integrity" and "international humanitarian law".

Naturally, each episode could fall under multiple categories. For instance, the preamble of a Council decision may mention several triggering causes, while multiple sanctions can be imposed at the same time.

The when

Consistent with other studies forming part of the literature mentioned above, the EU has increasingly used sanctions over time – as shown in Figure 1. The first post-Maastricht act
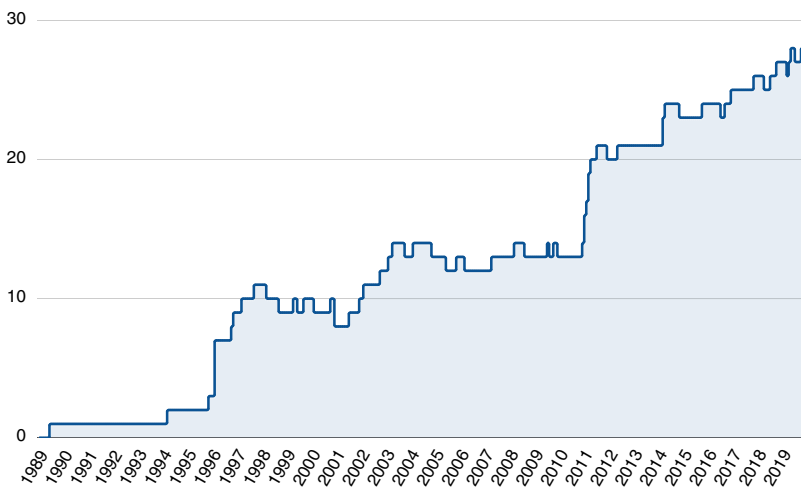

Figure 1. Restrictive measures in force over time.

was adopted to impose an arms embargo on Sudan in March 1994 (C38). Throughout the 1990s, the EU increasingly used its power to impose sanctions autonomously. The spikes in the graph correspond to particular situations occurring in the international context. For instance, the rise between 2001 and 2004 reflects EU action on terrorism but also cases such as Belarus (C3), Transnistria (C42) and Zimbabwe (C39). The increase in 2011 corresponds to events in the Middle East and North Africa (MENA) region. Some of the more recent cases concern Venezuela (C48) or chemical weapons (C10). As of December 2019, there were 28 active EU sanctions regimes currently in place.

On average, the sanctions episodes last 4.5 years (55 months). Among the shortest closed episodes are the FRY (C19-EP4), which lasted for one month only, and the one regarding the Comoros (C12-EP1), which lasted just four months. This does not include those cases that started towards the end of 2019, such as Turkey (C44), and which are thus still ongoing. Some cases are also not continuous. In the ones of Bosnia and Herzegovina (C4 and C6) and Libya (C29 and C29) sanctions were terminated, only to be reimposed again several years later in a different context and due to unrelated or only indirectly related matters. In such instances we have created different cases, unless sanctions were explicitly based on the legal basis provided by previous sanctions – such as in the case of the DRC (C16).

The differences in the lengths of cases reflect the wide variety of contexts in which the EU uses sanctions regimes. The longest formalised cases in the database are those of Myanmar (C8) and of the US (C46), having been in place for over 275 months.[2] In October 1996, the EU imposed arms embargoes, travel bans, financial and diplomatic restrictions in reaction to the systematic violation of human rights, a lack of progress towards democratisation in the country and due to the persistence of military rule there. From 2011 till 2013, most sanctions were lifted in reaction to ongoing reforms, leaving in place only an arms embargo. Yet, some measures were brought back in 2018 in the context of the Rohingya crisis, with travel bans and asset freezes on 14 individuals added. The case of Myanmar reflects the resilience of some sanction regimes and their versatile nature in addressing different types of crises. However, the first episode of China represents the longest non-binding episode (233 months); the longest binding episode is BiH (C7) for 252 months meanwhile.

In contrast, the Comoros case (C12) lies at the opposite end of the duration continuum. In 2008, the president of one of the islands of the Comoros refused to step down, challenging the democratic process in the country. In coordination with the African Union, the EU imposed travel bans and asset freezes on eight individuals in total: namely, the president, his brother and certain cabinet members. However soon after, the AU intervened militarily to reinstate the legitimate government – and, consequently, the EU terminated its sanctions regime.

The what

Travel bans and assets freezes are the two most common types of sanctions imposed by the EU, making up 75 per cent and 62 per cent of the episodes respectively. They are followed by arms embargoes, which have been imposed in 46 per cent of the episodes, while trade, financial and diplomatic restrictions fall much further behind in constituting 18, 16 and 11 per cent of the episodes respectively. Table 1 summarises the frequency of the six forms of sanctions that we identified in constructing the database.

Table 1. Frequency of types of sanctions imposed by the EU.

Cases	Arms embargoes	Assets freezes	Travel bans	Trade restrictions	Financial restrictions	Diplomatic restrictions
85	39	64	53	15	14	9
	46%	75%	62%	18%	16%	11%

Travel bans have been used, for instance, in the case of Transnistria (C42). In 2003, the EU decided to intervene in this long-standing conflict and restrict the entry and transit through its territory for 17 individuals – including Igor Smirnoff, de facto president of Transnistria. The EU identified these individuals as responsible for obstructing the path towards the political settlement of the conflict. When in 2012 talks on a peace agreement were restarted, the EU emptied the list of targets but did not terminate the sanctions regime altogether. Asset freezes featured prominently in the case of Egypt (C18), where they were used to target those deemed to have misappropriated resources from state funds, listing 19 such individuals – including Hosni Mubarak and his family.

Moving towards less individual sanctions, arms embargoes have been used to limit the influx of weapons into a specific area – such as in the case of Guinea (C21). In 2009 demonstrators gathered in the Stade du *28 Septembre* stadium in Conakry, where soldiers subsequently opened fire on the crowd and a massacre occurred. In reaction to this event, the EU identified individuals to be sanctioned with travel bans and asset freezes, but also imposed an arms embargo on the entire country. Trade and financial restrictions have been used, for instance, in the case of Syria (C40), where the import of crude oil and petroleum products was forbidden, as was the sale and purchase of gold, precious metals and diamonds from the government. Bans on servicing Syrian cargo flights, on luxury goods and on jet fuel were also enacted. In addition, the investments of the European Investment Bank were suspended. Finally, a prominent example of diplomatic sanctions is the case of Nigeria (C33) – where the EU limited the movement of the country's diplomats and suspended non-essential visits to there by EU officials.

An interesting aspect to observe is how often these measures have been used in combination with each other. Cases of the EU using just one of the instruments are relatively frequent (33 per cent of the episodes). This occurred for arms embargoes, in cases such as Afghanistan (C1), the DRC (C16) and Indonesia (C24) among others. An asset freeze alone has been imposed in Egypt (C18), Tunisia (C43) and Ukraine (C45). The cases of Mostar (C7) and Transnistria (C42) saw only travel bans issued. In the case of the US (C46), only trade restrictions have been imposed. Financial restrictions and diplomatic sanctions have never been used in isolation (Table 2).

The majority of cases (67 per cent) have at some point featured a combination of two or more types of sanctions. These combinations vary, but the most common one is the joint use of asset freezes and travel bans (22 cases). In a further 10 instances, these two measures were accompanied by an arms embargo. The broadest scale of instruments was used only in the case of Myanmar between 2007 and 2012 (C8-EP3), featuring all types hereof. The broad use of instruments was also at play in Russia for both cases of Crimea (C34-EP2) and Donbass (C35-EP2) where only arms embargo and diplomatic sanctions are missing respectively. Arms embargo, trade, travel and financial restrictions are imposed at the same time in four episodes, one in Syria (C40-EP2) and three episodes in the case of Iran (C25, EP 2, 3 and 4).

Table 2. Types of sanctions used at the same time.

Types sanctions	Episodes	Share of database
1	28	33%
2	27	32%
3	15	18%
4	9	11%
5	5	6%
6	1	1%

The where

EU autonomous sanctions are truly international in the sense that they were imposed on targets worldwide. In total, restrictive measures were imposed most frequently on targets located in Asia (33 per cent), followed by Europe (25 per cent) and Africa (26 per cent). Targets located in the Americas account for only 6 per cent of the episodes. Table 3 provides an overview of the geographical locations of targets relative to the EU's own. Thus, we notice that the EU imposes sanctions in its own vicinity almost as frequently as it does on the rest of the world. With the tripartite classification, the EU imposed sanctions on targets in its vicinity in 45 per cent, in its outer circle in 7 per cent and on the rest of the world in 46 per cent of the listed episodes.

We have also identified three cases of horizontal regimes, which equate to 6 per cent of the episodes. It is worth returning to the EU's horizontal sanctions regimes that cannot be confined to a single state or region, but which are potentially targeted rather against the international community of states as a whole. The three horizontal regimes – terrorism (C41), chemical weapons (C10) and cybercrime (C17) sanctions – exist for two reasons. First, the targets of sanctions are not necessarily located in a specific country. Second, the geographical location of certain targets does not imply the direct responsibility of the country from where these individuals and companies operate. Thus, horizontal regimes minimise the risk of attribution – namely, the political and legal responsibility of the state that issued passports to the specific individuals targeted.

The why

Seven different categories vis-à-vis why EU sanctions were imposed were identified above: democracy promotion, conflict management, post-conflict stabilisation, non-proliferation, terrorism, EU interests and international norms. Because the why of a sanctions regime can change depending on the episode in question, it is important not to look at the overall cases but rather to focus on their individual episodes when assessing what types of crises triggered EU intervention in the form of sanctions.

Table 3. Geographical classification of cases.

Continent	Europe	Asia	Africa	Americas	Horizontal
Cases	25	28	22	5	5
Share of total	29%	33%	26%	6%	6%
Consolidated areas	EU's vicinity		Outer circle		Rest of the world
Cases	38		6		36
Share of total	45%		7%		42%

Table 4. Why sanctions are imposed.

Triggering cause	Frequency	share
Democracy promotion	37	44%
Crisis management	28	33%
Post-crisis management	23	27%
Non-proliferation	8	9%
Terrorism	6	7%
EU Interests	11	13%
International norms	13	15%

The EU aimed to promote democracy in 44 per cent of the identified episodes. Next came reasons of crisis management, constituting 33 per cent hereof, closely followed by post-crisis management efforts, which were the raison d'être for 27 per cent of EU sanctions. Upholding international norms was mentioned in 15 per cent of the episodes, while EU interests were explicitly indicated in 13 per cent thereof. Non-proliferation came onto the agenda of the EU only at a later stage of its existence, with Iran and North Korea (DPRK) becoming the main concerns of European countries in this regard – and thus they make up around 14 per cent of the episodes in the database combined (Table 4).

Crisis-management sanctions are exemplified by the EU's involvement in the ongoing Ukraine crisis (C35). The EU, for instance, intervened in the conflict in the Donbass in an attempt to discourage activities by Russia aimed at undermining the independence of Ukraine. In the FRY (C19) in 1996, sanctions were called into action with the hope of stabilising the post-conflict environment after the 1995 Dayton Agreement. As a result the EU maintained its arms embargo even after the peace accord had been signed, and implemented additional sanctions when the situation again deteriorated. Against Zimbabwe (C39), for example, the EU maintained a sanctions regime for almost 10 years due to the country's democratic deficits. The EU enacted an arms embargo against the country as well as targeted sanctions against political and military decision makers held responsible for undermining democracy and the rule of law. The ISIL/al-Qaeda regime (C27) exemplifies a case of EU sanctions enacted due to concerns about terrorism. Here, the EU targeted organisations and individuals supporting terrorists. Looking at non-proliferation concerns, the DPRK (C15) was struck by sanctions with the purpose of halting the country's acquisition of WMDs. Accordingly, sales of equipment, dual-use goods and of services that could help promote the country's nuclear and ballistic missile programmes were prohibited, and targeted sanctions against the country's leadership implemented. EU interests were clearly articulated in the cases of the cyber regime (C17), which targets individuals committing acts against "the integrity and security of the Union", or Turkey (C44), which is accused of "illegal drilling activities in the Eastern Mediterranean". Finally, international norms were invoked to justify the imposition of sanctions on Russia in the case of Crimea (C34), which violated "Ukrainian sovereignty and territorial integrity", and the International Criminal Tribune for the former Yugoslavia (C23), as the EU acted in "full respect for and cooperation with the ICTY".

Discussion of the findings

Comprehensive and consolidated knowledge of EU sanctions practice contributes to understanding of the supranational body as an international actor, as mentioned above.

By scrutinising and discussing the empirical findings, we can draw related conclusions regarding the autonomy, actor capability and coherence/cohesion of the EU. Additionally, the way in which the EU utilised sanctions also provides insight on the distinctive characteristics of its behaviour on the international stage.

Undoubtedly, the frequency and intensity of EU sanctions have increased over time since the entry into force of the Maastricht Treaty. The observation of EU action *per se* cannot offer robust confirmation that the autonomy of the supranational body has increased compared to that of the member states, but the pace of utilisation and the degree of institutionalisation do verify that EU member states have delegated much of their sanctioning authority to Brussels (Giumelli 2013c). In itself, it can be stated that the mere imposition of sanctions does enhance the visibility and profile of the EU as an international actor.

Observing the evolution of sanctions' utilisation also offers an insight into the capability of the EU to act on the global stage in two ways. First, sanctions have gradually turned out to be the easiest and most effective way for the EU to play a role in the international security field given its shortcomings in building its own functioning military force. The EU's intention to play a direct role herein is demonstrated by its willingness to actively engage in the crises emerging in its immediate and relative neighbourhoods, from the social unrest in the MENA region to events in eastern Ukraine and beyond, from the arms embargo on Indonesia to the promotion of democracy in Venezuela – not to mention the imposition of horizontal regimes as well. The latter further confirm the global ambitions of the EU, and its increasing awareness of the fact that security challenges now originate from an ever-more complex international system wherein non-state actors have also come to play an active role. Second, it appears that the EU has learned how to adjust its policy choices to policy objectives. The adoption of the concept of episodes allows us to witness how the EU has managed to adjust its policy preferences over time according to changing scenarios; this is consistent with findings in other studies that adopted the concept of episodes as well (Biersteker *et al*. 2018). In the database, the adoption of the concept of episodes enhances the understanding of sanctions by identifying if and when the EU proved able to adjust either the motives (why) or the nature of the restrictive measures (what) to the new situation (Table 5).

In the case of Cote d'Ivoire (C13), for example, the EU enacted autonomous sanctions in 2010 and 2011 in order to manage the ongoing civil war there (crisis management). Then, from 2011 till 2016, the EU's priority became to support the consolidation of the new government led by Alassane Ouattara; as such, the triggering cause for sanctions became post-crisis management. In other cases, such as the one of Iran (C25), the multiple episodes reflect the different phases of the crisis. Measures at the inception of the Iranian regime were rather mild, then intensified with the EU-US's higher pressure (EP1), while the

Table 5. Case structures in episodes.

Number of episodes	Instances	Share
1	25	52%
2	15	31%
3	3	6%
4	4	8%
5	1	2%

episodes in 2014 (EP2) and 2015 (EP3) are in parallel with the negotiation of the Joint Comprehensive Plan of Action. Similar narratives can be articulated for other cases, such as in Burma/Myanmar (C8), the FRY (C19) and Guinea (C21). The overview shows when the EU adopted sanctions with the intention to participate in and thus affect the dynamics of a given crisis, such as in Transnistria (C42) or the FRY (C19), or when it alternatively relied on restrictive measures to show its commitment to, rather than desire to play a primary role in, the management of a given crisis, such as in the Comoros (C12). In all these cases, the adoption of the concept of episodes allows us to capture the dynamic and strategic adaptation of the EU to crises worldwide.

Other trends emerging from the analysis of the database demonstrate a certain degree of coherence/cohesion to EU policies in its capacity as an international actor. For instance, travel bans and asset freezes have become more popular over the last decade. The chronological overview of sanctions type shows an over-time increase in asset freezes and travel bans compared to a moderate rise in arms embargoes and trade restrictions, alongside the constant usage of financial restrictions and diplomatic sanctions. While in the 1990s arms embargoes constituted the EU's dominant sanctioning tool, more individually targeted tools - such as travel bans since 2004 and asset freezes since 2007 - would overtake as the primary sanctioning instruments. Looking at overall development patterns – with the exception of 2000–2001 when the sanctions imposed on Nigeria (C33) and the FRY (C19) were terminated, and 2013 when the travel bans and freezing of assets vis-à-vis Myanmar (C8-EP4) were lifted – the use of these two measures has been steadily increasing. Figure 2 indicates that certain types of sanctions (e.g. diplomatic ones) have not proven popular EU instruments at any point during the past 30 years.

The exponential growth in these two sanction types' utilisation could have been because of increasing awareness among member states that restrictive measures bear economic costs. Whereas the imposition of sanctions was thought to be a cheap foreign policy decision, it has held true for a while now that such measures should come at a price for senders too if they want to be taken seriously (Fearon 1994, 1997). Preoccupied more with the economic costs than the outcomes of foreign policy strategies, EU member states eventually learned that asset freezes and travel bans contribute to those strategies but do not have severe financial implications for their own economies. Instead of imposing trade sanctions, the EU consequently appears to privilege tailored restrictions on movement and access to personal wealth vis-à-vis targeted individuals.

Finally, an overview of sanctions policy contributes to the literature on what type of international actor the EU is. If we benchmark EU behaviour to the expectations of the normative power Europe (NPE) literature (Manners 2006, Tocci 2008), then we can confirm, in part at least, that the EU is normatively driven.

First, the increase in the use of travel bans and asset freezes clearly corresponds to the rise of the concept of "smart" or "targeted" sanctions from the mid-1990s onwards (Portela 2010). This reflects the conviction that targeted sanctions involve less collateral damage, as indicated by the "EU Guidelines"; member states would emerge as fierce defenders of the concept. "Personal sanctions" in this context refer to the concept of targeting specific people, under which asset freezes and travel bans fall. Related trends largely mirror the activities of the UN, whose sanctions became more targeted over time – the most common combination in use was travel bans, asset freezes and arms embargoes (Biersteker *et al.* 2018). Second, a chronological overview of EU sanctions and their triggering
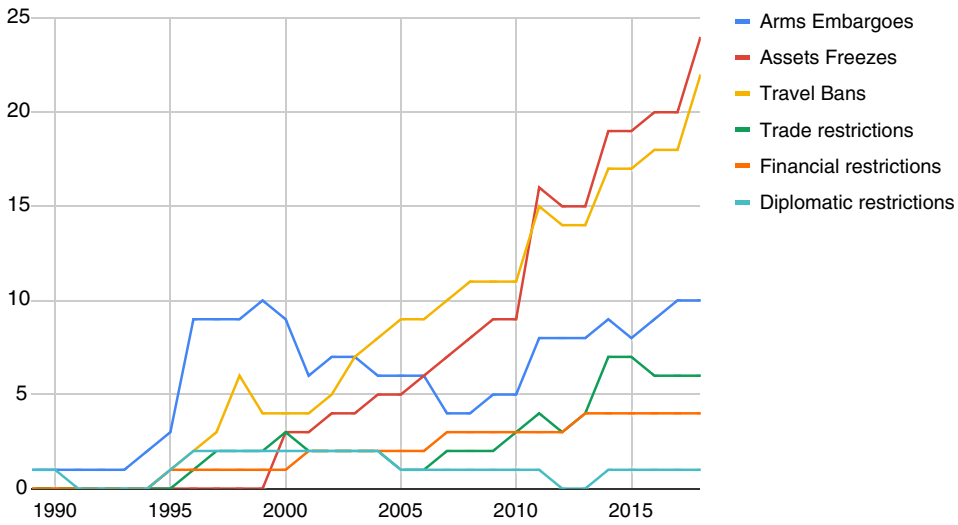
Figure 2. Types of EU sanctions.

crises confirms that cases of democracy promotion have been behind much of the increase herein since 2009, as shown in Figure 3.

Several trends become apparent when taking this overview. First, democracy promotion has since 1993 been relatively steadily on the rise, culminating in 15 active democracy-promotion episodes in 2018. The drastic increase from 2010 to 2011 can be traced back to the social uprisings in the MENA region and subsequent democratic rollbacks, causing the EU to react with a marked increase in sanctioning activity in this region. Crisis and post-crisis management have also driven the EU to use sanctions, especially since 2010.

There are, however, considerable differences with regard to why sanctions are imposed where, as already noted in the literature (Portela 2005, Beaucillon 2012). This variance challenges the assumption that the EU behaves based on norms instead of interests. For
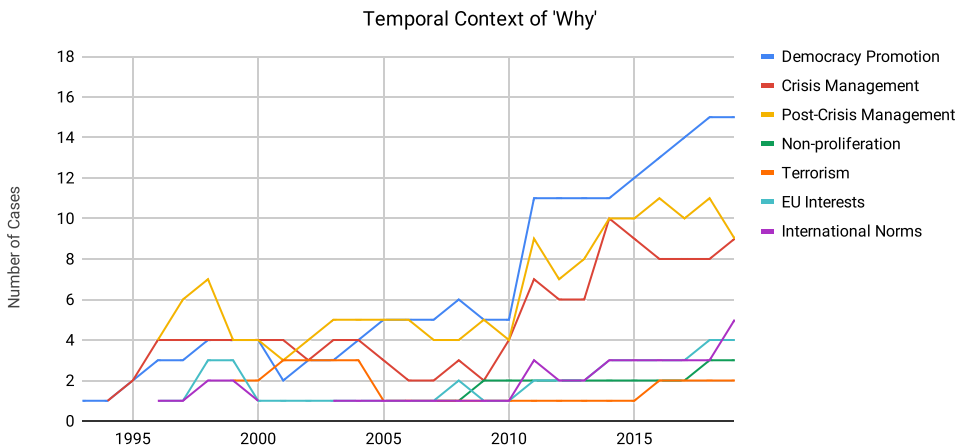

Figure 3. Chronological overview of crises types.

instance, sanctions in Europe are mostly triggered by post-crisis and crisis management (19 instances out of 36). Conversely, the most frequent triggering cause for sanctions in Africa and Asia is still democracy promotion; the second-most is post-crisis management in Africa and crisis management in Asia however.

Finally, the EU seems to have acted also away from its own borders in order to safe-guard good governance and democratic rights. Accordingly, we would expect EU foreign policy to be coherent and consistent when it comes to deciding to resort to sanctions regardless of the geographical location of the crisis in question. In other words, supporting national institutions in post-conflict scenarios should receive the same attention and response both in the EU's vicinity and beyond. While only half of episodes are located in the EU neighbourhood, almost all countries therein have been sanctioned; we can certainly infer that geographical proximity is a factor worth further exploring then. Marking another unique aspect of EUSD, it is clear that EU interests played a central role in its sanctions decision-making (as indicated in official documents) – a step back from NPE's expectations.

Conclusion

The European Union has gained attention as a sanctions player with the regimes imposed on Iran and Russia in the past few years. However, the Maastricht Treaty and the creation of a Common Foreign and Security Policy delegate this prerogative from the member states to the supranational institutions at the European level; the experience of the EU in adopting sanctions thus dates back to November 1993. This article has presented a comprehensive overview of the sanctions experience of the EU with the analysis of 48 cases, which were further subdivided into 85 episodes of restrictive measures.

The first post-Maastricht decision adopted by the EU was the arms embargo imposed on Sudan in the spring of 1994. Since then, the number of existing regimes managed in parallel by the EU has gradually increased from a handful to remain steadily over 20 in number since 2010. Additionally, the forms of sanctions as well as the reasons that led to the imposition of them have changed over time. If arms embargoes were the most common type of sanctions in the first decade post-Maastricht, asset freezes and travel bans would become the most prevalent forms in the last 15 years. Similarly, while one main pattern could not be identified in the first years after 1993, it eventually became clear that democracy promotion was the most frequent reason for the EU resorting to sanctions. Conversely, the geographical distribution of sanctions has not changed over time, with the EU imposing restrictive measures both in its own immediate vicinity and elsewhere.

The European Union Sanctions Database constitutes a substantial upgrade on existing databases vis-à-vis EU sanctions. EUSD is uniquely comprehensive, and offers a basis for comparison and further investigation of cases. When compared to the Sanctions Map, EUSD includes relevant and useful analytical innovations – such as the concept of episodes – that radically enhance the empirical basis for the understanding of EU restrictive measures. The accompanying material and the episode summaries constitute the largest database of EU sanctions readily available for immediate use to academics – who can further analyse and expand this research also thanks to its analytical innovations

– and practitioners alike – who stand to benefit from the vast and comprehensive empirical analyses available.

This empirical overview allows us to make a few observations regarding the nature of the EU's international actorness, and its distinctive characteristics. First, sanctions have contributed to the consolidation of the EU's position on the international stage, with the number thereof gradually increasing over time. Second, the way in which sanctions have been used and adjusted over time are strong indicators for more developed autonomy, capability and coherence/cohesion on the part of the EU as international actor. For instance, this is visible by looking at the types of sanctions imposed over time and the way in which the EU has adjusted its policy according to evolving contexts on the ground. Finally, the examination of how the EU has utilised sanctions contributes to the debate about the unique character of the supranational body; the findings suggest, for instance, that the expectations of the literature on normative power Europe are at least partially met.

Our comprehensive database of EU sanctions is, in itself, a key contribution to the literature, but represents ultimately only a starting point for future research on the subject. First, the database can be now further complemented with data and analysis. The main aspect to investigate comparatively would be sanctions' effectiveness. Additional elements could be the economic costs to senders and targets, as well as the interaction with other foreign policy instruments adopted both by the EU and other actors. Second, this database can be utilised to compare results with previous EU databases, to apply a similar framework to other senders (i.e. the United States or the United Nations) and to explore how sanctions' utilisation has evolved over time (i.e. have sanctions become more targeted? Are actors behave similarly or differently?). Finally, the database should be made available to a broader audience so as to contribute to creating the "institutional memory" often lacking in large organisations. For instance, the Targeted Sanctions Consortium created a SanctionsApp regarding the experience of the UN; the Estonian presidency of the Council led efforts to create a Sanctions Map with that objective in mind. Our database should now be further developed alongside and integrated with that Sanctions Map of EU restrictive measures.

Notes

1. This research considers sanctions only as CSFP measures.
2. If we consider the politically binding ones only, then China would be the longest case having being sanctioned for 30 years now.

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Disclosure statement

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Appendices

Appendix 1. List of cases and episodes.

Case Identifier	Case	Episode identifier	Episode
C1	EU/Afghanistan	E1	EU/Afghanistan_1996–2001
C2	EU/Belarus	E1	EU/Belarus (VCDR)_1998–1999
C3	EU/Belarus	E1	EU/Belarus_2004–2008
		E2	EU/Belarus_2008–2011
		E3	EU/Belarus_2011–2013
		E4	EU/Belarus_2013-present
C4	EU/BiH	E1	EU/Bosnia&Herzegovina_1996–2006
C5	EU/BiH	E1	EU/Bosnia&Herzegovina_1997–1998
C6	EU/BiH	E1	EU/Bosnia&Herzegovina_2011–present
C7	EU/BiH	E1	EU/Bosnia&Herzegovina-Mostar_1997–2018
C8	EU/Burma/Myanmar	E1	EU/Burma/Myanmar_1996–2000
		E2	EU/Burma/Myanmar_2000–2007
		E3	EU/Burma/Myanmar_2007–2011
		E4	EU/Burma/Myanmar_2011–2018
		E5	EU/Burma/Myanmar_2018-Present
C9	EU/Burundi	E1	EU/Burundi_2015-present
C10	EU/Chemical_weapons	E1	EU/Chemical_weapons_2018–2019
		E2	EU/Chemical_weapons_2019-present
C11	EU/China	E1	EU/China_1989–2008
		E2	EU/China_2008-present
C12	EU/Comoros	E1	EU/Comoros_2008–2008
C13	EU/Cotedivoire	E1	EU/Cotedivoire_2010–2011
		E2	EU/Cotedivoire_2011–2016
C14	EU/Croatia	E1	EU/Croatia_1996–2000
C15	EU/DPRK	E1	EU/DPRK_2009–2013
		E2	EU/DPRK_2013–2017
		E3	EU/DPRK_2017–2017
		E4	EU/DPRK_2017-present
C16	EU/DRC	E1	EU/DRC_2002–2003
		E2	EU/DRC_2016-Present
C17	EU/Cyber	E1	EU/Cyber_2019-present
C18	EU/Egypt	E1	EU/Egypt_2011-present
C19	EU/FRY	E1	EU/FRY_1996–1998
		E2	EU/FRY_1998–1999
		E3	EU/FRY_1999–2000
		E4	EU/FRY_2000–2000
C20	EU/FYROM	E1	EU/FYROM_2001–2004
		E2	EU/FRYOM_2004–2009
C21	EU/Guinea	E1	EU/Guinea_2009–2011
		E2	EU/Guinea_2011-present
C22	EU/Guinea-Bissau	E1	EU/Guinea-Bissau_2012-present
C23	EU/ICTY	E1	EU/ICTY_2003–2004
		E2	EU/ICTY_2004–2011
C24	EU/Indonesia	E1	EU/Indonesia_1999–2000
C25	EU/Iran	E1	EU/Iran_2007–2010
		E2	EU/Iran_2010–2014
		E3	EU/Iran_2014–2015
		E4	EU/Iran_2015-present
C26	EU/Iran	E1	EU/Iran-humanrights_2011-present
C27	EU/ISIL,Al-Qaeda	E1	EU/ISIL,Al-Qaeda_2016-present
C28	EU/Libya	E1	EU/Libya_1999–2004
C29	EU/Libya	E1	EU/Libya_2011–2013
		E2	EU/Libya_2013-present
C30	EU/Maldives	E1	EU/Maldives_2018–2019
C31	EU/Milosevic	E1	EU/Milosevic_2000–2014
C32	EU/Nicaragua	E1	EU/Nicaragua_2019-present
C33	EU/Nigeria	E1	EU/Nigeria_1995–1998

Continued.

Case Identifier	Case	Episode identifier	Episode
		E2	EU/Nigeria_1998–1999
C34	EU/Russia(Crimea)	E1	EU/Russia(Crimea)_2014–2014
		E2	EU/Russia(Crimea)_2014-present
C35	EU/Russia(Donbass)	E1	EU/Russia(Donbass)_2014–2014
		E2	EU/Russia(Donbass)_2014-present
C36	EU/Slovenia	E1	EU/Slovenia_1996–1998
C37	EU/South_Sudan	E1	EU/South_Sudan_2011–2014
		E2	EU/South_Sudan_2014–2018
C38	EU/Sudan	E1	EU/Sudan_1994–2004
		E2	EU/Sudan_2004–2005
C39	EU/Zimbabwe	E1	EU/Zimbabwe_2002–2010
		E2	EU/Zimbabwe_2010-present
C40	EU/Syria	E1	EU/Syria_2011–2011
		E2	EU/Syria_2011–2013
		E3	EU/Syria_2013-present
C41	EU/Terrorism	E1	EU/Terrorism_2001-present
C42	EU/Transnistria	E1	EU/Transnistria_2003–2008
		E2	EU/Transnistria_2008–2010
		E3	EU/Transnistria_2010-present
C43	EU/Tunisia	E1	EU/Tunisia_2011-present
C44	EU/Turkey	E1	EU/Turkey_2019-present
C45	EU/Ukraine	E1	EU/Ukraine_2014-present
C46	EU/US	E1	EU/US_1996–1998
		E2	EU/US_1998–2019
		E3	EU/US_2019-present
C47	EU/Uzbekistan	E1	EU/Uzbekistan_2005–2007
		E2	EU/Uzbekistan_2007–2009
C48	EU/Venezuela	E1	EU/Venezuela_2017-present

Appendix 2. The European Union sanctions database – cases and crisis types