FINANCIAL LEVERS OF PEACE

TARGETING ECONOMIC NETWORKS TO SUPPORT CONFLICT RESOLUTION IN SUDAN

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ISABELLA CRISPINO, GABRIELLE GERECHT,
REBECCA GROSS & CARMEN WU

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ACRONYMS

ANC	African National Congress
CAR	Central African Republic
CEO	Chief Executive Officer
CT	Counter-Terrorism
DIS	Defense Industries Systems
EU	European Union
GERD	Great Ethiopian Renaissance Dam
GI-TOC	Global Initiative against Transnational Organized Crime
GNA	Government of National Unity
IS	Islamic State
JEM	Justice and Equality Movement
KII	Key Informant Interviews
KSA	Kingdom of Saudi Arabia
LNA	Libya National Army
MIC	Military Industry Corporation
NISS	National Intelligence and Security Service
OSINT	Open-Source Intelligence
RSF	Rapid Support Forces
RUF	Revolutionary United Front
SAF	Sudanese Armed Forces
SFSSAF	Special Fund for Social Security of the Armed Forces
SST	State Sponsors of Terrorism
TSC	Targeted Sanctions Consortium
UAE	United Arab Emirates
UCAV	Unmanned combat aerial vehicle
UK	United Kingdom
UN	United Nations
US	United States of America

EXECUTIVE SUMMARY

April 2024 marks one year since the outbreak of war in Sudan. The events of 2019, which heralded a hopeful shift toward a civilian-led government and democracy, tragically devolved into an internal power struggle, resulting in the world's most significant displacement crisis. Over eight million individuals have been uprooted from their homes, about 16 million face extreme hunger, and the death toll has exceeded 60,000.

The financial underpinnings of the two key belligerents of the conflict, the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF), are intricately woven into the nation's corporate structure and beyond. The complexity of Sudan's war is exacerbated by a web of actors enmeshed in the turmoil. The country is a battleground for external powers, witnessing proxy confrontations such as those between Russia and Ukraine, and Saudi Arabia and Iran. It also serves as a profitable frontier for certain states that seek to reap the benefits of gold exports and other natural resources.

Since December 2023, countries and multilateral organizations including the United States, the United Kingdom, and the European Union have levied sanctions against several Sudanese companies owned or supporting the RSF and SAF. Meanwhile, the United States and Saudi Arabia continue to attempt to facilitate negotiations between the two belligerents in Jeddah, which seems to be at an impasse.

This report examines whether, and how, additional financial policy tools could be used to support a permanent cessation of violence. Through an extensive literature review on the efficacy of sanctions, an examination of external stakeholders in the conflict, and the mapping of current SAF and RSF financing, this report outlines a strategy for governments and international institutions to use sanctions, in tandem with diplomatic efforts, to bring an end to the devastating war crimes being committed by both belligerents.

Recommended Policy Approach

- **Coordinated Sanctions and Diplomacy:** Implement targeted sanctions tied to diplomatic efforts, escalating, or relieving them based on progress in peace negotiations.
- **Assess and avoid economic consequences for civilians:** Apply sanctions specifically to individuals and entities involved in conflict financing or arms provision, exempting those essential for civilian needs.
- **Strategic Collaboration:** Enhance coordination with regional actors, international bodies, and civil society to expose external interferences and support Sudanese pro-democracy movements.

Despite these challenges, a coordinated diplomatic approach alongside targeted sanctions could incentivize negotiations and contribute to conflict resolution, particularly if aligned with clear policy objectives. Policymakers should use financial policy tools within an evolving political strategy, tying the threat (and imposition) of sanctions to progress to mediation and utilizing threats to pressure external backers of the belligerents. This approach requires careful calibration to avoid unintended consequences and necessitates strong coordination with regional actors and Sudanese and international civil society organizations to ensure that policy tools applied create opportune openings in the political process towards peace.

The recommended framework for applying financial and non-financial policy tools provides a flexible framework for how the US, EU, and UK can apply financial (and non-financial) policy tools as part of an evolving political strategy towards peace. It proposes a series of sanctions targeting individuals and corporate entities involved in conflict financing and the provision of weapons while exempting entities vital for civilian goods and services. These sanctions would be imposed in successive rounds tied to the progress of mediation; escalating if either party refuses to attend or engage constructively with the talks.

Policymakers are advised to coordinate with civil society organizations and the media to expose third-party involvement in obstructing mediation efforts and explore further sanctions by international bodies such as the African Union. Specific actions are recommended in response to egregious violations of international humanitarian law, including blocking humanitarian aid and mass civilian killings. Continuous support to and coordination with Sudanese civil society is essential to the implementation of the framework, to sustain public awareness of the conflict's costs, and crucially, to strengthen the ability of Sudanese pro-democratic opposition groups and leaders to capitalize on political openings created by the imposition of sanctions Ultimately, the effectiveness of these measures hinges on their strategic application, timely implementation, and ongoing collaboration with Sudanese civil society.

METHODOLOGY

This research project used a mixed methodology, combining quantitative and qualitative analysis of primary and secondary data to produce and evidence recommendations. A literature review (see Annex 3) of authoritative academic sources and practitioner analysis was conducted to establish critical factors influencing the efficacy of various types of financial policy tools in different contexts, as well as on the history of and drivers for conflict in Sudan.

Open-source intelligence (OSINT) research techniques were used to collect information on the financial networks and corporate structures of the RSF and SAF and provide concrete examples of how recommended tools could be applied (see Annex 4). Semi-structured and discursive interviews were conducted with individuals from multinational institutions, the US government, and independent and academic researchers (see Annex 1 - List of Interviewees). The data captured through these methods were used to evaluate the likely efficacy of different sanctions and financial policy tools in contemporary Sudan, using the key indicators established through a secondary literature review. All data was qualitatively analyzed to evaluate whether various available policy tools could effectively address the drivers of violence in Sudan while avoiding unintended consequences, such as harm to civilians, inadvertent empowerment of alternate bad actors, or adverse political consequences.

Limitations

The team was unable to interview a sufficient number of Sudanese interviewees; while the team reached out to eleven Sudanese contacts, only one accepted the request for an interview. This result possibly indicates Sudanese caution around the topic or prioritization of other issues at hand. As a result, it was not possible to obtain the desired level of granular information on the evolving political dynamics within the belligerents, making it difficult to predict their reactions to various financial policy tools discussed. As a result, corporate mapping of the RSF and SAF is non-comprehensive and focuses more on information gathered through secondary sources and OSINT. The lack of local knowledge informing this report's evidence base means there is a higher degree of uncertainty over the impacts of proposed policy tools in the Sudan context, which the team has attempted to mitigate through careful consideration of potential risks and unintended consequences.

Introduction

The contemporary conflict in Sudan is deeply rooted in historical patterns of exploitation and marginalization. Since gaining independence in 1956, Sudan has experienced over five decades of military rule, with successive regimes entrenching themselves within the oligarchic elite. The regime of Omar al-Bashir, who came to power through a military coup in 1989, maintained control by empowering tribal leaders and militias to extract natural resources from peripheral regions through violence and coercion. The exploitation of essential resources like food and oil, coupled with the suppression of non-Arab ethnic groups, led to widespread conflict, notably in Darfur.

The Rapid Support Forces (RSF), the most powerful among militias empowered by Khartoum, were formed from the infamous Janjaweed militia who were used by the Sudanese Armed Forces (SAF) to quell uprisings in Darfur. They've profited from violence, organized crime, foreign mercenary activities and the illicit trade in the Sahel region. The Sudanese Armed Forces (SAF) have held significant economic power since Sudan's independence in 1956, controlling over four-fifths of the economy through a vast network of companies in sectors ranging from defense to pharmaceuticals. Their economic activities are further obscured by affiliated charity organizations, complicating regulation efforts. Similarly, the Rapid Support Forces (RSF) operate around 50 front companies with strong international links, particularly with the UAE, profiting from gold trading and mercenary services in Libya and Yemen. These groups, including those linked to Hemedti's family and others providing security services to Western embassies, skillfully evade sanctions despite serious human rights allegations.

After pro-democracy protests in 2019, al-Bashir was ousted, and a transitional government emerged from a coalition of military and civilian factions. However, neither SAF nor RSF were ready to cede power in Sudan to civilian rule or each other, culminating in a new round of conflict in 2023. The latest eruption of violence in Sudan is particularly devastating for the Sudanese people, already contending with drought, the reimposition of military rule, and a legacy of violent and brutal conflict in Darfur and outlying regions, including present-day South Sudan, during protracted civil wars. More than 60,000 civilians are thought to have died since April 2023. Open warfare broke out after the Rapid Support Forces (RSF) preemptively attacked the Sudanese Armed Forces (SAF) in Khartoum, two parts of a coercive armed apparatus established under the rule of former military ruler Al-Bashir, using open warfare to contest control of the country.[1] The conflict has disrupted harvests, which are already producing low yields due to drought. Around eight million people have been displaced, six and a half of those internally. More than half of Sudan's population - 25 million people - are in urgent need of humanitarian assistance, including 730,000 severely malnourished children. Now, an

[1] Hager Ali, *The War in Sudan: How Weapons and Networks Shattered a Power Struggle*. GIGA Focus Middle East, No. 2, 2024.

impending famine threatens to kill more than a million people, and[2] March 2024 recorded the highest number of village fires from airstrikes since last May.[3]

Amidst these ever-increasing challenges, Sudanese people urgently need an end to the violence, a significant increase in humanitarian aid, and a sustainable resolution to the conflict that facilitates legitimate, civilian-led Sudanese governance. Talks in Jeddah, or a potential ceasefire between the two parties, attended by the SAF, RSF, and vital external actors, including Saudi Arabia (KSA), the United Arab Emirates (UAE), Egypt, the United States (US), France, and Germany - offer an opportunity for tangible progress. Yet their prospects for success remain highly uncertain.

It is, therefore, crucial to consider which other policy tools external actors could use to complement political negotiations, thus creating conditions most conducive to a sustainable reduction and ultimate cessation of violence. This research examines whether financial policy tools could be used by governments and multilateral institutions (primarily the EU, UN, and US) to do so, aiming to produce well-evidenced and sequenced recommendations of financial policy levers in support of peace and mediation.

[2] UNOCHA, *Sudan Humanitarian Needs and Response Plan 2024*. December 2023.

[3] Mark Townsend, *Increasing number of villages torched across Sudan shows conflict is intensifying - report.* The Guardian, 17 April 2024.

SECTION I: DRIVERS OF CONFLICT IN SUDAN

Underlying Drivers of Contemporary Conflict in Sudan

Since at least the nineteenth century, when under Anglo-Egyptian domination, the various polities of present-day Sudan were conquered and consolidated into a British imperial domain. The political economy of Sudan has been driven by exploitation by a centralized state of less developed, outlying regions.[4] As a result, the felt presence of the state in "peripheral" areas (incl. present-day South Sudan) is mainly one of violence and exploitation/depredation, expressed through racial, ethnic, and religious hierarchies.[5]

The organized raiding of peripheral regions has been a feature of Sudanese polities since at least the fourteenth century, before the establishment of Muslim Kingdoms.[6] However, complex local traditions and mechanisms also played a role in keeping the peace between diverse ethnic and cultural groups; Darfur's origin is in the Sultanate of Dar Fur, an amalgamation of the Nilo-Saharan Fur people with the Arabic-speaking Tanjur. However, during the Anglo-Egyptian colonial period, these mechanisms began to break apart: British policies reversed detribalization dynamics, delineating people by tribe and appointing tribal leaders. The previously permeable idea of the tribe was made more rigid. The malign legacy of the unequal appointing of "homelands'' (*dar*) to different tribes is still felt today; while most sedentary tribes were granted *dar*, nomadic tribes were often left without, including Northern Darfuri Rizeigat Arabs, the tribe from which Hemedti and much of the RSF's leadership comes from.[7]

The size and diversity of Sudan (including present-day South Sudan) have meant that throughout the last two centuries of near-continuous conflict, belligerents and political entrepreneurs have manipulated multiple points of cleavage over religion, ideology, ethnicity, race, and tribe. The resolution of one conflict can serve to simply reorientate actors from one cleavage to another, making the state "structurally violent".[8]

Since Sudan's independence in 1956, the Sudanese Armed Forces (SAF) have had more than five decades of combined military rule, entrenching itself at the core of Sudan's oligarchic elite. [9] Al-Bashir, who came to power in a 1989 military coup enacted with the support of Islamist revolutionaries,[10] sought to protect himself from overthrow by the same means by empowering a patronage network of tribal leaders and militias.[11] These tribal leaders and militias acted as agents

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[4] DH Johnson, *The Root Causes of Sudan's Civil War*. Indiana University Press, 2003.
[5] Jok Madut Jok, *War and Slavery in Sudan*. University of Pennsylvania Press, 2001.
[6] DH Johnson, The Root Causes of Sudan's Civil War. Indiana University Press, 2003.
[7] Mahmood Mandani, *Saviors and Survivors; Darfur, Politics, and the War on Terror*. Pantheon books, 2009.
[8] Ian S. Spears and Patrick White, *Sudan and South Sudan: Accounting for Their Intractable Conflicts.* African Conflict and Peacebuilding Review, Vol. 5, No. 2, 2015.
[9] Peter Fabricius, *Sudan, a coup laboratory*. Institute for Security Studies, July 2020.
[10] Harry Verhoeven, *Can the Sudanese Armed Forces Save Themselves from Themselves?* LSE, 25 January 2024
[11] International Crisis Group, *A Race Against Time to Halt Sudan's Collapse*. Africa Briefing, 2023.

to extract and profit from natural resources in the peripheries - with violence, the primary tool to subjugate peripheral populations if necessary.[12] Longstanding links between the SAF and Islamist networks - chief among them the Sudanese chapter of the Muslim Brotherhood - have also entrenched the SAF's resistance to civilian, democratic rule, which would likely lead to more secular governance.[13]

Essential resources extracted include food (e.g., wheat, sorghum), which in Sudan's independent history has been grown in rural areas and exported abroad, with profits used to fund food subsidies for urban populations.[14] Communal land previously cultivated by small farmers was seized by Khartoum and sold to investors, primarily from the Gulf and Turkey.[15] Oil was extracted through the violent depredation of South Sudan, including that waged throughout two civil wars. Khartoum's oil supply dwindled following the 2005 Comprehensive Peace Agreement with South Sudan and mostly ceased after the 2011 Juba Peace Agreement.

In 2003, broadly non-Arab ethnic groups in Darfur (including the Fur, Zaghawa, and Masalit) mobilized against what they perceived as Khartoum's repression of non-Arab populations. Khartoum responded by mobilizing the Janjaweed, mostly Arab Darfurians who, with the SAF and police forces, conducted a brutal campaign of ethnic cleansing against non-Arabs in Darfur. The ensuing hunger, violence, and disease killed around 300,000 people,[16] and led to Al-Bashir's inditement for genocide at the International Criminal Court.[17] When Janjaweed leader Musa Hilal attempted to break from Khartoum, he was replaced by Mohamed Hamdan Dagalo ("Hemedti"), whose Rapid Support Forces (RSF) became the Janjaweed's main successor. [18]

The RSF capitalized on the spread of violence and organized crime through the Sahel following the fall of Gadaffi, profiting from the illicit trade of goods and people trafficking and aided by highly porous borders shared with Libya, Chad, and CAR.[19] This, along with the discovery of gold in 2013, for which the RSF initially extracted significant profits, further grew the financial capital and profile

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[12] Alex De Waal, *Sudan: a political market framework analysis*. FCDO, 2019.

[13] Peter Beaumont and Zeinab Mohammed Salih, *Sudan: What Future for the Country's Islamists?* The Guardian, 2 May 2019.

[14] Eddie Thomas and Alex de Waal, *Hunger in Sudan's Political Marketplace*. Tufts University Press, 2022.

[15] Mohyeldeen E. Taha, Land use, ownership, and allocation in Sudan: The challenge of corruption and lack of transparency. Sudan Democracy First Group, 2016.

[16] Mortality estimates greatly vary. The figure cited is based on the Centre for Research on the Epidemiology of Disasters's estimate of between 178,258 to 461,520 excess deaths (mean of 298,271), with 80% of these due to disease. See Dr Oliver Degomme, MD and Prof. Debarati Guba-Sapri, *Patterns of Mortality Rates in the Darfur Conflict*. The Lancet, Volume 375, Issue 9711, 23 January 2010.

[17] International Criminal Court, *The Prosecutor v. Omar Hassan Ahmad Al Bashir*. Archived from the original on 8 May 2016. Retrieved 12 April 2024.

[18] Nesrine Malik, *Sudan's outsider: how a paramilitary leader fell out with the army and plunged the country into war*. The Guardian, 20 April 2023.

[19] Global Witness, *Exposing the RSF's Secret Financial Network*. Global Witness, 2019.

of the group.[20] While both the RSF and SAF have profited from sending fighters as mercenaries in Libya and Yemen, this functioned as a critical income stream for the RSF in particular.[21]

Following sustained and remarkable pro-democracy civilian protests in 2019, al-Bashir was forced by Hemedti and key leaders within the SAF to step aside. The SAF, RSF, and civilian factions formed a transitional government, although this was likely simply a tactical measure to retain power while using the civilian elements of the government to stabilize the country, potentially improve relations with the West, and expedite the lifting of sanctions.[22] Additionally, Hamdok's popular support in 2020 was likely insufficient to allow him to tackle Sudan's bloated security sector head-on. Until he earned substantial political wins, such as the removal of certain sanctions along with the US State Sponsor of Terrorism (SST) designation, he perceived, and rightly so, that his power was not strong enough.[23] Both factions united to push Hamdok, the civilian prime minister, out of power in 2021; however, when the RSF refused to integrate into the SAF in 2023, it preemptively attacked the SAF, and the present round of devastating conflict began.[24]

Strategy of the Belligerents

The RSF has strived to position itself internationally as a progressive, pro-democracy political force. These claims have been met with extreme skepticism by most Sudanese and many international observers,[25] especially following incidents of mass slaughter, rape, looting, and abductions in major cities by RSF forces.[26] Hemedti, a member of the Mahariya Rizeigat Arab tribe located around Chad and Darfur, is an outsider to the Khartoum political establishment,[27] and seeks political legitimacy. Yet his attempts to position himself as a legitimate political authority - including by signing a vaguely worded agreement on democracy in Sudan with former Prime Minister Abdullah Hamdok[28] - have stalled. Further impacting their legitimacy is the fact that RSF fighters do not have the same training as members of a formal army, resulting in a weak command structure. Although this makes fighters more agile and less predictable on the ground, orders may not be followed across ranks, especially when they concern the safety of civilians.[29] The RSF initially made rapid gains on the battlefield, using

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[20] Anette Hoffmann and Guido Lanfranchi, *Kleptocracy versus Democracy: How security-business networks hold hostage Sudan's private sector and the democratic transition*. Clingendael Institute, 2023

[21] Mark Miccallef, Raouf Farrah, Alexandre Bish, and Victor Tanner, After the Storm: Organized Crime Across the Sahel-Sahara following upheaval in Libya-Mali. Global Initiative Against Transnational Organized Crime, 2019.

[22] International Crisis Group, *A Race Against Time,* 2023; Nesrine Malik, *Sudan's outsider: how a paramilitary leader fell out with the army and plunged the country into war*. The Guardian, 20 April 2023.

[23] Cameron Hudson, *Sudan's prime minister comes to Washington,* Atlantic Council, 2 December 2019.

[24] International Crisis Group, *A Race Against Time,* 2023.

[25] Mat Nashed, The soft-power campaign of Sudan's RSF leader 'Hemedti'. Al-Jazeera, 20 April 2023.

[26] See, for example, Maggie Michael and Ryan McNeill, *A Reuters Investigation: How Arab fighters carried out a rolling ethnic massacre in Sudan*. Reuters, 22 September 2023; Nima Elbagir, Barbara Arvanitidis, Alex Platt, Tamara Qiblawi and Pallabi Munsi, *They called me a slave: Witness testimony exposes alleged RSF-led campaign to enslave men and women in Sudan*. CNN, 20 November 2023.

[27] Alex De Waal, *General Mohamed Hamdan Dagolo 'Hemedti'*. World Peace Foundation, July 2019

[28] Sudan Tribune, *Hemetti reaffirms readiness to sign comprehensive peace agreement*. 3 January 2024.

[29] Hager Ali, The War in Sudan: How Weapons and Networks Shattered a Power Struggle. GIGA Focus Middle East, No. 2. 2024.

its more agile ground forces to take control of territory in and around Khartoum (including the cities of Omdurman and Bahri) as well as the majority of Khartoum.[30] Manipulation of internal factions by the SAF within the RSF's broad coalition of predominantly Arab Darfuri tribes has since created some internal fragmentation and tensions, made possible by the weak command structure. Reports have emerged of clashes between RSF-allied militias, such as the Salamat and Habbaniya ethnic militias, over land ownership disputes.[31] A lack of battlefield progress also means reduced means to pay footsoldiers in the form of loot, while the RSF have faced difficulties consolidating control and establishing civil administration in southern and eastern areas of Sudan captured from the SAF.[32] The RSF now appears to be aiming to stall the SAF's counteroffensive and regain momentum on the battlefield by going on the offensive in Western Sudan, with the group appearing poised to launch a new offensive against the city of El Fasher.[33] The AU has called for a ceasefire in Western Sudan in response.[34]

However, it is possible that the RSF now has a greater incentive to negotiate a ceasefire to consolidate battlefield gains and address internal fragmentation. The RSF maintains a strong network of alliances and controls around half of the country. Hemedti and other key figures in the RSF, such as his brother Dagalo, are sensitive to perceived slights and, like the SAF, are engaged in a prolonged struggle for sustained power and political legitimacy in Sudan. This means that while the RSF may be open to negotiating a resolution to the conflict, but only if it creates a sustainable source of political legitimacy for Hemedti. It is doubtful the RSF would agree to integrate into the SAF, conscious that this move would lead to Hemedti's marginalization within Sudan's political economy. Hemedti and the RSF's senior leadership were reportedly unperturbed by the recent imposition of sanctions by the US, UK, and EU, interpreting the mutual sanctioning of the SAF and RSF as a confirmation of the RSF's equal relevance and legitimacy. However, lower-level RSF commanders (i.e., those commanding single battalions or groupings of several hundred fighters) are reportedly nervous about being subject to sanctions.[35]

The SAF has long positioned itself as the custodian and defender of Sudan's national interest against more radical groups such as the Sudanese Communist Party, using the diverse composition of its soldiers as proof that commitment to "national integration" is stronger than parties led traditionally by the Khartoum elite.[36] In reality, members of the Awlad Al-Bahr (riverine Arabs), and particularly the Ja'aliyyin, Shaigiyya, and Danagla ethnic lineages, make up most of its leadership.[37]

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30 See Sudan War Monitor and Thomas Van Linge, *Map of Areas of Control in Sudan*. Sudan War Monitor, 2 November 2023.
31 ACLED, *Sudan: Unraveling the Conflict Dynamics in Darfur*. December 2023.
32 Radio Tamazuj, RSF establishes civilian administration in Al-Gazira state. Wad Madani, 27 March, 2024.
33 N-News, *Imminent attack on Sudan's El Fasher city is likely, UN warns*. 26 April 2024.
34 Albawaba News, *African Union calls for ceasefire in Western Sudan*. 28 April 2024.
35 Interview with Independent Intelligence Analyst.
36 Harry Verhoeven, *Surviving revolution and democratisation: the Sudan armed forces, state fragility and security competition*. The Journal of Modern African Studies 61.3, 2023.
37 Verhoeven, *Surviving revolution and democratisation, 2023.*

Since the advent of Bashir's Islamist regime in 1989, many of the SAF's officers have increasingly professed Islamist political ideologies and have links to Islamist groups and leaders - particularly the Muslim Brotherhood. Officers of the National Intelligence and Security Service (NISS), a powerful institution composed mainly of Islamists, have particularly close links, with promotions based on adherence to Islamist political ideologies.[38]

These factors make the SAF highly resistant to power-sharing with what they regard as a militia unfit to hold political authority at the national level (the RSF) and with civilian political leadership who could dismantle both the corporate networks, allowing leaders of the SAF to generate personal profit and political influence, and Islamist elements of Sudan's government and judicial systems. The recent arrest orders for Abdullah Hamdok and other pro-democratic Sudanese opposition leaders underlines the SAF's opposition to democracy in Sudan, although it may also be motivated by the agreement signed between Taqqadum and the RSF in January 2024.[39]

After losing vast territory to the RSF, the SAF has gone on the counteroffensive, retaking territory around Omdurman[40] and Bahri.[41] The SAF appears to be attempting to regain significant territory before heavy rains begin in June. However, it is unclear whether their counter-offensive will sustain momentum; many within Sudan doubt their ability to win a decisive military victory against the RSF.[42] While the SAF's dependence on air power and shortage of ground troops would generate difficulties in a protracted conflict, pronouncements from al-Burhan and other SAF generals indicate they are willing to sustain a protracted conflict, predicting their coalition of forces to have more staying power than the RSF.[43] The SAF has recently joined forces with diverse opposition militias, including the Darfur Joint Forces,[44] Sudan Liberation Movement factions led by Mustafa Tambour and Minni Minawi, and the Justice and Equality Movement (JEM).[45] The Darfur Joint Forces in particular have been responsible for a series of clashes and violent reprisals against communities in Northern Darfur, the homelands of many members of the RSF.[46] The increasing number of armed groups who have joined the fight on behalf of either belligerent could serve to protract the conflict even further as different groups pursue competing agendas, making the conflict ever more challenging to resolve.[47]

A new round of talks in Jeddah was planned for after Eid, and at the time of writing has not been officially announced. Sudan's pro-democratic civilian opposition coalition Taqqadum has stated talks

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[38] Interviews. See also Khalid Abdelaziz, *Exclusive: Islamists wield hidden hand in Sudan conflict, military sources say*. Reuters, June 2023.

[39] Radio Tamazuj, *Sudanese authorities' decision to detain Hamdok and others sparks condemnation*. 5 April 2024.

[40] Sudan War Monitor, *Sudan paramilitary suffers crushing defeat in Omdurman*. 2 April 2024.

[41] Sudan War Monitor, *Fighting set to escalate in Bahri*. 17 March 2024.

[42] Africa Defense Forum, *Sudanese Army Aims to Regain Ground, Public Support Against RSF*. 20 February 2024

[43] See Africa Research Bulletin, *Burhan on Offensive*. Volume 61, Issue 3t, April 2024; Africa Confidential, Ceasefire efforts resume as Burhan's forces go on offensive. 19 March 2024.

[44] Sudan War Monitor, *Darfur Joint Force declares war on Rapid Support Forces*. 12 April 2024.

[45] Sudan War Monitor, *Sudan Army Marches into Jazira State*. 8 April 2024.

[46] Sudan War Monitor, *Hundreds of Camels Killed in North Darfur Attack*. 28 April 2024.

[47] Kirsten Knipp, *Sudan's war: A year on, no hope for a cease-fire*. DW, 14 April 2024.

will begin in early May and emphasized there can be no military resolution to the conflict.[48] Meanwhile, the US has announced Saudi Arabia will convene the talks by early June,[49] but Saudi Arabia is reportedly strongly opposed to the UAE's participation, while the US wants as broad a regional (East African and Gulf) presence as possible, including the UAE.[50] The SAF is reportedly deeply divided on the question of whether to attend talks at all.[51]

The Corporate Networks of the SAF & RSF

This section of the report explores the vast corporate networks of the SAF and the RSF; while not an exhaustive list, key entities and individuals who may prove to be powerful targets of financial policy tools during the mediation process are identified.

Figure 1: Currently Sanctioned Entities

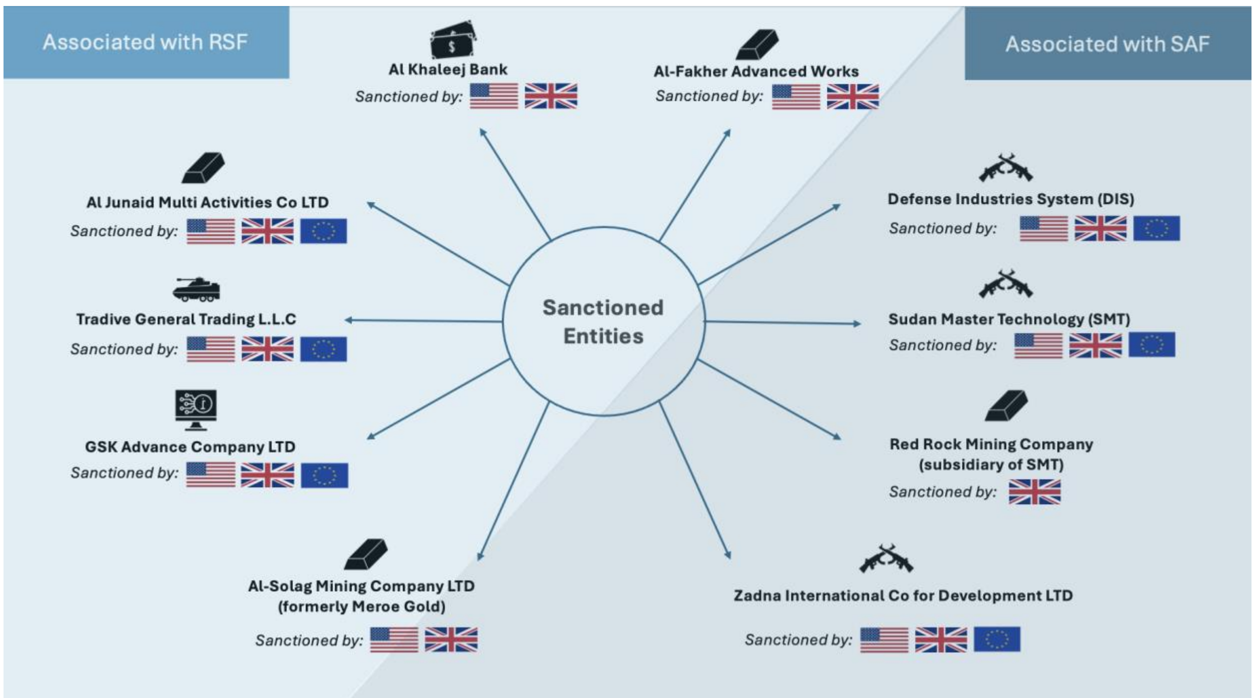

Table 1 & 2: Currently sanctioned individuals by the US, UK, EU, UN

[48] Radio Tamazuj, *'SAF, RSF to resume Jeddah Talks in May'-Tagadum*. 23 April 2024.
[49] The New Arab, *Saudi Arabia to host Sudan peace talks in next three weeks: US*. 17 April 2024.
[50] Dabanga Khartoum Washington D.C., *Cameron Hudson On Sudan War - 'I Do Not Expect Anything From the Jeddah Negotiations'*. 20 April 2024.
[51] Africa Intelligence, *Burhan clan divided ahead of Jeddah talks*. 24 April 2024.

DARFUR-RELATED SANCTIONS	SANCTIONED BY
Musa Hilal | Former leader of the Janjaweed militia and current advisor the the Sudanese Minister of Internal Affairs	
Jibril Abdulkarim Ibrahim Mayu | Commander of the National Movement for Reform and Development	
Gaffar Mohammed Elhassan | Former Major-General of the SAF	
Adam Yacub Shareif | Commander of the Sudan Liberation Army	

CURRENT CONFLICT-RELATED SANCTIONS*
Salah Abdallah Mohamed Salah | Former high-ranking government official | SAF Affiliated
Taha Osman Ahmed al-Hussein | Former State Minister and Presidential Office Director | RSF Affiliated
Abdelrahim Hamdan Dagalo | Paramilitary commander and brother of Hamdan Dagalo | RSF Affiliated
Mohamed Etta Elmoula Abbas | Former leader of NISS
Ali Karti | Leader of the Sudanese Islamic Movement

**All individuals are only sanctioned by* 

Sudanese Armed Forces

The SAF has been a principal actor in the political economy of Sudan since 1956.[52] Today, Sudanese economists estimate that over four-fifths of the economy is under military control.[53] They have achieved this by establishing an expansive network of companies across almost all sectors of the economy.[54] Additionally, and illustrating the extent of the armed forces' control over Sudan's economy, the SAF controls Omdurman National Bank, valued in 2019 at over USD 13 million by the Clingendael institute in 2019.[55] The scale of SAF's involvement in Sudan's economy may make it impossible to target the SAF's corporate entities without massive ramifications for Sudan's beleaguered economy and the Sudanese people. Without direct access to local sources, it is difficult to ascertain whether an entity provides necessary goods and services, or only purports to do so. All corporate entities discussed here are either formally controlled by the SAF or are shadow-designated to the SAF, with at least 50% of shares controlled by the group.

The strongest arm of the SAF's economic operation is the **Defense Industries Systems** (**DIS**), formerly known as the **Military Industry Corporation** (MIC) [56] The DIS has been sanctioned by the US, the UK, and the EU, and is estimated to control over 200 companies, bringing in an annual revenue of USD 2 billion for the SAF.[57] While many companies work in sectors strategic to the armed forces, such as construction, aviation, engineering, and electronics, others are focused on profitable areas of the Sudanese economy, particularly agricultural production, and export. The **Safat Aviation Complex**, which has not been sanctioned, located close to the DIS-owned Karari industrial complex in Khartoum, includes Safat aircraft repair complex, Safat holding complex, Safat air, and Safat training complex) and falls under the DIS.[58] According to a senior representative of the Sudanese air force, all maintenance of SAF air force assets takes place at the Complex–including the maintenance of air force assets in Darfur, including the Mi-24 helicopter and the Su-25 and An-26 aircraft.[59]

Another key subsidiary of the DIS is the **Multiple Directions Company**, which owns the **Kadaru** slaughterhouse, an investment worth $40m,[60] which processes and exports meat abroad,[61] likely to the Gulf and Egypt.[62] The **Atlas Trading Company** is also a subsidiary and is listed as an importer of pharmaceutical items from India (timeframe unclear).[63] **Zarqa Engineering** is responsible for various

[52] Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute, 2023.
[53] Ibid.
[54] Ibid.
[55] Ibid.
[56] Ibid.
[57] Ibid.
[58] C4ADS, Sudan - SAF corporate network mapping. Accessed 23 April 2024.
[59] UN, *Panel of Experts Report*, December 2023.
[60] Jean-Baptiste Gallopin, *Bad Company: How Dark Money Threatens Sudan's Transition*. European Council on Foreign Relations, 2020.
[61] See post on company's facebook page.
[62] Sudan Tribune, *Livestock export in Sudan ongoing despite conflict: official*. 20 August 2023.
[63] Document uploaded by Export Council of India.

electronic and electro-optical devices for the Sudanese army, and it also participates in the Sudanese telecom market through Sudatel.[64] Also under DIS is **El-Nasr,** a construction company,[65] while **Crop Protection Sudan,** owned by the Safat aviation group, specializes in the production and operation of aerial pesticides for agricultural production.[66]

Sudan Master Technology, also referred to as the **Giad conglomerate,** is part of DIS and has been sanctioned by the US, the UK, and the EU for its provision of funds to the SAF. It comprises a vast array of heavy industry companies controlled by the SAF and involved in the production of weapons and vehicles for the armed forces, as well as in the provision of services to the SAF–in particular through a partnership between Giad for Automotive Services and the Corps of Engineers.[67] Numerous business activities are of concern–most notably, Giad signed a memorandum of understanding with the Ministry of Religious Affairs and Endowments, as well as with Libya Oil in April 2023.[68] **Red Rock Mining,** a mining and exploration company, was sanctioned by the UK in April 2024 due to it being a subsidiary of Sudan Master Technology.[69] The company is headquartered in the UAE, but also has business in the Netherlands and Tanzania.[70]

The **Ports Engineering Company**, whose Director General, Colonel Marine Staff Anas Younis, recently signed a deal with Giyad Engineering Group to launch Giyad Automobile Services Center in the Red Sea; while the purpose appears to be general car repair and maintenance, the facility could also service military vehicles.[71] The **Sur Industrial complex** is also involved in the production of military equipment; one subsidiary, **Sur International Investment**, is founded by Turkish investor Oktay Ercan and is jointly owned by Sudanese, Turkish, and Qatari investors, manufacturing military uniforms.[72] It is a member of the Common Market for Eastern and Southern Africa (COMESA) and boasts operations extending beyond military–such as dealings in the textile, energy and industrial and agricultural industry.[73] In 2016, it entered into a partnership with the Qatar Armed Forces.[74] However, the sprawling nature of the Investment company into industries of great importance to civilians such as agriculture necessitates extra care if considering applying financial policy tools.

The SAF's use of charity organizations, particularly the Special Fund for Social Security of the Armed Forces (SFSSAF), the Charity Authority for Support the Armed Forces Khartoum, and the Martyr's

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64 Sudan Tribune, Did the defence industries put the Sudanese army in advanced rank in Africa? October 2022.
65 EMIS profile.
66 See relevant LinkedIn profile.
67 Council of the European Union, Council Implementing Regulation implementing Regulation (EU) 2023/2147 concerning restrictive measures in view of activities undermining the stability and political transition of Sudan.
68 Giad Group Engineering, *Website: News*. Accessed 28 April 2024.
69 HM Treasury, *Financial Sanctions Notice.* 15 April 2024.
70 See Annex 4.
71 Giad Group facebook page.
72 The Worldfolio, *An Investment Success Story*. July 2015.
73 Sudanjob, *SUR International Investment Co.Ltd*. Accessed 28 April 2024.
74 See company website. Accessed 28 April 2024.

Organization, is used to conceal corporate activities.[75] Its Director is Major General Mohammed Mohammed Al-Hassan Al-Saouri.[76] These organizations represent a more extensive network of smaller (often private) companies that SAF leaders run. **Karari International Foundation for Upbringing and Education** was founded by SFSSAF under its former name, the National Economic Authority. It has engaged in joint construction projects with the Sudanese military and shares and has two subsidiary companies, **Karai Engineering** and **Karari Printing Press & Distribution company**.[77] **Zadna International Investments Limited** is 100% owned by the Charity Authority for Support the Armed Forces Khartoum, and is currently under US, UK and EU sanctions.[78] Its CEO, Ahmed Magzoub,[79] is also a board member at Sudan's United Capital Bank.[80] The company appears to focus on attracting international investment for large-scale infrastructure projects, including a partnership with US firm Valmont International for an irrigation project on the river Zadi before it came under sanctions.[81] The US believes Zadna to be used by SAF to launder funds.[82] **Ola Real Estate**, which appears not to be listed as an SFSSAF entity in existing open-access research, is also affiliated with the SFSSAF and was one of several companies listed as affiliated with the army and contracted by the SAF to work on "strategic" construction work in Sudan's east during 2021.[83]

Al-Sataa Transport and Investment Company Limited, whose general manager is Major General Mohamed Al-Hassan Al-Saouri,[84] transports and exports crops.[85] It reportedly uses a fleet of tractors and heavy vehicles belonging to the armed forces with military license plates; merchants contract with it to avoid various tolls and taxes that the military would otherwise impose, and a guarantee to provide all needed export certifications, including certifications that crops meet export standards, despite a lack of actual laboratory testing.[86] **Sheikhan Insurance**, also a subsidiary of the SFSSAF, is chaired by the SAF Chief of Staff Mohamed Othman Al-Hussein[87]

The following table identifies key individuals within the SAF's network who have not yet been sanctioned but would make impactful targets of financial policy tools due to their business interests and position within the SAF.

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75 Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute. 2023.

76 Sudan Home, *Nominations for a number of former military governors to head military investment companies*. 15 August 2020.

77 Hoffmann and Lanfranchi, *Kleptocracy versus Democracy.* Clingendael Institute. 2023; Sudan C4ADS: Innovation for Peace: Corporate Networks of the SAF, Accessed 23 April 2024.

78 Sudan C4ADS: *Innovation for Peace: Corporate Networks of the SAF.* Accessed 23 April 2024.

79 Dun & Bradstreet Business Directory, *Zadna International Investments Ltd*. Accessed 23 April 2024.

80 MarketScreener, *Zadna International Investments Ltd*. Accessed 23 April 2024.

81 SUNA, *Al-Burhan inspects Zadi pivot irrigation project in River Nile State.* 4 April 2020.

82 US Department of State, *Designating Entities in Sudan that Contribute to War Efforts: Press Statement*. 31 January 2024.

83 Rakoba News, *Launching a number of strategic projects on the eastern border*. March 2021.

84 Sudan Times, Transport Company: We are ready to transport crops in Gedaref State. October 2022.

85 Sudan Akhbar, بترحيل المحاصيل الزراعية بالقضارف - اخبار السودان تؤكد الالتزام الساطع للنقل. October 2021

86 Al-Sudan Net, *The Army Is In The Market: Al-Sata' Comes To You With The Issued Document While You Are In Your Office.* 25 August 2020.

87 General Arab Insurance Federation, *Sheikhan Insure Company Profile*. Accessed March 2024.

Table 3: Individuals of note in the SAF's corporate structures

INDIVIDUAL	ROLE	ADDITIONAL INFORMATION
Brigadier General Mohammad Qureishi Mohammad al-Amin	Manager of Aswar Multi Activities	Aswar is a security company that was paid large sums of money in exchange for supplying weapons and organizing flights for Wagner.[88] Neither Aswar nor its general manager, a brigadier general in the Sudanese army, have been sanctioned. Aswar is an important target due to its visibility thanks to the investigation, its direct ties to Wagner, and the prominent role of al-Amin within SAF's ranks.
General Mohamed Othman al-Hussein	Chair of Sheikhan Insurance[89]	Individual is chair of a key SAF-linked company and is likely a key player within the SAF.
Major General Mohamed al-Hassan al-Saouri	General Manager of Al-Sataa Transport and Investment Company Limited[90]	Individual is a general manager of a key SAF-linked company and is likely a key player within the SAF.
Khalid Hassan Mohiuddin	Director General of Police	Mohiuddin, al-Siddiq, Ibrahim and Mufaddal are chairs of the Supreme Committee for Crisis Management. All are noted to have Islamist affiliations. Given that Islamists are reportedly spurring SAF's general's desire to fight, targeting these individuals with sanctions may be a powerful signaling tool.[91]
Borai al-Siddiq	Central Bank Governor	
Jibril Ibrahim	Minister of Finance & Justice and Equality Movement (JEM) Leader	
Lieutenant Gen Ahmed Ibrahim Mufaddal	The Director of the General Intelligence Service	Al Sadiq and Mufaddal are two high-ranking SAF officials who regularly travel with Burhan – visa restrictions may hinder the SAF's diplomatic operations.
Ali Al-Sadiq	Foreign Minister	
Dafallah al-Hajj Ali	Special Envoy of the SAF	Key individual in SAF diplomatic relations. In a meeting with Egyptian officials, he stressed that Burhan and the army would not accept any mediation efforts.[92] He is a noted Islamist and a close associate of Ali Karti,[93] who has been sanctioned by OFAC.

88 OCCRP, *Documents Reveal Wagner's Golden Ties to Sudanese Military Companies*, 2 November 2022.

89 General Arab Insurance Federation, Shiekan Insurance & Reinsurance Co.LTD, [information accessed at the bottom of the webpage].

90 Sudan Times, النقل الساطع : مستعدون لنقل المحاصيل بولاية القضارف ركة, October 2022.

91 Interview with Independent Intelligence Analyst.

92 Al Arabiya, مبعوث البرهان من القاهرة: لن نقبل بحلول تفرض على الجيش, May 2023

93 Interview with Independent Intelligence Analyst.

INDIVIDUAL	ROLE	ADDITIONAL INFORMATION
Lieutenant General Yasser al-Atta	Assistant Commander-in-Chief of SAF. Member of Sovereignty Council	General in the upper ranks of the SAF, who has repeatedly publicly ruled out a ceasefire.[94] Appears to welcome Islamists into SAF, counter to Malik Agar.
Lieutenant General Ibrahim Jaber Kareem	Sovereignty Council member, SAF's expert on economic issues. Chaired the board of directors of Sudatel, one of Sudan's leading telecom providers.[95]	Kareem and Kabbashi are both very senior in the SAF and are noted Islamists and have a working relationship with Ali Karti.**[96]**
Lieutenant General Shams al-Deen Kabbashi	Member of Sovereignty Council	
General al-Mirghani Idris Suleiman	Chairman of Zadna[97] and Defense Industries System[98]	Individual is chair of two corporate entities vital to the SAF's control over military industries, and thus one of the most powerful players within the SAF.
General Mohalab Hassan Ahmed	Head of Martyr's Organization[99]	Individual is head of an entity within the SAF's corporate network, and thus an individual of note within their corporate structure.
General al-Sadiq Gamal ud-Deen	Heads the Telecommunications and Post Regulatory Authority	Control over Sudan's telecommunications is a way in which the SAF has developed power within Sudan.

Rapid Support Forces

The RSF has developed a network of around 50 front companies[100] with extensive international linkages, particularly to the UAE. Substantial income has been generated through the purchase and export of gold, first discovered in Sudan in 2013, with total exports valued at $2.5 billion annually. The largest share of the trade was initially captured by the militia of Musa Hilal, who led the Janjaweed militia responsible for widespread atrocities in Darfur; when Khartoum armed the newly-formed RSF to defeat Hilal's forces in 2017, they took control of the sources of gold.[101] More than half of the gold mined is smuggled out through informal channels.[102] Equally important are funds gained through

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94 Al Jazeera, *Sudan army general rules out Ramadan truce unless RSF leaves civilian sites*. 10 March 2024
95 Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute. 2023.
96 Interview with Independent Intelligence Analyst.
97 Council of the European Union, COUNCIL DECISION (CFSP) 2024/383 amending Decision (CFSP) 2023/2135 concerning restrictive measures in view of activities undermining the stability and political transition of Sudan. Accessed 23 April 2024.
98 Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute. 2023.
99 Jean-Baptiste Gallopin, *Bad Company: How Dark Money Threatens Sudan's Transition*. European Council on Foreign Relations, 2020.
100 Hager Ali, *The War in Sudan: How Weapons and Networks Shattered a Power Struggle*. GIGA Focus Middle East, No. 2. 2024.
101 Alex De Waal, *Sudan: a political market framework analysis*. FCDO, 2019.
102 UN, *Panel of Experts Report*, December 2023.

the provision of mercenaries to conflicts in Libya[103] and Yemen,[104] for which the RSF was paid in looted goods and paid fighters in Sudanese currency, thereby pocketing a substantial profit.[105] The RSF also extracts rents from armed groups involved in the smuggling of goods and people through the Sahel in areas of Darfur under their control.[106]

The RSF invests income gained through its mercenaries and the gold network into a wide array of companies, many of whom have licit and illicit income streams. In general, RSF businesses operate in the same industries, gold, agriculture, equipment, and security, allowing for quick pivoting and the proliferation of subsidiary shell companies. The UK, US, and EU sanctioned the largest of the RSF's front companies, **GSK Advance Company Ltd, Tradive General Trading LLC, and Al-Junaid Multi Activities Companies**. **GSK Advance Company Ltd** is a technology and security company connected to Jumaia Hamad and Algoney Hamdan.[107] The company has offices in the UAE, which were used to purchase 1,000 pickup trucks for the RSF. There are also allegations of direct dealing with the Russian-based military supply company Aviatrade LLC.[108]

Tradive General Trading LLC is a procurement company that has purchased military vehicles for the RSF.[109] The company is based out of the UAE, with accounts at the First Abu Dhabi Bank under the RSF, and it also lists Algoney Hamdan as a director.[110] The RSF's empire is built around keeping business deals close to the family network while rapidly shifting between different companies to prevent the tracing of its corporate entities. The encapsulating conglomerate **Al-Junaid for Multi-Activities** comprises over 15 known subsidiaries. The original name **Al-Junaid Industrial Group** can be traced back to 2008 when it was first connected to the UAE. The company itself is not listed under the sanctioned Al-Junaid Multi Activities Company but seems to be back in operation. This is an example of the history behind the RSF's companies, specifically, Hemedti's long-standing relationship with the UAE.[111] The formulation of new shell companies makes it challenging to track their exact operations. The tracked subsidiaries of Al-Junaid Multi Activities are directly connected to Hemedti, Abdulrahim Hamdan, Aladdin Abdulrahim, and Adil Hamid.[112] These holding companies include businesses in the gold mining industry and across the economy.[113] Since Al-Junaid was sanctioned by the US it has likely been able to continue operations by finding routes outside Sudan through CAR or

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103 Alia Brahimi, *Mercenary bloodline: The war in Sudan*. The Atlantic Podcast. July 2023.
104 Global Witness, *Exposing the RSF's Secret Financial Network*. Global Witness. 2019.
105 Alex De Waal, *Sudan: a political market framework analysis*. FCDO. 2019.
106 Mark Miccallef, Raouf Farrah, Alexandre Bish, and Victor Tanner, *After the Storm: Organized Crime Across the Sahel-Sahara following upheaval in Libya-Mali*. Global Initiative Against Transnational Organized Crime. 2019.
107 Hoffmann and Lanfranchi, Kleptocracy versus Democracy. Clingendael Institute, 2023.
108 *US Department of the Treasury. Treasury Designates Entities and Individual Exacerbating Sudan's Instability.* 28 September 2023.
109 US Department of the Treasury. *Treasury Sanctions Military-Affiliated Companies Fueling Both Sides of the Conflict in Sudan*. 1 June 2023.
110 Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute. 2023.
111 See Annex 4, under Al Junaid Industrial Group.
112 Ibid.
113 US Department of the Treasury. T*reasury Sanctions Military-Affiliated Companies Fueling Both Sides of the Conflict in Sudan*. 1 June 2023.

Chad[114] Also connected to the mining of gold is the US sanctioned company **Al-Fakher Advanced Works Co. Ltd.**[115] The company was recently sanctioned by the UK, 15 April 2024, and exposed as a holding company that continued to export gold.[116]

Many of the RSF's companies are in the agricultural sector; however, some are likely used as convenient fronts for gold smuggling, given that Sudan's main licit exports are agricultural. For example, the last involvement of one RSF entity, **Al-Mukhtar Ahmed, for Animal and Agricultural Investment Limited activities** in the livestock trade was over ten years ago. With their extended connections to trading companies in the UAE, RSF front companies like **Esnad for Engineering** work alongside import-export subsidiaries to bring gold to the UAE and sell it elsewhere. Although this company seems to be inactive,[117] its strong connection to the Wagner Gold company Meroe Gold, sanctioned by the UK, makes it an important company to research further. The company was based out of the UAE and Khartoum and operated both in the UAE and Sudan.[118]

Through a developed corporate network, the RSF has also created and used businesses as recruitment mechanisms and financial resources. Formerly known as **Shield Security Services,** is a contract security company supported by and run by the RSF. The company is connected to Musa Hamdon, and Mostafa Ibrahim Abdelnabi is a major shareholder. As of August 2022, Turkish managers and trainers were involved with the company.[119] The UK-based director Adil Abdel-Hadi, who also served as deputy chairman of Dubai's Security Industry Regulatory Agency, looks active.[120] The companies have sold services to Western embassies and managed individual security. There were allegations that Sweden continued to use Shield Security Services as recently as October 2023,[121] and the UK has so far failed to sanction the company, which is still active in the UK.

The following table identifies key individuals within the RSF's network that have not yet been sanctioned. These individuals have business interests and are positioned within the RSF, they may prove to be important targets of financial policy tools.

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114 Interview with Independent Intelligence Analyst.

115 US Department of the Treasury, *Treasury Targets Entities Funding the Conflict in Sudan.* 31 January 2024.

116 Andrew Mitchell, *Sudan Conflict Sanction.* UK Parliament, V. 748. 15 April 2024.

117 There is no website available for the company, nor any other information apart from what is written in reports. It is likely this company has changed its name.

118 See Annex 4, under Esnad Engineering.

119 Hoffmann and Lanfranchi, Kleptocracy versus Democracy. Clingendael Institute. 2023.

120 See Annex 4, under Shield Security Services.

121 Al Taghyeer, *Investigation reveals European institutions made use of services by RSF security company*. 3 October 2023.

Table 4: Individuals of note in the RSF's corporate structures

INDIVIDUAL	ROLE	ADDITIONAL INFORMATION
Sheikh Salih Maali Bin Saleh	Hemedti's uncle	Described as a "nodal point" in the family business network – to which all the other relatives who manage and/or own businesses report.[122]
Mostafa Ibrahim Abdelnabi	Majority shareholder of Shield Security Services and reportedly sits on the board of directors of Al-Khaleej Bank[123]	The Al Khaleej bank, already under sanctions, plays a "central role in funding the RSF's operations." [124]
Aladdin Abdulrahim Hamdan Dagalo Mousa	Hemedti's nephew. Listed as one of the "founders" of the Al-Junaid group[125]	The Al-Junaid group, already under sanctions, is one of the core sources of RSF finances. Its leadership, which is closely related to Hemedti, is not under sanctions.
Adal Abdulrahim Hamdan Dagalo Mousa	Hemedti's nephew. Listed as one of the "founders" of the Al-Junaid group[126]	
Abuljabbar Mohamed Ahmed	Owner of Al-Junaid Group[127]	
General Algoney Hamdan Dagalo	Hemedti's younger brother	Recently, Algoney has tried to establish himself as a leader because the rest of the upper circle has been sanctioned.[128]
Major General Nooreldin Ahmed Abdelwahab	Head of RSF human rights unit	Head of the RSF's human rights unit,[129] has given interviews with outlets like the New York Times. Given RSF's sensitivity about their public image,[130] sanctioning Abdelwahab, given his position, would be a powerful signaling move.
General Jiddo Hamdan Ahmed (Abu Nshouk)	Commander of the Rapid Support Forces, North Darfur sector[131]	Described as a "member of the Hemedti clan" and "party of the inner circle of military command".[132] If most of Hemedti's family is sanctioned, the immediate inner circle must also be sanctioned to prevent the passing on of financial responsibilities.

122 Hoffmann and Lanfranchi, *Kleptocracy versus Democracy.* Clingendael Institute. 2023.

123 Ibid.

124 Matthew Miller, Department Spokesperson, *Designating Entities in Sudan that Contribute to War Efforts*, US Department of State. 31 January 2024.

125 Commercial Registration Department of the Ministry of Justice, *Al Junaid Company Registration Data*, Courtesy of Global Witness.

126 Ibid.

127 UN, *Panel of Experts Report*, December 2023.

128 African Intelligence, *Hemeti's youngest brother emerges from the shadows in bid for RSF prominence.* November 2023.

129 Sudan in the News, *The Rapid Support Forces: A Comprehensive Profile,* October 2019.

130 Independent Intelligence Analyst.

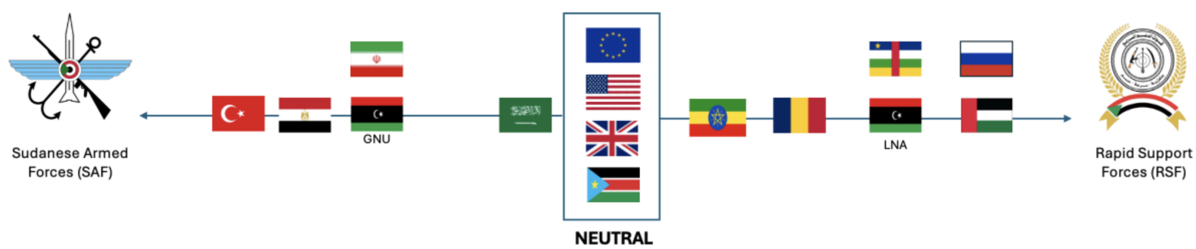
131 Darfur24, *RSF arrest 160 Sudanese nationals on their way to Libya to fight as mercenaries*, July 2020.

132 Al Estiklal, *Who Are Hemedti's Generals in Sudan.*, 2023.

INDIVIDUAL	ROLE	ADDITIONAL INFORMATION
Idriss Hassan	Former RSF commander of West Darfur and currently a senior RSF officer	Hassan, Aseel, Karshoum, and Angir have all been identified by a Reuters investigation as having played a crucial role in the ethnically targeted violence against the Masalit in El Geneina.[133] Given the RSF's sensitivity over their public image, sanctioning these individuals based on their involvement in grave violations of human rights may be an effective signaling mechanism.
Massar Aseel	Top Arab tribal leader of the Rizeigat tribe, "the group from which many RSF leaders hail"[134]	
Al Tijani Karshoum	Deputy of the slain governor Khamis Abbakar	
Moussa Angir	Angir is a commander of the Third Front-Tamazuj, an Arab-dominated militia allied with the RSF	

Key External Stakeholders

Figure 2: External Stakeholders and Their Current Allegiances in the Conflict



The number of regional and international actors with stakes in the conflict has enabled violence to continue without resolution. These relationships complicate peace efforts; each actor pursues their interests and often forges complex relationships with both the belligerent parties and other external actors. The following section examines the relationships of key external stakeholders to the conflict in Sudan, focusing on the level and means of support to the SAF and RSF. Countries have been listed based on their relationships with the RSF, SAF, and those with general interests in the conflict. A more detailed version of this analysis is listed under Annex 4.

[133] Reuters, *The Sudanese commanders waging war on the Masalit.* December 2023.

[134] Reuters, *Sudanese women describe being gang-raped in ethnically targeted attacks by Arab forces.* November 2023.

Middle East

Iran. The SAF has purchased military equipment, including drones, from Iran - likely after being denied access to sufficient weapons or military support from established allies such as Egypt.[135] Iran's engagement with the SAF is motivated by its strategic aim to secure a presence in the Red Sea, bordering Yemen, Saudi Arabia, and Israel. In return for military support, the SAF has allegedly promised Iran this access.[136]

Kingdom of Saudi Arabia. Saudi Arabia has long-standing political and economic interests in Sudan; it has cultivated close military ties with the SAF, from whom it hired mercenaries to fight in Yemen,[137] and invested billions of dollars in Sudan,[138] including investments in communal land seized by Khartoum under Al-Bashir.[139] [140] Positioning itself as a mediator and strategic partner of the US, Saudi Arabia retains an outward posture of neutrality in the conflict and has hosted the Jeddah process.[141] Saudi Arabia is adamant about hosting the mediation talks on its territory, seeking to enhance its global reputation as a mediator.

Turkey. Turkey has a longstanding strategic partnership with Sudan, fostering close economic and political ties with the SAF.[142] Corporations partly or wholly owned by the SAF, and its leaders have long-standing commercial relationships with Turkish enterprises, such as Sur International Investment, a military textile mill in Sudan jointly owned by Qatari, Sudanese, and Turkish businesses.[143] Turkey has allegedly sold military equipment to the SAF intending to acquire port rights.[144]

United Arab Emirates. The UAE has emerged as a concerted backer of the RSF and likely remains a key hub for the RSF's international business dealings and bank accounts.[145] The RSF holds accounts in their name at the First Abu Dhabi Bank and has had funds transferred from front companies, such as Tradive, using the UAE Dirhams.[146] Additionally, RSF fighters have been hired by the UAE to fight

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[135] Interview with UN researcher with experience in the region.

[136] Areej Elhag, I*ran in Sudan: Fears of a Sudanese Popular Mobilization Forces***.** Fikra Forum, January 2024.

[137] Mentioned by multiple interviewees; see also Shaul Shay, The Growing Military Ties between Sudan and Saudi Arabia. Israel Defence, 2017.

[138] Guardian Africa Network, Why has Sudan ditched Iran in favour of Saudi Arabia? January 2016.

[139] Taha, Land use, ownership and allocation in Sudan, 2016.

[140] Alex De Waal, *Sudan conflict: Hemedti – the warlord who built a paramilitary force more powerful than the state*. The Conversation, April 2023.

[141] Interview with Gulf policy expert at a DC think tank.

[142] Jihad Mashamoun, *Turkey and Sudan: An enduring relationship?* Middle East Eye, July 2022

[143] Sur International Website, *Our History*. Accessed March 2024.

[144] Dr. Renad Mansour, Ahmed Soliman, *How a transnational approach can better manage the conflict in Sudan,* Chatham House. December 2023.

[145] In 2019, leaked bank documents revealed that the RSF had an account at the National Bank of Abu Dhabi (part of First Abu Dhabi Bank). See Global Witness, *Exposing the RSF's Secret Financial Network*, 2019.

[146] Global Witness, *Exposing the RSF's Secret Financial Network*, 2019.

in Yemen.[147] The UAE has both purchased gold from the RSF and acted as an importer for their product, with goods traded licitly and illegally smuggled in collaboration with Emirati enterprises.[148] Strong relationships with the Wagner Group, the Russian mercenary group that has increasingly gained influence in Sudan, have also facilitated the supply of weapons to the region, only further entrenching the UAE's position in the conflict and circumnavigation Western sanction regimes.[149]

The relationship is not simply commercial: driven by power competition with rivals in the Gulf (i.e., the KSA) and likely a related intention to nurture an agent able to pursue Emirati interests in East Africa.[150] The UAE has transferred weapons and at least 40 million dollars to the RSF (used to purchase dual-use vehicles) for "technical support".[151] The UAE's close diplomatic and economic ties to a range of Western and non-Western great powers and desire to situate itself as a regional mediator make the UAE sensitive regarding their public image. This may be an opening for diplomatic and advocacy tools to impact the UAE through naming and shaming.

North Africa

Egypt. The SAF and Egypt have a longstanding history of military cooperation and interlinked military-industrial complexes[152] Official trade between Sudan and Egypt runs at over USD 1 billion annually, 6.8 percent of Sudan's total trade.[153] Egypt is invested in the SAF's operations for strategic interests and security concerns. The SAF has therefore presumed that Egypt would supply them with both financial and military support; however, interviewees indicate that Egypt would likely prefer a political solution compared to continual violence, and thus has not contributed to the SAF's military effort at expected levels.[154] When Egyptian fighters conducted air operations on behalf of the SAF in April 2023,[155] they were reportedly captured by the RSF. The capturing may have also deterred Egypt's direct involvement in the conflict moving forward.[156] Currently, it seems improbable that Egypt would be willing or capable of acting as auxiliary support for foreign policy measures directed at Sudan.[157]

Libya. In divided Libya, the RSF has established a strong relationship with the Libyan National Army (LNA) under General Haftar despite Haftar's statements to the contrary.[158] Both groups cooperate in

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147 Global Witness, *Exposing the RSF's Secret Financial Network*, 2019.

148 Sudeep Kainee, *Egyptian national arrested with 6.5 kg gold from Kathmandu airport*. The Kathmandu Post, February 2024.

149 See Una Hajardi, *Cut off their funding: US sanctions groups linked to Wagner in Africa and UAE.* Euronews, 29 June 2023; Kersten Knipp and Emad Hassan, *Sudan's war: A year on, no home for a cease-fire.* Deutsche Welle, 14 April 2024.

150 Interview with Eddie Thomas, independent Sudan researcher and analyst. See also Khalil Al-Anani, *The Sudan Crisis: How Regional Actors' Competing Interests Fuel the Conflict*. Arab Centre Washington DC, 11 May 2023.

151 Nasim Ahmed, *Sudan: Bloody War Shows UAE Is an Agent of Chaos and Instability*. Middle East Monitor, 2023.

152 Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute, 2023

153 Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute, 2023

154 Interview with Academic in the Region

155 Oscar Rickett, S*udan: How an RSF attack on Burhan set the tone for a bitter conflict*. Middle East Eye, May 2023.

156 Kazim Abdul, *Sudan paramilitary RSF and army clash, Egypt's MiG-29 captured.* Military Africa,16 April 2023.

157 Interview with UN researcher with experience in the region.

158 XCEPT and Rift Valley Institute, *Sudan Conflict: Assessing the risk of regionalization*. Briefing Paper, 2023.

the trans-Sahel smuggling of goods and people to generate profits. The RSF has sent mercenaries to support the LNA and purchased weaponry from the LNA.[159] By contrast, Libya's Government of National Unity (GNU) - officially recognized by Qatar, Turkey, and Egypt, all of whom back the SAF to varying degrees - appears to be deepening ties with the SAF.

Eastern & Central Africa

Chad. There is a degree of cooperation between armed actors in Northern Chad and the RSF, which transfers arms (including those supplied by the UAE) across the Sudanese/Chadian border. The Government of Chad has tolerated the transfer of arms from the UAE to the RSF via Chadian territory, and there is likely a coordination between the government and the RSF. In February 2024, Sudan's acting Minister of Foreign Affairs issued a Note Verbale ordering a halt of delivery of humanitarian aid entering Sudan across the Eastern border of Chad, in an attempt to stop the illicit networks and transportation of small arms to the RSF.[160] The purpose of this note was to signal to the RSF that the SAF was aware of the trade route, since it was RSF territory the SAF couldn't realistically halt the humanitarian aid. By highlighting the route, actors that were more risk averse, such as the UN, were less willing to continue offering humanitarian aid without guarantees from both sides. An agreement with the United Nations (UN) Humanitarian Coordinator later allowed for aid shipments through the Tina border crossing, controlled by the SAF.[161] As cross-border aid shipments from Chad into Darfur are one of the most important supply routes for humanitarian actors in Darfur, any further restrictions would be devastating for the humanitarian response.

Ethiopia. Due to ongoing internal political tensions, Ethiopia has not officially stated its support for either belligerent. Despite maintaining a facade of neutrality, their ongoing distrust of the SAF has strained their relationship and brought them closer to the RSF.[162] RSF assets and operations have been traced to Ethiopia, and companies in Ethiopia may be used as a sanction evasion tool for the RSF.[163]

The Central African Republic. Hemedti and the RSF have developed strong ties to the Central African Republic (CAR) political leadership facilitated by the Wagner Group. Since 2022, the RSF has been involved in gold mining in CAR and has established bases for military resupply.[164] Wagner has been aiding in gold mining in the region by securing the mines and using its subsidiaries in the UAE to move the gold from the CAR and Sudanese border gold mines into the global market.[165] Evidence suggests the RSF may be preventing refugees from crossing into CAR as part of an arrangement allowing them operational movement in the nation and potentially access to control over several

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[159] UN, *Panel of Experts Report*, December 2023.
[160] Radio Dabanga, *Chad-Sudan aid supply ban leaves Darfur families 'teetering on the edge'*. Press Release, March 2024.
[161] USAID, *Sudan: Complex Emergency. Factsheet #12*. March 13, 2024.
[162] XCEPT and Rift Valley Institute, *Sudan Conflict: Assessing the risk of regionalization*. Briefing Paper, 2023
[163] Report shared by Independent Intelligence Analyst.
[164] XCEPT and Rift Valley Institute, *Sudan Conflict: Assessing the risk of regionalization*. Briefing Paper, 2023
[165] Mohammed Amin, *Hemeti's CAR coup boast sheds light on Sudanese role in conflict next door*. Middle East Eye, 18 January 2023.

gold mines.[166] Hemedti has developed relationships with CAR's political leadership and has recruited fighters directly from CAR while controlling the border at Um Dafuq.[167] This border has turned into a potential supply chain route for the transfer of weapons and resources.[168]

South Sudan. In light of the conflict's repercussions in South Sudan, the country has endeavored to remain neutral, aiming to facilitate a mediated resolution between the RSF and SAF.[169] Oil from South Sudan passes directly through the contested areas and has been subject to stoppages because of the fighting.[170] The SAF received an estimated 35 million USD per month[171] in revenue from the South Sudan government for use of the Al-Khair Petroleum Terminal in Port Sudan.[172] Small arms and ammunition have been provided to the RSF using these routes.[173] In South Sudan, the RSF maintains assets and operations, utilizing companies within the country as a protective barrier against sanctions.[174]

Other relevant multilateral actors and actors from outside the region:

African Union. The African Union has repeatedly called for a ceasefire in Sudan and expressed concern over the rapidly unfolding humanitarian crisis and the broader potential for the conflict to spillover and destabilize the region. It has adopted a neutral position in the conflict, and previously sanctioned Sudan by suspending it from the AU after the SAF and RSF expelled civilian elements of the Transitional Government in 2021.[175]

Russian Federation/ Wagner Group. Russia's interest in the conflict centers on securing resources and financing. Its aims include gaining access to a port on the Red Sea, escalating the migration crisis to exert pressure on the European Union, and supporting their war efforts in Ukraine.[176] The goal of the Wagner Group in Sudan initially centered around the protection of gold mines for the RSF to allow for export into Russia.[177] This relationship changed, however, when the Wagner Group became more active in the conflict, providing significant resources, including surface-to-air missiles to the RSF.[178]

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166 Abdallatif, Mawahib, *Sudan Shuts Border with Central Africa Republic.* The East African, 6 January 2023.
167 ADF Staff, *Sudan's Connections With CAR, Chad Could Cause Conflict to Spread.* Africa Defense Forum, 30 May 2023.
168 Ibid.
169 XCEPT and Rift Valley Institute, *Sudan Conflict: Assessing the risk of regionalization*. Briefing Paper, 2023.
170 Reuters, *Sudan war causes stoppages on South Sudan oil pipeline, officials say.* 25 March 2024.
171 This is an estimated number, the bank where this transfer occurs is unclear and the transactions are likely not in USD.
172 Interview with Independent Intelligence Analyst.
173 Interview with Independent Intelligence Analyst.
174 Report shared by Independent Intelligence Analyst.
175 Jehanne Henry, *The worst forgotten conflict in the world: Sudan's civil war one year on*. Middle East Institute, 14 April 2024.
176 Bernard Siman, *Russia's Hybrid Wars Come to Sudan.* Egmont Institute, 2023.
177 Mohamed El Doh, *Sudan Conflict: More Complex than Meets the Eye*. Geopolitical Monitor, 21 April 2023.
178 *US Department of the Treasury, Treasury Sanctions the Head of the Wagner Group in Mali. Press Release, May 2023*

European Union. In the ongoing conflict, the EU has not taken a leading role in conflict resolution,[179] but it has sanctioned both the RSF and SAF.[180] The Sudanese government has supported the EU's increasingly strict migration policies. In 2016, Sudan became a leading EU partner on migration, with the capital hosting the headquarters of the EU's regional "Khartoum Process".[181] The EU's interest in the swift resolution of the conflict in Sudan is, therefore, likely also motivated by a desire to slow the flow of refugees and migrants into Europe.

United Kingdom. From 1899 to 1956, the United Kingdom (UK) ruled Sudan through the Anglo-Egyptian Condominium Since gaining independence, the relationship between the United Kingdom (UK) and Sudan has been complex. Despite this, the UK plans to provide £89 million in aid to Sudan for 2024/25, doubling the aid from the previous year.[182] and continues to engage in trade, with £237 million traded in the final quarter of 2023, a 15% increase from 2022. Both the RSF and SAF have business ties within the UK.[183] Throughout the recent conflict in Sudan, the UK has remained officially neutral, sanctioning both the RSF and SAF following unsuccessful talks in Bahrain. These sanctions were reportedly aimed at prompting Gulf states, including Saudi Arabia and the UAE, to reassess their ties with the conflicting parties.[184]

United States. The US established diplomatic ties with Sudan in 1956. Relations have since fluctuated. Relations improved following Sudan's shift to a civilian-led government in 2019. Sudan was then taken off the SST list in 2020 After the 2021 coup, the US froze $700 million of aid and engaged with international partners to suspend development lending and debt relief to Sudan's government.[185] Despite a tenuous relationship, the US has been the largest single donor to Sudan, providing over $5 billion in aid since 2005.[186] In the current conflict, the US has sanctioned the RSF and SAF relatively equally and have been involved in the recent Bahrain and Jeddah talks.

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[179] Gordon D. Cumming, *The European Union in Sudan: A Missed Opportunity?* The Commonwealth Journal of International Affairs, Volume 104, 2015.

[180] European Council, *Sudan: Council adds six entities to EU sanctions list*. Press Release, 2024.

[181] Jérôme Tubiana, *Europe Is Making Sudan's Refugee Crisis Worse*. Foreign Policy, 8 January 2024.

[182] Louisa Brooke-Holland, *Sudan: The Forgotten Conflict,* UK Houses of Parliament, Commons Library, 29 February 2024.

[183] United Kingdom Department for International Trade, *Sudan Trade and Investment Factsheet.* 21 March 2024.

[184] Patrick Wintour, *UK imposes sanctions on companies linked to warring Sudanese factions*. The Guardian, 12 July 2023

[185] Jonathan Guyer, *Could the US have helped avert the crisis in Sudan?* Vox, 18 May 2023.

[186] US Embassy in Sudan, *Sudan Sanctions*. Website, accessed March 2024.

SECTION II: FACTORS INFLUENCING THE EFFICACY OF DIFFERENT FINANCIAL POLICY TOOLS

Many Western governments view sanctions as generally straightforward and inexpensive means of responding to undesirable behavior by political leadership in comparison to potential alternatives, including direct military action and military support.[187] As a former US diplomat once explained, 'as a tool for policymakers, [sanctions] serve as a solid middle space in terms of the types of policies you can pursue between kinetic action and soft approaches like diplomacy."[188] The following section outlines past sanctions on Sudan and whether future sanctions may be effective at achieving their intended objective. However, the efficacy of each tool will be highly dependent on the specific situation at hand; the framework listed in this section is malleable to keep pace with the rapidly evolving situation.

History and Outcomes of Sanctions in Sudan

Sudan has long been subject to different sanctions regimes imposed by the UN, US, EU, and UK (the US, UK, and EU apply all UN sanctions on Sudan). Sanctions have come in three waves: firstly, implemented in the 1990s regarded Sudan's Islamist links with international terrorist organizations and the subsequent East Africa embassy bombings; then, in the mid-2000s, sanctions were imposed around the Darfur genocide.[189] The last round of sanctions began in 2023 to prevent further instability in Sudan and hold those committing atrocities in the country accountable.

The United Nations

The United Nations Security Council began imposing sanctions in the mid-2000s in response to the violence in Darfur, imposing a partial arms embargo in resolutions 1556 (2004) and 1591 (2005) prohibiting arms transfers to the Government of Sudan in Darfur and to all non-governmental persons operating in Darfur.[190] Resolution 1672 (2006) applied a travel ban and asset freeze on four specific individuals responsible for heinous violence in Darfur.[191] These resolutions were amended and renewed by several subsequent UN Security Council (UNSC) resolutions, but they have not been significantly updated to match the current situation in Sudan. The outbreak of recent violence prevented the UN's ability to assess progress made in Sudan regarding transitional security arrangements in Darfur and the national action plan for the protection of civilians.[192] However, the annual reports of the Panel of Experts have provided important evidence on the financing of the

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[187] Matt Herbert and Lucia Bird, *Hard Targets: Identifying a Framework of Objectives for Targeted Sanctions on Illicit Economies*. Global Initiative Against Transnational Organized Crime, June 2023.

[188] Ibid.

[189] US Embassy in Sudan, *Sudan Sanctions*. Website accessed March 2024.

[190] US Department of State, *US Sanctions on Sudan*. Report, April 2008.

[191] These individuals are Gabril Badri, Colonel for the National Movement for Reform and Development, Gaffar El Hassan, former Major General for the SAF, Musa Hilal, Sheikh and paramount chief of the Jalul tribe, and Adam Shant, former commander of the SLA.

[192] Security Council Letter *S/2023/918*. Security Council Report, November 2023.

belligerents and their recruitment patterns.[193] Sudan's envoy to the UN Security Council has called for an end to the current UN sanctions regime targeted against those who have committed war crimes in Darfur (comprising of arms embargoes, asset freezes, and travel bans), stating this would allow "the Sudanese government to better protect its civilians" in the war against the RSF.[194]

The United States

The US initiated its sanctions regime against Sudan before the UN and EU, starting in 1993, primarily due to the Sudanese government's ties to Islamic extremism. In 1993, the US government placed Sudan on its list of countries designated as supporters of international terrorism, which prohibits the provision of non-humanitarian economic aid (already blocked by USAID), restricts dual-use exports and arms sales, and requires US representatives at international organizations to vote against loans to Sudan and miscellaneous other restrictions.[195] In 1996, President Clinton signed the Anti-Terrorism and Effective Death Penalty Act, which bans Americans from engaging in any financial transactions with governments on the US list of terrorism sponsors, including Sudan.[196]

By the mid-2000s, the US developed general licenses and exemptions to ensure humanitarian aid could enter the country, along with other goods and services. The 2006 Darfur Peace and Accountability Act prohibited transactions with designated individuals and entities associated with Sudan’s government while easing sanctions against areas of southern Sudan that did not involve the Sudanese government.[197] In 2016, the Obama administration used trade sanctions relief to motivate Sudan to cooperate in five discrete areas. The tactic was viewed as largely effective. Khartoum appeared to satisfy most of the conditions that were set, yet Washington slow-rolled the sanctions relief.[198] Sudan's designation as an SST was rescinded in 2020 under the Trump administration.[199] The removal from the SST list allowed for urgently needed debt relief and foreign financing to the country.[200]

Several reasons have been presented for the State Department's decision to remove Sudan from the SST list, which emerged from a convergence of factors linked to domestic political changes in Sudan after the 2019 revolution and a US-led push for the normalization of ties with Israel. A combination of Sudan’s agreement to compensate victims of past attacks on US embassies,[201] a new civilian

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[193] UN, *Panel of Experts Report*, p.12. December 2023.

[194] Remarks made by representative of Sudan (SAF) in United Nations Security Council, 79th year: 9538th meeting on 29 January 2024.

[195] US Embassy in Sudan, *Sudan Sanctions.* Website, accessed 2024.

[196] Center for Global Development, *Brief TImeline of Key Sanctions Events in Sudan*. October 2011.

[197] Center for Global Development, *Key Sanctions Events in Sudan*. 2011.

[198] Harris Gardiner, *Trump Administration Formally Lifts Sanctions on Sudan*. The New York Times, October 2017.

[199] US Department of State, *Country Reports on Terrorism 2020: Sudan.* State Department, 2020.

[200] Spetalnick et al. *Trump: US to remove Sudan from state terrorism sponsors list after payment to victims*. Reuters, 20 October 2020.

[201] Naba Mohiedeen, *Sudan Welcomes US Decision to Remove Khartoum from Sponsors of Terrorism List*. Voice of America, 15 December 2020.

leadership movement,[202] proof of Sudan's efforts to denounce terrorist groups in Sudan, and the normalization of relations with Israel under the Abraham Accords.[203] Sudan's designation as a State Sponsor of Terrorism (SST) was rescinded in 2020 under the Trump administration.[204] The removal from the SST list would allow for urgently needed debt relief and foreign financing.[205]

The October 2021 coup, however, ended Sudan's transitional period and reversed progress on lifting sanctions.[206] In 2023, The US restarted its sanctions regime against Sudan, with a greater focus on targeted sanctions on persons or entities in connection with "the military's seizure of power in October 2021 and the outbreak of inter-service fighting in April 2023."[207] The US also still adheres to sanctions imposed in 2006 in line with the UN sanctions regime against the four individuals who are connected to the conflict in Darfur.

The European Union

Since 1994, the European Union has embargoed arms supplies to Sudan.[208] In line with UN and US sanctions, the EU has also sanctioned several Sudanese and Russian individuals (associated with Wagner Group) involved in the conflict in Darfur in 2017 and 2018.[209] As of 2024, the European Union has imposed sanctions on Sudan, targeting six entities connected to the SAF and the RSF. These sanctions specifically include the freezing of assets of entities engaged in the manufacture of weapons and vehicles for the SAF, such as the Defense Industries System and SMT Engineering, and three companies associated with procuring military equipment for the RSF have been sanctioned.[210] These sanctions aim to impede the operational capabilities of the SAF and RSF by restricting their

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[202] Max Bearak and Naba Mohieddin, *US lifts Sudan's designation as a state sponsor of terrorism.* The Washington Post, 14 December 2020.

[203] Ibid.

[204] US Department of State, *Country Reports on Terrorism 2020: Sudan.* State Department, 2020.

[205] Spetalnick et al. Trump: US to remove Sudan from state terrorism sponsors list after payment to victims. Reuters. 20 October 2020.

[206] DT Global, *Impact of US Government Sanctions on the RSF/SAF conflict*.

[207] Terrence Gilroy, Eunkyung Kim Shim, Daniel Andreeff, US Government Announces New Sudan Sanctions Authority. May 2021. Current sanctioned entities and individuals associated with the Sudanese conflict include: AL JUNAID MULTI ACTIVITIES CO LTD, AL-FAKHER ADVANCED WORKS CO. LTD., ALKHALEEJ BANK CO LTD, Russia-based military supply company AVIATRADE LLC, DEFENSE INDUSTRIES SYSTEM, GSK ADVANCE COMPANY LTD, SUDAN MASTER TECHNOLOGY, TRADIVE GENERAL TRADING L.L.C, ZADNA INTERNATIONAL CO FOR INVESTMENT LTD, Taha Osman Ahmed al-Hussein (Taha), Salah Abdallah Mohamed Salah (Salah Gosh), Ali Ahmed KARTI MOHAMED, Mohamed Etta Elmoula Abbas (Elmoula), and Abdelrahim Hamdan Dagalo. See US Department of the Treasury, *Treasury Targets Sudanese Actors. Press Release*. 2023; and OFAC, *Sanctions List Search*. Accessed March 2024.

[208] SIPRI, *Arms Embargoes Database, Sudan*. Accessed March 2024.

[209] *EU/EEAS Sanctions Database*, accessed March 2024. Sanctioned individuals include Andrei Sergeevich Mandel, the head of the Wagner Group's branch in Sudan, Jibril Abdulkarim Ibrahim Mayu, the General for the National Movement for Reform and Development, and Gaffar Mohammed Elhassan, former Major-General and Commander of the Western Military Region for the Sudanese Armed Forces (SAF).

[210] *European Council, Sudan: Council adds six entities to EU sanctions list*. Press Release, 2024: Sanctioned companies linked to the RSF are Al Junaid Multi Activities Co Ltd, Tradive General Trading, and GSK Advance Company Ltd.

access to financial resources and military equipment. Sudan's Foreign Ministry denounced EU sanctions against three companies affiliated with the SAF "as unjust".[211]

The United Kingdom

In 2023, the UK, in tandem with the US, announced sanctions targeting the same six entities associated with the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF). These measures, outlined under the Sudan (Sanctions) (EU Exit) Regulations 2020, involve asset freezes aimed at entities linked to the military factions led by General Abdel Fattah al-Burhan and Hemedti, respectively. The imposition of these sanctions also may have served as a signal to certain Gulf states to reassess their commercial ties with the warring factions in Sudan. The UK implemented these sanctions after failed US-Saudi-sponsored peace talks in Jeddah.

Impact of Sanctions on Sudan

Very little research is dedicated specifically to the impacts of sanctions on Sudan. Prolonged US, UN, and EU sanctions have likely played a role in exacerbating the decline of Sudan's economy.[212] While US trade and financial sanctions put substantial pressure on Sudan's economy and are credited with nearly crippling companies such as Sudan Airways,[213] key government institutions and elite actors were able to avoid or evade most sanctions, particularly the prohibition on US dollar transactions and restrictions on US-origin goods and services.[214] This meant that the Sudanese population as a whole suffered more harm due to sanctions than the elite actors the sanctions were intended to target.[215] The lack of access to US dollars within the Sudanese banking sector led to the growth of a substantial black market, drawing liquidity away from the formal banking system,[216] and increasing commercial opportunities for criminal actors[217] Sanctions hit the middle classes in Khartoum by impeding their ability to make international transactions, significantly raising the cost of performing ordinary transactions as part of the international economy.[218] As such, sanctions raised the cost of entry into international markets for Sudanese people unaffiliated with the SAF, possibly entrenching the market dominance of the SAF and affiliated armed groups such as the RSF.[219]

Sanctions also constrained the government's ability to provide basic services, including clean water, electricity, and medicine; public hospitals in particular faced enormous shortages of medicine

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[211] Mohammad Amin Yassin, *Sudan Condemns European Sanctions Against 'Army-Affiliated Companies'*. Asharq al-Wasat, January 2024.

[212]United Nations Sudan, *United Nations in Sudan - Annual Report 2022*. November 2023.

[213] Peter Fabricius, *Are sanctions working in Sudan?* Institute for Security Studies, October 2017.

[214] Emile LeBrun and Claire Mc Evoy, *Lifting US Sanctions on Sudan: Rationale and Reality.* Small Arms Survey*. May 2018.*

[215] Mary Carlin Yates with Kelsey Lilley, *Sudan: A Strategy for Re-Engagement*. Atlantic Council. 1 July 2017.

[216] Nesrine Malik, *Sanctions Against Sudan Didn't Harm an Oppressive Government — They Helped It*. Foreign Policy, July 2018.

[217] Bryan Early and Dursun Peksen, *Searching in the Shadows: The Impact of Economic Sanctions on Informal Economies*. Political Research Quarterly, Volume 72, Issue 4, 2018.

[218] Ahmed Saeed, *US sanctions on Sudan under the spotlight*. Al-Jazeera. 2 December 2015.

[219] Ahmed Saeed, US sanctions on Sudan under the spotlight. Al-Jazeera. 2 December 2015.

regardless of humanitarian carve-outs, likely due to over-compliance with sanctions regimes by banks and international suppliers, with suppliers willing to transact with Sudanese entities raising costs due to the scarcity of supply.[220] US sanctions in particular triggered financial and economic crisis, decreased employment rates,[221] halted social entrepreneurship enterprises, and disrupted the maintenance of civil infrastructure[222] and the health system.[223]

By 2016, many in Washington had concluded that the embargo had achieved little besides making life more difficult for the Sudanese people.[224] A United States Institute of Peace report from 2018 explains that while the lifting of sanctions was welcomed by most Sudanese interviewed, the deteriorating economy, government repression, and failure to resolve Sudan's multiple conflicts overshadowed the US overture.[225] The country remained on the US's SST list until 2020. Remaining sanctions contributed to US businesses' decisions to withhold investment, despite efforts by US officials to encourage economic activity in Sudan. Banks also limited the financial support available to the transitional government, deepening an already dire economic crisis and contributing to conditions that brought about the removal of that government in a military coup in 2021.[226] Additionally, The wealthy business elites who had gained control over informal and illicit markets had strived to create strong, mutually beneficial relationships with corrupt government officials, who cooperated to shift goods from public providers to the black market, where they are sold at significantly higher prices. This meant that basic goods, such as fuel and medicine, continued to command high prices, meaning that sanctions termination did not alleviate widespread hardships for the Sudanese people; their harmful effects still linger to this day.[227]

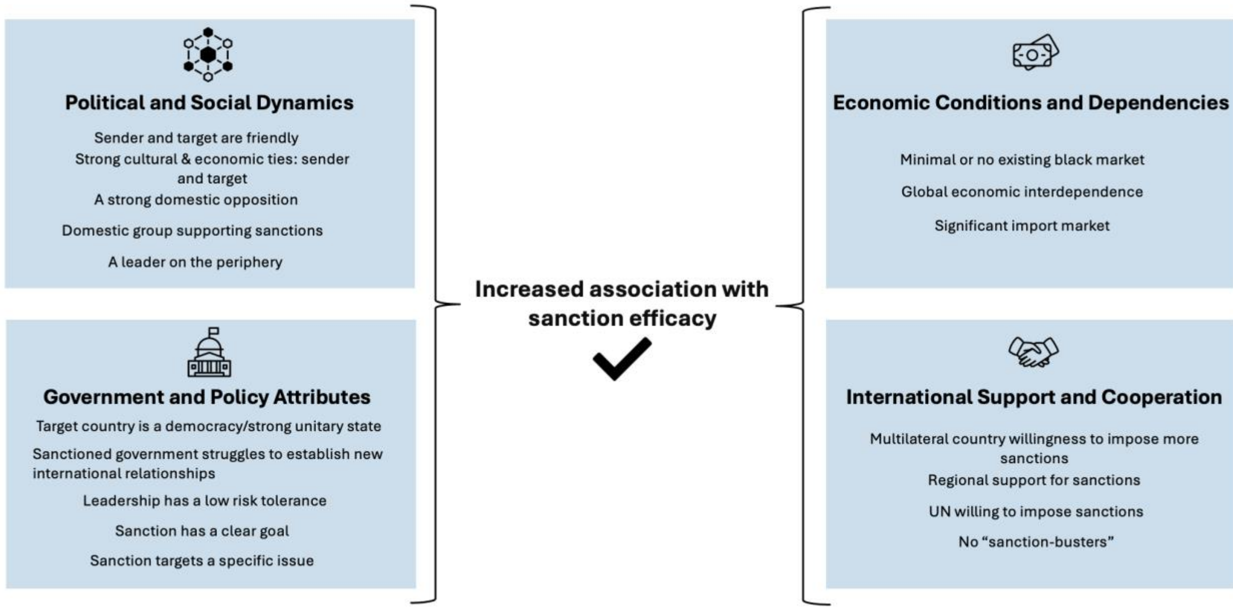
Factors Determining the Efficacy of Sanctions in Sudan

The consensus in academic literature is that conventional trade and financial sanctions result in some meaningful behavioral change in the targeted or sanctioned country about 40 percent of the time.[228] However, Biersteker and van Bergeijk highlight that the widely used Peterson Institute for International Economics sanctions database, which covers almost 200 cases, shows that sanctions

[220] Ibid.
[221] Adil Hassan Ibrahim and Dyah Mutiarin, *The Major Factors behind the Economic and Financial Crisis in Sudan*. Saudi Journal of Economics and Finance, 2020.
[222] Muhamad Malik and Muhamad Malik, *The Efficacy of United States Sanctions on the Republic of Sudan*. Political Science, 2015.
[223] Ebrahim M. A. Ebrahim, Luam Ghebrehiwot, Tasneem Abdalgfar1, and Muhammad Hanafiah Juni, *Health Care System in Sudan: Review and Analysis of Strength, Weakness, Opportunity, and Threats.* Sudan Journal of Medical Sciences Volume 12, Issue no. 3, 2017.
[224] The Economist, *Why America has lifted sanctions on Sudan*. The Economist Explains, 2017.
[225] Aly Verjee, *Sudan after Sanctions Sudanese Views of Relations with the United States*. USIP Special Report. 2018.
[226] Delaney Simon, *America's Sanctions Habit is Hurting Peacemaking.* Just Security, 24 April 2024.
[227] Wang, Yaohui, Amel Y. A. Alfakiali, and Yuhuang Niu, *Why Sanctions Termination Doesn't Put an End to Humanitarian Crises: The Case of Sudan*. Journal of Asian and African Studies, (1) 2023.
[228] Dursun Peksen, *When Do Economic Sanctions Work Best? Five Key Conditions Associated with Successful Sanctions Outcomes*. CNAS, 10 June 2019.

fail to achieve their policy goals of the sender country in about two out of three cases.[229] More recent research by the Targeted Sanctions Consortium (TSC) on UN-targeted sanctions suggests an even lower success rate: on average, in less than one in four instances. The variations in success rates reflect differing methodologies and definitions of what constitutes 'success' in the context of sanctions. A detailed breakdown of factors influencing the efficacy of sanctions, drawn from academic literature, is included in Annex 3.

Figure 3: Factors for sanctions efficacy



Assessing the effectiveness of sanctions is particularly challenging due to a vast array of context-specific variables. During the 2008 political crisis in Zimbabwe, for example, prompted by human rights abuses and electoral fraud, the EU and the US responded by imposing travel bans and freezing the personal assets of Zimbabwean officials, particularly those associated with Robert Mugabe's regime. Evidence suggests that a significant motivator for Mugabe to seek compromise was the desire among regime leaders to have the EU and US lift the freezes on their personal assets. However, an equally important factor may have been the country's catastrophic economic situation and poor governance rather than the targeted sanctions themselves.[230]

The Zimbabwe example underpins the broader challenge of assessing sanctions' efficacy. Early sanctions research has focused on economic ties, regime type, issue salience, and the sanctions' characteristics. Recent scholarship has identified additional elements based on much larger datasets and macroeconomic literature, including international consensus on sanctions, economic and

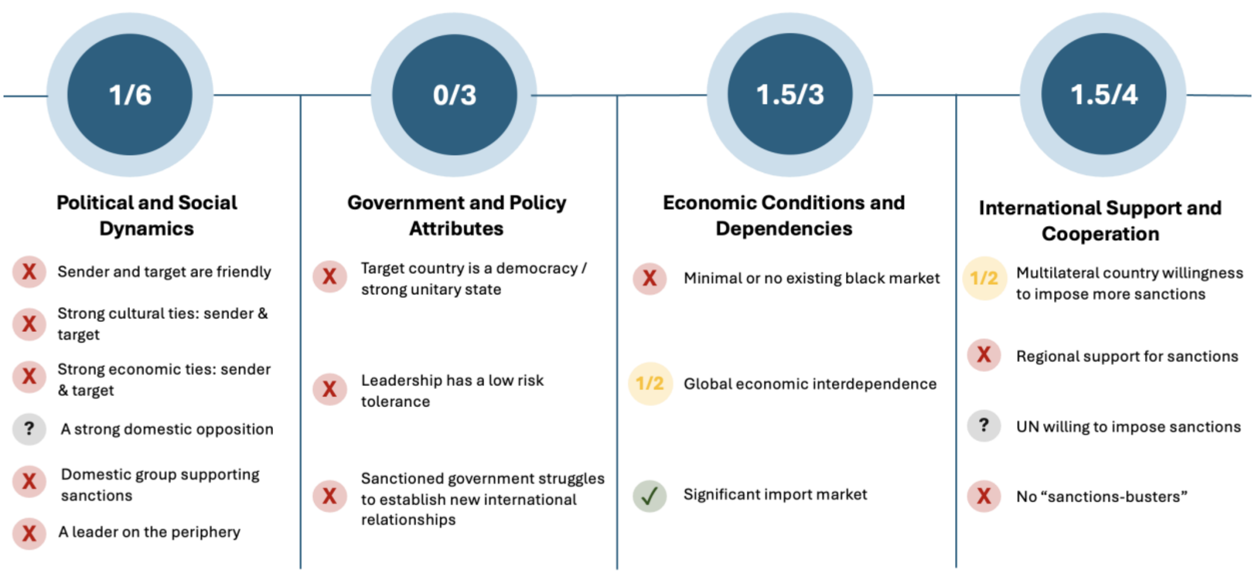
[229] Thomas Biersteker and Peter A.G. van Bergeijk, *How and When Do Sanctions Work? The Evidence*. Institute for Security Studies, 2015.
[230] Martin Russel, Briefing: *EU Sanctions: A key foreign security policy instrument. European Parliament.* May 2018.

political linkages between the involved parties, the democratic nature of the targeted state, the risk tolerance of key stakeholders, and the clarity and duration of the sanctions imposed.

The above factors influenced the indicators below that have been used to assess various sanctions case studies and identified key factors that did or did not lead to their success. Sanctions efficacy is defined as the degree to which the sanctions achieved the sanctioning authorities' intended goals. Overall, Sudan meets very few indicators for sanctions efficacy: out of the 15 indicators assessed, only one is fully met, two may be met, and two are partially met (see Figure 4).

While it is doubtful that any country would meet all 15 indicators, an example of a country that would score far higher than Sudan is Peru in 1992 when the US imposed sanctions following President Fujimori's dismissal of the Peruvian congress. Peru had close military, economic, and political ties to the US, including strong trade dependency and a significant import market; a strong unitary state and organized domestic opposition, including leaders on the peripheries, some of whom supported sanctions. Regional actors such as Brazil supported the imposition of sanctions,[231] which were aimed at compelling Fujimori to reverse his dissolution of the Peruvian Congress and restore democracy.[232] Peru may have scored in the range of 11-13.

Figure 4: Indicators for sanctions efficacy in Sudan



Considering political and social indicators for sanctions efficacy, there is potential for civilian opposition to manifest through groups such as the FFC; the initial success of the revolutionary committees in 2019 speaks to the ability of the Sudanese to mobilize and assert their political

[231] Research Directorate, Canada Immigration and Refugee Board, *Impact of the April 1992 Coup*. 1 May 1994.
[232] Barbara Crossette, *US, Condemning Fujimori, Cuts Aid to Peru*. New York Times. 7 April 1992.

interests.[233] However, insights suggest that none among them currently possess the requisite strength or influence to effectively counter the dominance of the SAF/RSF.[234] While interviews confirmed that the SAF often supports sanctions against the RSF privately, it is unclear to the authors of this report whether any domestic group outside the two warring parties could use sanctions to gain influence; nonetheless, they are supportive of sanctions. There does not seem to be a leader on the periphery or an organized domestic opposition who could leverage sanctions to create openings in the peace process.

No government and policy attributes indicate the efficacy of sanctions. Sudan has never been a democracy, with leadership having extremely low levels of accountability to the Sudanese people. Sudan's leadership is willing to survive a notably high level of risk, primarily attributed to the escalating conflict between the RSF/SAF. Both factions employ high-risk and violent methods in their pursuit of power. Interviews highlighted the prevailing view that this conflict is existential for both parties, heightening the stakes and contributing to the heightened volatility within Sudan's political environment. Both belligerent parties have demonstrated the ability to establish new international relations to circumvent sanctions (see stakeholder mapping). However, if the sequencing of sanctions is timed well, the cumulative weight of sanctions waves may contribute to long-run conflict exhaustion. As their war-fighting abilities deteriorate over time, SAF and RSF leaders might increasingly see the value of genuine negotiations. This scenario does depend on the sanctions successfully inflicting significant political and material costs recognized by decision-makers on both sides.[235]

Economic conditions and dependencies indicate some limited opportunities for sanctions effectiveness, primarily a significant import market and heavy dependency on foreign currency. Decades of comprehensive sanctions have further isolated Sudan's economy from the global market, hindering trade opportunities. However, Sudan contributes to the global economy by exporting to the United Arab Emirates, China, Italy, Egypt, and Turkey. A notable black market[236] and illicit smuggling of goods through the Sahel increases the likelihood that targets effectively evade sanctions.

International support and cooperation for sanctions in Sudan exist only among Western countries. While the UN Security Council has prolonged existing sanctions until September 2024, China and Russia appear reluctant to renew them further. The US appears to have a strong appetite for further targeted sanctions, which will likely be reflected in further UK and possibly EU sanctions. While the AU has imposed sanctions on Sudan (limited to simply suspending Sudan from its activities, such as

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[233] Interview with Eddie Thomas, independent Sudan researcher and analyst.

[234] Interviews with Researcher, North Africa and the Sahel expert focused on illicit economies, and Ali Dinar, Senior Lecturer in the Department of African Studies at the University of Pennsylvania.

[235] Interview with Independent Intelligence Analyst.

[236] Jawhratelkmal Kanu, *In the Shadow of Conflict: The Black Markets of Sudan's War.* The Tahrir Institute for Middle East Policy, 28 February 2024.

meetings and conferences), it remains broadly opposed to the imposition of new sanctions by Western authorities, perceiving AU sanctions 'as a peer overseeing loyalty to commonly agreed standards' as opposed to Western sanctions, seen as external interference.[237]

Juba's reliance on income from oil, running through pipelines in Sudan, means South Sudan's priority is to maintain stable political relations with the SAF and RSF; its political leadership is also sanctioned by the US, UK, and UN. As the host of the AU, Ethiopia tends to follow the AU's posture of opposition to sanctions imposed by the West. Libya's rival governments support opposing sides in the Sudanese conflict and are unlikely to compromise these relationships, strategic for commercial and military purposes; political leadership in Chad and CAR are also unlikely to impose sanctions due to valuable commercial and military relationships with the SAF and RSF. Sudan's political elite have decades of experience in sanctions-busting and have allies such as Russia, Iran, and the UAE, who are willing and able to permit national businesses to transact with sanctioned entities.

Although alone sanctions may be unable to curb the exploitation of Sudan's natural resources or bring about a cessation of violence. But, if used in tandem with a clear diplomatic goal, targeted asset freezes and travel bans may be enough of a credible threat to bring and keep the belligerents at the negotiating table. This is in line with the US Treasury's 2021 Sanctions Review, which encourages using sanctions to support a clear policy objective, and creating sanctions that are easily understood by the target entities and individuals.[238]

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[237] Elin Hellquist, *Regional sanctions as peer review: The African Union against Egypt (2013) and Sudan (2019)*. IPSA, vol. 42 Issue. 4 September 2021.

[238] US Department of the Treasury, *The Treasury 2021 Sanctions Review.* October 2021.

SECTION III: POLICY OPTIONS AND RECOMMENDATIONS

This report's final policy options and recommendations were informed, in addition to our OSINT and interviews, by an extensive literature review. The report by GI-TOC's Herbert and Lugo on targeted sanctions for illicit economies, was particularly impactful.[239] We used their framework, for assessing the objectives and goals of criminal activity sanction regimes, to evaluate our policy options.

Individual designations serve three potential objectives: to coerce, constrain, or signal, each aligning with a sanction regime's broader strategic goals. Coercing an actor involves persuading them to change their behavior. Constraining an actor aims to limit or diminish their capacity to act in certain ways. Signaling allows sender countries to communicate to a wider audience that a normative boundary has been violated. This dual-level approach of assessing impact—strategic and designation—provides more apparent structural analysis and more entry points for understanding the effectiveness of sanctions.

Policy Options

Different financial policy tools present opportunities to influence the belligerents towards peace through alternative strategic applications, including via deterrence, coercion, or persuasion of - or signaling to - the belligerents. Yet, these tools also pose significant risks by potentially influencing both the domestic and international aspects of the conflict in Sudan, adversely affecting the country's political economy and worsening the humanitarian crisis, similar to the outcomes under the previous sanctions' regime.

Policymakers could opt to **do the same**, i.e., keeping existing sanctions in place while not initiating new sanctions; the main advantage of this option is that it avoids the risk of destabilizing planned talks between the belligerent parties in Jeddah, whose leaders could react to further sanctions by walking away from the table. It also avoids the potential for further destabilization in the region if additional sanctions impact Sudan's already fragile neighbors. Given that the willingness of the SAF and RSF to agree to a ceasefire, let alone a negotiated resolution to the conflict, remains highly uncertain, this option risks simply allowing the talks to stall or fail and for the conflict to continue unabated. Policymakers could instead choose **to do less** by proposing to lift sanctions if the belligerent parties agree on a ceasefire, thereby persuading the belligerents to negotiate. However, even if successful, this option could simply give parties time to regroup and reconsolidate their finances before recommencing with violence. Removing the targeted sanctions may also be politically unfeasible in the US, UK, and EU based on current parliamentary and congressional conversations around Sudan.

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239 Matt Herbert, Lucia Bird Ruiz-Benitez de Lugo, *Hard Targets: Identifying a Framework of Objectives for Targeted Sanctions on Illicit Economies.* Global Initiative against Transnational Organized Crime. December 2023.

Policymakers could also **do more** by imposing targeted sanctions on most businesses that can be shadow-designated to the RSF and SAF to constrict their financing and coerce them towards negotiations. Since the RSF has excelled at quickly closing front companies and opening new ones, targeting one or two companies at a time may be futile; targeting a significantly higher number of entities at one time may make it more difficult for the RSF to recuperate. However, the belligerents would almost certainly be able to transfer assets and finances through their porous borders' illicit routes (such as smuggling through the Sahel), limiting the financial impact of the sanctions, and continuing to strengthen black markets and the criminal networks thriving with them. The SAF may feel insulted by a renewed round of more extensive sanctions and walk away from the table.

Additionally, given that businesses shadow-designated to the SAF constitute an enormous part of Sudan's economy, such measures would almost certainly worsen Sudan's current dire economic crisis and deepen the humanitarian crisis at a time of impending famine. This would represent a failure to apply past lessons learned on the effects of past comprehensive sanctions, which had enormous adverse consequences for the Sudanese people and further entrenched the control of illicit networks over the economy. Given their precarious stability, broad sanctions on Sudan might inadvertently destabilize its neighbors—Chad, Ethiopia, and the Central African Republic.[240] These countries, which combined host hundreds of thousands of Sudanese refugees, are already dealing with grave humanitarian, violent extremism and weapons smuggling issues.[241] The effects of such sanctions could further undermine the fragile balance in these countries.

A careful analysis of the evidence base for this report indicates that policymakers seeking to reduce or cease the violence in Sudan would be best served by **doing differently**. The efficacy of financial policy tools alone in sustainably reducing the belligerents' capacity to wage war is likely limited and fraught with risk for adverse political, economic, and humanitarian consequences. While adroitly timed sanctions can hit the belligerents' financing, the effects of these hits are likely short term only: sources indicating that the SAF and RSF can rearrange their networks to avoid sanctions over time, and Sudan's highly porous border and extensive black market means that sanctions are unable to reach many key import/export routes and illicit commercial activities.

Yet instead of conceiving sanctions as a financial policy tool to reduce the belligerent's ability to wage war, policymakers could use financial policy tools as levers within an evolving political strategy aimed at influencing the parties towards a negotiated resolution to the conflict. This can be done by tying the threat of sanctions to the progress of mediation, i.e., the upcoming Jeddah talks. Concurrently, policymakers should utilize threats to influence external backers of either side (mainly Saudi Arabia and the UAE) to pressure both parties into pursuing a ceasefire and, eventually, a negotiated resolution to the conflict through mediation. Sanction targets would be only corporate entities and individuals key to the belligerents' conflict financing. Corporate entities crucial for delivering goods

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[240] Interview with Researcher, North Africa and the Sahel expert focused on illicit economies.

[241] Folahanmi Aina, *Sudan's War Might Not Stay in Suda*n. Foreign Policy. 1 May 2023.

and services to civilians should be excluded from sanctions, where possible; this excludes industries that have historically functioned as front companies for illicit trade, such as agricultural businesses. This does involve a trade-off between hitting the conflict financing of either belligerent and avoiding harm to civilians, as the RSF and SAF have intentionally structured their corporations to complicate the targeting of illicit trade and weapons production without affecting essential civilian services. Furthermore, due to the low risk tolerance of international banks and corporations, even sanctions exemptions intended for humanitarian purposes may not be enough to prevent adverse humanitarian impacts.[242]

This approach builds on the evidence that adroitly timed threats of sanction imposition are often more effective than the imposition of sanctions themselves, and that financial policy tools tailored and timed to the evolving political situation on the ground generally have the highest chance of success. However, if threats fail to produce the desired behavior from the targets, policymakers must then impose new sanctions in the case of adverse developments in the conflict and political process, imposing costs on the belligerent parties if they fail to attend the Jeddah talks, fail to make progress during talks, or commit new atrocities against civilians during the conflict. Such sanctions would impose at least short-term costs to the belligerents, and signal to the belligerents that major powers will not tolerate a protracted conflict, creating incentives for meaningful participation in mediation. To maintain the flexibility necessary to tie financial policy tools to an evolving political strategy, all sanctioning authorities must include a one-year required review and implementation assessment, like many UN sanctions regimes.

To achieve appreciable impact, such measures need to be tied to clear benchmarks that are achievable within a specific timeframe during mediation talks. They would also need to be tied to other non-financial policy tools targeting a wider range of actors. To reduce support to belligerents by external actors, policymakers could threaten the release of information regarding connections between Sudan and Gulf countries. For example, Adil Abdel-Hadi is the UK-based director of Shield Security Services Ltd. Sudanese security company connected to two senior leaders within the RSF - Musa Hamdan and Mostafa Ibrahim Abdelnabi - with the latter also serving as the deputy chairman of Dubai's Security Industry Regulatory Agency. The UAE was recently taken off the FATF "grey list." Threats of re-addition to the gray list or a similar list may be enough encouragement for the UAE to exert pressure on the RSF. Given the sensitivity of Gulf countries to bad press, this option may pressure targets to keep the belligerents at the negotiating table, especially if combined with international and national civil society advocacy campaigns in the public sphere and in key multilateral governmental institutions, such as the United Nations - where the UAE's military support to the RSF has already garnered attention.[243]

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[242] OHCHR, *Guidance Note on Overcompliance with Unilateral Sanctions and its Harmful Effects on Human Rights*. Accessed 28 April, 2024.
[243] Bloomberg, *Diplomatic Spat Erupts Over Claims UAE Shipped Weapons to Sudan*. 12 December 2023.

The US should also consider using secondary sanctions to target RSF and SAF relations with the Gulf that are outside the US nexus. If violated, secondary sanctions can result in possible limitations on access to, or even exclusion from, the US financial system and marketplace for Gulf members. This could have serious consequences for the UAE in particular. Since 2009, the UAE has been the number one export market for US goods in the entire Middle East and North Africa (MENA) region.[244] However, there are significant humanitarian consequences associated with this kind of larger network targeting and alone, these secondary sanctions don't appear to lead to conflict resolution.[245] Additionally, secondary sanctions are only as good as their enforcement mechanisms. It may not be realistic now for the US government to enforce secondary sanctions against any Gulf country, particularly those that have signed on to the Abraham Accords or that the US would like to sign on to the Abraham Accords in the future.

Ongoing support to Sudan's still-active network of civil society organizations and the pro-democracy coalition of Taqqadum is essential to both gaining actionable information regarding the political strategy of the belligerents and their illicit networks and preparing the ground for civilians to eventually assume control of the country's government and economy. Evidence on factors for sanctions efficacy reviewed in this project strongly indicates that the existence of a well-organized domestic opposition, composed of factions and individual leaders able to use the threat and/or imposition of sanctions to pursue political goals in line with the objectives of sanctioning authorities, is an important factor for success. To achieve a sustainable cessation of violence in Sudan, policymakers cannot treat the establishment of an interim political system - essential to transition Sudan away from violence as a mode of governance and towards democratic, civilian rule - as an afterthought. This is critical and key to ending the violence in Sudan for good.[246]

Policymakers should seek to strengthen the pro-democracy civilian opposition in Sudan so that key groups and individuals are better able to capitalize on political openings created by the application of financial policy tools. Enhanced coordination and support to regional actors and bodies, such as the AU and IGAD, in their efforts to curb the illicit flows of goods, including weapons, across the Sahel, and within the broader region is also essential to containing and reducing both the drivers of conflict in Sudan and its regional spill-over effects.

There are several associated risks with this approach. Firstly, if policymakers threaten sanctions and the target does not display the desired behavior, the sender countries must be prepared to implement the sanctions. However, if the sender threatens and then falls short the credible threatening capabilities of the sender country will be weakened. Secondly, Western entities are averse to threatening Gulf actors, especially considering US efforts to build Gulf-Israel relationships given current regional conflicts, and strong political and commercial ties to the Gulf. The SAF/RSF

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[244] Embassy of The United Arab Emirates in Washington, DC, *UAE-US Trade*. Accessed 28 April 2024.
[245] Howard J. Shatz, *The Power and Limits of Threat: The Caesar Syrian Civilian Protection Act at One Year,* Rand, 8 July 2021.
[246] See also Ali, the War in Sudan, GIGA Focus Middle East, 2024.

may view additional sanctions as an acceptable cost toward their end goal, minimizing the potential for financial policy tools to create openings in the political process toward peace.

Sudan's pro-democratic opposition is a broad coalition, and it is unclear whether its existing leaders, such as former Prime Minister Abdullah Hamdok, can become sufficiently organized to meaningfully influence the political process towards peace. The conflict in Sudan is rapidly evolving, and new spoilers could emerge that render political strategies towards peace unviable. Nevertheless, this underlines the need to prepare a flexible package of financial policy tools that can be deployed at opportune moments within the shifting landscape of the conflict.

Recommendations

The recommended framework for applying financial (and non-financial) policy tools is tied to the upcoming Jeddah talks but could be applied to other mediation processes if the Jeddah talks fail. It targets individuals and corporate entities involved in the provision of weapons, military equipment, and conflict financing while, where possible, excluding corporate entities important to the provision of goods and services to civilians, which would be provided exemption licenses by sender countries. These options may work in subsequent order or may work independently if belligerents, for example, attend the talks on their own but then fail to engage constructively.

The framework details three rounds of sanctions to be imposed if either party **refuses** to attend the Jeddah talks by June 2024 (or simply fails to attend despite the opportunity to do so), and/or, **fails to engage constructively** with the Jeddah process by deploying different types of spoilers or delaying tactics, or by refusing to make necessary compromises or concessions. In these cases, US, EU, and UK policymakers should threaten the imposition of new sanctions against individual leaders (see **1.1** and **1.2** of the **Sanctions Framework - Annex 5**). Such threats should be non-specific and made within a limited timeframe (1-2 weeks) before the sanctions are imposed so that the targets are less able to rearrange their financial networks in response. If sanctions are then imposed, they must be imposed quickly, as a key indicator of sanction failure is the delay in imposition of sanctions. If the target(s) fail to display the target behavior; or if the targets agree to talks but then fail to engage constructively, a further round of sanctions should target several key corporate entities within the belligerents' financial networks; if targets still fail to display the intended behavior, the subsidiaries of these entities should then be sanctioned. More details are included in **2.1** and **2.2** of the **Sanctions Framework** (**Annex 5**). This also has the benefit of keeping Sudan in the news and thereby generating public pressure internationally for a resolution to the conflict (see **2.5**).

- Should the UAE continue to supply arms to the RSF and/or help obstruct RSF engagement in mediation, policymakers should coordinate with Sudanese and international civil society organizations and media to initiate a name-and-shame campaign publicizing the extent of the UAE's involvement in the conflict. A similar approach should be applied to other third countries obstructing a negotiated resolution to the conflict (**2.4**). At the same time, Western policymakers should engage with AU counterparts to explore the scope for additional sanctions by the AU on specific individuals in neighboring African countries (such as South Sudan, CAR, Chad, Libya, and Ethiopia) who are continuing to provide weaponry, fuel, or allow for human smuggling into and out of Sudan (**2.5**).

Other actions recommended in the framework are linked to **specific adverse developments in the conflict**, aiming to punish **egregious violations of international humanitarian law** and deter the belligerents from repeating these violations. Should the SAF or RSF substantially block the provision of humanitarian aid in Sudan, implicated commanders should also be sanctioned for coercive and signaling purposes (**3.1** and **3.2**). Similar sanctions are also recommended should either party commit mass, intentional killings of civilians and other serious violations against the civilian population (**3.3** and **3.4**).

Regardless of developments within the political process, policymakers should provide **immediate and ongoing support** to (especially) **Sudanese civil society** and international civil society and advocacy groups in close coordination with Sudanese counterparts. This can be done through various complementary measures, including establishing ongoing dialogue and consultation mechanisms between civil society, the UN, the US, the EU, and the UK, and providing funding for aid allocations to Sudan. Specific actions and entities to support are included in section **4.1** of the sanctions framework. Finally, policymakers should leverage these connections with civil society actors to raise awareness about the costs of the conflict to Sudan and the broader region and strengthen the ability of pro-democratic political leaders and groups to take advantage of political openings created by the threat or imposition of new sanctions, thereby increasing the efficacy of financial policy tools imposed. These efforts will be particularly crucial in ensuring that, should the conflict continue, the UN sanctions regime is renewed in 2025 - for which specific actions are included in section 4.2.

The war in Sudan is complex, violent, and devastating. Policymakers pursuing the sustainable cessation of violence will achieve a positive impact only by applying policy tools - financial and otherwise - in an adroit, timely, and flexible manner, while recognizing the limits of what their interventions may realistically achieve. Yet by tying the application of financial policy tools to unfolding political developments - and crucially, by grounding all interventions in continuous collaboration with Sudanese civil society - policymakers can use financial policy tools as financial levers within an evolving political strategy for peace.

ANNEX 1 - LIST OF INTERVIEWEES

A total of 16 interviews were conducted during this research. Many interviewees requested anonymity within this report; for these interviewees, a brief description of their professional functions is included instead.

- **Ali Dinar**, Senior Lecturer in the Department of African Studies at the University of Pennsylvania.
- **Ashleigh Subramanian-Montgomery**, Associate Director, Policy & Advocacy at Charity Security Network.
- **Eddie Thomas**, independent Sudan researcher and analyst
- **Guido Lanfranchi**, Research Fellow, Clingendael Conflict Research Unit
- **Analyst** at UN agency working on Sudan
- **Deen Sharp**, Visiting LSE Fellow in Human Geography & Environment
- **Senior researcher** at international research and analysis NGO
- **Independent Intelligence Analyst**
- **Kate Alexander**, Policy and Campaigns Officer, Madre
- **Researcher** at UN with experience in the region
- **Senior Fellow,** Gulf policy expert at a DC think tank
- **Reuel Gerecht**, Iran expert at the Foundation for Defense of Democracies
- **Researcher**, North Africa and the Sahel expert focused on illicit economies
- **Sanctions expert** at large conflict-focused analyst group.
- **UN employee working on Sudan**
- **US Government employee**, economic and trade expert in the Horn of Africa.

ANNEX 2 - EXTERNAL STAKEHOLDER ANALYSIS

The following section examines the relationships of key external stakeholders to the conflict in Sudan, focusing on the level and means of support to the SAF and RSF. The number of regional and international actors with stakes in the conflict has enabled violence to continue without resolution. These relationships complicate peace efforts; each actor pursues their own interests and often forges complex relationships with both the belligerent parties and other external actors. . Countries have been listed based on their relationships with the RSF, SAF and those with general interests in the conflict. The RSF's recorded relationships are with the United Arab Emirates, Libya, Chad, The Central African Republic, Ethiopia and The Russian Federation. The SAF's recorded relationships are with Saudi Arabia, Egypt, Iran, and Turkey. South Sudan has tried to stay relatively neutral during the conflict and has interests on both sides. Additionally, the United Kingdom, the United States, and the European Union have been included based on their role with each actor and their relevance to our analysis.

Middle East

Iran

The SAF has purchased military equipment, including drones, from Iran - likely after being denied access to sufficient weapons or military support from established allies such as Egypt. In Khartoum, Sudan's largest military manufacturer produced rockets, light to heavy artillery, light weapons, and ammunition, which were partly owned by Iran.[247] Iran's engagement with the SAF is motivated by its strategic aim to secure a presence in the Red Sea, bordering Yemen, Saudi Arabia, and Israel. In return for military support, the SAF has promised Iran this access.[248] Regional officials and diplomats reported that the SAF recently acquired and used Iranian unmanned aerial vehicles (UAVs).[249] It would be difficult to intercept weapon shipments through the Red Sea into Sudan consistently.[250] Since October 7th, 2023, Western and Gulf naval vigilance over arms traffic from Iran through the Persian Gulf and the Red Sea has intensified, which will help prevent some shipments from entering Sudan. However, naval resources remain primarily focused on Yemen. Even then, more shipments have been able to enter Yemen than anticipated. Sudan's extensive coastline also complicates monitoring efforts. While it's worth attempting to intercept these shipments, expectations for significant impact should be tempered.[251]

Kingdom of Saudi Arabia

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247 Hager Ali, *The War in Sudan: How Weapons and Networks Shattered a Power Struggle.* German Institute for Global and Area Studies, 2024.

248 Areej Elhag, I*ran in Sudan: Fears of a Sudanese Popular Mobilization Forces*. Fikra Forum, January 2024.

249 Khalid Abdelaziz, Parisa Hafezi, Aidan Lewis, *Sudan civil war: are Iranian drones helping the army gain ground,* Reuters, 10 April 2024.

250 Interview, Reuel Gerecht, Senior Fellow at the Foundation for Defense of Democracies. April 15, 2024.

251 Ibid.

Saudi Arabia has long-standing political and economic interests in Sudan; it has cultivated close military ties with the SAF, from whom it hired mercenaries to fight in Yemen,[252] and invested billions of dollars in Sudan,[253] including investments in communal land seized by Khartoum under Al-Bashir.[254] Saudi Arabia has also hired substantial mercenaries for the war in Yemen from the RSF but retains far closer ties to the SAF (particularly as its regional rival, the UAE, has backed the RSF as part of ongoing Gulf power politics.[255] Positioning itself as a mediator and strategic partner of the US, Saudi Arabia retains an outward posture of neutrality in the conflict and has hosted the Jeddah process of dialogue between the RSF and SAF.[256]

Saudi Arabia is adamant about hosting the mediation talks on its territory, seeking to enhance its global reputation as a mediator.[257] Saudi Arabia's long-term objectives in Sudan are somewhat opaque since its foreign policy, like that of the UAE, is often driven by personal rivalries between heads of state.[258] However, Saudi Arabia favors an SAF victory to deny the UAE economic and political capital in Sudan.

Turkey

Turkey had a longstanding strategic partnership with Sudan, fostering close economic and political ties with the SAF.[259] Corporations partly or wholly owned by the SAF and its leaders have long-standing commercial relationships with Turkish enterprises, such as Sur International Investment, a military textile mill in Sudan jointly owned by Qatari, Sudanese, and Turkish businesses.[260] Turkey has also purchased land captured from local populations by Khartoum[261] including in Gezira governorate (which Ethiopia contests sovereignty over with Sudan).[262] Political instability in Sudan since 2019 has prevented a deal signed with Khartoum in 2018, which allowed 12,500 hectares of land for the establishment of a pilot farm and 780,500 hectares for the investment of private Turkish companies (in unspecified regions) from being implemented.[263] Turkey has allegedly sold military equipment to the SAF intending to acquire port rights.[264]

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252 Interviews. See also Shaul Shay, *The Growing Military Ties between Sudan and Saudi Arabia*. Israel Defence, 2017.
253 Guardian Africa Network, *Why has Sudan ditched Iran in favour of Saudi Arabia*? January 2016.
254 Mohyeldeen E. Taha, *Land use, ownership and allocation in Sudan: The challenge of corruption and lack of transparency*. Sudan Democracy First Group, 2016.
255 Alex De Waal, *Sudan conflict: Hemedti – the warlord who built a paramilitary force more powerful than the state*. The Conversation, April 2023.
256 Interview with Gulf policy expert at a DC think tank.
257 Ibid.
258 Ibid.
259 Jihad Mashamoun, *Turkey and Sudan: An enduring relationship?* Middle East Eye, July 2022.
260 Sur International Website, *Our History*, accessed March 2024.
261 Mohyeldeen E. Taha, *Land use, ownership and allocation in Sudan: The challenge of corruption and lack of transparency*. Sudan Democracy First Group, 2016.
262 Nickolaos Mavromates, *Turkey began cultivating vast tracts of land in Sudan*. LinkedIn, 29 January 2023.
263 Levent Kenez, *Turkey's ambitious project in Sudan turns into a fiasco*. Nordic Monitor, 16 April 2022.
264 Dr. Renad Mansour, Ahmed Soliman, *How a transnational approach can better manage the conflict in Sudan*, Chatham House. December 2023.

United Arab Emirates

The UAE has emerged as a concerted backer of the RSF and likely remains a key hub for the RSF's international business dealings and bank accounts.[265] The RSF holds accounts in their name at the First Abu Dhabi Bank and has had funds transferred from front companies, such as Tradive, using the UAE Dirhams.[266] Additionally, RSF fighters have been hired by the UAE to fight in Yemen.[267] The UAE has both purchased gold from the RSF and acted as an importer for their product, with goods traded licitly and illegally smuggled in collaboration with Emirati enterprises.[268] Even though the UAE denies involvement in Sudan, the UAE's history of ignoring arms embargoes was already precedent when they delivered weapons to Haftar in Libya.[269] Strong relationships with the Wagner Group, the Russian mercenary group that has increasingly gained influence in Sudan, have also facilitated the supply of weapons to the region, only further entrenching the UAE's position in the conflict and circumnavigation of Western Sanction regimes, choosing the Wagner Group even in light of extensive sanctions on gold trades across Africa.[270]

The relationship is not simply commercial: driven by power competition with rivals in the Gulf (i.e., the KSA) and likely a related intention to nurture an agent able to pursue Emirati interests in East Africa.[271] The UAE has transferred weapons and at least 40 million dollars to the RSF (used to purchase dual-use vehicles) for "technical support".[272] Currently, the UAE transfers weapons - including unmanned combat aerial vehicles (UCAV), small and light weapons, anti-aircraft missiles, mortars, and ammunition[273] - through flights from the UAE to Entebbe and then on to Amdjarass in Chad,[274] which were then moved into Sudan by the RSF.[275] These planes were earmarked for humanitarian aid; however, when stopped in Uganda, authorities found assault rifles and weapons instead of aid.[276] Once found the airplanes were allowed to continue onward by Ugandan officials and officials were ordered by superior officers to no longer check planes arriving from the UAE. RSF officers denied receiving the support yet the UAE stated they are willing to provide any necessary support to alleviate human suffering.[277]

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[265] In 2019, leaked bank documents revealed that the RSF had an account at the National Bank of Abu Dhabi (part of First Abu Dhabi Bank). See Global Witness, *Exposing the RSF's Secret Financial Network*, 2019.

[266] Global Witness, *Exposing the RSF's Secret Financial Network*, 2019.

[267] Ibid.

[268] Sudeep Kainee, *Egyptian national arrested with 6.5 kg gold from Kathmandu airport*. The Kathmandu Post, 2024

[269] Kersten Knipp, Emad Hassan, *Sudan's war: A year on, no home for a cease-fire.* Deutsche Welle, 14 April 2024.

[270] Una Hajardi, *Cut off their funding: US sanctions groups linked to Wagner in Africa and UAE.* Euronews, 29 June 2023; Kersten Knipp and Emad Hassan, *Sudan's war: A year on, no home for a cease-fire.* Deutsche Welle, 14 April 2024.

[271] Interview with Eddie Thomas, Independent Sudan researcher and analyst. See also Khalil Al-Anani, *The Sudan Crisis: How Regional Actors' Competing Interests Fuel the Conflict*. Arab Centre Washington DC, 11 May, 2023.

[272] Nasim Ahmed, *Sudan: Bloody War Shows UAE Is an Agent of Chaos and Instability*. Middle East Monitor, 2023

[273] United Nations Panel of Experts on Sudan, *Midterm report of the Group of Experts submitted in accordance with paragraph 6 of resolution 2688 (2023)*. December 2023.

[274] Airline tracking data shows the flights have routed from Abu Dhabi to Amdjarass with a connecting stop in Entebbe (Ethiopia).

[275] UN, *Panel of Experts Report*, December 2023.

[276] Kersten Knipp, Emad Hassan, *Sudan's war: A year on, no home for a cease-fire.* Deutsche Welle, 14 April 2024.

[277] Middle East Monitor, *UAE sending weapons to Sudan instead of humanitarian aid, report reveals. 13 August, 2023.*

The UAE's close diplomatic and economic ties to a range of Western and non-Western great powers and desire to situate itself as a regional mediator make the UAE sensitive regarding their image. This may be an opening for diplomatic and advocacy tools to impact the UAE through naming and shaming.

North Africa

Egypt

The SAF and Egypt have a longstanding history of military cooperation and interlinked military-industrial complexes[278] Official trade between Sudan and Egypt runs at over USD 1 billion annually.[279] Egypt is invested in the SAF's operations for strategic interests and security concerns. The SAF has therefore presumed that Egypt would supply them with both financial and military support; however, interviewees indicate that Egypt would likely prefer a political solution compared to continual violence, and thus has not contributed to the SAF's military effort at expected levels.[280] Egypt hosts over a million Sudanese refugees and has received significant financial investments from the UAE during a period of escalating national debt. Egypt's economic constraints have likely influenced its ability to support the SAF only moderately and instead prefer a swift resolution to the conflict. Egypt's decision to support officials in power, from their perspective, Abdel Fattah Burhan, has been related to regional concerns and border protection. Due to the current influxes of refugees and the physical resource limitations, Egypt is particularly concerned that conflict could spread over the border, risking its water supply from the Nile.[281]

When Egyptian fighters conducted air operations on behalf of the SAF in April 2023,[282] they were reportedly captured by the RSF. The capturing may have also deterred Egypt's direct involvement in the conflict moving forward.[283] Currently, it seems improbable that Egypt would be willing or capable of acting as auxiliary support for foreign policy measures directed at Sudan.[284] The relationship between Egypt and the SAF is further complicated, by Egypts strong economic ties to the UAE.

Libya

In divided Libya, the RSF has established a strong relationship with the Libyan National Army (LNA) under General Haftar despite Haftar's statements to the contrary.[285] Both groups cooperate in the trans-Sahel smuggling of goods and people to generate profits. The RSF has sent mercenaries to

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[278] Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute, 2023
[279] Hoffmann and Lanfranchi, *Kleptocracy versus Democracy*. Clingendael Institute, 2023
[280] Interview with academic in the region.
[281] Kersten Knipp, Emad Hassan, *Sudan's war: A year on, no home for a cease-fire.* Deutsche Welle, 14 April 2024.
[282] Oscar Rickett, S*udan: How an RSF attack on Burhan set the tone for a bitter conflict*. Middle East Eye, May 2023.
[283] Kazim Abdul, *Sudan paramilitary RSF and army clash, Egypt's MiG-29 captured.* Military Africa,16 April 2023.
[284] Interview with UN researcher with experience in the region.
[285] XCEPT and Rift Valley Institute, *Sudan Conflict: Assessing the risk of regionalization*. Briefing Paper, 2023.

support the LNA and purchased weaponry from the LNA.[286] Fuel, weapons and ammunition have been trafficked through Libya to the RSF in Sudan[287] via coordination between the LNA, Subul Al-Salam, and the Salafist brigade.[288] However, while long-standing relationships between these groups exist, relationships have at times been conflictual, as evidenced by border closings in January 2022.[289] Recent allegations from Libyan authorities called for investigations into the management of the National Oil Corporation on the illicit trade of oil into Sudan; oil has been traded through Libya by countries such as Russia, who have used Libya as a way to send their oil into larger markets.[290] Although there is evidence of a relationship that has resulted in oil trade into Sudan, attempts to decrease the trade are unlikely to have a substantial influence on the intensity of fighting.[291] Since these trade routes were pre-existing prior to the most recent outbreak of fighting, the chances of closing the routes are unlikely due to the porous borders. Even so, finding a way to close the route to one actor may lead to another actor taking advantage of the situation and cutting a deal. By contrast, Libya's **Government of National Unity (GNU)** - officially recognized by Qatar, Turkey, and Egypt, all of whom back the SAF to varying degrees - appears to be deepening ties with the SAF. Burhan has made concerted efforts to deepen military relations with GNU-aligned factions in Libya.[292] During a recent visit to Libya, Burhan and the Libyan President of the Presidential Council, Mohammed Al-Manfi, pledged to strengthen economic, political, and military cooperation.[293]

Eastern & Central Africa

Chad

There is a degree of cooperation between armed actors in Northern Chad and the RSF, which transfers arms (including those supplied by the UAE) across the Sudanese/Chadian border. The RSF has competed and cooperated with Chadian non-state armed groups; accordingly, there is no evidence of overt support from the Government of Chad towards the RSF. However, the Government of Chad has tolerated the transfer of arms from the UAE to the RSF via Chadian territory, and there is likely a degree of coordination. The recent signing of multiple agreements between the UAE and Chad in June 2023 - including a loan to Chad and cooperation in the military, mining, and energy sectors, may be linked to Chad's acquiescence to the UAE's military shipments to the RSF through Chad.[294] In September 2023, over 100 Wagner vehicles and weapons being transported to the RSF were stopped at the border, further complicating the situation in whether the Chadian government

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[286] UN, *Panel of Experts Report*, December 2023.
[287] XCEPT and Rift Valley Institute, *Sudan Conflict,* 2023.
[288] UN, *Panel of Experts Report*, December 2023.
[289] Libya Security Monitor, *LNA Battalion in Kufra Orders Closure of Sudanese-Libya Border Due to Unrest*. International Actors, 2022.
[290] Patrick Wintour, *Libya to investigate claims oil smuggling is fuelling Sudan civil war*. The Guardian, 2024.
[291] Interview with Researcher, North Africa and Sahel expert focused on illicit economies.
[292] Sudan War Monitor, *Al-Burhan seeks Libyan help in Sudan war*. 26 February, 2024.
[293] BLN News, *Sudan and Libya Reject External Interventions in Their Affairs*. Tripoli, 24 February, 2024.
[294] Gulf Today, *UAE President, Chad interim leader witness exchange of agreements and MoUs.* 15 June, 2023.

is supporting or allowing the RSF to operate.[295] The relationship between the Sudanese and Chadian governments has been contentious and difficult to trace. After the SAF accused Chad of supporting the RSF, Chad retaliated by expelling diplomats.[296] [297] In February 2024, Sudan's acting Minister of Foreign Affairs issued a Note Verbale ordering a halt of delivery of humanitarian aid entering Sudan across the Eastern border of Chad, in an attempt to stop the illicit networks and transportation of small arms;[298] an agreement with the United Nations (UN) Humanitarian Coordinator later allowed for aid shipments through the Tina border crossing, controlled by the SAF.[299] As cross-border aid shipments from Chad into Darfur are one of the most important supply routes for humanitarian actors in Darfur, any further restrictions would be devastating for the humanitarian response.

Ethiopia

Due to ongoing internal political tensions, Ethiopia has not officially stated their support for either belligerent. Despite maintaining a facade of neutrality, their ongoing distrust of the SAF has strained their relationship and brought them closer to the RSF.[300] However, Ethiopia's interests in the Great Ethiopian Renaissance Dam (GERD) and interests in the Red Sea have limited their ability to support the RSF directly for fear of a proxy war with Egypt.[301] Informal visits by Hemedti to Addis have complicated their position, and it is clear that the relationship is more robust than Prime Minister Abiy would like to publicly convey.[302] RSF assets and operations have been traced to Ethiopia, and companies in Ethiopia may be used as a sanction evasion tool for the RSF.[303]

The Central African Republic

Hemedti and the RSF have developed strong ties to the Central African Republic (CAR) political leadership facilitated by the Wagner Group. Hemedti claimed to have foiled a coup attempt against the government of CAR in January 2023.[304] Links to Chadian opposition militias have also been documented, including sales of dual-use vehicles and weapons.[305] Since 2022, the RSF has been involved in gold mining in CAR and has established bases for military resupply.[306] Wagner has been aiding in gold mining in the region by securing the mines and using its subsidiaries in the UAE to

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295 Hager Ali, *The War in Sudan: How Weapons and Networks Shattered a Power Struggle.* German Institute for Global and Area Studies, 2024.
296 UN, *Panel of Experts Report*, p.12, December 2023.
297 Reuters, *Chad declares four Sudanese diplomats persona non grata- government statement*. December 2023.
298 Radio Dabanga, *Chad-Sudan aid supply ban leaves Darfur families 'teetering on the edge*'. Press Release, March 2024.
299 USAID, *Sudan: Complex Emergency. Factsheet #12*. March 13, 2024.
300 XCEPT and Rift Valley Institute, *Sudan Conflict: Assessing the risk of regionalization*. Briefing Paper, 2023
301 Ben Hunter, *War in Sudan: 5 countries at risk of being pulled into the conflict.* Verisk Maplecroft, 2023.
302 XCEPT and Rift Valley Institute, Sudan Conflict: Assessing the risk of regionalization. Briefing Paper, 2023
303 Report from Independent Intelligence Analyst.
304 Mohammed Amin, *Hemeti's CAR coup boast sheds light on Sudanese role in conflict next door*. Middle East Eye, 18 January 2023.
305 Kaamil Ahmed, *Gold, weapons, fighters: Sudanese Janjaweed's international path to power.* Middle East Eye, 2019.
306 XCEPT and Rift Valley Institute, *Sudan Conflict: Assessing the risk of regionalization*. Briefing Paper, 2023.

move the gold from the CAR and Sudanese border gold mines into the global market.[307]The continuing relationship between Wagner and the RSF is mutually beneficial; however, it is unclear to what extent they share financial gains from the gold mines. Evidence suggests the RSF may be preventing refugees from crossing into CAR as part of an arrangement allowing them operational movement in the nation and potentially access to control over several gold mines.[308] Hemedti has developed relationships with CAR's political leadership and has recruited fighters directly from CAR while controlling the border at Um Dafuq.[309] This border has turned into a potential supply chain route for the transfer of weapons and resources,[310] and fighters from the RSF supported Wagner and CAR troops in clashes against armed Chadian opposition groups in 2023.[311]

South Sudan

In light of the conflict's repercussions in South Sudan, the country has endeavored to remain neutral, aiming to facilitate a mediated resolution between the RSF and SAF.[312] South Sudan has strong economic ties to Sudan, and the continuation of the conflict only further limits its economic growth. Oil from South Sudan passes directly through the contested areas and has been subject to stoppages because of the fighting.[313] The SAF received an estimated 35 million USD per month[314] in revenue from the South Sudan government for use of the Al-Khair Petroleum Terminal in Port Sudan.[315] The RSF have not generated revenue from the parts of the pipeline they control. Their interests are to cease fighting so their pipeline can resume full operation. The SAF may use threats of oil disruption to leverage South Sudan; Comparatively, the RSF, which controls aspects of the route, may make similar threats.[316] Outside of the South Sudan government and economic interests, the country has also been an important smuggling route for the RSF, which has maintained and increased these routes through the conflict.[317] Small arms and ammunition have been provided to the RSF using these routes.[318] In South Sudan, the RSF maintains assets and operations, utilizing companies within the country as a protective barrier against sanctions.[319]

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[307] Mohammed Amin, *Hemeti's CAR coup boast sheds light on Sudanese role in conflict next door*. Middle East Eye, 18 January 2023.

[308] Abdallatif, Mawahib, *Sudan Shuts Border with Central Africa Republic. The East African, January 6, 2023.*

[309] ADF Staff, *Sudan's Connections With CAR, Chad Could Cause Conflict to Spread.* Africa Defense Forum, May 30, 2023.

[310]Ibid.

[311] Antoine Galindo and Antoine Rolland, *Burhan-Hemeti feud plays out in CAR to Washington's dismay*. Africa Intelligence, 26 January 2023.

[312] XCEPT and Rift Valley Institute, *Sudan Conflict: Assessing the risk of regionalization*. Briefing Paper, 2023.

[313] Reuters, *Sudan war causes stoppages on South Sudan oil pipeline, officials say.* Reuters, 25 March 2024.

[314] This is an estimated number, the bank where this transfer occurs is unclear and the transactions are likely not in USD.

[315]Independent Intelligence Analyst.

[316] XCEPT and Rift Valley Institute, Sudan Conflict: Assessing the risk of regionalization. Briefing Paper, 2023.

[317] Note: Observation found from Sudan Security Forces: https://twitter.com/ahmadhgurashi/status/1662154888137310208

[318]Independent Intelligence Analyst.

[319] Independent Intelligence Analyst Report.

Other Relevant Multilateral Actors and Actors from Outside the Region

African Union

The African Union has repeatedly called for a ceasefire in Sudan and expressed concern over the rapidly unfolding humanitarian crisis and broader potential for the conflict to spillover and destabilize the region. It has adopted a neutral position in the conflict, and previously sanctioned Sudan by suspending it from the AU after the SAF and RSF expelled civilian elements of the Transitional Government in 2021.[320] During the Third Meeting of the Expanded Mechanism for the Resolution of the Sudan Conflict, held in Addis Ababa, Ethiopia, the AU emphasized the importance of an inclusive, Sudanese-owned process to end the fighting and establish a democratic, civilian-led government, as outlined under the AU's Roadmap for the Resolution of the Conflict in Sudan entails.[321] Additionally, the AU has appealed to the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF) to implement an immediate ceasefire, ensuring the protection of civilians, critical infrastructure, and humanitarian access.[322]

Russian Federation / Wagner Group

Russia's interest in the conflict centers on securing resources and financing. Its aims include gaining access to a port on the Red Sea, escalating the migration crisis to exert pressure on the European Union, and supporting their war efforts in Ukraine.[323] Early in the conflict, Russia's relationship and interests aligned with those of the SAF. Through potential agreements with Sudan's military leaders, Russia gained approval to build a naval base on the Red Sea before the fighting.[324] On the day before the invasion of Ukraine was declared, Putin met with Al-Burhan to arrange the trade of gold to support the conflict. [325] Both Al-Burhan and Hemedti assisted Russia in exploiting Sudan's gold resources to fund the water in Ukraine.[326] However, the relationship between Russia and the SAF soon became strained. The goal of the Wagner Group in Sudan initially centered around the protection of gold mines for the RSF to allow for export into Russia.[327] This relationship changed, however, when the Wagner Group became more active in the conflict, providing significant resources, including surface-to-air missiles to the RSF.[328] Although there is substantial evidence of Wagner and Russian actions in Sudan, sources say this is an unlikely leverage point due to the

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[320] Jehanne Henry, *The worst forgotten conflict in the world: Sudan's civil war one year on*. Middle East Institute, 14 April 2024.
[321] African Union, *Third Meeting of the Expanded Mechanism for the Resolution of the Sudan Conflict*. Press Release, 1 June 2023.
[322] African Union, *African Union Condemns Violence in Sudan, Calls for Humanitarian Ceasefire and Urges Coordinated International Support to the Sudanese People Amidst Armed Confrontatio*n. Press Release, 2 May 2023.
[323] Bernard Siman, *Russia's Hybrid Wars Come to Sudan.* Egmont Institute, 2023.
[324] The Maritime Executive, *Sudan's Leader Agrees to Host Russian Naval Base on Red Sea*, 2023.
[325] Sarah Al-Arshani, *The two generals fighting in Sudan helped Putin plunder the country's gold to fund Russia's war in Ukraine*. Business Insider, 15 April 2023.
[326] Ibid.
[327] Mohamed El Doh, *Sudan Conflict: More Complex than Meets the Eye*. Geopolitical Monitor, April 21, 2023.
[328] *US Department of the Treasury, Treasury Sanctions the Head of the Wagner Group in Mali.* Press Release, *May 2023*

ongoing crisis in Ukraine. The fighting between Ukraine and Russia has also impacted those involved in the conflict in Sudan.

After discovering potential RSF's ties with Wagner, Ukraine engaged directly in Sudan's conflict against Russia, aligning with the SAF. This action escalates the already tense environment by increasing the number of combatants in a complex scenario. Currently, this information is relatively anecdotal in the available reports; as such, until it can be sufficiently proven, drastic action may end up being incorrectly directed, such as directing towards actors already highly sanctioned and would not substantially change the nature of the conflict.[329]

European Union

Following the 1989 Sudanese coup d'état and ensuing violation of human rights, the European Community suspended development aid in March 1990. In the absence of a legal framework for development, except for humanitarian assistance funds, relations were put on hold. However, following the Sudanese revolution and the establishment of a civilian-led government in September 2019, the European Union (EU) committed to supporting Sudan's democratic transition. In the ongoing conflict, the EU has not taken a leading role in conflict resolution,[330] but it has sanctioned both the RSF and SAF.[331] Since April 2023, the EU has initiated a Humanitarian Air Bridge to facilitate crucial shipments from the UN warehouse in Dubai to Port Sudan, alongside providing emergency aid, deploying humanitarian experts, and pushing for humanitarian access.[332] The EU is also heavily focused on the current migrant crisis flowing from Sudan, Chad and Libya into North Africa and then to the EU. The Sudanese government has supported the EU's increasingly strict migration policies. In 2016, Sudan became a leading EU partner on migration, with the capital hosting the headquarters of the EU's regional "Khartoum Process".[333] The EU's interest in the swift resolution of the conflict in Sudan is, therefore, likely also motivated by a desire to slow the flow of refugees and migrants into Europe.

United Kingdom

From 1899 to 1956, Sudan was under British rule. Since gaining independence, the relationship between the United Kingdom (UK) and Sudan has been complex. Despite this, the UK plans to provide £89 million in aid to Sudan for 2024/25, doubling the aid from the previous year.[334] and continues to engage in trade, with £237 million traded in the final quarter of 2023, a 15% increase from 2022. Both the RSF and SAF have business ties within the UK.[335] Throughout the recent conflict in Sudan, the UK has remained officially neutral, sanctioning both the RSF and SAF following unsuccessful talks in

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[329] Ian Lovett, *Ukraine Is Now Fighting Russia in Sudan*. The Wall Street Journal, March 6, 2024.
[330] Gordon D. Cumming, *The European Union in Sudan: A Missed Opportunity?* The Commonwealth Journal of International Affairs, Volume 104, 2015.
[331] European Council, *Sudan: Council adds six entities to EU sanctions list*. Press Release, 2024.
[332] United Nations Regional Information Centre for Western Europe, *Sudan: 5 Ways the EU Is Helping*. May 16, 2023.
[333] Jérôme Tubiana, *Europe Is Making Sudan's Refugee Crisis Worse*. Foreign Policy, 8 January 2024.
[334] Louisa Brooke-Holland, *Sudan: The Forgotten Conflict,* UK Houses of Parliament, Commons Library, 29 February 2024.
[335] United Kingdom Department for International Trade, *Sudan Trade and Investment Factsheet.* March 21, 2024.

Bahrain. These sanctions were reportedly aimed at prompting Gulf states, including Saudi Arabia and the UAE, to reassess their ties with the conflicting parties.[336] As the 'penholder' for Sudan in the UN Security Council, the UK led a discussion on Sudan on December 21st, 2023, and proposed a ceasefire resolution.[337] Additionally, the UK is funding "open-source investigation experts" to document attacks on civilians and infrastructure using satellite and social media during internet shutdowns. [338] For example, the Centre for Information Resilience (CIR), a research body partly funded by the UK government, recently used NASA heat-recognition technology to identify fires and satellite images to detect smoke and burnt-out buildings. These were then matched with images from social media that had been geolocated using maps and photos.[339]

United States

The US established diplomatic ties with Sudan in 1956. Still, relations have fluctuated, particularly after Sudan's designation as a State Sponsor of Terrorism in 1993 due to its links with terror groups under Omar al-Bashir's rule. Relations improved following Sudan's shift to a civilian-led government in 2019. Sudan was then taken off the SST list in 2020. After the 2021 coup, the US froze $700 million of aid and engaged with international partners to suspend development lending and debt relief to Sudan's government.[340] Despite a tenuous relationship, the US has been the largest single donor to Sudan, providing over $5 billion in aid since 2005.[341] In the current conflict, the US has sanctioned the RSF and SAF relatively equally and have been involved in the recent Bahrain and Jeddah talks. The US appears to have a high appetite for further sanctions, congressional members on both sides of the aisle recently published memos regarding a need for additional sanctions.[342]

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[336] Patrick Wintour, *UK imposes sanctions on companies linked to warring Sudanese factions*. The Guardian, 12 July 2023

[337] Brooke-Holland, *Sudan: The Forgotten Conflict.* February 2024.

[338] Information provided by the UK Government regarding their OSINT research remains nonspecific. This could be used as an avenue for further research. See also *Sudan: Internet and Telecommunications, Question for Foreign, Commonwealth and Development Office,* submitted 19 February 2024. UK Houses of Parliament Website, accessed 28 April 2024.

[339] Mark Townsend, *Increasing number of villages torched across Sudan shows conflict is intensifying - report.* The Guardian, 17 April 2024.

[340] Jonathan Guyer, *Could the US have helped avert the crisis in Sudan?* Vox, 18 May 2023.

[341] US Embassy in Sudan, *Sudan Sanctions*. Website, accessed March 2024.

[342] James Risch, Michael McCaul, Benjamin Cardin, Gregory Meeks, *Letter Request Determination of Human Rights Abuses Committed by Sudan's RSF*. Foreign Relations Committee, 19 April 2024.

ANNEX 3 - LITERATURE REVIEW ON FACTORS OF SANCTION EFFICACY

There are varied definitions for sanctions and their subsets. This report separates sanctions into three main categories: economic, financial, diplomatic, and military. **Economic sanctions** are commercial and financial penalties that states or institutions apply against states, groups, or individuals, including travel bans, export restrictions, trade embargoes, and asset seizures.[343] **Diplomatic sanctions** are usually taken to express disapproval of a particular action through diplomatic means, such as reducing or canceling foreign aid or expelling diplomats.[344] **Military sanctions** restrict the **transfer** of military-related equipment, technology, and services. The most used sanction tools, particularly in cases of human rights violations such as in Sudan, are arms embargoes, asset freezes and travel bans.

Comprehensive vs Targeted

In their review of existing literature on smart and comprehensive sanctions, Zemtsov et al. do not believe there is sufficient evidence to suggest that smart sanctions are necessarily more effective.[345] Biersteker and Bergeijk state that targeted and comprehensive sanctions have similar success rates. The aggregate figures of the effectiveness of 63 cases of UN targeted sanctions from the TSC suggest an average of 22%, as opposed to the Peterson Institute for International Economics data that suggest 33% for all types of sanctions (comprehensive and targeted).[346] Some studies have indicated that the effectiveness of sanctions increases with the level of per capita income in the target country, making the case for comprehensive sanctions.[347] While the literature recognizes that sanctions are more effective the greater the cost inflicted on sensitive economic sectors of the target country,[348] some evidence has shown smart sanctions are more effective when there is a strong oligarchic economy.[349] Smart sanctions appear to be less effective when the government of the target country strategically protects those economic sectors.[350]

Multilateral vs Unilateral

Despite some policymakers and early academic research suggesting unilateral sanctions (sanctions applied by only one sanctioning authority)[351] can be effective, recent studies demonstrate multilateral

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343 Oxford Reference, *Overview: Economic Sanctions*. 2024.

344 National Museum of American Diplomacy, *Encyclopedia Entries: Sanctions*. Accessed 28 April, 2024.

345 Masha Zemtsov, Orisa Thandi, Natasha Dixon, Zoë Illingworth, Lily–Ann Peterson, and Jaylynne Garcia, *The Legitimacy and Effectiveness of the UK Sanctions Regime as a Human Rights Tool.* UCL, 2021.

346 Thomas Biersteker and Peter A.G van Bergeijk, *On target? EU sanctions as security policy tools, I. How and when Do Sanctions Work? The Evidence,* ISS Report No. 25, pp. 17-28, 2015.

347 Hamid Beladi and Reza Oladi, *On smart sanctions*. Economics Letters. vol. 130, issue C, pp. 24-27, 2015.

348 Navin A. Bapat,Tobias Heinrich,Yoshiharu Kobayashi & T. Clifton Morgan, *Determinants of Sanctions Effectiveness: Sensitivity Analysis Using New Data*. International Relations, Volume 39, Issue 1, 2013.

349 Beladi and Oladi, *On smart sanctions.* 2015.

350 Caetano, Galego, and Caleiro, *Determinants of Sanctions Effectiveness.* 2023.

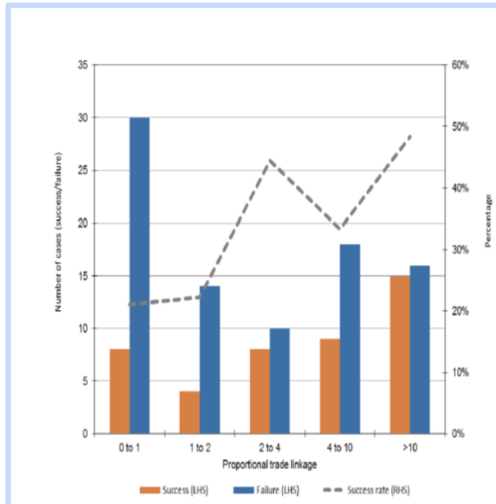
351 N.B. The term “unilateral sanctions” is distinct from the term “unilateral coercive measures”, which is used by traditional opponents of sanctions such as Russia, China, and Iran to refer to sanctions, particularly in multilateral forums such as the UN.

sanctions (applied by two or more sanctioning authorities) are correlated with a higher success rate due to their broader impact and higher success rate.[352] Multilateral sanctions, though more challenging to implement, can generate far greater cumulative impacts while enabling actors to monitor and enforce sanctions more effectively.

Relationship between Sanctioning and Sanctioned Regimes

Cultural and strategic proximity between the sanctioning and sanctioned countries also influences effectiveness; when rivals impose sanctions, the targeted countries are less inclined to alter their behavior, partly due to the anticipation of future conflicts and the potential reputational damage of yielding to adversaries.[353] The greater the trade dependence of the sanctioned entity on the sanctioning authority, the more likely sanctions will impact the supporters of the target regime negatively and bolster its opponents. Trade linkage is, therefore, often crucial to sanctions efficacy, while sanctions from allies might prompt more willingness to change than those from adversaries.[354]

Figure 5: Trade linkages and sanctions



As explained in Figure 5 from Biersteker & Bergeijk, when trade linkage is low, failures to coerce a behavior change exceed successes by far. Once proportional trade linkage is above 10%, the rate of success is almost 50%.[355]

Existence of Domestic Opposition Willing to use Sanction Threat/Implementation as Leverage

Sanctions are more likely to be effective when a well-organized domestic opposition exists, crucially, groups or individuals willing to use the threat or existence of sanctions to secure political concessions, which advance the sanctions' intended objectives. Solomon Major contends that sanctions are effective when they enhance the political power of opposition groups compared to the ruling elite. This can happen by either energizing the opposition to increase their political activism, diminishing the political influence of the elite, or both.[356] Sanctions have provided leverage for the African National Congress (ANC) in South Africa[357], Black resistance fighters in Rhodesia, Solidarity in Poland, and anticommunists in Nicaragua, who gained more political capital as a result of the

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[352] Navin A. Bapat and T. Clifton Morgan, *Multilateral Versus Unilateral Sanctions Reconsidered*. International Studies Quarterly, Vol. 53, No. 4 December 2009.

[353] Dursun Peksen, *When Do Economic Sanctions Work Best.* CNAS, June 2019.

[354] William H. Kaempfer and Anton D. Lowenberg, *Unilateral Versus Multilateral International Sanctions: A Public Choice Perspective*. International Studies Quarterly, Vol. 43, No. 1, March 1999.

[355] Biersteker and van Bergeijk, *How and When Do Sanctions Work.* 2015.

[356] S, Major. *Timing Is Everything: Economic Sanctions, Regime Type, and Domestic Instability*. International Interactions, 38(1), 2012.

[357] Lee Jones, *Societies Under Siege. Chapter South Africa: Sanctioning Apartheid.* Oxford Academic, October 2015.

sanctions;[358] similar results are also evident after the 2018 sanctions on Libya.[359] Conversely, when sanctions were imposed against Iraq after it invaded Kuwait, despite a 43% reduction in Iraq's GDP, the desired political outcomes of the sanctions were not met due to a fragmented and disorganized opposition.

Ability of Sanctioned Regime to Create New Relationships

The capacity of targeted nations to withstand sanctions is dependent on their *ability to create new commercial and financial relationships with third countries*[360] and to resort to the black market and other illicit channels to access external goods and services or to sell their own goods.[361] Even the best designed sanctions will fail if the regime has allies willing to circumvent sanctions. Lopez and Gaeghan-Breiner point to the past decade of President Bashar al-Assad's brutal regime in Syria, and the politicide executed by the military junta in Myanmar, to highlight that even the best designed sanctions will fail if the dictators have allies willing to circumvent sanctions.[362]

Target Country Regime Type

Generally, the literature on target regime types states that democracies are generally more susceptible to the pressures exerted by sanctions compared to autocratic regimes.[363] In Peru, Christian and Wahman note that sanctions even contributed to the country's democratization. When President Fujimori suspended the legislature and introduced rule by decree in 1992, the US withheld military assistance and economic aid and blocked Peru's efforts to obtain loans from international financial institutions. In response, Fujimori agreed to hold elections and to reinstate formally democratic institutions.[364]

However, when comprehensive sanctions harm the population, regimes which are not democratic have a lower degree of responsiveness to widespread dissatisfaction. Targeted sanctions, like those against the Ivory Coast from 2005 to 2016, are likewise less effective, as the authoritarian government's ability to reward loyalty with access to scarce luxury goods and its control over coercive apparatuses further diminishes the potential impact of sanctions on prompting policy change or regime behavior.[365]

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[358] Kaempfer and Lowenberg, *Unilateral Versus Multilateral International Sanctions.* March 1999.

[359] Herbert and Bird, *Hard Targets: Identifying a Framework of Objectives.* June 2023.

[360] Biersteker and van Bergeijk, *How and When Do Sanctions Work?* 2015; Ohyun Kwon, Constantinos Syropoulos, and Yoto Yotov, *The Extraterritorial Effects of Sanctions*. No 2022-3, School of Economics Working Paper Series from LeBow College of Business, Drexel University, 2022.

[361] José Caetano, Aurora Galego, and António Caleiro, *On the Determinants of Sanctions Effectiveness: An Empirical Analysis by Using Duration Models*. Economies 2023, 11(5), 136, May 2023.

[362] George A Lopez and Beatrix Geaghan-Breiner. *Research Brief: Using Economic Sanctions to Prevent Mass Atrocities*. International Association of Genocide Scholars. December 2022.

[363] Caetano, Galego, and Caleiro, *Determinants of Sanctions Effectiveness.* May 2023.

[364] Christian Von Soest, Michael Wahman, *The Underestimated Effect of Democratic Sanctions.* Weatherhead Center for International Affairs at Harvard University, 2014.

[365] Peksen, *When Do Economic Sanctions Work Best?* 2019.

Solomon Major does suggest that although authoritarian regimes generally withstand sanctions better, periods of domestic instability present unique vulnerabilities. He argues that public unrest in these regimes signals deeper crises that can be used by sanctions.[366]

Clarity of Goals and Strategic Implementation

The overarching success of sanctions largely hinges on the specificity and clarity of their objectives. Ambiguous objectives and lack of alignment with broader foreign policy goals reduce the effectiveness,[367] while multiple core goals often weaken the impact of targeted sanctions by emitting mixed or conflicting signals to the intended targets.[368] Zemtsov et al. observed a notable decline in the effectiveness of UK humanitarian sanctions due to ambiguous objectives and their uncertain alignment with the broader UK humanitarian foreign policy.[369] Sanctions with more modest goals are generally more effective than those trying to achieve significant policy objectives.[370] Matt Herbert and Lucia Bird Ruiz-Benitez de Lugo with Global Initiative Against Transnational Organized Crime (GI-TOC) state that the ability to maintain clear goals for sanctions differs between sanctions focused on counter-terrorism (CT) and criminal networks. CT regimes usually specify policy changes or scenarios needed for their termination, such as the dismantlement of specific terrorist organizations like Al-Qaeda or the Islamic State (IS). In contrast, thematic regimes addressing criminal activities, corruption, or human rights abuses tend to be open-ended and lack clear, achievable end-states. This makes addressing issues such as organized crime, corruption, or human rights violations through sanctions and other measures more opaque.[371]

Timing and Duration

Sanctions are generally more effective when precisely timed to target vulnerable actors already starting to orient towards the target behavior, pushing them "over the edge."[372] The effectiveness of sanctions in achieving their intended strategic goals tends to decrease over time, although this is partly because sanctions that quickly achieve their intended impact, prompting a swift resolution, are inherently more effective.[373] This also underscores that successful sanctions generate impact quickly; sanctions which have little initial impact are unlikely to do more over time, especially as sanction targets develop methods to overcome or circumvent them.[374] Herbert and Ruiz-Benitez de Lugo highlight the case of Libya, where a goal seemed to be the targeting of vulnerable actors who

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366 Major, S. *Timing Is Everything.* International Interactions, 2012.
367 Stepan Zemtsov, Alexander A. Mikhailov, and V. Barinova, *Sanctions, Exit of Foreign Companies and Business Activity in the Russian Regions*. Economic Policy 2023.
368 Thomas Biersteker, David Lanz, and Rebecca Brubaker, *UN Sanctions and Mediation: Establishing Evidence to Inform Practice*. United Nations University, 2019.
369 Zemtsov et al. *The Legitimacy and Effectiveness of the UK Sanctions Regime as a Human Rights Tool.* UCL. 2020.
370 Peksen, *When Do Economic Sanctions Work Best?* 2019.
371 Herbert and Bird. *Hard Targets: Identifying a Framework of Objectives for Targeted Sanctions on Illicit Economies*. Global Initiative Against Transnational Organized Crime. December 2023.
372 Herbert and Bird, *Hard Targets*, 2023.
373 Caetano, Galego, and Caleiro, *Determinants of Sanctions Effectiveness,* 2023; G. Hufbauer, J. Schott, and K. Elliott, *Economic Sanctions Reconsidered, 3rd Edition*. Peterson Institute, 1990.
374 Caetano, Galego, and Caleiro, *Determinants of Sanctions Effectiveness,* 2023.

could be “pushed over the edge”. In this case, the timing of sanctions must be swift and precise.[375] While extensive, protracted economic and financial sanctions regimes targeting multiple sectors of a country’s economy can generate substantial impacts on the target economy, as in the cases of Russia,[376] Iran,[377] and North Korea,[378] there are few examples of protracted sanctions regimes which have sustainably produced the intended political objectives of the sanctioning authority, such as regime change or moderation. This may be because political and commercial elites react to sanctions by rearranging their networks, with sanctions often functioning to reshape and consolidate, rather than erode, the elite’s control over economic activity, often through increasing use of illicit means (Pond, 2015;[379] Hastings & Wang, 2018;[380] Mclean & Whang, 2021).[381]

Threats vs Implementation

Evidence indicates that the threat of sanctions can better deter undesirable actions than the actual implementation of sanctions, following which targets may perceive little incentive to alter their behavior in response to sanctions, especially if they believe that compliance with sanctioners' demands is unlikely to lift the sanctions.[382] The EU's complex institutional framework and the diverse economic interests of its member states complicate the process of sanction imposition, making EU threats less credible compared to those from the US. While empirical evidence suggests that EU sanctions tend to be more successful than US sanctions, US sanction threats often yield better outcomes.[383]

Risk Tolerance of Targets

Sanctions against targets whose leadership has a short horizon of survival are less likely to succeed in changing target behavior. Targets who believe sanctions are a direct threat to their personal safety are likely to adopt a more daring stance, betting against the full implementation or effectiveness of these sanctions - especially for key stakeholders embroiled in civil conflicts, where the conflict seems existential with no valid alternatives.[384] In such cases, targeted measures, like travel restrictions and

[375] Herbert and Bird, *Hard Targets*, 2023.

[376] Max Bergmann, Maria Snegovaya, Tina Dolbaia, and Nick Fenton, *Out of Stock?: Assessing the Impact of Sanctions on Russia’s Defense Industry*. Center for Strategic and International Studies (CSIS), 1 April, 2023.

[377] Holly Dagres and Barbara Slavin, *How Iran Will Cope with US Sanctions*. Atlantic Council South Asia Centre: Issue Brief, June 2018. To note, sanctions against Iran can be argued to contribute towards the 2015 Iran nuclear deal; however, the deal was for a limited time and collapsed after President Trump was elected to the White House.

[378] Michael Whitty, Suk Kim , and Trevor Crick, *The Effectiveness of Economic Sanctions: the Case of North Korea*. North Korean Review, Vol. 2, No. 1, Spring 2006.

[379] Amy Pond, *Economic Sanctions and Demand for Protection*. Journal of Conflict Resolution, Volume 61, Issue 5, 2015.

[380] Justin V. Hastings and Yaohui Wang, *Informal Trade along the China-North Korea Border*. Journal of East Asian Studies, Volume 18 Issue 2, 2018.

[381] Elena V. McLean and Taehee Whang, *Economic Sanctions and Government Spending Adjustments: The Case of Disaster Preparedness*. British Journal of Political Science, Volume 51, Issue 1, 2021.

[382] Nicholas L. Miller, *The Eroding Value of Nonproliferation Sanctions*. Centre for New American Security, 2019.

[383] Patrick M. Weber and Gerald Schneider, *How many hands to make sanctions work? Comparing EU and US sanctioning efforts*. European Economic Review, Volume 130, November 2020.

[384] Biersteker and van Bergeijk, *How and When Do Sanctions Work?* 2015.

the freezing of assets against individuals implicated in war crimes or threatening peace efforts, as witnessed in Angola and Liberia during the late 20th and early 21st centuries, may be more effective.

Factors Driving Targets' Behavior

Targets with a strong ideological motivation are almost impossible to coerce, as a change in their behavior might undermine the rationale or basis on which they rely for political legitimation, survival and support. As a result, they are willing and able to bear very high costs. Groups engaged in carrying out acts of terrorism that are highly resistant to attempts at coercion are more appropriately targeted with sanctions intended to constrain their activities rather than to force a change in their behavior, a principle extending to most sanctions against non-state armed groups.[385]

Factors for Success in the Context of Conflict Mediation

The literature also illustrates how sanctions, or the threat thereof, can serve as critical leverage in nudging parties towards negotiation tables, citing examples from Libya, Sierra Leone, and Yemen. These instances demonstrate sanctions' potential dual role in both compelling negotiation participation and sustaining commitments made during peace processes.[386]

In Sierra Leone, Biersteker et al. highlight evidence suggesting that an arms embargo on Liberia was instrumental in pressuring Foday Sankoh, leader of the Revolutionary United Front (RUF) and recipient of substantial support from Liberian president Charles Taylor, to sign the Abidjan Accord in November 1996. Subsequent sanctions, including travel bans and asset freezes on RUF's senior leaders imposed by the UN Security Council in June 1998, alongside a diamond trade embargo in July 2000, reinforced the peace process. These measures effectively deterred RUF from breaching the accord's terms, utilizing UN sanctions as a strategic tool for managing spoilers and facilitating Sierra Leone's political transition.[387]

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[385] Biersteker and van Bergeijk, *How and When Do Sanctions Work?* 2015.

[386] International Crisis Group, *Sanctions, Peacemaking and reform: Recommendations for US Policymakers*. United States Report N8, 28 April 2023

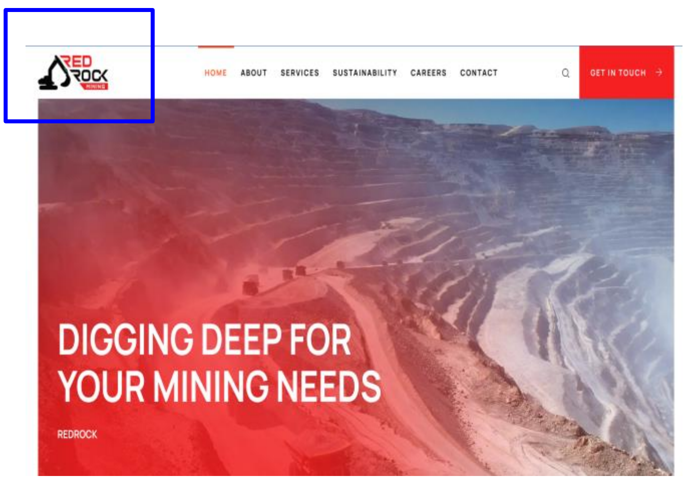
[387] Biersteker et al. *UN Sanctions: Liability or Asset in Mediation Processes?* Oslo Forum 2018 Background Paper. Center for Humanitarian Dialogue. 25 July 2018.

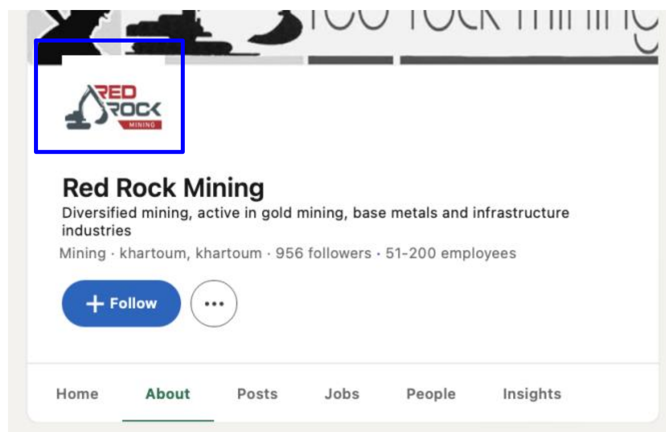
ANNEX 4 - BREAKDOWN OF RELEVANT OSINT RESEARCH

SAF Company

Red Rock Mining Group

Red Rock Mining is the most recent company to come under sanctions; by the UK in April 2024. According to their website, https://redrockmining.co/, they were founded in Sudan in the 1960s but are headquartered in the UAE. The address, therefore, listed on the website is not one in Sudan. In order to ensure that the website actually belongs to the sanctioned entity, we performed a reverse image search of the logo and found a LinkedIn profile which lists the same address as the UK sanctions listing. This confirms that the website above does indeed belong to the sanctioned entity– which is significant because this website lists business activities in Tanzania, Ethiopia –and perhaps most significantly, the Netherlands.





RSF Companies

The Central Bank of Sudan provided a list of RSF affiliated companies. This list includes companies that were already sanctioned by the UK, US, and EU and companies that are not sanctioned. The companies that are already sanctioned were only used as a starting point but did not make up the majority of the OSINT research, since they were already identified by international sanction regimes. From this list, after conducting OSINT, it has been possible to connect potential shell companies outside of Sudan with these listed companies. However, most shell companies have been changed and are no longer active, due to the RSF's ability to change corporate structures prior to any sanction applications on these companies. Finding links to the external actors outside Sudan proves to be a potential direction for finding active subsidiaries. Many RSF companies do not have websites available indicating a lack of priority towards creating legitimate business operations. The research below is non exhaustive; however, it provides indications on where more research should be focused. Below is a summarization of key aspects uncovered from OSINT research.

Al-Junaid Industrial Group

This original name of Al-Junaid Multi-Activities was found using the website Open Sanctions.[388] The connected website http://aljunaidgroup.com/ has the same physical address in the UAE, 61401, Industrial Area 13, Sharjah, UAE, as the sanctioned Al-Junaid Multi-Activities company. However, the website for Al-Junaid Multi-Activities, www.ajmac.com, does not list Al-Junaid Industrial Group as a partner in their business sectors. This is an interesting differentiation that Al-Junaid Multi-Activities was attempting to make to isolate their business activities from an already recognized company connected to the RSF.

However, from the wayback machine it is possible to trace the Al-Junaid Industrial Group website back to 2008 when it was first developed and connected to the UAE, based on the same address listed for Al-Junaid's current UAE address. In September 2022 the website was briefly inactive and was undergoing changes. Although its return is unknown, it was last saved in June 2023. The website seems to reference legitimate activities but has been traced as a funneling company for Hemedti.[389] Depending on ownership structure this company may be sanctioned under the US's 50% rule, and the U.K.'s > 50% rule, since Al-Junaid Multi-Activities is sanctioned. Even if this is the case it is a strong example of the depth of the RSF's relationship with the UAE.

Esnaad Engineering

Through searching Esnad for Engineering no website was available. However, through secondary sources, the relationship between Esnad Engineering and the Wagner Group is clearly exposed.[390] Esnaad Engineering, controlled by Mohamed Hamdan Dagalo, is connected to Meroe Gold, which is

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[388] Open Sanctions, *Al Junaid Multi Activities Co. Ltd.* Accessed 27 April, 2024.

[389] Eric Reeves, *Op-ed: The Constitutional Charter and the future of Sudan*. Dabanga Sudan, 7 August 2019.

[390] Antoine Labeyrie, *Russia, a predator in Africa.* Geopol-trotters, 13 May 2023.

directly connected to an entity in the UAE.[391] When researching Esnad for Engineering the company Esnad Supplies Supplies Co. was recommended through google. The company is in Khartoum and in the same sector as Esnad Engineering. This may be a coincidence based on a potential relationship; however, the activities of Esnad Supplies Co. present an interesting research direction. From the wayback machine the website esco-sd.com is no longer active. However, their UK website is still active (http://esnad.co.uk/). The no longer active and active UK website both have the same logo.

This company is connected to two trading companies based on a reverse search with both their phone and fax numbers, Royal East General Trading LLC and Essa Mahmood General Trading Company LLC. These companies, although not confirmed, have some interesting trading practices. This research is not conclusive; however, based on their relationship with a subsidiary in the UK and the UAE further research into Esnad Supplies.

Shield Security Services

This company has changed its name multiple times operating under Shield Protective Services and Protective Shield Solutions Ltd in Sudan. The website https://www.shieldsecurity.co.uk/ is still active however, the last news article was in January 2023 when Adil Abdel-Hadi was awarded an outstanding commitment to the industry by IES Security Consulting. In addition to awarding Shield Security with the award they listed Shield Security as a trusted partner offering a "deal" in 2019. The phone number from Shield Security website under security consultations, 01252 319899 also directly linked to a page on IES Security Consultants.[392] This UAE company was giving away a discount to Shield Protective Services. Interestingly this number on Shield Security and IES Security is different from the general contact number on Shield Security Services and was not listed anywhere else. It may be worthwhile to look into this number further. The connection is unclear, but collaboration is expected based on these different levels of relationship.

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[391] Global Julia Stanyard, Thierry Vircoulon, Julian Rademeyer, *The Grey Zone, Russia's military, mercenary and criminal engagement in Africa.* Global Initiative Against Transnational Organized Crime. February 2023.
[392] IES Consulting, Accessed 27 April 2024.

ANNEX 5

SUDAN ECONOMIC SANCTIONS AND DIPLOMATIC FRAMEWORK

Event	Means of Verification for Event	Type of Action	Recommended Action(s) and Target(s)	Sender Actors	Designation Objective (Coerce, Constrain, Signal)	Likelihood of Achieving Intended Impact (Low/Medium/High)	Risks - Negative Consequences (Low/Medium/High)	Comments (if applicable)
1. Belligerents back out or refuse to participate in mediation								
1.1 SAF refuses to attend Jeddah talks	Well-positioned contacts of the Sentry working within the US government; other governments involved in Jeddah process; or other relevant organizations/institutions report outright refusal or sustained delaying tactics from SAF; media reports of the same; SAF does not attend the Jeddah talks by mid-June 2024 (talks originally scheduled shortly after Eid in mid-April)	(Threat of) Targeted financial sanctions under country-based or human rights sanction regimes including: Asset freezes Travel ban Prohibition of transactions by sender country persons with blocked individuals Prohibition of the contribution or provision of funds, goods, or services by, to, or for the benefit of any designated person	Threat, followed by imposition (if target does not display intended behaviour) of sanctions against SAF military and Islamist leadership, including: **Ali Karti,** Former Minister of Foreign Affairs and leader of Sudanese Islamists (EU, UK) **Khalid Hassan Mohiuddin** - Director General of Police **Borai al-Siddiq** - Central Bank Governor **Jibril Ibrahim** - Minister of Finance & Justice and Equality Movement Leader **Lt Gen Ahmed Ibrahim Mufaddal -** The Director of the General Intelligence Service **Dafallah al-Hajj Ali -** Special Envoy of SAF *All are noted to have strong Islamist ties*	Multilateral sanctions: US, UK, EU,	Coerce	**Medium:** Dependent on key internal divisions within the SAF and where current senior Islamist leadership stands. Also dependent on the global financial exposures of the target individuals.	**Medium:** Sanctions could backfire and further push SAF against talks. SAF also may feel unjustly targeted if sanctions only apply to the SAF and not the RSF. Additionally, if the peace talks fail and non-governmental organizations attempt to facilitate further dialogue between sanctioned individuals, this may subject those NGOs to criminal and civil liability. NGOs may decide to pull out of, or reduce their activities in, sanctioned countries.	Some leaders within the SAF feel that the international community has favored the RSF unjustly. This perception partially arises from the historical international backing of the FCC, viewed as a political collaboration with the RSF to undermine the SAF. The effect of sanctions of key leadership is dependent on their global financial expsoure. If they have money overseas or childred study overseas, they may be more inclined to agree to certain decisions.
1.2 RSF refuses to attend Jeddah talks	Well-positioned contacts of the Sentry within the US government; other governments involved in Jeddah process; or other relevant organizations/institutions report outright refusal or sustained delaying tactics from RSF; media reports of the same; RSF does not attend the Jeddah talks by June 2024 (talks originally scheduled shortly after Eid in mid-April)		Threat, followed by imposition (if target does not display intended behaviour) of sanctions against RSF military/political leadership, including: **Sheikh Salih Maali Bin Saleh –** Hemedti's uncle and nodal point in family business **General Algoney Hamdan Dagalo -** Hemedti's brother **Major General Nooreldin Ahmed Abdelwahab** - Head of RSF human rights unit **Aladdin Abdulrahim Hamdan Dagalo Mousa** & **Adal Abdulrahim Hamdan Dagalo Mousa** - Hemedti's nephews and founders of Al-Junaid Group			**Medium:** Analysts have noted the RSF's sensitivity to their image on the world stage. Targeting key officers and influential individuals within the RSF, especially its so-called head of human rights, may damage claims to legitimacy.	**Medium:** Sanctions could backfire and further push RSF against talks. Additionally, if the peace talks fail and non-governmental organizations attempt to facilitate further dialogue between sanctioned individuals, this may subject those NGOs to criminal and civil liability. NGOs may decide to pull out of, or reduce their activities in, sanctioned countries.	
2. No results from mediation after one month of dialogue; OR, parties continue to refuse to participate in mediation								
2.1 SAF refuses to engage constructively with talks	Well-positioned contacts of the Sentry working within the US government; other governments involved in Jeddah process report lack of constructive engagement, such as spoiler tactics, clear attempts to drag out talks, refusal to compromise, indicating the SAF are not genuinely engaging with the mediation process; reports from reputable media organizations emerge of the same; OR SAF still refuses to participate in mediation by mid-August 2024 (four months after Jeddah talks were originally planned to commence)	(Threat of) Targeted financial sanctions under country-based or human rights sanction regimes including: Asset freezes Travel ban Prohibition of transactions by sender country persons with blocked individuals Prohibition of the contribution or provision of funds, goods, or services by, to, or for the benefit of any designated person	Sanctions against senior SAF leaders, including those listed under 1.1 (if not already sanctioned) and: **Brigadier General Mohammad Qureishi Mohammad al-Amin** – Owner of Aswar Multi Activities **General Mohamed Othman Al-Hussein** - Chair of Sheikhan Insurance **Major General Mohamed Al-Hassan Al-Saouri** - General Manager of Al-Sataa Transport and Investment Company Limited **Ali Al-Sadiq** - Foreign Minister **Lt. Gen. Yasser al-Atta** - Assistant Commander-in-Chief of SAF	Multilateral sanctions: US, UK, EU,	Coerce	**Medium:** Targeting officers with both a high rank within the SAF and significant business holdings may affect revenue generation and diplomatic and logistical military ability.	**Medium:** Sanctions backfire and further push SAF against talks. SAF also may feel unjustly targeted if sanctions only apply to the SAF and not the RSF. Additionally, if the peace talks fail and non-governmental organizations attempt to facilitate further dialogue between sanctioned individuals, this may subject those NGOs to criminal and civil liability. NGOs may decide to pull out of, or reduce their activities in, sanctioned countries.	SAF's non-military holdings mostly feel the effects. SAF's military production companies have already been severely hit by the conflict. Most RSF companies usually operate in a single sector, thereby limiting the effectiveness of each sanction. If one company is sanctioned, they can easily pivot to another company.
			Sanctions against SAF companies, including: **The Sudan Mineral Resources Company (SMRC)** **Safat Aviation Group** **Aswar Multi Activities Company** **Martyr's Organization** Should the first wave of sanctions not achieve its intended objective, additional waves of sanctions targeting subsidiary companies should be introduced, which also keeps Sudan in the news (see 2.5).			**Medium:** the SAF's non-military holdings are the most vulnerable to sanctions, and may have an effect on overall revenue generation. Also, despite the recommended sanctions excluding corporate entities important to the provision of goods and services for civilians, these sanctions may also affect the supply chain for civilian goods and services by discouraging third party vendors from engaging for fear of sanctions, underlining the importance of carefully selecting a small number of target entities	**Medium:** Dependent on how well the US Treasury's general licenses could exempt some of these activities or whether US banks with a much lower tolerance would be willing to allow activities with these entities. If exempted however, this may allow SAF to raise money.	**SMRC**: Hemedti holds a 33% stake, handed over all gold production to SAF-run state security committees in late April. The SMRC has allegedly sided with SAF and shut out Hemedti. **Safat**: Predominantly military but holds 99% of shares in Crop Protection Sudan, the main seed supplier to the Gezira agricultural scheme. **Al Sataa:** Plays a central role in crop transportation and is controlled by the SAF; while likely a key part of the SAF's corporate network, it has been excluded from the list of potential targets due to the risk of adverse humanitarian impacts. **Sheikhan Insurance**: Provides insurance for large proportion of public assets and the military. While a key part of the SAF's corporate network, it has been excluded from the list of potential targets due to the high risk of harmful unintended consequences for civilians accessing public services, and adverse humanitarian impacts.

2.2 RSF refuses to engage constructively with talks	Well-positioned contacts of the Sentry working within the US/EU government; other governments & mediators involved in Jeddah process report lack of constructive engagement, such as spoiler tactics, clear attempts to drag out talks, refusal to compromise, indicating the RSF are not genuinely engaging with the mediation process; reports from reputable media organizations emerge of the same. OR RSF still refuses to participate in mediation by mid-August 2024 (four months after Jeddah talks were originally planned to commence)	(Threat of) Targeted financial sanctions under country-based or human rights sanction regimes including: Asset freezes Travel ban Prohibition of transactions by sender country persons with blocked individuals Prohibition of the contribution or provision of funds, goods, or services by, to, or for the benefit of any designated person	Sanctions against senior RSF leaders, including those listed under 1.1 (if not already sanctioned) and: **Senior Darfur** commanders **Jiddo Hamdan Ahmed (Abu Nshouk)** - North Darfur Sector Commander **Idriss Hassan** - senior RSF officer RSF commanders involved in the **forced recruitment of Sudanese refugees** in Sudan and third countries	Multilateral sanctions: US, UK, EU	Coerce	**Medium:** Dagalo reportedly stated that RSF leaders fear individual sanctions. However, there's no indication that sanctions will deter their resolve, driven by battlefield successes and motives like looting and state capture, except for potential targeted sanctions against Darfur area commanders.	**Medium:** Risk of backfiring and keeping the RSF away from the negotiation table. Additionally, if the peace talks fail and non-governmental organizations attempt to facilitate further dialogue between sanctioned individuals, this may subject those NGOs to criminal and civil liability. NGOs may decide to pull out of, or reduce their activities in, sanctioned countries.	Evidence from interviews indicate that lower-level commanders of individual RSF battalions worry about being sanctioned - this is especially true of Darfur area commanders, who may be the most susceptible to future sanctions. Lower-ranked RSF commanders are generally more concerned about sanctions than higher ranked commanders. Sanctioning their superiors may decrease the number of lower-ranking generals willing to take their place. SAF may feel less effect since targeting individuals wont impact their business structures and companies can still operate. Whereas within the RSF, the families own the businesses and individual targets have a greater effect.
			Sanctions against RSF companies, particularly those linked to the illicit trade of gold operating in Sudan, including: **Tradive General Trading LLC (EU)** **Al-Junaid Multi Activities Companies (EU) and Al-Junaid Industrial Group** Imposition of UK sanctions against **Shield Protective Services** and **Protective Shield Solutions Ltd**. (continuing operations in the UK). Should the first wave of sanctions not achieve its intended objective, additional waves of sanctions targeting subsidiary companies should be introduced, which also keeps Sudan in the news (see 2.5).		Coerce	**Medium:** RSF may not need revenue generation to pursue military action in the short-to-medium term. RSF has reportedly well integrated cash payments and looting into its recruitment and payment structure. Also, despite the recommended sanctions excluding corporate entities important to the provision of goods and services for civilians, these sanctions may also affect the supply chain for civilian goods and services by discouraging third party vendors from engaging for fear of sanctions, underlining the importance of carefully selecting a small number of target entities.	**Medium:** Sanctions on profit generating companies inside Sudan may result in RSF increasing their looting and recruitment for alternative profit. Also, despite the recommended sanctions excluding corporate entities important to the provision of goods and services for civilians, these sanctions may also affect the supply chain for civilian goods and services by discouraging third party vendors from engaging for fear of sanctions, underlining the importance of carefully selecting a small number of target entities.	Many of the potential target companies are quickly able to transition to new companies not under sanctions. SAF, for example, has already begun implementing smuggling workarounds for gold exports. Sanctioning these entities may have no impact on these companies, however they do ensure that discussions around Sudan and the role of sender countries in Sudan remain in the news. They also may reduce the potential backfiring of sanction objectives by RSF/SAF. Focus on the EU in the interest of constraining potential relationships outside of Sudan that have spread and for those entities that have yet to be sanctioned by the EU but have been sanctioned by the US/UK.
2.3 UAE continues to supply arms to the RSF and/or helps obstruct RSF engagement in mediation	Future UN Panel of Experts reports; evidence from OSINT; reports of reputable advocacy, research, analysis organizations; contacts with reputable informants; reports from reputable media organizations.	Naming & shaming (Threat of) secondary sanctions	Naming and shaming Secondary sanctions against RSF Sudanese based companies linked to the illicit gold trade as a way of targeting the UAE, such as **Esnad Engineering**, **Al Junaid Industrial Group** (EU)	Multilateral sanctions: US, UK, EU	Constrain & Signal	**"Naming and Shaming" Medium:** Depending on the press coverage and conversations that come from the PR campaigns. Potentially high if these are highly profitable businesses. **Secondary Sanctions High:** Although secondary sanctions may not be a plausible avenue for the US at the moment, if applied, secondary sanctions could be highly influential in dissuading the UAE and others with large trade relationships with the US.	**Medium:** UAE could become frustrated with the US and others involved in the naming and shaming or secondary sanctions campaigns and instead becomes unwilling to push the RSF to participate effectively.	Since the RSF's businesses are mainly in the same sector, pivoting to alternative import/export companies has been relatively uncomplicated. Once companies are found, it tends to be after they have changed. Naming and Shaming using political or social means to expose these companies may help deter future subsidiaries.
2.4 Other third countries continue to supply arms to either belligerent and/or helps obstruct the engagement of the belligerent(s) in mediation	Future UN Panel of Experts reports; evidence from OSINT; reports of reputable advocacy, research, analysis organizations; contacts with reputable informants; reports from reputable media organizations.	Naming & shaming (Threat of) Secondary sanctions	Naming and shaming Secondary sanctions against RSF Sudanese based companies linked to the illicit gold trade. Esnad Engineering, Al Junaid Industrial Group (EU)	Multilateral sanctions: US, UK, EU	Constrain & Signal	**"Naming and Shaming" Medium:** Depending on the press coverage and conversations that come from the PR campaigns and which countries are targeted. The UK may be more sensitive to bad press about comapnies using the Uk for illicit trade. The Chadian government is perceived to be less sensitive to external media regarding relations with Sudanese entities, however naming and shaming campaigns regarding specific individuals may be more effective. **Secondary Sanctions Medium:** Enforcing secondary sanctions Chinese, Russian and Iranian entities working with sanctioned Sudanese entities/individuals may be viable. However, enforcing secondary sanctions on countries like the United Kingdom or Chad is highly unlikely.	**TBD:** Dependent on country named and shamed. However, other countries appear less sensitive to bad press than the UAE. The UK if called out, would still remain part of the mediation process.	Subsidiary of DIS: The Export Development Group (EDG General Trading, L.L.E.) is registered in the UAE and oversees most of SAF's agricultural assets.
		AU sanctions: Cautionary or Intermediate	Engage with the AU to determine scope for additional sanctions on specific individuals in neighbouring African countries who are continuing to provide weaponry, fuel, or allow for human smuggling into and out of Sudan, particularly Darfur. Countries of interest: CAR, Chad, South Sudan, Libya, and Ethiopia.		Coerce	**Medium:** The AU and especially IGAD also wish to curb arms proliferation in the region in parallel to peace initiatives, because the war in Sudan opens new corridors in trans-Saharan arms trafficking However the AU has a cautious approach to sanctions, and may not wish to use financial policy tools to these ends.	**Low:** As long as policymakers manage their dialogue and relations with the AU carefully, there are few if any risks to engaging in dialogue or exploring the opportunities of coordinating sanctions regimes with the AU.	
2.5 Regular media coverage of Sudan in international news outlets ceases or substantially reduces	Key international media outlets (e.g., the NYT, Wall Street Journal, Le Monde, Al-Jazeera, Xinhua, CGTN, The Times, El Pais, etc…) report on Sudan infrequently or rarely (less than multiple times per week).	Media engagement Ongoing collaboration with Sudanese and international civil society	Policymakers can ensure that new rounds of sanctions are accompanied by press conferences and media outreach to garner attention. Even when no new sanctions are introduced, the organization and publicization of conferences with Sudanese and international civil society actors, as well as donor pledging conferences, can bring Sudan back into the headlines and generate more public pressure in different countries for a resolution of the conflict.	African Union, IGAD, US, EU, UK, UN	Signal	**Medium:** When a sanction is implemented, the sender government must release a press statement, generating media coverage in both the sender's and Sudan's news outlets. Additionally, influential figures such as congressional and parliamentary leaders, like U.S. senator James Risch (R-ID) recently, publicly supported sanctions through their own press releases and statements. Large meetings of civil society and pro-democracy coalitions such as FFC and Taqqadum also generate media coverage. However, attention may be limited by the plethora of ongoing conflicts today.	**Low:** Increased media coverage of Sudan is very unlikely to generate risks to civilians or destabilize the political process towards peace, and no economic impacts are anticipated apart from a possible increase in humanitarian aid to Sudan.	

3. Parties commit atrocities (egregious/extremely serious violations of human rights and international humanitarian law)								
3.1. RSF substantially blocks the provision of humanitarian aid	Credible reports from Sudanese civil society activists, humanitarian organizations, human rights and advocacy groups, UN agencies emerge that the RSF has taken action to block the access of entire communities to humanitarian aid, with communities impacted by this action (i.e., actions are not merely symbolic).	Financial sanctions under: US Global Magnitsky Act EU Global Human Rights Sanctions Mechanism UK Global Human Rights regime Diplomatic sanctions	Sanction **Major General Nooreldin Ahmed Abdelwahab,** head of Human Rights unit, and lower level commanders.	Multilateral sanctions: US, UK, EU	Constrain & Signal	**Medium**: While the financial impact of these sanctions on the targets is expected to be low, it sends a strong signal to the wider organization that the blocking humanitarian aid will not be tolerated by the international community, and counteracts the RSF's attempts to position itself as a progressive force.	**Low**: Sanctions against individuals within the RSF have not previously resulted in adverse consequences, such as causing the group to disengage with mediation processes. The financial impact of these sanctions does not represent a high cost to the group.	
3.2 SAF substantially blocks the provision of humanitarian aid	Credible reports from Sudanese civil society activists, humanitarian organizations, human rights and advocacy groups, UN agencies emerge that the SAF has taken action to block the access of entire communities to humanitarian aid, with communities impacted by this action (i.e., actions are not merely symbolic, as in the case of the SAF's block of aid cross-border from Chad into Darfur).	Financial sanctions under: US Global Magnitsky Act EU Global Human Rights Sanctions Mechanism UK Global Human Rights regime Diplomatic sanctions	Sanction chairs of Supreme Committee for Crisis Management in charge of delivering humanitarian aid: **Khalid Hassan Mohiuddin** **Jibril Ibrahim** **Ahmed Ibrahim Mufaddal** **Borai al-Sidiq**	Multilateral sanctions: US, UK, EU	Constrain & Signal	**Low:** Prior sanctions imposed against individuals within the SAF due to their violations of international law have not significantly altered targets behaviour; however, the sanctions serve to signal that the SAF cannot block humanitarian aid without repercussions, eroding their impunity and potentially deterring the SAF from further blockage of humanitarian aid to avoid more negative press.	**Medium:** Sanctions could backfire and further push SAF against talks. SAF also may feel unjustly targeted if sanctions only apply to the SAF and not the RSF.	
3.3 SAF commits atrocites, including intentional mass killings, and mass perpetration of sexual violence	Credible reports from Sudanese civil society activists, humanitarian organizations, human rights and advocacy groups, UN agencies, and reputable media outlets that the SAF has intentionally targeted and killed 100+ civilians	Financial sanctions under: US Global Magnitsky Act EU Global Human Rights Sanctions Mechanism UK Global Human Rights regime Diplomatic sanctions	Sanction commanders of this region, and individuals of note.	Multilateral sanctions: US, UK, EU	Constrain & Signal	**Medium**: While financial impacts against individual commanders may be minimal (with individuals able to cross porous borders, use forged documents to travel, and shift their assets to circumnavigate sanctions, these sanctions will create negative publicity for the SAF and likely disincentivize further attempts to block humanitarian aid.	**Medium**: The SAF is sensitive to sanctions and might threaten to disengage from the political process towards peace in response.	
3.4 RSF commits atrocites, including intentional mass killings, and mass perpetration of sexual violence	Credible reports from Sudanese civil society activists, humanitarian organizations, human rights and advocacy groups, UN agencies, and reputable media outlets that the RSF has intentionally targeted and killed 100+ civilians.	Financial sanctions under: Global Magnitsky Act - US EU Global Human Rights Sanctions Mechanism UK Global Human Rights regime Diplomatic sanctions	Asset freezes and travel bans against commanders known to have participated in the mass atrocities. Four generals who played a key role in the 2023 Masalit massacre could also be sanctioned at this time: **Idriss Hassan** **Massar Aseel** **Al Tijani Karshoum** **Moussa Angir**	Multilateral sanctions: US, UK, EU	Constrain & Signal	**Medium**: the financial impact of sanctions against individual, lower-level commanders is likely low, as targets will use porous borders or alternate (fake) passports to travel and use illicit networks for financial transactions. However, the sanctions signal a lack of impunity for war crimes and could lead RSF leadership, keen to portray the RSF as a progressive force which respects international law.	**Low:** This action targets individual commanders; and does not risk direct negative impacts to Sudan's economy or humanitarian situation. The RSF has a degree of tolerance to sanctions, although there remains a residual risk, they are unlikely to walk away from negotiations as a result.	The EU already set a precedent in 2023, when it sanctioned gender-based violence in Afghanistan, Russia, and South Sudan among others. US, UK, EU routinely deploy sanctions against perpetrators of alleged human rights abuses.

4. Additional efforts to call for

Action	Reason	Support Mechanism	Actors	Comments
4.1 Immediate and ongoing support to civil society efforts in Sudan	Civil society is instrumental in upholding human rights and documenting abuses during times of war, which is vital for future accountability. Strengthening civil society supports the foundation for a more stable and democratic post-conflict recovery, promoting peace and reconciliation within the community. Lastly, civil society plays a key role in humanitarian relief operations, providing essential services and aid to civilians affected by the conflict. Civil society groups to support could include: **Sudanese American Physicians Association** **Nas Al Sudan** **Taqqadum leadership & constituent groups** **Members of the Forces for Freedom and Change (FFC)**	Encourage government actors to engage with civil society in an open dialogue about what other policy tools are available at this time. Call for a dedication of a portion of the $100 million from USAID to Sudan to support programs for civil society re digital literacy and human rights abuse tracking efforts. Additionally, engage with civil society to bolster political transition and transitional justice efforts, ensuring unity and preventing further fractures within Sudan's civil society. Call for a dedication of a portion of the $2.2 billion from the International Humanitarian Conference for Sudan and neighboring countries to civil society support.	**US**: USAID's Office of Transition Initiatives (OTI) & the State Department's Global Engagement Center and Office of Global Criminal Justice **UK**: FCDO **EU**: DG International Partnerships, European Commission **EU Member States**: Norway (NMFA), Sweden (SIDA), Denmark (DANIDA) Finland (FIDA) all have a strong tradition of engagement with civil society to support conflict resolution efforts	The existence of an organized domestic opposition able to capitalize on the threat and(or imposition of sanctions to pursue objectives in support of the sanctions intended purposes (reduction or cessation of violence in Sudan). As such, it is essential that sanctioning authorities help the Sudanese pro-democracy opposition consolidate and strengthen strategic coherence, and ensure that sanctions are threatened and(or applied in ways that enable the pro-democracy opposition to pursue their goals.
4.2 UN sanctions regime is up for renewal, but no ceasefire or negotiated resolution to the conflict has been agreed.	1591 Sudan Sanctions Committee is set to meet on 12 March 2025; the sanctions regime will then be maintained, modified, or renewed. Of the five member states with veto power, Russia and China are opposed to sanctions in principle and may push for sanctions to be lifted. Any removal of sanctions which is not benchmarked to specific, positive developments in the reduction of violence or towards sustainable resolution of the conflict risks removing not only a helpful point of leverage over the belligerents, but also a key reporting mechanism on the violations of international humanitarian law and violations of sanctions regimes by targeted individuals.	Multiple interviews suggest that the UN Security Council is unlikely to agree on new sanctions. Therefore, policymakers who wish to maintain the existing sanctions regimes should do the following: **Coordinate** with international and Sudanese civil society organizations for advocacy at the UN, through e.g. addresses to the UNSC during Open Briefings on Sudan; organization of Arria-formula meetings on the conflict in Sudan **Sanctioning** authorities to conduct interviews and press briefings on the conflict in Sudan and the need to renew sanctions **Work** with the elected 3 members of the UNSC who are African states (the A3) to agree to a common approach to renewing the sanctions regime; and other elected members not intrinsically hostile to sanctions. Collectively, these efforts may result in enough diplomatic weight behind a renewal of the sanctions regime, enabled by Russian and Chinese absentions on the UNSC vote.	UN Security Council	New UN sanctions woud allow for the global applicability of sanctions and the amplification of messaging around the conflict in Sudan