

July 26, 2021

NATO Sanctions Policy

Demyan Plakhov

NAADSN Post-Graduate Fellow

Abstract

This policy primer is inspired by the Canadian Department of National Defence's policy challenge: what is the future of the North Atlantic Treaty Organization (NATO) in an era of great power competition?¹ As the global balance of power continues to shift, major powers are increasingly engaging in behaviours that threaten and challenge the international rules-based order. Major powers, such as China and Russia, have proven their willingness to test the international security environment. It is not always clear how NATO can or should respond to emerging security challenges, including those arising from Russia and China. One of the most overlooked options, never used before, is a unified NATO sanctions policy as a potential response. Consequently, this policy primer evaluates the current structure of NATO members' coordinated sanctions policy, and the potential options that NATO can use to implement sanctions, with a background in the literature on the effectiveness of sanctions.

1. Introduction

1.1 A brief overview

NATO member states apply sanctions regimes autonomously, through the European Union (EU) if the state is a member of the EU, or via the United Nations (UN). With the exception of the United States, most states like to enact sanctions as part of an organization or coalition to give the sanctions measures teeth in the form of a great number of senders. NATO, with now 30 states that regularly apply sanctions and represent one billion citizens, has never adopted a unified sanctions policy. Further, there do not seem to be any discussions about how NATO could utilize sanctions in the 21st century. With the rise of great power competition — particularly Russia's foreign policy in its nearby region and abroad — NATO has scrambled for ways to respond to provocative manoeuvres, hybrid warfare, espionage, chemical warfare, and human rights violations. All NATO member states, with the exception of one, currently apply some form of sanctions against Russia.² However, NATO continues to clarify that these sanctions are not implemented by the Organization. All EU members have imposed sanctions unanimously, as have Canada, the UK, the US, Iceland, Norway, North Macedonia, Montenegro, and Albania.³

Therefore, this policy primer will evaluate the potential for a unified NATO sanctions policy against external threats. To do this, the research will outline the sanctions literature and theories that could help explain if NATO could apply sanctions, if they would be effective, and how they could be made effective. This will help situate

whether sanctions are a viable tool that NATO could use. This research will also provide a description of NATO's outlook on sanctions, and how the literature evaluates NATO's sanctions potential — which will identify both benefits and risks. Following this, there will be a listing of potential options available for NATO in implementing sanctions, ranging from an advisory body to a legally-binding mechanism. Finally, these findings will then be compiled to help identify whether or not NATO could use a unified sanctions policy and what sort of options are available to the Alliance.

1.2 Great power competition

Great power competition has returned to the international system. China is a rising economic power, and Russia has proven its willingness to test the international security environment. The Western-designed security system is challenged by the recent shift from a unipolar to a multipolar world, and the effects of this power competition are evident in the South China Sea, Eastern Europe, the Middle East, the Arctic, and in Africa. We are also seeing its effects in the evolving role and presence of the major powers on issues related to the Arctic.

In light of the return to major power competition, NATO should revisit its role in the international system and look to new ways of responding to emerging security challenges. These new methods could include a wide variety of sanctions tools that could be added to NATO's tool kit. The international security environment is being challenged by the actions of certain powers that flout international law, and sanctions could signal NATO's disapproval of certain behaviours. But before this research outlines NATO's options for sanctions, section 2 will first provide a brief overview of the sanctions literature, definitions, frameworks of sanctions' effectiveness, and the evolution of sanctions to better understand how NATO could utilize sanctions and if this would be beneficial.

2. Sanctions Theory and Background

2.1 Literature review of sanctions and their evolution

Before understanding how and if NATO should utilize sanctions, it is important to establish a foundation of sanctions knowledge, whether the literature finds sanctions effective, and if so, what factors lead to increasing their effectiveness. In short, the majority of the sanctions literature concludes that sanctions are, overall, ineffective.⁴ However, there are cases that have strong evidence to suggest how sanctions can be utilized effectively and how a combination of countries could build a more effective sanctions policy.⁵ Given the rising number of sanctions regimes in recent decades, with many regimes still ongoing, the data is still very new to draw any strong conclusions about their effectiveness.

NATO has never had a sanctions policy, and so there are no previous cases to examine, although NATO was instrumental in enforcing sanctions in the Federal Republic of Yugoslavia.⁶ There are recent cases, such as the Russian case, that may provide a glimpse into what NATO sanctions may look like, given the fact that most NATO members have imposed similar sanctions policies against Russia. Although NATO is one of the most enduring security alliances, it is still fairly new — just over 70 years old — and has been consistently changing its structure. Even if NATO enacted a sanctions policy in the 1980s, for instance, its organizational structure and member composition would have been completely different from what they are today, which may have had a crucial

impact on the result of the sanctions policy. In addition, its surrounding circumstances — a Cold War with the Soviet Union, and the existence of an Eastern Bloc, with several communist/socialist governments — were also different, which could also have affected the result. At the same time, it is important to review the use of sanctions and the literature to see what is known thus far.

One of the first known cases of sanctions can be traced back to 432 BC, when Pericles, a Greek statesman and general of Athens, instituted the *Megarian Decree* due to the kidnapping of three Aspasian women — although this example was a blockade, it used methods similar to sanctions.⁷ This early example of sanctions was recorded by Thucydides and Aristophanes in *The Peloponnesian War* and *The Acharnians*, respectively, where a clear divergence is seen in the conclusions about the significance and effectiveness of sanctions. In the post-First World War era, sanctions were beginning to substitute more hostile means of international relations.⁸ Prior to the 1940s, sanctions were used in conjunction with hostile and military means, but after the Second World War, sanctions were beginning to be utilized more as ‘stand-alone’ policy.⁹ Shortly prior to the Second World War, the League of Nations applied sanctions. The application of sanctions by the League of Nations is mostly remembered by its failure to respond to Italy’s invasion of Abyssinia in 1935.¹⁰ The foundation of the UN, the successor to the League of Nations, continued the move towards multilateral sanctions regimes. With increasing globalization and economic interdependence, states have turned to sanctions more often than before, with a notable peak in the 1990s with the UN sanctions regimes and US’s unilateral measures and the start of the EU’s measures.¹¹

Although nations would normally impose an embargo at the beginning of the 20th century, sanctions evolved from comprehensive measures (especially against Haiti, Iraq, and the Federal Republic of Yugoslavia) to *targeted* or *smart sanctions* in the 1990s. States started to use more targeted measures such as travel bans and asset freezes to target those responsible for policy decisions and those with influence over changing policy, rather than the entire population and country.¹² This evolution came about from some research suggesting that embargoes or widespread sanctions can have severe humanitarian impacts and fail to damage those actually responsible for the “bad actions”.¹³ The next step in the sanctions evolution saw the creation of *secondary sanctions*. In an increasingly globalized environment, targeted states and entities have more opportunities to avoid sanctions or escape the intended economic damage, turning to other countries and methods. To address this issue, the sanctions literature identified the option of imposing secondary sanctions — the Countering America’s Adversaries Through Sanctions Act (CAATSA) legislation in the US is a clear example of this method — which would threaten states from assisting targeted states during sanctions regimes.¹⁴ These sanctions have been used rarely, however.

2.2 Types of sanctions and definitions

To start, *sanctions* have different objectives, which means that understanding their effectiveness can be complicated. Cooper Drury describes sanctions as “forms of negative economic pressure” that coerce the target state, rather than the precise definition of reducing economic relations, which could include a diverse set of methods such as tariffs — these types of sanctions are also referred to as trade sanctions.¹⁵ Other experts use the term *pain* to suggest the same type of economic pressure.¹⁶ Given that the sanctions definition provided by the UN Charter is universally the most agreed to definition, this research defines sanctions as “measures not

involving the use of armed force [... but rather including the] complete or partial interruption of economic relations and of rail, sea, air, postal, telegraphic, radio, and other means of communication, and the severance of diplomatic relations”.¹⁷

The sanctions literature also does not have a well-defined framework for *effectiveness*. This is an important concept to discuss when examining the potential of NATO sanctions given that this could provide evidence for why NATO sanctions might be more effective than certain sanctions imposed by Western states. Some experts claim that effective sanctions are those that can deliver economic damage, pain, or pressure on the target state, while for others, effective sanctions are those that achieve the aims of sanctions. For the former, it is possible to collect enough evidence to suggest that the target state did indeed suffer economic damage, pain, or pressure. However, it is often difficult to connect this damage directly to sanctions, as it could be from a variety of other factors.¹⁸ In the case of Russia, the sanctions coincided with a substantial drop in oil prices and challenged experts to explain which aspect is more accountable for Russia’s economic drop – the general drop in oil prices or the sanctions on Russian elites who are often heavily invested in Russia’s state-owned oil companies.

The latter definition of effectiveness seems clearer, but the literature diverges in defining the *aims* of sanctions. Some experts argue that the general aims of sanctions are to send a signal, to respond to domestic/international outcry, to respond to key stakeholders, and/or to support a particular foreign policy that is already in place. For others, the aim of sanctions is that which is publicly stated in a public release and by enacted legislation. A minority of scholars — with a strong presence in the Russian literature — believe that the real aim of sanctions is not publicly available, as sender states might publicly say one thing but actually have different goals altogether. Other interpretations of sanction cases speculate objectives other than those that are publicly stated, such as preventing the target state from expansionism, militarism, or nuclear options.¹⁹ This rationale is popular in Russian literature and policy, as many experts and the Russian government believe that the real aim of Western sanctions is to hamper the ability and competitive edge of Russia. Nevertheless, this interpretation is quite speculative. There are ways of finding evidence of other aims that are not made public by sender states, but these aims will remain unconfirmed until the sender state confirms them. It is also difficult to ascertain whether sanctions prevented a target state from carrying out specific actions.

However, the literature does agree on the following basic terms as presented in Table 1 below. Examining various sanctions policies and literature, Table 2 also outlines several types of sanctions and describes the various methods.

Table 1: Agreed to sanctions definitions

Sanctions Term	Definition
Target State(s)	The state(s) receiving the sanctions.
Sender State(s)	The state(s) applying the sanctions.
Secondary State(s)	The state(s) assisting a target state in avoiding sanctions imposed by a sender state.

Table 2: Some types of sanctions (with descriptions)

Type of Sanctions	Description
Embargo (also referred to as a ban on trade, exports, or imports)	A legal restriction by a state or group of states that prohibits the target state’s movement of goods — either import, export, or both.
Sectoral/industry sanctions	A restriction on financing or trade within a particular sector — such as the oil sector, tourism industry, defence sector, or technological sector. This could include a listing of particular individuals and entities in a particular sector.
Restrictions on certain goods or services	<p>Similar to sectoral sanctions, this restriction prohibits the act of selling, supplying, transferring, or exporting particular goods or services. This may also include related technical or financial assistance.</p> <p>This section is often related to dual-use goods, chemicals, biological substances, or technology that could be utilized or transformed for military use.</p>
Travel ban/restrictions	Individuals are prohibited from travelling to states where these individuals are listed.
Trade and investment restrictions	Restrictions made on trade and investment in certain economic sectors, national projects, or internationally coordinated projects.
Asset freezes	All listed persons and entities are restricted from any access to direct or indirect funds and assets — within the jurisdiction of the sender states.
Financial measures	A prohibition of any new loans, credit, transactions, or business, and/or prohibition of dealings with any listed person, entity, or body.
Secondary sanctions	Sanctions imposed by the sender state(s) against secondary states to pressure them from assisting the target state.

<p>Diplomatic sanctions</p>	<p>Diplomatic sanctions come in various forms, but usually try to limit membership or bilateral relations with the target state. This could include the removal of the target state’s diplomatic mission, excluding the target state from an intergovernmental organization, putting on hold accession or trade agreement negotiations, or reducing cooperation in certain areas (such as military exercises).</p>
<p>Positive sanctions</p>	<p>Sanctions that incentivize the target state rather than punish it. These could include the promise of a mutually beneficial agreement, investment, or other benefits to the target state.</p>

Sources: George Shambaugh, “Embargo: international law,” *Wars, Battles and Armed Conflicts*, May 10, 2019, <https://www.britannica.com/topic/embargo-international-law>; Council of the European Union, “Common Military List of the European Union,” last updated on February 17, 2020, [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020XG0313\(07\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020XG0313(07)&from=EN); Official Journal of the European Union, “Equipment covered by Council Common Position 2008/944/CFSP defining common rules governing the control of exports of military technology and equipment,” *Notices from European Union Institutions, Bodies, Offices and Agencies*, December 13, 2008, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008E0944>; European Union, “Country: Russia,” *EU Sanctions Map*, March 4, 2021, <https://www.sanctionsmap.eu/#/main/details/26/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D>.

2.3 Explaining sanctions’ effectiveness

After identifying the various types of sanctions, it is also important to have an understanding of whether or not sanctions are an *effective* tool in general before looking at NATO sanctions. In fact, by looking at the sanctions literature, it could become clearer whether NATO should utilize sanctions, and if it would be the proper forum for doing so. In short, the sanctions literature is, again, uncertain. The literature does mostly agree that at least some sanctions cases were effective — for various reasons — but it has not agreed on which sanctions can guarantee effectiveness and which aspects can help improve effectiveness. There are several existing sanctions theories that present various aspects that could help improve effectiveness. However, disagreement may also arise from how different experts frame *effectiveness*.

As early as 1985, David Baldwin and other scholars claimed that a sanctions policy could be a safer and cheaper foreign policy option than military force, and as effective.²⁰ The majority of the literature since then that has extensively reviewed multilateral sanctions agrees that with more sender states, or multilateral cooperation, a sanctions policy will have more legitimacy and will be likely to have more effectiveness.²¹ However, Hufbauer et al. pointed out in their 2007 study that more sender states and/or international cooperation does not necessarily guarantee success.²² In fact, their study claims that more international cooperation could dilute sanctions’ objectives and misdirect negotiations, as there are more states invoking sanctions.

The sanctions literature has pointed to many factors and conditions that may lead to an effective or ineffective sanctions policy. Some suggest that sanctions are only effective within five years, some claim that they are only effective as a threat, some say that they should be used in parallel with military threat, while others suggest utilizing both negative and positive sanctions in tandem.²³ There is strong evidence for each case, but nothing has been determined with certainty. There have been cases where a strong sanctions policy threat deterred a state or changed its behaviour, but this has not always been the case. Some sanctions regimes take time, and may take well over five years to see any results. Some sanctions can cause inadvertent effects, as they might encourage the target state to solidify its stance and behaviour, reorient its policy and trade to avoid sanctions, and become more confrontational towards the sender state.²⁴ All in all, previous sanctions cases do still present evidence that they work in some cases, and that they might be best utilized multilaterally.

2.4 Multilateral sanctions

The literature has evaluated numerous sanctions regimes, and has paid special attention to the difference between sanctions regimes imposed unilaterally and multilaterally. Although there is no unanimous agreement as to whether one is more effective or not, the majority of the evidence suggests that multilateral sanctions regimes often apply more pressure on the target state to change its policy or behaviour. In multilateral terms, the UN brings together the most states in a sanctions regime, under an agreed international interpretation of sanctions and their use. The legitimacy of the UN's sanctions is founded in the member states agreeing to the Charter of the UN, where Chapter VII authorizes the UN Security Council (UNSC) to determine situations worthy of sanctions and administer sanctions regimes in response.²⁵ With powers vested under Article 39, the UNSC may determine that there is a “threat to peace, breach of peace, or act of aggression,” and under Article 41, the UNSC may apply sanctions under the definition of “measures not involving the use of armed force [... which] may include complete or partial interruption of economic relations and of rail, sea, air, postal, telegraphic, radio, and other means of communication, and the severance of diplomatic relations”.²⁶ It is a definition that includes both economic and diplomatic measures, setting a non-prescriptive definition to allow the UNSC flexibility in its decisions.

Since the 1960s, the UNSC has imposed 27 sanctions regimes under Article 41, ranging from “comprehensive economic and trade sanctions to more targeted measures such as arms embargoes, travel bans, and financial or commodity restrictions”.²⁷ Margaret Doxey's examination of UN sanctions regimes suggests that they have had a diversified history of effectiveness due to the fact that the interpretation and implementation of UN sanctions is done by the UNSC, where permanent members (Russia, the UK, France, the US, and China) have a veto and may have varying policy agendas.²⁸ Even with these conclusions, Doxey's research still argues that multilateral sanctions likely increase sanction effectiveness.²⁹ Director of the Office of Foreign Assets Control (OFAC) John Smith also claims that sanctions are most effective when they are applied multilaterally with a clear objective and are not overused by the sender state — because it is harder to get multilateral support.³⁰

There is also a new trend of multilateral autonomous sanctions. Barring a resolution by the UNSC, likeminded states such as the US, Canada, the EU, the UK, and others have used autonomous national legislation to put in place sanctions to create coordinated sanctions regimes. Consider, for example, the sanctions against Belarus for gross and systematic human rights violations after the fraudulent Belarusian 2020 presidential elections, and

the sanctions against China for human rights violations against the Uighur minority.³¹ Although these are not multilateral sanctions regimes, they are coordinated measures with multilateral-like intentions. Given that NATO's decision-making is by consensus, all 30 member states would have, essentially, a veto. Therefore, agreeing to anything at the NATO level could prove to be difficult and can be highly political. On the other hand, as the Washington Treaty did not specify an Article 41-like paragraph, there is the possibility that NATO members could decide to enact autonomous sanctions measures but in a coordinated fashion against the same targets and with the same aims.

2.5 Has NATO administered sanctions before?

Unfortunately, the literature using “NATO sanctions” consistently misidentifies the term, as it is commonly used to label sanctions invoked by Western states.³² This misperception is very common in Russian literature. It combines anti-NATO and anti-sanctions sentiments, and attempts to link the sanctions regime to NATO's actions. However, as discussed previously, this is not the case. NATO does not impose, and has never imposed, a sanctions policy — instead, NATO member states unilaterally, or through the EU, impose their own sanctions regimes based on their own national legislation. Therefore, when trying to find whether NATO has utilized sanctions before, it is important to consider this misperception. For instance, in the case of the current Russian sanctions, many Russian experts and scholars label these sanctions as “NATO sanctions” so as to imply that they are administered by NATO members. The misperception may come from the fact that many NATO member states apply similar sanctions regimes at the same time. Even a *New York Times* article miscommunicated with the following title, *NATO Prepares New Sanctions Over Russian Action in Ukraine*, as did this title in the NATO review, *Sanctions after Crimea: Have they worked?*³³

This research did not identify any cases where NATO applied sanctions. This could be due to the fact that most sanctions between 1950 and the 1990s were applied by either the US or the Soviet Union, NATO was largely thought of as a military alliance, and the EU only became a reality in the 1990s — the EU used sanctions for the first time in the 1980s as the formerly-known European Community (EC) against the Soviet Union.³⁴ In 1981-1982, the US, Japan, the UK, and other Western European nations imposed sanctions against Poland, and then against the Soviet Union.³⁵ Sanctions were imposed due to the martial law enacted by Polish authorities and pressured them to find a “nonviolent resolution of the situation based on constructive, cooperative agreements” with the Polish people.³⁶ Soon after, sanctions imposed against the Soviet Union were in response to its involvement in Poland during the martial law.³⁷ However, similar to the current sanctions placed by the EU, the US, Canada, and other states against the Russian Federation, they were not implemented by NATO.

Certain media articles at the time and later academic papers nicknamed these as NATO sanctions, even though what had happened was that NATO had held a meeting where member states had announced their intentions to declare sanctions, including “travel restrictions on Soviet and Polish diplomats and [the] withholding of financial credits to both countries”.³⁸ The US was adamant about issuing NATO sanctions, and all member states at the time found that the situation in Poland had worsened and that there was a need to “[exert] steady and graduated pressure on those responsible for events in Poland”.³⁹ There could have been the potential to explore the possibility of enforcing sanctions on a NATO level, but the new socialist Greek government ultimately decided to object, effectively blocking the possibility of NATO sanctions and forcing member states to apply

unilateral sanctions instead. Moreover, the US' attempt to convince Western Europeans to follow its sanctions plan played directly into pre-existing transatlantic disagreements and undermined confidence in the Alliance.⁴⁰

Nonetheless, the Ditchley Report stated that NATO did prepare a list of retaliatory economic measures in the event of a Soviet invasion of Poland — presumably this included sanctions — but they never came to fruition on the NATO level.⁴¹ Interestingly, David Hunter notes that the US Defense Intelligence Agency (DIA) reported that the plans for economic sanctions were responsible for the Soviet Union supporting martial law rather than invading Poland, arguing that NATO's threat of sanctions deterred the Soviet Union from a military invasion.⁴² Albeit, Hunter does caution — like much of the sanctions literature — that understanding what may have deterred a state from potential acts is nearly impossible. It is still fairly possible that the threat of sanctions was a part of the Soviet Union's calculus in its decision-making.

In unraveling this situation, Hunter explores the concept of NATO applying sanctions during that time. He suggests that NATO applying sanctions would have presented the member countries with a “dilemma equivalent to NATO engaging in military action in the Middle East,” given that sanctions were outside of NATO's traditional role and where it did not have much experience or expertise.⁴³ Second, Hunter indicates that if NATO was to fail in removing Soviet troops from Poland via sanctions, it could have damaged NATO's prestige and credibility, which would have taken away from its deterrent capabilities through military force. Third, the potential conflict caused by sanctions within the Alliance — either due to national interests or due to the lack of effectiveness — could produce hostility among NATO members, leading members to blame each other for the failure of the sanctions. Considering these factors, Hunter comes to the conclusion that NATO is an “inappropriate organizational vehicle for planning or delivering East-West economic sanctions”.⁴⁴

In fact, this is an interesting case study given its similarity to the current sanctions regime implemented against Russia, since in 1982, West Germany, a NATO ally, was at first cautious to agree to any sanctions against Poland, and particularly the Soviet Union, given its growing energy interests.⁴⁵ This case study clearly shows that domestic issues can be an impediment to pursuing a unified NATO sanctions policy — similar to the domestic issues faced by some NATO allies today. The case of West Germany's national interests and Greece's objections in 1981, based on their separate reasons, shows that NATO can be supportive of sanctions and not become the administrator, in order to potentially avoid any conflict or domestic concerns that may prevent a comprehensive sanctions policy.

3. NATO and Sanctions Policy

3.1 NATO's outlook on sanctions and Russia

On April 15, 2021, a NATO statement backed the new round of US sanctions on Russia over its build-up of troops along Ukraine's border.⁴⁶ The statement confirmed that “NATO Allies support and stand in solidarity with the United States, following its April 15 announcement of actions to respond to Russia's destabilising activities. Allies are taking actions individually and collectively to enhance the Alliance's collective security”. Although the US and many other NATO member states have imposed sanctions against Russia, and NATO allies agree with these actions, there have been no discussions of applying a unified NATO sanctions policy against Russia.

This might be puzzling given the fact that there has been unanimous agreement among NATO allies on Russia's destabilizing actions, including its widespread disinformation campaigns, malicious cyber activities, use of chemical weapons to poison various individuals, espionage, military build-up around Ukraine's border, and attempted interference in Allied elections — to name a few. It might be perplexing as well given the unanimous agreement that NATO allies should work together to address Russia's actions.⁴⁷ Since diplomacy has been attempted and Russia's grey-zone actions may not necessarily constitute a breach of the Alliance's Article 5 — thus invoking a conventional military response — there is a need for a third 'middle-ground' approach that stops short of military confrontation: sanctions. However, before attempting to understand how NATO sanctions can be applied, it is important to further understand how NATO sees sanctions and Russia's behaviour.

Investigating NATO's online archives, there are several views on the subject. In 2016, current NATO Secretary General Jens Stoltenberg was fielding questions from reporters when he was asked for an assessment of "the state of unity between NATO members on the sanctions question and to what extent are people now growing weary of sanctions because there is an undercurrent in debate on that?"⁴⁸ Even in the uncertain times of the Trump administration, Stoltenberg responded that NATO members were strongly united when it came to their approach to Russia, which was built on a dual-track approach of deterrence and dialogue. He also added that economic sanctions from the EU, US, and G7 were part of that response to the "aggressive actions of Russia in Ukraine".⁴⁹

Although NATO did not decide on these sanctions, it does usually express strong support for sanctions applied by its member states towards external targets as per the spirit of the Washington Treaty. Stoltenberg even suggested that "sanctions are an important tool to send a very clear message that we do not accept the kind of aggressive behaviour".⁵⁰ When asked about Russian airstrikes in Aleppo and the EU's continued sanctions regime, Stoltenberg also reaffirmed NATO's supportive stance towards sanctions as a response. Fast-forwarding to 2021, Stoltenberg responded with the same position to sanctions imposed by the EU, Canada, the US, and the UK on China — and once again clarified that these are not NATO sanctions.⁵¹ He also indicated that NATO should adapt to a "more challenging and difficult security environment," including, for NATO, the rise of China. In responding to China's actions in the South China Sea, the democratic protests in Hong Kong, and the suppression of the Uighur minority population, Stoltenberg indicated that there is a need for new ways of strengthening the Alliance and for allies to work more closely in responding to these issues.⁵² Stoltenberg went on to explain that NATO members "can complement each other and support each other, and economic sanctions are an example of that".⁵³ Stoltenberg also acknowledged that new forms of threats — such as cyber, economic coercion, and disinformation — force NATO to work together and apply many different tools, including "political, diplomatic, *economic*, and military [emphasis added]" tools.⁵⁴

Published in November 2020, the *NATO 2030: United for a New Era* report, written by a group of experts appointed by the Secretary General, recommends that NATO ought to consistently adapt to changing circumstances.⁵⁵ It suggests that besides being a military Alliance, it is also a political Alliance, united by "a common strategic vision, a community of shared values, shared interests, and shared destiny".⁵⁶ The report goes on to suggest that for NATO to look ahead, it should "consider ways to evolve the content of its dual-track strategy to ensure its continued effectiveness," and potentially "consider a dynamic template under which it takes steps to *raise the costs* [emphasis added] for Russian aggression (e.g., coordinating to tighten rather than

merely renew sanctions),” which could evolve NATO’s strategy and capabilities and “preserve cohesion within NATO while providing a prospect for breaking the stalemate with Russia on NATO’s terms”.⁵⁷

Although NATO’s Secretary General has made it clear, on several occasions in recent years, that NATO does not apply sanctions, there is evidence from within NATO that suggests that a unified sanctions policy is something that could be reviewed. NATO allies have shown unity in their statements and actions when responding to various challenges; this includes undeniable unity in regards to several key issues, including China, Belarus, and Russia. Further, Stoltenberg confirmed that NATO is in full agreement that the Alliance should respond to these challenges. The evidence above also shows that the Alliance agrees that there are many different threats that are hybrid in nature, causing a dilemma in *how* to respond to these matters. Further, the evidence shows that NATO requires new methods of responding to these emerging threats, utilizing its dual-track strategy, and specifically using ‘economic tools’ to ‘raise the cost’ of certain actions by particular states.

3.2 NATO’s Article 2, and economic and political cooperation

In May 1956, Norway’s Foreign Minister Halvard Lange, Canada’s Foreign Minister Lester B. Pearson, and Italy’s Foreign Minister Gaetano Martino wrote a report that advised the North Atlantic Council on “ways and means to improve and extend NATO cooperation in non-military fields and to develop greater unity within the Atlantic Community”.⁵⁸ This came at a time when NATO thought of itself as a military Alliance, and other medium and smaller members of the Alliance felt that their influence was marginalized by the ‘big three’ — the US, the UK, and France — all possessing nuclear weapons and a P5 membership.⁵⁹ Canada helped insert Article 2 in the drafting of the Washington Treaty to install economic cooperation as another element of the Alliance.⁶⁰ This diversification enabled political and diplomatic solidarity, alongside the military component, where members also had the chance to contribute. This acknowledged that security was not only a military aspect, but required economic and political attention.

Even though it was never the focus of the organization, economic cooperation among allies has become ever more important to consider as a means of solidarity and as a response to emerging threats, due to the rising use of sanctions in contemporary international relations and the replacement of conventional military tools with unconventional and grey-zone hybrid warfare. Article 2 states:

The Parties will contribute toward the further development of peaceful and friendly international relations by strengthening their free institutions, by bringing about a better understanding of the principles upon which these institutions are founded, and by promoting conditions of stability and well-being. They will seek to eliminate conflict in their international economic policies and will encourage economic collaboration between any or all of them.⁶¹

The 1956 report, penned by the three foreign ministers, recommended strengthening unity within the Alliance by promoting non-military cooperation. The report concluded that the “peace-ensuring role of NATO [... is] based on solidarity and strength, [and] can be discharged only if the political and economic relations between its members are cooperative and close”.⁶² Examples of allied coordination within this space include science and technology sharing through the Science for Peace and Security programme, which has a budget of €12 million

for developing cooperation among NATO member states and partner countries on issues such as demining, water management, and the destruction of chemical and biological substances.⁶³ However, even with multiple discussions on non-military and economic cooperation, the publicly available NATO information does not show any real discussions of a NATO sanctions policy.

Observing the NATO Secretary General's Annual Reports, sanctions in general are seldom mentioned. When mentioning hybrid threats, the NATO Secretary General's Annual Report of 2017 includes "economic and political pressure," but does not explore the option of responding with economic tools to such threats.⁶⁴ The annual report from 2014 is the only one that mentions sanctions, stating that "NATO supports the sanctions imposed by the European Union (EU), the G7 and others as part of an international effort to address Russia's destabilising behaviour".⁶⁵ From the outset, the Alliance agreed on the threat presented by Russia and supported the use of sanctions, but never explored the potential of how NATO itself could apply or coordinate them. Other than that, economic issues and tools are scarcely mentioned in the Secretary General's annual reports for at least the past two decades, and when economic issues are mentioned, the reports usually refer to defence expenditures and the effects of the global economic crisis of 2008.

A unified NATO sanctions policy checks off the criteria set out by the *three wise men*, since it could i) balance everyone's interests and priorities while establishing a framework for common action, ii) tackle different emerging security challenges, iii) enable the Alliance to influence events through non-military cooperation and action, and iv) adapt to new challenges.⁶⁶ A sanctions policy could also address the milestone "Report of the Council on the Future Tasks of the Alliance" from 1967, also known as the Harmel Report, which lays out the principles of deterrence and dialogue.⁶⁷ A sanctions policy once again exemplifies a potential option for NATO to deter states, individuals, and entities from certain actions and increase the potential for dialogue — a dialogue in discussing actions, consequences, and potential ways forward. As a potential deterrent, a sanctions policy can raise the costs of and provide consequences for certain actions. Sanctions are also used as an effective signalling tool, which could underline a position and the seriousness of a sender state to the target state.

However, it could also be argued that a sanctions policy could become an irritant and therefore reduce the chances of effective dialogue.⁶⁸ Although this is a possibility, it is also equally important to respond to challenges and to signal condemnation through actions. Responding to challenges through only diplomatic channels may limit effectiveness due to the lack of tools used, while the possibility of using military or conventional security methods might be more provocative or escalate dangerous engagement. A sanctions policy could provide a middle ground approach, as it stops short of dangerous military engagement, supplies a useful tool for influencing, and establishes consequences and a unified action, while not necessarily eliminating diplomatic engagement and dialogue. In fact, sanctions could be beneficial for dialogue because they can indicate NATO's red lines and propose potential avenues for the target state to change its behaviour in order to remove the sanctions. This is similar to Florian Encke's 2020 article in the NATO review, which argues that "sanctions are a legitimate countermeasure against Russia's violations of international law, while avoiding any further military escalation".⁶⁹

It is consistently indicated, both by the Alliance and by experts outside the Alliance, that for NATO to remain relevant and effective, it needs to continuously re-evaluate its circumstances, re-examine itself, and adapt

accordingly.⁷⁰ Circling back to the *NATO 2030: United for a New Era* report, the group of experts confirm that “future uncertainties demand that NATO continues to adapt,” and that “NATO Allies will once again face a systemic challenge cutting across the domains of security and economics”.⁷¹ However, a sanctions policy is not explored as an option, even though NATO allies already rely on sanctions as a crucial tool in responding to human rights violations, state aggression and interference, breaches of international law, hybrid threats, and many other scenarios. Alongside other non-military cooperation, under Article 2, a unified sanctions policy could be a tool for NATO allies to preserve and potentially solidify political solidarity, which in turn could deter aggression and other forms of pressure and defend the territory of member states.

3.3 A NATO 2019 sanctions study

This research has found only one study that focuses on analyzing the potential use of NATO sanctions. Ian Bolton submitted a paper to the NATO Science and Technology Organization System Analysis and Studies Panel in January 2019 that put forth the merits of a unified NATO sanctions policy. In brief, Bolton argues that i) NATO could help its member states ensure they adopt relevant legislation to enforce international sanctions, ii) NATO members could share best practices on the implementation of sanctions, and iii) NATO could play a role in coordinating interdiction activity by NATO members for enforcement purposes.⁷²

Bolton also indicates that NATO is in a special position, given that member states are already strong proponents of sanctions and NATO could “act as a force multiplier” that could enable sanctions to be administered more widely.⁷³ He claims that NATO has the ability to have a significant impact on sanctions as they would allow NATO to increase its impact in both conflict prevention and resolution, and thereby reduce the likelihood of deploying military forces.⁷⁴ A unified sanctions policy would also arguably help advance the security interests of the Alliance with more flexibility, as a sanctions policy could be utilized both with bordering states as well as further abroad — rather than responding to or deploying defence capabilities globally — and could target thematic circumstances, such as chemical or biological weapons usage.

Bolton’s research also suggests that a sanctions policy would fall under current NATO commitments, as the Alliance could use sanctions to promote democratic values, increase cooperation on defence and security, and deter conflict. It could potentially help NATO’s commitment to peaceful resolutions of disputes by applying pressure to reach peace agreements, claiming that “arms embargoes and trade measures are amongst the most robust peaceful conflict resolution measures that can be adopted”.⁷⁵ Furthermore, sanctions are directly relevant to both violations carried out by states and those committed by various non-state bodies, and they could target illicit trafficking and terrorism.⁷⁶ Bolton outlines various other benefits of a NATO sanctions policy, including i) the fact that NATO would be the go-to body for the implementation and enforcement of sanctions, ii) NATO could contribute via additional resources, decreasing costs by burden sharing, iii) the sharing of information, expertise, and lessons learned, and iv) the Alliance could provide assistance to partner countries in creating and implementing sanctions. At the same time, Bolton does agree that there is still risk in the fact that a NATO sanctions policy could further harm relations with countries such as China and Russia.

3.4 NATO's current tools

NATO's tools are mostly a combination of the resources that the member states provide. These tools include i) nuclear deterrence and ballistic missile defence, ii) conventional military capabilities, iii) technology and science research and partnerships, iv) cyber defence, v) intelligence, surveillance, information sharing, and internal consultation, vi) strategic communications, vii) political unity and advocacy, viii) partnerships with key external entities such as the UN and EU, ix) counter-terrorism, and x) funding projects through a trust fund. NATO's organizational capacities provide additional tools besides the member states' immediate resources, not to mention the additional capacity for collective defence and crisis management. For instance, the recently created Joint Intelligence and Security Division (JISD) and Policy Planning Unit (PPU) are tools that provide NATO, as well as its member states, with additional capacities in horizon scanning, intelligence, threat assessment, and providing tailored recommendations and responsive actions.⁷⁷ There is also the Cooperative Cyber Defence (CCD) Centre of Excellence (COE) — accredited in 2008 and based in Tallinn, Estonia — which provides cyber security capabilities for NATO members to detect and combat cyber attacks.⁷⁸

As described by NATO itself, “deterrence [is] based on an appropriate mix of nuclear, conventional and ballistic missile defence capabilities, [and] remains a core element of NATO's overall strategy”.⁷⁹ However, this strategy and the tools mentioned above lack the diversity of responsive measures. These tools range from cautious minimal tools to military force, with large gaps in between. Technological advances, surveillance, intelligence sharing, cyber defence, advocacy, and other likeminded tools are acceptable responses, but lack the nature of a direct response to a state or adversary. These tools react to threats and try to mitigate or eliminate them. However, they do not directly pressure the target to stop or deter harmful action. On the other hand, although military force may send a strong signal and act as a deterrent, it also runs the severe risk of escalation, direct military engagement, and casualties (military and civilian), as well as the destruction of the environment and infrastructure. These risks can prevent NATO from committing to military action and cause a disproportional response — allowing the target state or entity to escape pressure and accountability for its actions.

Adding a sanctions policy to the NATO toolbox may be beneficial in bridging this wide gap, and may provide a spectrum of policy responses. Sanctions could be used as a direct tool to respond to an aggressor, target state, individuals, or target entities. They have the potential to put direct pressure in response, rather than being a passive response. A sanctions policy also has the potential dual ability of both responding and playing a preventative role, as it could raise the costs of certain actions and prevent individuals, entities, or states from pursuing that same action or escalating their actions further.

3.5 How can NATO implement a unified sanctions policy?

This section explores the practical side of how NATO could create a unified sanctions policy. To start, this research did not find any literature that explains how NATO could utilize sanctions, except for a brief overview done by Bolton's 2019 study. In analyzing NATO's current structure, as well as the formation of new approaches, mechanisms, and resources within NATO's organizational level, there are many different possible options for NATO to implement a unified sanctions policy. These options are wide-ranging, with different levels of commitment and varying consequences.

Prior to looking at NATO's options, it is important to keep in mind that sanctions are currently applied on a national legal basis and not solely by political will. This means that sanctions are usually applied on a national level, with each state having its own definitions of the applicable scenarios and legal instruments. Considering this, there are several options available.

To start, NATO could act as a platform by bringing together leadership from member states to discuss the application of sanctions via their own national mechanisms. These ad hoc high-level discussions, usually conducted by ministers and heads of states (or heads of government), could provide flexibility and adapt to political will. This way, there is no need to build a formal mechanism, set criteria, or amend the North Atlantic Treaty. Members can simply try to enhance economic cooperation, as stated in Article 2 of the North Atlantic Treaty, by discussing and agreeing to certain sanctions at the NATO level. This method could prove to be simpler and quicker than other methods. However, if NATO is to apply sanctions more often, it may need to create a formal mechanism to make application of sanctions more efficient, as this method might prove to be less formalized, less structured, and less consistent. Moreover, this method would also require political will each time to create a sanctions package, and one or a few member states will need to drive political will, at least at the beginning. This also leaves the burden of creating a sanctions package on the member states — as it is now — unless member states agree to create an ad hoc working group to research, compile the targets and evidence, and share recommendations.

Following this methodology, the North Atlantic Council (NAC) is the principal political decision-making authority, and has the power to create decisions under Article 9 of the North Atlantic Treaty.⁸⁰ It also has authority over its network of committees, including the Political Committee, Partnerships and Cooperative Security Committee, Defence Policy and Planning Committee, and the Committee on Proliferation. The NAC could make these ad hoc decisions to create sanctions regimes, or it could also form a separate committee — a Sanctions Committee — that could work on building possible sanctions regimes that the member states could then discuss and agree on. As NATO describes, “committees form an indispensable part of the decision-making process since they enable members to exchange information, consult with each other and take decisions”.⁸¹ Committees allow all members to participate in discussions with national experts, providing technical expertise and consensus building at an early stage. Besides the costs of maintaining an additional committee, the benefits of having a committee include the fact that creating sanctions regimes for NATO members would become more efficient and cost-effective due to burden sharing.⁸²

Another way that NATO members could formalize a sanctions mechanism would be to agree on a set criterion where sanctions should be applied. This would help eliminate the need for constant political will in creating a sanctions regime, and would allow for a formal structure that all member states agree on. For instance, member states may agree that sanctions can be applied when a state, company, or individual commits human rights violations or violations of international law. This would provide a consistent base for sanctions regimes to develop, and create a more structured and agreed-upon approach. However, this approach may require time and resources to establish, and could spark disagreement among members on what the criteria should look like. It could also lead to future disagreements among members, as they could disagree on how the criteria is applied and interpreted in future cases. Additionally, this method is less flexible, and members may be limited in certain cases where a situation might warrant a sanctions response but may not fit the set criteria.

Similar to the creation of a sanctions committee, NATO could create a Sanctions Division. At the Warsaw Summit in July 2016, the members' heads of state and government agreed to establish a new Joint Intelligence and Security Division (JISD), with the purpose of improving NATO's ability to draw on a wide range of intelligence resources.⁸³ Similarly, a Sanctions Division would be able to operationalize a team of national sanctions experts, alongside divisions such as the Political Affairs and Security Policy Division, Operations Division, and Defence Policy and Planning Division.⁸⁴ Combining efforts this way, NATO members would be able to save on costs through burden sharing, combine strengths by bringing together their best experts, potentially improve efficiency in the delivery of sanctions packages, analyze the impact of sanctions, and work on improving the enforcement or implementation of sanctions. Selecting targets for sanctions can also be a political decision, given that they could have implications for certain domestic interests. However, a recommendation created by a NATO division could eliminate some of that political bias.

Lastly, sanctions could also be put forth by the NATO Parliamentary Assembly (NATO PA). The NATO PA is an inter-parliamentary organization bringing together legislators from NATO member states to deliberate on security-related issues based on common interest and concern.⁸⁵ Since the 1980s, it has evolved to take on additional roles and has created five committees and eight sub-committees, including the Economics and Security Committee.⁸⁶ For instance, the NATO PA published Resolution 463, titled *Economic Resilience and Pandemics*, providing recommendations for NATO and members going forward.⁸⁷ Using a similar process, the NATO PA could utilize the Economics and Security Committee to take on sanctions issues, assess various cases, and provide recommendations on potential sanctions packages or regimes.

Bolton's 2019 study also provides some analysis of potential options for NATO.⁸⁸ He suggests that although NATO is incapable of legislating for its members, NATO could require its members to use their own domestic legislation to give effect to NATO sanctions. One option that Bolton prioritizes could see the political leaders of member states coming to a political commitment at a summit, for instance. The creation of more specific and binding language could require members to enforce sanctions. This could include the amendment of NATO's "mandate" to provide a specific reference to the ability of the Alliance to mandate sanctions regimes in the interest of peace and security — similar to the EU's sanctions policy. Bolton indicates, however, that this would be a major shift in the organization given its voluntary nature. Bolton also exposes a significant question by asking how NATO sanctions would impact the EU's sanctions policy and the overlapping member states that happen to be a member of both organizations, which this research will respond to in the next section.⁸⁹

Most importantly, NATO has the potential to utilize its immense capabilities, including its conventional military forces, to aid in the implementation and enforcement of sanctions regimes. One of the key factors in the ineffectiveness of sanctions is the ability of targets to avoid sanctions through different trade routes, trading partners, and other adaptive approaches. NATO's combined military capabilities can reinforce sanctions regimes by identifying those areas of avoidance and restricting those approaches for targets, which will reinforce the pressure on target actors and could increase the likeliness of changed behaviour.

3.6 Potential consequences of NATO sanctions

This section explores the impacts, benefits, risks, and potential dilemmas of imposing NATO sanctions. First, the effects of such a policy would be completely dependent on the way it is implemented, given that there are many options to choose from, as indicated in the section above. Its impacts would be dependent on whether the sanctions policy is a political commitment or recommendation, as well as if it is binding or not binding.

Sanctions imposed on a national, or unilateral, level provide a sense of sovereignty. By having a formal, structured, and operationalized NATO sanctions mechanism, there could be worry that this may infringe on sovereignty and national interests. However, given that NATO decisions are built only by consensus — like the EU’s sanctions policy — the sanctions policy would require all NATO members to agree. In turn, this creates another potential issue of dilution. When sanctions are created at the multilateral level, they are more likely to be diluted due to the various national and domestic interests of the member states. This means that certain targets that would be permissible for some members would not be permissible for others, which can severely reduce the sanctions targets or restrictions given the fact that the decision would need to be unanimous.

Given that NATO has not imposed a sanctions policy before, it may encounter difficulties at the beginning due to the lack of a well-functioning, efficient, and experienced mechanism. This may create skepticism of a unified sanctions policy among member states, and create a negative impression of sanctions within the Alliance. Disagreements on sanctions targets and restrictions could also generate or enhance divisions amongst the members. These divisions and frustrations could also be a potential risk for the Alliance’s reputation and public appearance, especially in the eyes of its adversaries.

NATO is also a defensive alliance at its core, and responding to threats with sanctions could be seen as aggressive. For instance, in responding to Russian aggression, NATO looks to cyber security, reinforcing critical infrastructure, aerial patrols, air defence systems, and other methods of protection. A sanctions policy against Russia — its individuals and entities — could be seen as an *offensive* strategy, one that is overreaching the boundaries of its member states. However, when observing this aspect, a sanctions policy is actually an isolating and reactive tool rather than an offensive tool. Sender states use sanctions not to attack certain industries, individuals, states, or entities, but rather to cut ties with them due to certain actions by those actors. They are also conditional, meaning that sanctions are applied only if the target has not changed its policy or behaviour that produced the sanctions in the first place. This aspect is important to consider, as the sanctioned actor always has the choice to maintain or change its behaviour. Even with sender states isolating target states through sanctions, sanctioned parties are still able to do business, store their reserves, travel elsewhere, and establish new partnerships in order to avoid sanctions altogether. Moreover, these sanctions would also be targeted, meaning that they would not be targeting the country or general civilian population, and would usually avoid any humanitarian impacts or at least try to avoid widespread harm.

Even though the EU already applies a sanctions policy, NATO sanctions would also include the US, Canada, Norway, Montenegro, Albania, North Macedonia, and Turkey.⁹⁰ At the same time, due to consensus-based voting, a NATO sanctions policy would need the approval of all these countries as well. In addition, Sweden, Finland, Ireland, Cyprus, and Austria are not part of NATO, and therefore could change the calculus of the

sanctions policy due to different domestic demands. This could be of benefit, since NATO sanctions could target areas that EU sanctions would not. NATO and the EU both applying sanctions regimes would not necessarily need to complicate circumstances, as there is the possibility of coexisting sanctions policies. This is based on the fact that a unanimous vote is required in both institutions, and thus a sanctions policy would be agreed to by all corresponding member states.

The EU and NATO already have many responsibilities, areas of focus, values, and member states in common — 21 member states are in both the EU and NATO. For instance, both organizations work on energy security, cyber security, disinformation, humanitarian assistance, transport infrastructure, and other areas.⁹¹ These tasks overlap, but provide areas for mutual assistance and cooperation. Economic integration is the foundation of the EU — originating from the European Economic Community (EEC) and the 1957 *Treaty of Rome* — while security and defence is at the bedrock of NATO. Therefore, a key question arises: would sanctions be considered to be more aligned with economic integration or security and defence?

Without arguing which organization should be implementing sanctions and which should not be, this research finds that both organizations can implement sanctions policies simultaneously. In a situation where one organization (either the EU or NATO) imposes harsher sanctions than the other, EU members that are not part of NATO will have the chance to shape the EU's sanctions policy, while NATO members that are not part of the EU will shape the NATO sanctions policy. Those members that are part of both organizations will need to shape and impose both sanctions commitments. Therefore, either way, member states will be able to be a part of shaping and voting for the sanctions policy they would like to implement and will not be forced to implement a sanctions policy with which they disagree.⁹²

4. Conclusions

Based on this research and assessment, a unified NATO sanctions policy is possible, has several viable approaches for implementation, and has the potential to be a strong policy due to the Alliance's capacity and membership. But to start, it was surprising not to find any literature on NATO sanctions besides Bolton's study in 2019, or any real political discussion on or political appetite to explore the Washington Treaty. This may be due to the fact that NATO has never used a unified sanctions policy before, and sanctions have been applied in a coordinated fashion instead. This research has also found that the literature on "NATO sanctions" is misleading, as this term was usually used in reference to sanctions imposed by NATO member states unilaterally or through the EU.

This research also found that NATO and its member states speak in support of sanctions enacted by members against external threats. It was consistently shown that NATO's leadership was supportive of sanctions imposed against various states and that there was unity among the Alliance on these actions. Moreover, the current NATO Secretary General, NATO reports, and NATO experts consistently indicate that there is a need for new, flexible, proactive, and adaptive tools. This research shows that a sanctions policy could be one of those tools, and may be engrained in Article 2 of the North Atlantic Treaty and the report by the Three Wise Men who indicated the need for political, economic, and non-military cooperation.

Many options are available to NATO should there be the political will to create a unified sanctions policy, ranging from an ad hoc regime to a formal ongoing mechanism. Options include political commitments made at a summit, through the NATO PA or potentially through the Economics and Security Committee, through the NAC or by creating a Sanctions Committee through the NAC, or by creating a designated Sanctions Division within NATO.

Finally, this research has shown the potential effects of NATO's sanctions policy and has responded to various possible issues. This research found that NATO and EU sanctions policies could coexist due to consensus in both organizations. There are risks and costs associated with sanctions, including the sanctions becoming an irritant, the costs of doing business or trade, the utilization of additional resources, and the potential of creating divisions in the Alliance over the sanctions approach. However, in the face of these cons, there are many potential benefits for NATO and its members, and a sanctions policy could be particularly useful in responding to contemporary great power competition. NATO members would benefit from burden sharing if there is a NATO sanctions mechanism. In any scenario, the Alliance would benefit from information gathering and exchange, to identify targets and ensure enforcement. Further, NATO could utilize its current resources and capacity (including the military) to identify gaps in enforcing sanctions and to reduce the avoidance of sanctions. Altogether, this would also enable NATO and its members to share best practices and improve sanction regimes.

A unified NATO sanctions policy would also give members a chance to participate in more encompassing Western sanction regimes, and create an option to pursue a multilateral sanctions policy when the UN's and EU's options are limited. A sanctions policy would enhance NATO's toolbox by filling the gap between its passive responsive measures and military engagement or escalation, thereby enabling a middle-ground approach. In comparison to its passive responsive measures — such as advocacy, cyber defence, and anti-disinformation campaigns — a sanctions policy could be a direct response to the target actor(s). NATO would also be able to use sanctions as leverage for dialogue and to potentially deter harmful actions, and NATO would be able to use this tool to address a variety of different challenges including state aggression, hybrid warfare, breaches of international law, and human rights violations.

For future research, it is imperative for sanctions and NATO experts, as well as key decision-makers, to come together and deliberate on the potential of a unified NATO sanctions policy. In other related areas, it would also be beneficial to evaluate how NATO could utilize a sanctions policy specifically towards Russia, China, Belarus, terrorism, organized crime networks, and several other areas that NATO members already target on a unilateral level. There is also considerable space to observe how NATO can best approach a sanctions policy given the many options available, and how economic cooperation and a sanctions policy would affect the internal dynamics of the Alliance.

¹ National Defence of Canada, "Theme Three: Global Defence Engagement, Challenge 2: Canada's Defence Engagement," *Defence Policy Challenges - Canada.ca*, December 1, 2020. Accessed July 12, 2021. <https://www.canada.ca/en/department-national-defence/programs/minds/defence-policy-challenges.html>

² Turkey is the only NATO member to have not imposed sanctions against Russia. Ministry of Foreign Affairs of the Republic of Turkey, "Interview of H.E. Mr. Mevlüt Çavuşoğlu to TRT World, 15 January 2016, Ankara." https://www.mfa.gov.tr/interview-by-h_e_-mr_-mevl%C3%Bct-%C3%A7avu%C5%9Fo%C4%9Flu-given-to-trt-world--15-january-2016-ankara.en.mfa

³ European Council, "Infographic - EU sanctions against Russia over Ukraine," *Infographics*, 2021.

<https://www.consilium.europa.eu/en/infographics/eu-sanctions-against-russia-over-ukraine/>; Government of Canada, "Canadian Sanctions Related to Russia," *Global Affairs Canada*, 2021. https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/russia-russie.aspx?lang=eng; Congressional Research Service, "U.S. Sanctions on Russia: An Overview," June 7, 2021. <https://fas.org/sgp/crs/row/IF10779.pdf>; Government of UK, "UK sanctions relating to Russia," *Foreign, Commonwealth & Development Office*, December 31, 2020. [https://www.gov.uk/government/collections/uk-sanctions-on-russia#:~:text=This%20sanctions%20regime%20is%20aimed,legislation%20and%20related%20UK%20regulations](https://www.gov.uk/government/collections/uk-sanctions-on-russia#:~:text=This%20sanctions%20regime%20is%20aimed,legislation%20and%20related%20UK%20regulations;); "EU Candidate Serbia Pledges No Sanctions against Russia," *AP NEWS*, June 24, 2021. Accessed July 12, 2021. <https://apnews.com/article/russia-serbia-europe-government-and-politics-3bae844d1f7c483be0109eea00ba15>

⁴ Most famously indicated by Johan Galtung (1967), Peter Wallensteen (1968), Karin Knorr (1977), Margaret Doxey (1980 and 1983), Robert Pape (1997), Clifton Morgan and Valerie Schwebach (1997), and Daniel Drezner (1999).

⁵ Makio Miyagawa, *Do Economic Sanctions Work?* Palgrave Macmillan, 1992. <https://www.palgrave.com/gp/book/9780333552759>

⁶ United Nations Secretary General, "Letter dated 24 September 1996 from the Chairman Of The Security Council Committee Established Pursuant To Resolution 724 (1991) Concerning Yugoslavia Addressed to the President of the Security Council," *Operation Joint Endeavour S/1996/776*, September 24, 1996. <https://www.nato.int/ifor/un/u960924a.htm>

⁷ Gary Clyde Hufbauer, Jeffrey J. Schott, Kimberly Ann Elliott, and Barbara Oegg, *Economic Sanctions Reconsidered*, Peterson Institute for International Economics, May 2008: 9.

⁸ Hufbauer et al., *Economic Sanctions Reconsidered*, Peterson Institute for International Economics, May 2008: 10.

⁹ Demyan Plakhov, *Theory and Practice of Sanctions Strategy and Effectiveness: Influencing Russian Foreign Policy*, Carleton University Research Virtual Environment, 2020. <https://curve.carleton.ca/21289117-1298-4f89-8cf1-2d5f3c4187ca>

¹⁰ George W. Baer, *Test Case: Italy, Ethiopia, and the League of Nations*, Hoover Institution Press, 1976.

¹¹ Hufbauer et al., *Economic Sanctions Reconsidered*, Peterson Institute for International Economics, May 2008: 20-33.

¹² John Smith and Kieran Beer, "Sanctions with John Smith," *Financial Crime Matters* (Podcast), April 15, 2019; State Secretariat for Economic Affairs SECO, "Smart sanctions – targeted sanctions," *Swiss Confederation*, March 24, 2017. https://www.seco.admin.ch/seco/en/home/Aussenwirtschaftspolitik_Wirtschaftliche_Zusammenarbeit/Wirtschaftsbeziehungen/exportkontrollen-und-sanktionen/sanktionen-embargos/smart-sanctions--gezielte-sanktionen.html

¹³ Majid Khadduri and Hugh Kennedy, "Iraq: The UN Embargo and Oil-for-Food Program," *Encyclopædia Britannica*, May 9, 2020. <https://www.britannica.com/place/Iraq/The-UN-embargo-and-oil-for-food-program>

¹⁴ U.S. DEPARTMENT OF THE TREASURY, *Countering America's Adversaries Through Sanctions Act*, United States Government, 2021. <https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information/countering-americas-adversaries-through-sanctions-act>

¹⁵ Cooper A. Drury, "Evaluating Sanction Effectiveness," *Economic sanctions and presidential decisions: models of political rationality*, Palgrave Macmillan, 2005: 12-14.

¹⁶ Richard Nephew, *The Art of Sanctions: A View from the Field*, Columbia University Press, 2018.

¹⁷ United Nations, "United Nations Charter (full text)," *About Us*, 2021. <https://www.un.org/en/about-us/un-charter/full-text>

¹⁸ Hufbauer et al., *Economic Sanctions Reconsidered*, Peterson Institute for International Economics, May 2008.

¹⁹ Joy Gordon, "A Peaceful, Silent, Deadly Remedy: The Ethics of Economic Sanctions," *Ethics & International Affairs* 13 (1999): 123-124, 127, 133, 138; Jane E. Holl et al., *Preventing Deadly Conflict: Final Report*, Carnegie Corporation of New York, 1997; Nicholas L. Miller, "The Secret Success of Nonproliferation Sanctions," *International Organization* 68, no. 4 (2014): 913-944; Richard H. Speier, Brian G. Chow, and S. Rae Starr, *Nonproliferation Sanctions*, RAND, 2001; Christopher Daase and Oliver Meier, *Arms control in the 21st century: Between coercion and cooperation*, Routledge Global Security Studies, 2013.

²⁰ David Allen Baldwin, *Economic Statecraft*, Princeton University Press, 1985.

²¹ Lisa Martin, *Coercive Cooperation: Explaining Multilateral Economic Sanctions*, Princeton University Press, 1992; Hufbauer et al., *Economic Sanctions Reconsidered*, Peterson Institute for International Economics, May 2008. See Drezner for reservations: Daniel W. Drezner, *The Sanctions Paradox: Economic Statecraft and International Relations*, Cambridge University Press, 1999.

²² Hufbauer et al., *Economic Sanctions Reconsidered*, Peterson Institute for International Economics, May 2008.

²³ Ibid., 171; Sean M. Bolks and Dina Al-Sowayel, "How Long Do Economic Sanctions Last? Examining the Sanctioning Process through Duration," *Political Research Quarterly* 53, no. 2 (2000); Han Dorussen and Jongryn Mo, "Ending Economic Sanctions: Audience Costs and Rent-Seeking as Commitment Strategies," *Journal of Conflict Resolution* 45, no. 4 (2001); Han Dorussen, "Mixing Carrots with Sticks: Evaluating the Effectiveness of Positive Incentives," *Journal of Peace Research* 38, no. 2 (2001); David Allen Baldwin, "The Power of Positive Sanctions," *World Politics* 24, no. 1 (1971): 2; Fiona McGillivray and Allan C. Stam, "Political Institutions, Coercive Diplomacy, and the Duration of Economic Sanctions," *The Journal of Conflict Resolution* 48, no. 2 (2004): 154-172; Drury, "Evaluating Sanction Effectiveness," *Economic sanctions and presidential decisions: models of political rationality*, Palgrave Macmillan, 2005: 7-9; Jason Davidson and George Shambaugh, "Chapter 3: Who's Afraid of Economic Incentives? The Efficacy-Externality Tradeoff," *Sanctions as Economic Statecraft*, Palgrave Macmillan, 2000.

²⁴ Plakhov, *Theory and Practice of Sanctions Strategy and Effectiveness: Influencing Russian Foreign Policy*, Carleton University Research Virtual Environment, 2020: 96-124.

²⁵ United Nations, "Chapter VII: Action with Respect to Threats to the Peace, Breaches of the Peace, and Acts of Aggression," *Charter of the United Nations*, October 24, 1945: 27.

²⁶ Ibid., 27-28.

²⁷ United Nations, "Sanctions," *United Nations Security Council*, 2020. <https://www.un.org/securitycouncil/sanctions/information>; Margaret Doxey, "United Nations Sanctions," *International Sanctions in Contemporary Perspective*, Palgrave Macmillan, 1987: 32-52.

²⁸ UN Permanent Members (in alphabetical order): China, France, Russia, the UK, and the US.

²⁹ Margaret Doxey, "The Impact of Sanctions," *International Sanctions in Contemporary Perspective*, Palgrave Macmillan, 1987: 115.

³⁰ Smith and Beer, *Sanctions with John Smith*, Financial Crime Matters, 2019.

³¹ Jennifer Hansler, "US, EU, UK and Canada impose fresh sanctions on Belarus," *CNN News*, June 21, 2021.

<https://www.cnn.com/2021/06/21/politics/belarus-coordinated-sanctions/index.html>; Global News, "Trudeau urges international community for coordinated sanctions on China for Uyghurs' mistreatment," March 29, 2021.

<https://globalnews.ca/video/7726386/trudeau-urges-international-community-for-coordinated-sanctions-on-china-for-uyghurs-mistreatment/>

³² Here is a list of articles misusing the term: Steven Chadwick, "The Effectiveness Of Nato Sanctions Against Russia," *NATO Association of Canada*, May 5, 2014. <https://natoassociation.ca/the-effectiveness-of-nato-sanctions-against-russia/>; Sonali Chowdhry et al., "The economic costs of war by other means," *Kiel Policy Brief*, No. 147, Kiel Institute for the World Economy (IfW), 2020. <https://www.econstor.eu/bitstream/10419/225500/1/1736480774.pdf>; Subcommittee on International Economic Policy and Trade, "East-West Economic Issues, Sanctions Policy, and the Formulation of International Economic Policy," Hearing Before the Subcommittees on Europe and the Middle East and on International Economic Policy and Trade of the Committee on Foreign Affairs, House of Representatives, Ninety-eighth Congress, Second Session, March 29, 1984; Foreign Policy, "ARCTIC COMPETITION," *PART TWO: MILITARY BUILDUP AND GREAT POWER COMPETITION*, December 14, 2020. <https://foreignpolicy.com/2020/12/15/arctic-competition-defense-militarization-security-russia-nato-war-games-china-power-map/>; Catherine Studemeyer, "Cooperative Agendas and the Power of the Periphery: the US, Estonia, and NATO after the Ukraine Crisis," *Geopolitics* 24, no. 4 (2019): 787-810. https://www.tandfonline.com/doi/pdf/10.1080/14650045.2018.1496911?casa_token=xcuFb8SA5pwAAAAA:mZWE8RV5bcCae43VFQWJKx1BTQmYKVemuO7MsxJlJ_FUyx6yquBT9Un6tiuhudYzH5ZmYXeEU5MNnQ; Matthias Matthijs, "The Three Faces of German Leadership," *Survival: Global Politics and Strategy* 58, no. 2 (2016): 135-154. https://www.tandfonline.com/doi/full/10.1080/00396338.2016.1161908?casa_token=bvgw35KIMhAAAAA:KOx8gleL3fHHbYh8vOChmTdj5aw65VKOvoQb500_B1M41cN7mxm2tyHnzBDT9TxSBOYK7f6nML6pUw; Tolga Oz and Ahmet Ergulen, "Secure and Optimum Fuel Distribution of Nato," *Journal of Applied Security Research* 13, no. 2 (2018): 186-198. https://www.tandfonline.com/doi/pdf/10.1080/19361610.2017.1354271?casa_token=q1Ulp9vAlpQAAAAA:dkZRacXlbrJ2ritSEQJOylRmY-cSk5gxA-3wjsdDiOqvi2SJ6ILLQc82-8lmCFINzIfC_gr_RVI51A; Eric Grove, "I Navies in peacekeeping and enforcement: The British experience in the Adriatic sea," *International Peacekeeping* 1, no. 4 (1994): 462-470. https://www.tandfonline.com/doi/pdf/10.1080/13533319408413525?casa_token=c_tg6tSjkzAAAAA:eZfW4n4QiWz7ABlzf2K8--21NOxhnggB_C83P-PNi8lrJNX2xf4WVTxGEEdMPgshxhu6LnmPwFR5Cg; Sam Moyo, "Perspectives on South-South relations: China's presence in Africa," *Inter-Asia Cultural Studies* 17, no. 1 (2016): 58-67. <https://www.tandfonline.com/doi/pdf/10.1080/14649373.2016.1138615>; Walter Russell Mead, "Eastern Europe and the Return of Geopolitics," *Horizons: Journal of International Relations and Sustainable Development*, no. 5, 2015: 22-31. https://www.jstor.org/stable/pdf/48573584.pdf?casa_token=LnKe4jRlbtQAAAAA:1JjXywwWuZBsa0e4RlyuDAppUjI_3ZeWWZYPvMpSTPDuDZeloDUF_PslR6yk4rLef9fkE8Xb39NAbhyPfuOhTbPplcQPVNvu9nLvIcUFKkeYQCHexHZ-

³³ Steven Erlanger, Julie Hirschfeld Davis, and Stephen Castle, "NATO Prepares New Sanctions Over Russian Action in Ukraine," *The New York Times*, September 4, 2014. <https://www.nytimes.com/2014/09/05/world/as-nato-meets-ukraine-conflict-holds-center-stage.html>; Edward Hunter Christie, "Sanctions after Crimea: Have they worked?" *NATO Review*, July 13, 2015.

<https://www.nato.int/docu/review/articles/2015/07/13/sanctions-after-crimea-have-they-worked/index.html>

³⁴ Clara Portela, *European Union Sanctions and Foreign Policy. When and Why do they Work?*, Routledge, 2010: 19. As a side note, it is also important to note here that one of the reasons for the European Community (EC) using sanctions in the 1980s was the absence of UN Security Council mandates. However, this is not to say that the EU does not implement UN sanctions. It is to say that beyond applying UN-mandated sanctions, the EU also implements additional *autonomous* sanctions. Some may say that the EC applied UNSC-mandated sanctions prior to the 1980s. However, evidence will show that there was no EC regulation or mandate to apply sanctions, and EC states applied sanctions unilaterally.

³⁵ Miyagawa, *Do Economic Sanctions Work?*, Palgrave Macmillan, 1992: 13; Stuart D. Goldman and Victoria L. Engel, "MARTIAL LAW IN POLAND (ARCHIVED--01/21/83) ISSUE BRIEF NUMBER IB81181," *THE LIBRARY OF CONGRESS CONGRESSIONAL RESEARCH SERVICE MAJOR ISSUES SYSTEM*, December 30, 1981: 5. https://www.everycrsreport.com/files/19830121_IB81181_29deb8c705c0796c30a97bc62fb09a92b8757a0b.pdf

³⁶ *Ibid.*, 5.

³⁷ Goldman and Engel, "MARTIAL LAW IN POLAND (ARCHIVED--01/21/83) ISSUE BRIEF NUMBER IB81181," *THE LIBRARY OF CONGRESS CONGRESSIONAL RESEARCH SERVICE MAJOR ISSUES SYSTEM*, December 30, 1981: 6.

³⁸ AP, "NATO SEES DECLINE IN POLAND," *The New York Times*, January 24, 1982. <https://www.nytimes.com/1982/01/24/world/nato-sees-decline-in-poland.html>

³⁹ *Ibid.*

⁴⁰ Helene Sjursen, "WESTERN POLICY-MAKING IN THE POLISH CRISIS (1980-83): THE PROBLEM OF COORDINATION," *The London School of Economics and Political Science*, 1997: 10. <http://etheses.lse.ac.uk/2477/1/U615426.pdf>. For a further discussion of the EC member states' positions on sanctions at the time, see: Simon Nuttall, "Interaction between European Political Cooperation and the European Community," *Yearbook of European Law*, no. 7 (1987): 211-249.

⁴¹ David W. Hunter, *Western Trade Pressure on the Soviet Union: An Interdependence Perspective on Sanctions*, Palgrave Macmillan, 1991: 79.

⁴² *Ibid.*, 99.

⁴³ *Ibid.*, 99.

⁴⁴ *Ibid.*, 99.

⁴⁵ Bernard Gwertzman, "U.S. IS RELENTING ON NATO SANCTIONS AGAINST RUSSIANS," *The New York Times*, January 7, 1982. <https://www.nytimes.com/1982/01/07/world/us-is-renting-on-nato-sanctions-against-russians.html>

⁴⁶ North Atlantic Treaty Organization, "North Atlantic Council Statement following the announcement by the United States of actions with regard to Russia," *Newsroom*, April 15, 2021. https://www.nato.int/cps/en/natohq/news_183168.htm?selectedLocale=en

⁴⁷ *Ibid.*

⁴⁸ North Atlantic Treaty Organization, "Press conference by NATO Secretary General Jens Stoltenberg following the meeting of the North Atlantic Council with Resolute Support operational partner nations," *Newsroom*, December 7, 2016.

https://www.nato.int/cps/en/natohq/opinions_138764.htm

⁴⁹ The uncertainty was founded on the Trump administration's unwillingness to acknowledge NATO's function and relevance. NATO allies and the organization were distraught over the confrontational stance from the US president given his remarks about other allies not 'sharing the same burden' as the US.

⁵⁰ North Atlantic Treaty Organization, "Press conference by NATO Secretary General Jens Stoltenberg following the meeting of the North Atlantic Council with Resolute Support operational partner nations," *Newsroom*, December 7, 2016.

⁵¹ North Atlantic Treaty Organization, "Press conference by NATO Secretary General Jens Stoltenberg following [sic] the meeting of the North Atlantic Council at the level of Foreign Ministers," *Newsroom*, March 24, 2021.

https://www.nato.int/cps/en/natohq/opinions_182510.htm

⁵² *Ibid.*

⁵³ *Ibid.*

⁵⁴ *Ibid.*; North Atlantic Treaty Organization, "Joint press point by NATO Secretary General Jens Stoltenberg and the Foreign Minister of Ukraine, Dmytro Kuleba," *Newsroom*, April 13, 2021.

https://www.nato.int/cps/en/natohq/opinions_183016.htm?selectedLocale=en

⁵⁵ North Atlantic Treaty Organization, “Analysis and Recommendations of the Reflection Group Appointed by the NATO Secretary General,” *NATO 2030: United for a New Era*, November 25, 2020.

https://www.nato.int/nato_static_fl2014/assets/pdf/2020/12/pdf/201201-Reflection-Group-Final-Report-Uni.pdf

⁵⁶ *Ibid.*, 7.

⁵⁷ *Ibid.*, 26.

⁵⁸ This report is also known as the “report of the three wise men”. Jamie Shea, “What can we learn today from the ‘three wise men’?” *NATO Review*, December 5, 2016. <https://www.nato.int/docu/review/articles/2016/12/05/what-can-we-learn-today-from-the-three-wise-men/index.html>

⁵⁹ There are five permanent members in the United Nations Security Council, each possessing a veto vote. The members are Russia, China, the United Kingdom, the United States, and France. They are also known as the P5.

⁶⁰ Shea, “What can we learn today from the ‘three wise men’?” *NATO Review*, December 5, 2016.

⁶¹ North Atlantic Treaty Organization, “The North Atlantic Treaty,” Washington D.C., April 4, 1949.

https://www.nato.int/cps/en/natohq/official_texts_17120.htm

⁶² North Atlantic Treaty Organization, “Analysis and Recommendations of the Reflection Group Appointed by the NATO Secretary General,” *NATO 2030: United for a New Era*, November 25, 2020: 7.

⁶³ Shea, “What can we learn today from the ‘three wise men’?” *NATO Review*, December 5, 2016.

⁶⁴ NATO Secretary General, “The Secretary General’s Annual Report 2017,” *North Atlantic Treaty Organization*, 2017: 22.

https://www.nato.int/nato_static_fl2014/assets/pdf/pdf_2018_03/20180315_SG_AnnualReport_en.pdf

⁶⁵ NATO Secretary General, “The Secretary General’s Annual Report 2014,” *North Atlantic Treaty Organization*, 2014: 5.

https://www.nato.int/nato_static_fl2014/assets/pdf/pdf_2015_01/20150130_SG_AnnualReport_2014_en.pdf. Analyzing just over the last two decades of annual reports.

⁶⁶ Shea, “What can we learn today from the ‘three wise men’?” *NATO Review*, December 5, 2016.

⁶⁷ North Atlantic Treaty Organization, “Harmel Report,” North Atlantic Treaty Organization, 1967. Published November 2017.

https://www.nato.int/cps/en/natohq/topics_67927.htm

⁶⁸ Plakhov, *Theory and Practice of Sanctions Strategy and Effectiveness: Influencing Russian Foreign Policy*, Carleton University Research Virtual Environment, 2020.

⁶⁹ Florian Encke, “An independent and sovereign Ukraine is key to Euro-Atlantic security,” *NATO Review*, July 8, 2020.

https://www.nato.int/docu/review/articles/2020/07/08/an-independent-and-sovereign-ukraine-is-key-to-euro-atlantic-security/index.html?utm_source

⁷⁰ Shea, “What can we learn today from the ‘three wise men’?” *NATO Review*, December 5, 2016; Conn Hallinan, “NATO: Time to Re-Examine an Alliance,” *INTERNATIONAL POLICY DIGEST*, July 28, 2018. <https://intpolicydigest.org/nato-time-to-re-examine-an-Alliance/>; Financial Times, “Nato needs to reassert its common purpose,” *Financial Times editorial*, December 1, 2019.

<https://www.ft.com/content/0a9d6c6e-12b6-11ea-a7e6-62bf4f9e548a>; Damon Wilson and Will O’Brien, “Reimagine the Washington Treaty,” *Atlantic Council*, October 14, 2020. <https://www.atlanticcouncil.org/content-series/nato20-2020/reimagine-the-washington-treaty/>;

Jonathan Masters, “Backgrounder: The North Atlantic Treaty Organization (NATO),” *Council on Foreign Relations (CFR)*, May 6, 2021. <https://www.cfr.org/backgrounder/north-atlantic-treaty-organization-nato>

⁷¹ North Atlantic Treaty Organization, “Analysis and Recommendations of the Reflection Group Appointed by the NATO Secretary General,” *NATO 2030: United for a New Era*, November 25, 2020: 5.

⁷² Ian Bolton, “Deterrence and the use of Sanctions,” *NATO SCIENCE AND TECHNOLOGY ORGANIZATION SYSTEM ANALYSIS AND STUDIES PANEL*, STO-MP-SAS-141, January 2019. <https://www.sto.nato.int/publications/STO%20Meeting%20Proceedings/STO-MP-SAS-141/MP-SAS-141-10.pdf>

⁷³ *Ibid.*, 2.

⁷⁴ *Ibid.*, 19.

⁷⁵ *Ibid.*, 18.

⁷⁶ *Ibid.*, 18.

⁷⁷ North Atlantic Treaty Organization, “Analysis and Recommendations of the Reflection Group Appointed by the NATO Secretary General,” *NATO 2030: United for a New Era*, November 25, 2020: 24.

⁷⁸ North Atlantic Treaty Organization, “Centres of Excellence,” *Topics*, November 3, 2020.

https://www.nato.int/cps/en/natohq/topics_68372.htm?

⁷⁹ North Atlantic Treaty Organization, "NATO's capabilities," *Topics*, April 30, 2021.

https://www.nato.int/cps/en/natohq/topics_49137.htm

⁸⁰ North Atlantic Treaty Organization, "North Atlantic Council," *Topics*, October 10, 2017.

https://www.nato.int/cps/en/natolive/topics_49763.htm

⁸¹ North Atlantic Treaty Organization, "Committees," *Topics*, March 17, 2020.

https://www.nato.int/cps/en/natohq/topics_49174.htm

⁸² Ibid. There is also no need to amend the North Atlantic Treaty when creating an additional committee.

⁸³ North Atlantic Treaty Organization, "Analysis and Recommendations of the Reflection Group Appointed by the NATO Secretary General," *NATO 2030: United for a New Era*, November 25, 2020: 24.

⁸⁴ North Atlantic Treaty Organization, "NATO Organization," *Structure*, August 20, 2020.

<https://www.nato.int/cps/en/natohq/structure.htm>

⁸⁵ North Atlantic Treaty Organization, "NATO Parliamentary Assembly," *Topics*, March 23, 2020.

https://www.nato.int/cps/en/natolive/topics_50080.htm

⁸⁶ Ibid.

⁸⁷ Christian Tybring-Gjedde, "2020 - RESOLUTION 463 - ECONOMIC RESILIENCE AND PANDEMICS," *NATO Parliamentary Assembly*, November 23, 2020. <https://www.nato-pa.int/document/2020-resolution-463-economic-resilience-and-pandemics>

⁸⁸ Bolton, "Deterrence and the use of Sanctions," *NATO SCIENCE AND TECHNOLOGY ORGANIZATION SYSTEM ANALYSIS AND STUDIES PANEL*, STO-MP-SAS-141, January 2019: 17.

⁸⁹ Ibid., 17.

⁹⁰ "EU Sanctions Map," *European Union*. Accessed July 12, 2021. <https://www.sanctionsmap.eu/>. The EU is currently applying 45 sanctions regimes.

⁹¹ Alexandros Papaioannou, "Strengthening EU-NATO relations," *NATO Review*, July 16, 2019.

<https://www.nato.int/docu/review/articles/2019/07/16/strengthening-eu-nato-relations/index.html>

⁹² This is particularly interesting when observing the EU member states in NATO. In a situation where the EU has established a sanctions policy and is wishing to enforce the same policy at NATO will need the support of other NATO members. Due to consensus, EU members will not be able to dominate the sanctions policy within NATO based on their majority.