2026

STUDY GUIDE

SECURITY COUNCIL

AUTHORS: ŠTEFAN GRAŠIČ
VYACHESLAV BAKANOV



UNIVERSITY OF LJUBLJANA
Faculty of Law

this page is left intentionally blank

MUNLawS 2026

SECURITY COUNCIL

Study Guide

It is prohibited to (re)upload or (re)use this document elsewhere without priorly consulting the MUNLawS 2026 Organising Team.

EDITORS: ŽIVA SRŠE, ŽIVA ROZINA

this page is left intentionally blank

From the Secretary General...

Dear Delegates,

It is my great pleasure to welcome you to this year's MUNLawS!

After ten months of planning, organising, and probably overthinking every possible detail, the day has finally come! We have put a lot of ourselves into making this conference happen, and we hope that you will enjoy it as much as we have enjoyed creating it.

Having been part of the MUN community for a few years now, organising a conference of your own is definitely a different experience, one filled with equal parts excitement, stress, and the occasional crisis. A big thank you goes to my team, Živa Srše, Živa Rozina, Vito Vidmar, and Maks Novak, for everything they have done along the way. I truly could not have asked for a better team!

As a law student with a particular interest in human rights, I find myself increasingly concerned by the ongoing conflicts and divisions across different regions of the world. This is one of the reasons why, this year, we have chosen ***Strengthening Regional Cooperation*** *as our overall theme.*

While that might sound like a very diplomatic way of saying "let's get along", there is much more to it. In a world that often seems too divided, cooperation can sometimes feel difficult but that is exactly why it matters. And what better place to promote cooperation among young people than an MUN, where people from different countries and backgrounds come together, ready to listen to one another and, sometimes, even let go of their own ideas for the sake of finding common ground?

Throughout this conference, I encourage you to challenge one another, question your own assumptions, and defend your positions but most importantly, remember to listen to one another. The goal is not to be the loudest person in the room, but rather to see what we can achieve when all those voices are heard.

And of course, do not forget to have fun. At the end of the day, we are not real diplomats (yet)!

I hope you have an unforgettable few days filled with great debates, questionable amounts of caffeine, and, hopefully, many new friendships.

See you in the committee!

Irma Alibabić

Secretary General

Table of contents

INTRODUCTION TO THE COMMITTEE 1

Chairs' Welcome 1

About the UN Security Council 2

TOPIC A: 4

SITUATION IN THE TAIWAN STRAIT 4

Introduction 5

Historical Background 5

1. People's Republic of China vs. Republic of China (1927 - 1949) 5
2. One China Principle vs. One China Policy 6
3. Taiwan Strait Crises (1954 - 1996) 11

Present State of Affairs 12

1. Strategic Ambiguity 12
2. Chinese Ambiguity 14
3. First Island Chain 16
4. The Device You Are Reading This On 18
5. Asking the People of Taiwan 20

Main Issue I: Sovereignty and International Recognition 22

Main Issue II: Military Escalation and Security 24

Main Issue III: International Law and Maritime Governance 27

Main Issue IV : Economic Interdependence and Global Consequences 30

Points a Resolution Should Address 30

Additional Preparation Materials 32

TOPIC B: 34

STRENGTHENING UN SANCTIONS 34

Introduction: The Gap Between Law and Reality 35

Historical Background: How Sanctions Became What They Are 36

Architecture of the Contemporary Sanctions System 39

1. Three Categories of Measures 39
2. Sanctions Committees and the Monitoring Architecture 40

Main Issue I: Conflict Financing Networks 42

1. Eastern Democratic Republic of Congo: the Mineral Laundering Model 42
2. Somalia: The Charcoal Ban and Its Limits 45
3. Arms Trafficking and the Transit State Problem 46

Main Issue II: Cryptocurrency, Digital Finance, and Sanctions Evasion 49

1. North Korea: State-Level Crypto Theft Programme 49
2. Iran: Proxy Financing Through the Crypto Ecosystem 51
3. Hawala and the Persistence of Informal Finance 52

Main Issue III: Regional Implementation and the Enforcement Gap 53

1. African experience: the African Union, the Economic Community of West African States, and the Sahel Fragmentation 54
2. The Capacity Deficit 55
3. Political Will and the Sovereignty Calculus 56

Main Issue IV: the Humanitarian Dimension 57

1. Resolution 2664 and the Humanitarian Exemption 57
2. Sanctions and Health: the Iranian Case 58
3. Due Process and the Rights of Listed Individuals 60

Points a Resolution Should Address 62

Strategic Questions for Debate 65

Additional Preparation Materials 66

Additional Note 68

BIBLIOGRAPHY 70

Introduction to the Committee 70

Topic A 70

Topic B 74

Table of figures

Figure 1: Map of China and Taiwan 4

Figure 2: Map of the areas controlled by the People's Republic of China (PRC) and the Republic of China ROC) 6

Figure 3: Battle for Yijiangshan Islands, part of the First Taiwan Strait Crisis 7

Figure 4: Taiwanese Foreign Minister quoted saying “Now we are being deserted. We are being forsaken” after the transfer of the UN seat 9

Figure 5: Signing of the Second Communique, between Vice President Deng Xiaoping..... 10

Figure 6: Nancy Pelosi and President Tsai Ing-wan hold a press conference in Taiwan's Presidential Office 13

Figure 7: PLA exercises as part of the Fourth Taiwan Strait Crisis 16

Figure 8: First and Second Island Chain 17

Figure 9: Position of existing, and under construction, TSMC facilities..... 19

Figure 10: Local residents participate in a Taiwan National Day parade on Oct. 10, 2023, in New Taipei City 21

Figure 11: PRC's debut at the UN - famous photo titled "Qiao's Laugh" 23

Figure 12: Luwowo coltan mine near Rubaya, North Kivu, Democratic Republic of the Congo, March 2014 34

Figure 13: Governance structure of United Nations Security Council sanctions regimes, illustrating the institutional relationships and information flows between the Security Council, sanctions committees, Panels of Experts, Member States, and supporting UN bodies..... 41

Figure 14: Strategic economic centres in eastern Democratic Republic of the Congo under M23 control in early 2025 43

Figure 15: Firearms trafficking flows in the Sahel 47

INTRODUCTION TO THE COMMITTEE

Chairs' Welcome

Dear Delegates,

We are delighted to welcome you to the United Nations Security Council at MUNLawS 2026. This year's agenda addresses two challenging subjects: ***Situation in the Taiwan Strait*** and ***Strengthening UN Sanctions***. We expect delegates to arrive prepared to examine the relevant international law, assess competing national positions, and negotiate with precision and respect. We look forward to substantive debate and creative, legally grounded proposals.

Sincerely,

Your Chairs

Vyacheslav Bakanov is a Law & Politics student in London who does MUNs for fun. He has long since lost track of the number of MUNs he has attended, but he has experienced and seen every offered role and every possible scenario. In his spare time, he quite often reads and paints miniatures. He has a decently strict chairing style, with a focus on academics and the schedule, but with a balance allowing for fun.

Štefan Grašič is a fourth-year medical student at the University of Ljubljana with a strong interest in international relations, diplomacy, and international law. Alongside his medical studies and research, he has been actively involved in Model United Nations, participating as a delegate, organiser and a chair. Having received the Best Delegate award at MUNLawS, he is delighted to return as Chair of the United Nations Security Council and looks forward to fostering substantive debate on some of the most pressing challenges facing the international community. He currently serves as Slovenia's Youth Health Delegate to the World Health Organization (WHO), representing the perspectives and interests of young people in international health policy discussions.

About the UN Security Council

*"The Security Council bears the **primary responsibility for the maintenance of international peace and security**. In discharging these duties, it acts on behalf of all Members of the United Nations"*[1].

Of the UN Security Council's **fifteen members**, China, France, the Russian Federation, the United Kingdom and the United States hold permanent seats (collectively referred to as the **P5**). **Ten non-permanent members** are elected for two-year terms; those serving in 2026 are Bahrain, Colombia, the Democratic Republic of the Congo, Denmark, Greece, Latvia, Liberia, Pakistan, Panama and Somalia.[2] **Substantive decisions** of the Council require nine affirmative votes and are subject to the veto of any permanent member, whereas **procedural decisions** also require nine affirmative votes but cannot be vetoed. An abstention by a P5 member on a substantive decision does not prevent its adoption. While Article 27(3) of the UN Charter requires a member that is party to a dispute to abstain on decisions under Chapter VI or Article 52(3), the provision is seldom applied in practice.[3]

Under Chapter VI of the UN Charter, the Council may **investigate disputes and recommend peaceful means of settling them**. Chapter VII of the Charter serves a different purpose. After determining the existence of a threat to the peace, breach of the peace or act of aggression under Article 39, the Council may decide on **measures not involving armed force**, under Article 41, including sanctions. If the Council deems the measures, adopted under Article 41 to be inadequate, it may **take action involving the use of armed force** under Article 42. The exercise of these powers remains subject to the Charter.[4]

---

[1] United Nations, *Charter of the United Nations* (San Francisco, June 26, 1945), art. 24(1), https://www.un.org/en/about-us/un-charter.

[2] United Nations Security Council, "Current Members," accessed October 20, 2026, https://main.un.org/securitycouncil/en/content/current-members.

[3] United Nations, *Charter of the United Nations*, signed June 26, 1945, art. 27, https://legal.un.org/repertory/art27.shtml; Akira Kato, "Revitalizing the Obligatory Abstention Rule in the UN Security Council: An Interpretation of the Proviso in Article 27(3) of the UN Charter," *Journal of Conflict and Security Law* 30, no. 1 (2025): 3–22, https://doi.org/10.1093/jcsl/kraf002.

[4] United Nations, *Charter of the United Nations*, signed June 26, 1945, chaps. VI–VII, arts. 34, 36, 39, 41–42, https://www.un.org/en/about-us/un-charter.

Peacekeeping is another established Council practice, although the Charter does not expressly provide for it. Acting under Chapter VII, the Council may also **refer a situation to the Prosecutor of the International Criminal Court** under Article 13(b) of the Rome Statute.[5]

The committee's two topics illustrate different constraints. China's permanent seat affects the likelihood of Council action on the Taiwan Strait without resolving competing legal claims. Sanctions involve the separate problem of implementing Council decisions through national authorities. Delegates must decide whether a legally defensible text can command sufficient support, rather than assume that a binding resolution will be adopted.

[5] United Nations Peacekeeping, "Mandates and the Legal Basis for Peacekeeping," accessed October 20, 2026, https://peacekeeping.un.org/en/node/132278; *Rome Statute of the International Criminal Court*, adopted July 17, 1998, art. 13(b), https://ihl-databases.icrc.org/en/ihl-treaties/icc-statute-1998/article-13.

Topic A:

SITUATION IN THE TAIWAN STRAIT

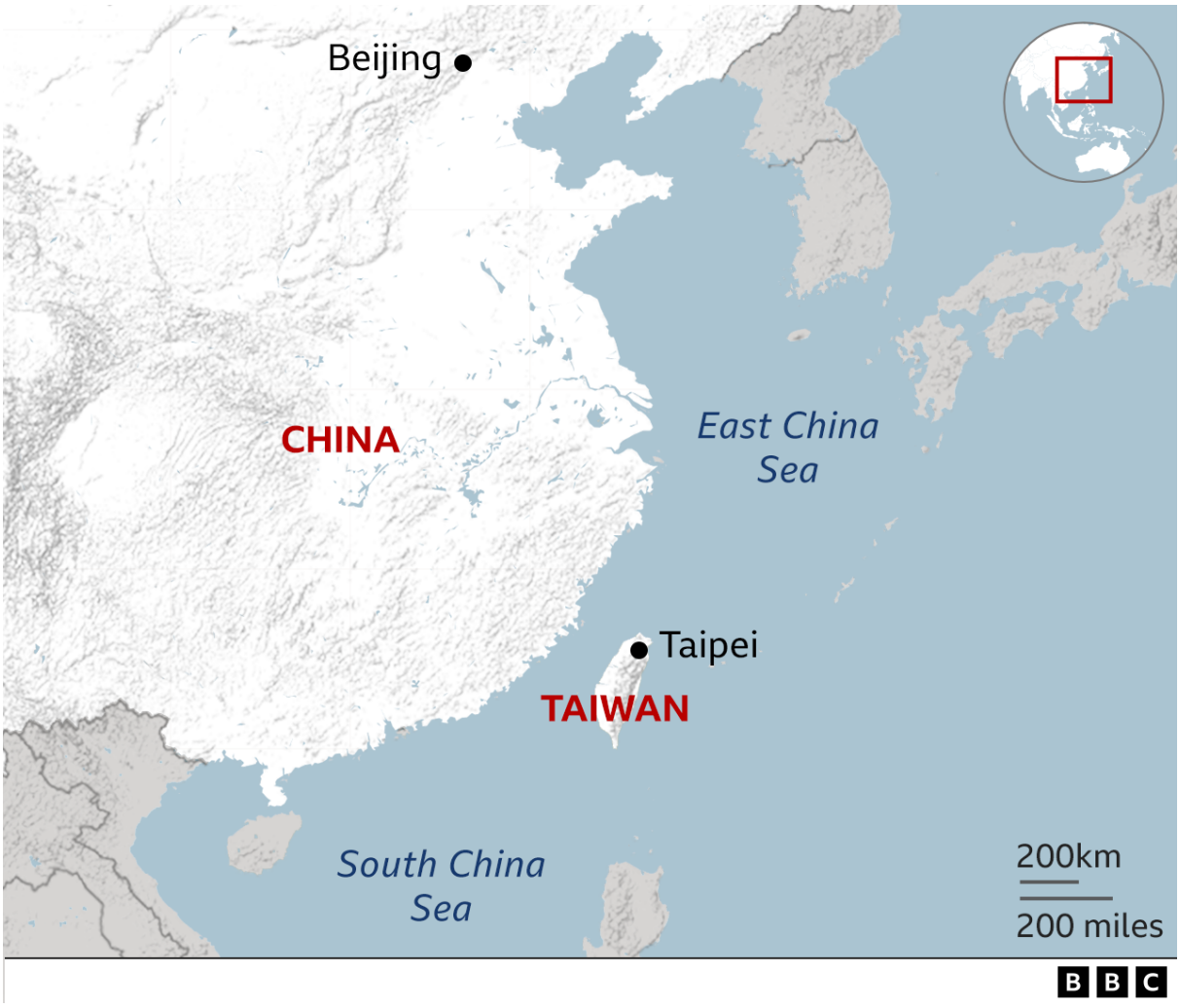


Figure 1: Map of China and Taiwan[6]

[6] Photograph retrieved from: BBC News, "What's behind China-Taiwan tensions?," October 14, 2024, https://www.bbc.com/news/world-asia-34729538.

Introduction

The island of Taiwan lies off the coast of southeastern China and remains at the centre of one of the world's most complex and consequential geopolitical and legal disputes. After the Republic of China government relocated to the island in 1949, Taiwan developed into a prosperous self-governing democracy and a vital trading hub. The island hosts much of the world's advanced semiconductor manufacturing capacity. This remains deeply unacceptable to mainland China, which seeks to unify the island under the One China Principle through a combination of diplomatic, economic, and military measures. The unresolved dispute over Taiwan's international status and the United States' long-standing unofficial security relationship with Taiwan add to the risk of escalation.[7]

OUTLINE OF THE TOPIC: This study guide aims to cover the topic's most relevant dimensions, from military escalation and trade to historical developments and contemporary crises, in order to support a fruitful and well-informed debate.

Historical Background

1. People's Republic of China vs. Republic of China (1927 - 1949)

The Qing dynasty ruled mainland China from 1644 until its overthrow in 1912, and incorporated Taiwan in 1683. Following the fall of the Qing dynasty, the **Republic of China (ROC) was established** in 1912. From 1928, the nationalist Kuomintang (KMT), led by Chiang Kai-shek, controlled the central government, consolidating a one-party state and much of the territory associated with modern China. At the end of the Second World War, the ROC assumed control over Taiwan following Japan's surrender, in line with the post-war settlement. The Chinese Civil War then resumed after the Second World War, with the Chinese Communist Party (CCP), led by Mao Zedong, fighting the KMT-led government of the ROC. The conflict resulted in a CCP victory in 1949, which then **proclaimed the People's Republic of China (PRC)**, as it is known today, while the KMT-led government fled to

[7] Susan V. Lawrence, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, March 30, 2026), https://www.congress.gov/crs-product/IF10275.

Taiwan. Since then, **the mainland has been governed by the People's Republic of China, while Taiwan has continued under the constitutional framework of the Republic of China**. This sets the historical precedent for the legal limbo in which Taiwan lies today.[8]

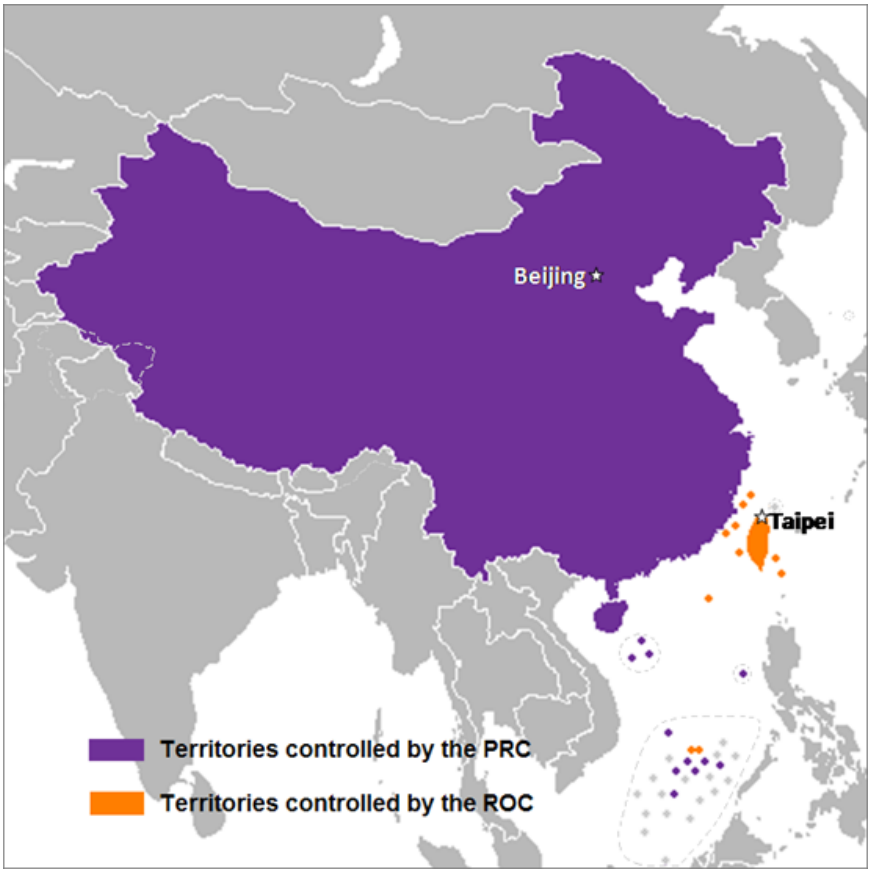


Figure 2: Map of the areas controlled by the People's Republic of China (PRC) and the Republic of China ROC)[9]

2. One China Principle vs. One China Policy

As of 1949, the stance of the PRC has been known as the **'One China Principle'**, **seeing both the China mainland and Taiwan as one country**, a stance not shared by all members of the international community. Not only had the ROC remained the sole representative of China at the United Nations until 1971 (as it was founded 4 years before the end of the civil war), but global views on communism had begun to sour at this point. This led to the increase of interest by major powers in the island of Taiwan over the following years.

[8] Susan V. Lawrence, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, March 30, 2026), https://www.congress.gov/crs-product/IF10275.
[9] Photograph: Nat at English Wikipedia. Retrieved from: Wikipedia Commons, "China map.png," https://commons.wikimedia.org/wiki/File:China_map.png.

Most notably, 1950 marked the beginning of a more direct American presence in relation to Taiwan, including renewed military support for the ROC after the PRC entered the Korean War. Fom this point onward, on that the island of Taiwan was earmarked, for the United States, as "an anti-communist military and cultural stronghold", as stated by Richard Nixon (then vice president of the United States) in 1953. The United States also supported remaining ROC forces in Burma as part of its broader regional anti-communist strategy until those forces were largely pushed out in 1953. From 1954 onward, the United States also provided economic and educational support to Taiwan while assisting the KMT in consolidating control over the island.[10]



Figure 3: Battle for Yijiangshan Islands, part of the First Taiwan Strait Crisis[11]

The **First Taiwan Strait Crisis** occurred in 1954 and resulted in the United States signing the **Mutual Defence Treaty between the United States and the Republic of China**,[12]

[10] United Nations General Assembly, "Restoration of the Lawful Rights of the People's Republic of China in the United Nations," Resolution 2758 (XXVI), A/RES/2758(XXVI), October 25, 1971, https://digitallibrary.un.org/record/192054; Susan V. Lawrence, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, 2024), https://www.congress.gov/crs-product/IF10275.

[11] Photograph retrieved from: Wikimedia Commons, "PLA attack 203 Highland.jpg," https://commons.wikimedia.org/wiki/File:PLA_attack_203_Highland.jpg.

[12] "Mutual Defense Treaty between the United States of America and the Republic of China," signed at Washington, December 2, 1954, United Nations Treaty Series, vol. 248, No. 3496, https://treaties.un.org/Pages/showDetails.aspx?objid=080000028014607a.

establishing mutual defence commitments concerning Taiwan and the Pescadores, subject to the treaty's terms. The U.S. Congress subsequently passed the **Formosa Resolution**[13] allowing the President of the U.S. "to employ the Armed Forces of the United States as he deems necessary for the specific purpose of securing and protecting Taiwan." Hostilities resumed into the **Second Taiwan Strait Crisis**.[14]

In 1968, following the Sino-Soviet split, the PRC started to improve relations with the United States, gradually relaxing trade restrictions and other impediments to bilateral dialogue between the two states. Through the efforts of Henry Kissinger, and ping-pong diplomacy, this gradually led to the rapprochement of Sino-American relations, which was emphasised by the signing of the **Shanghai Communiqué** in 1972, in which the **United States acknowledged the Chinese position concerning One China** and both governments outlined principles for normalising relations.[15]

In 1971, the PRC replaced the ROC delegation as China's representative to the United Nations under **Resolution 2758**.[16] This followed the view among various UN Member States that the ROC did not represent the millions of residents of the mainland. Following the December 1978 **Joint Communiqué**, **the United States established diplomatic relations with the PRC** on January 1, 1979.[17] The U.S. cut diplomatic ties with the ROC and shifted diplomatic recognition from Taipei to Beijing. The Communique still allowed for the maintenance of economic and cultural ties to the island.

[13] "Joint Resolution Authorizing the President to Employ the Armed Forces of the United States for Protecting the Security of Formosa, the Pescadores and Related Positions and Territories of That Area," Pub. L. No. 84-4, 69 Stat. 7 (January 29, 1955), https://www.congress.gov/bill/84th-congress/house-joint-resolution/159/text.
[14] Susan V. Lawrence, "Taiwan: The Origins of the U.S. One-China Policy," IF12503 (Washington, DC: Congressional Research Service, September 27, 2023), https://www.congress.gov/crs-product/IF12503.
[15] Susan V. Lawrence, "Taiwan: The Origins of the U.S. One-China Policy," IF12503 (Washington, DC: Congressional Research Service, September 27, 2023), https://www.congress.gov/crs-product/IF12503.
[16] United Nations General Assembly, "Restoration of the Lawful Rights of the People's Republic of China in the United Nations," Resolution 2758 (XXVI), A/RES/2758(XXVI), October 25, 1971, https://digitallibrary.un.org/record/192054.
[17] J. Carter, "Establishment of Diplomatic Relations Between the United States and the People's Republic of China", 11 Case Western Reserve Journal of International Law 227, 1979, https://scholarlycommons.law.case.edu/cgi/viewcontent.cgi?article=1950&context=jil.



Figure 4: Taiwanese Foreign Minister quoted saying "Now we are being deserted. We are being forsaken" after the transfer of the UN seat[18]

The **Taiwan Relations Act** of 1979, enacted by the U.S. Congress, **establishes a statutory framework for continued unofficial ties with Taiwan, without conferring diplomatic recognition**, allowing the U.S. to continue economic, cultural, and security relations with Taiwan. The Act provides for making defence articles and services available to Taiwan to support a sufficient self-defence capability, alongside stating that any non-peaceful effort to decide Taiwan's future would be a serious concern for the United States.[19]

ESSENTIAL: All of this shapes the **'One China Policy'**, whereby the United States recognises the PRC as the sole legal government of China while only acknowledging, rather than endorsing, the PRC's position on Taiwan's status.[20]

The **Third Communique** from 1982, reaffirms the desire for both countries to strengthen ties, while addressing a contested interpretation of the relationship between U.S. arms sales and cross-strait security conditions. Alongside the Third Communique, the Reagan administration conveyed its **Six Assurances**, an informal list of guidelines in conducting

[18] Photograph: "Why Taiwan is caught between China and the US - BBC World Service," uploaded by BBC World Service and BBC News, YouTube, 2026, 4:38, https://www.youtube.com/watch?v=5SJ6MU4gI9A.
[19] United States Congress, *Taiwan Relations Act*, Public Law 96-8, 93 Stat. 14 (April 10, 1979), https://www.congress.gov/bill/96th-congress/house-bill/2479.
[20] Susan V. Lawrence, "The U.S. 'One-China Policy' and Taiwan," IF1250, pp. 1–2., (Washington, DC: Congressional Research Service, August 15, 2025), https://www.congress.gov/crs-product/IF12503.

U.S. relations with Taiwan (subsequently reaffirmed in congressional action). They state the following:

1. *The United States has not agreed to set a date for ending arms sales to Taiwan.*
2. *The United States has not agreed to consult with the PRC on arms sales to Taiwan.*
3. *The United States will not play a mediation role between Taipei and Beijing.*
4. *The United States has not agreed to revise the Taiwan Relations Act.*
5. *The United States has not altered its position regarding sovereignty over Taiwan.*
6. *The United States will not exert pressure on Taiwan to enter into negotiations with the PRC.*



Figure 5: Signing of the Second Communique, between Vice President Deng Xiaoping[21]

From 1987, relations across the strait began to thaw, leading to frequent negotiations and the formation of guarantees on economic cooperation. The two states maintained semi-official relations in the 1990s, through the use of non-governmental organisations, at which point both parties agreed that they should maintain ambiguity regarding sovereignty, in order to resume discussion of operational questions affecting both sides.[22]

[21] Photograph retrieved from: Wikipedia Commons, "Deng Xiaoping and Jimmy Carter during the Sino-American signing ceremony.," https://commons.wikimedia.org/wiki/File:China_map.png.
[22] Chi-hung Wei, "China–Taiwan relations and the 1992 consensus, 2000–2008." I*nternational Relations of the Asia-Pacific 16 (2016)*, pp. 67-95.

3. Taiwan Strait Crises (1954 - 1996)

In 1954, the U.S. led the establishment of the **Southeast Asia Treaty Organisation**, with the goal of deterring the spread of communism in the region, under the widely known Domino Theory. The PRC, viewing such developments as threats to its national security, initiated the **bombardment of several ROC-held islands**. Hence, the First Taiwan Strait Crisis began. This resulted in the United States signing the **Mutual Defence Treaty between the United States and the Republic of China** (*see 2.*). The U.S. Congress further passed the **Formosa Resolution** (*see 2.*), giving President Eisenhower authority to use U.S. forces to defend Taiwan and its islands. The crisis de-escalated after the **PRC expressed interest to negotiate with the United States at the Bandung Conference**, stemming either from Soviet pressure, or the concerns of very real war with the United States.[23]

As there was no resolution to the fundamental issues of the conflict, the Second Taiwan Strait Crisis broke out in 1958. The **PRC shelled secondary Taiwanese islands**, in an attempt to take them from the ROC, as well as to test the extent of American commitment to support the ROC militarily.[24] After brief escalation, the conflict ceased, returning to the status quo a mere three months later, as a result of **American backing of ROC forces and escorting supply ships.** The crisis illustrated both the danger of direct U.S.–PRC confrontation and the difficulty of maintaining deterrence without escalation.[25]

It should be noted that, starting around 1958, the United States deployed nuclear weapons to Taiwan. They were then recalled in 1974 by Richard Nixon, following improvements of US-PRC relations.[26]

---

[23] Pang Yang Huei, "Strait Rituals: China, Taiwan, and the United States in the Taiwan Strait Crises, 1954–1958" (1st ed., Hong Kong University Press, 2019).
[24] United States Department of State, Office of the Historian, "Report by the Commander, U.S. Taiwan Defense Command (Smoot) to the Commander in Chief, Pacific (Felt)," in Foreign Relations of the United States, 1958–1960, China, vol. 19, document 248 (Washington, DC: U.S. Government Printing Office), https://history.state.gov/historicaldocuments/frus1958-60v19/d248.
[25] Morton H. Halperin, *The 1958 Taiwan Straits Crisis: A Documented History*, RAND research memorandum RM-4900-ISA (Santa Monica, CA: RAND Corporation, 1966), https://www.rand.org/pubs/research_memoranda/RM4900.html.
[26] Robert S. Norris, William M. Arkin, and William Burr, "Where They Were," Bulletin of the Atomic Scientists (November/December 1999), reproduced by the National Security Archive, https://nsarchive.gwu.edu/document/34132-where-they-were.

The Third Taiwan Strait Crisis came about in 1995, as a result of U.S. congressional support for the visa of a Taiwanese presidential candidate. The **People's Liberation Army (PLA) conducted live fire missile tests in the region surrounding Taiwan**, prompting the U.S. to route a destroyer and frigate to the strait, as well as two carrier strike groups (one in 95 and the other in 96). The PLA viewed these exercises as successful, stating that "they attacked the power of the 'Taiwan separatists' represented by Lee Teng-hui, and warned the United States as the main outside intervening power". [27]

Present State of Affairs

1. Strategic Ambiguity

The term 'strategic ambiguity' is commonly used to describe the American position on Taiwan. The United States has maintained Taiwan's defence capabilities while generally avoiding an explicit advance commitment to intervene militarily in every contingency.[28] Statements by individual presidents have sometimes suggested greater certainty, followed by White House clarifications that the underlying policy had not changed.[29]

In recent years, U.S.-Taiwan political and security ties have continued to deepen, culminating in increasingly visible high-level engagement. The highest-level visit occurred in **August 2022**, with **Speaker Nancy Pelosi leading a congressional delegation**, which prompted a military and economic response from China. The **PLA conducted major ballistic missile tests and military exercises around Taiwan** in what is now widely referred to as the Fourth Taiwan Strait Crisis, and the **PRC announced sanctions on Taiwanese exports as well as Pelosi and her immediate family**. Multiple EU Member States, alongside the G7, issued a statement condemning the Chinese military exercises in

[27] Susan V. Lawrence, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, March 30, 2026), https://www.congress.gov/crs-product/IF10275.
[28] United States Congress, Taiwan Relations Act, Pub. L. No. 96-8, 93 Stat. 14 (April 10, 1979), codified at 22 U.S.C. §§ 3301–3316, https://www.ait.org.tw/policy-history/taiwan-relations-act/; Congressional Research Service, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, August 14, 2025), https://www.congress.gov/crs-product/IF10275.
[29] George W. Bush, remarks on Taiwan, quoted in CNN, "President Bush Says United States Will Defend Taiwan From Chinese Attack," April 24, 2001, https://transcripts.cnn.com/show/ltm/date/2001-04-25/segment/02.

the strait. The United States expressed its dissatisfaction with the attempts to alter the status quo, and expressed concern over the military action.[30] These events also intensified discussion of the so-called 'Davidson Window',[31] the idea that the period up to 2027 could be especially dangerous in terms of a potential Taiwan contingency. The Centre for Strategic and International Studies (CSIS) summarised U.S. experts' analysis in the following:

1. *China is determined to unify with Taiwan, but Beijing does not have a coherent strategy.*
2. *China is willing to wait to unify with Taiwan, and the August 2022 exercises are not an indicator of accelerated PRC timelines.*
3. *Xi Jinping feels there are still avenues to peaceful unification.*
4. *The potential for a military crisis or conflict in the Taiwan Strait is very real.*
5. *China would immediately invade if Taiwan declared independence.*
6. *China assumes that the United States would intervene in a Taiwan conflict.*[32]

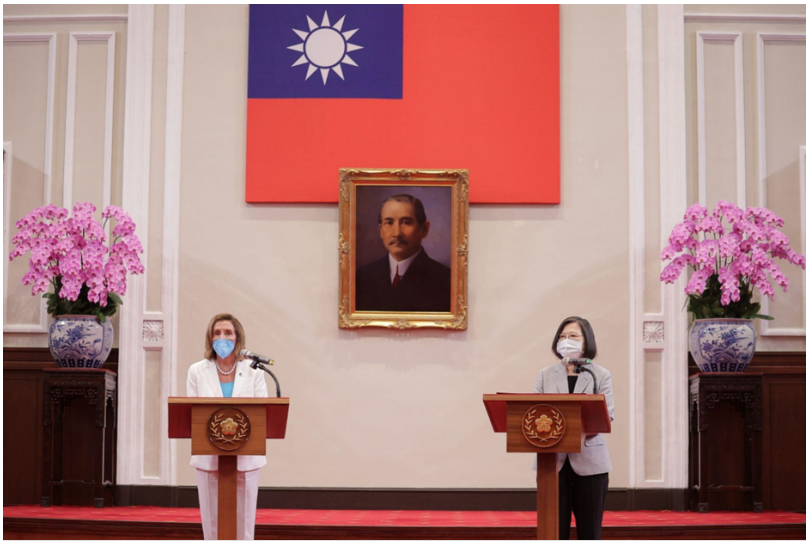


Figure 6: Nancy Pelosi and President Tsai Ing-wan hold a press conference in Taiwan's Presidential Office[33]

[30] G7 Foreign Ministers, "G7 Foreign Ministers' Statement on Preserving Peace and Stability Across the Taiwan Strait," August 3, 2022, https://www.gov.uk/government/news/preserving-peace-and-stability-across-the-taiwan-strait-g7-foreign-ministers-statement.

[31] Philip S. Davidson, "Statement of Admiral Philip S. Davidson, USN, Commander, United States Indo-Pacific Command, before the Senate Committee on Armed Services," testimony, March 9, 2021, https://www.armed-services.senate.gov/hearings/21-03-09-united-states-indo-pacific-command.

[32] Bonny Lin, Brian Hart, Matthew P. Funaiole, Samantha Lu, Hannah Price, and Nicholas Kaufman, "Surveying the Experts: China's Approach to Taiwan," Center for Startegic & International Studies – China Power Project, November 8, 2023, https://chinapower.csis.org/survey-experts-china-approach-to-taiwan/.

[33] Photograph: Official Photo by Chien Chih-Hung / Office of the President. Retrieved from: Wikipedia Commons, 08.03 總統與美國聯邦眾議院議長裴洛西媒體互動會 (52259967861).jpg,

2. Chinese Ambiguity

The Chinese position is far less ambiguous and considerably more explicit in its long-term objectives. The PRC's intent to reunify Taiwan with the mainland has been a mostly consistent part of the CCP's narrative since 1949. This is further backed by the repeated military training exercises conducted around the island, and by its geopolitical responses to American support for Taiwan. The PRC heavily bases its negotiations on the **1992 Consensus**, an informal agreement between the PRC and the ROC, the foundation for semi-formal cross-strait relations, agreeing that there is 'One China', however the two sides have different interpretations of that term.[34]

From the early 2000s onward, cross-strait relations periodically deteriorated as Beijing reacted sharply to political forces in Taiwan seen as leaning toward a stronger separate Taiwanese identity or formal independence. While limiting official contact with the ROC government, the PRC began to improve relations with the remaining parties in Taiwan, namely the KMT, due to their support for discussion over a peaceful unification of the differing perspectives of 'One China'.[35] During the subsequent years, when the KMT was the ruling party, the cross-strait relations had reached an all-time high, with talks on military de-escalation and trade cooperation, even resulting in the **first meeting between the leaders of the two sides since 1949**.[36] The meeting took place amid the prospect of a KMT defeat in the upcoming elections and resulted in the establishment of a hotline between the leading affairs bodies of each government.

https://commons.wikimedia.org/wiki/File:08.03_總統與美國聯邦眾議院議長裴洛西媒體互動會_(52259967861).jpg.

[34] Office of the People's Republic of China to the State of Palestine, "The Taiwan Question and China's Reunification in the New Era (The People's Republic of China The Taiwan Affairs Office of the State Council and The State Council Information Office),"August 10, 2022, https://ps.china-office.gov.cn/eng/zxxx/202208/t20220810_10739896.htm.

[35] Susan V. Lawrence, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, March 30, 2026), https://www.congress.gov/crs-product/IF10275.

[36] Office of the President, Republic of China (Taiwan), "Opening Remarks by President Ma Ying-jeou at His Meeting with Mainland Chinese Leader Xi Jinping in Singapore," November 7, 2015, https://english.president.gov.tw/NEWS/4779.

In 2016, the Democratic Progressive Party (DPP) became the ruling party in Taiwan, and criticised the 1992 Consensus, resulting in Beijing suspending cross-strait relations.[37] In January 2019, Xi Jinping called for the peaceful reunification of Taiwan, in accordance with the 1992 Consensus, to which the President of Taiwan responded that they never accepted the Consensus.[38] Amidst the COVID-19 pandemic, the KMT also rejected the prior models of discussion with the PRC, due to mounting unpopular opinion.[39]

Since Nancy Pelosi's visit in 2022, Beijing has increased the frequency of live-fire military drills surrounding Taiwan.[40] Following the 2024 Taiwan election, the PRC declared that the ruling DPP could not accurately represent the interests of the people of Taiwan. This followed a worsening of trade relations, and deterioration of trust over espionage claims across the strait, including acts of sabotage to Taiwanese undersea communication cables, since attributed to Chinese actions using 'grey-zone' tactics.[41]

Large-scale Chinese military drills continued into 2025, with PLA announcements of new major exercises following the China-Japan diplomatic crisis, in which Japan stated that an attack on Taiwan would present an 'existential-threat' to Japan and bring about military action for collective self-defence, and the largest U.S. sale of weapons to Taiwan under President D.J. Trump.[42]

In April 2026, Xi Jinping met the KMT chairwoman and publicly emphasised peace, prosperity, and the need to avoid conflict across the Strait. This meeting then followed an

[37] Susan V. Lawrence, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, March 30, 2026), https://www.congress.gov/crs-product/IF10275.
[38] Office of the President, Republic of China (Taiwan), "President Tsai Issues Statement on China's President Xi's 'Message to Compatriots in Taiwan,'" January 2, 2019, https://english.president.gov.tw/NEWS/5621.
[39] Viktor Friedmann, "Social Distancing? The Impact of the COVID-19 Pandemic on Cross-Strait Relations," *Foreign Policy Review 14(3)*: 60-84, January 2021.
[40] Paul Haenle and Nathaniel Sher, "How Pelosi's Taiwan Visit Has Set a New Status Quo for U.S.-China Tensions," Carnegie Endowment for International Peace, August 16, 2022, https://carnegieendowment.org/europe/posts/2022/08/how-pelosis-taiwan-visit-has-set-a-new-status-quo-for-us-china-tensions.
[41] Brian Hart, Scott Kennedy, Jude Blanchette, Benny Lin, "Taiwan's 2024 Elections: Results and Implications," Center for Strategic & International Studies, January 19, 2024, https://www.csis.org/analysis/taiwans-2024-elections-results-and-implications.
[42] Susan V. Lawrence, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, March 30, 2026), https://www.congress.gov/crs-product/IF10275.

active attempt by the PRC to prevent the leader of Taiwan from attending a meeting in Eswatini, pressuring various African states to deny overflight permits.[43]

The Chinese stance remains complicated amid uncertain prospects for further high-level meetings between Chinese President Xi Jinping and U.S. President Donald Trump.

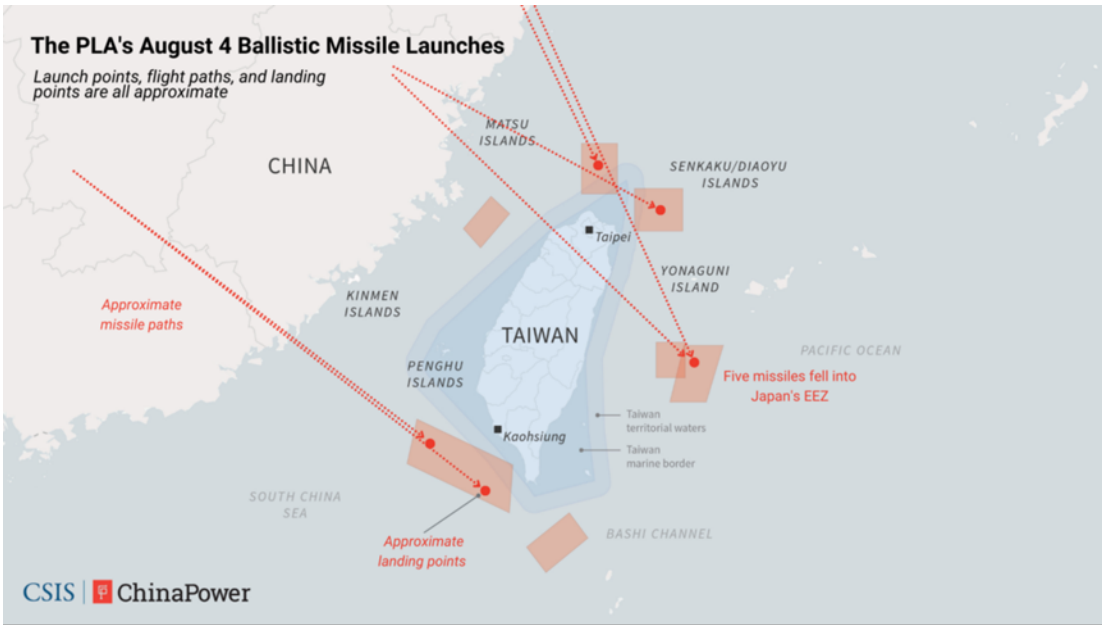


Figure 7: PLA exercises as part of the Fourth Taiwan Strait Crisis[44]

3. First Island Chain

The First Island Chain is **a line of strategically significant landmasses** stretching from Japan through Taiwan and the Philippines toward Southeast Asia. Geostrategically, this is seen by the PRC as a U.S. barrier to constrain their access to the Pacific. Taiwan presents itself as a key territory in the chain, being a midpoint with shallower water, allowing for easier submarine tracking.[45]

[43] Yi-Chin Lee and Ben Blanchard, "Eswatini King Pledges to Strengthen 'Enduring Friendship' with Taiwan," Reuters, October 9, 2026, https://www.reuters.com/world/china/eswatini-king-pledges-strengthen-enduring-friendship-with-taiwan-2026-10-09/.
[44] Photograph retrieved from CSIS in: Bonny Lin, Brian Hart, Matthew P. Funaiole, Samantha Lu, Hannah Price, and Nicholas Kaufman, "Surveying the Experts: China's Approach to Taiwan," Center for Startegic & International Studies (CSIS) – China Power Project, November 8, 2023, https://chinapower.csis.org/survey-experts-china-approach-to-taiwan/.
[45] Matthew P. Funaiole, Brian Hart, David Peng, Bonny Lin, and Jasper Verschuur, "Crossroads of Commerce: How the Taiwan Strait Propels the Global Economy," CSIS ChinaPower (Center for Strategic and International Studies, October 9, 2024), https://features.csis.org/chinapower/china-taiwan-strait-trade/.



Figure 8: First and Second Island Chain[46]

This chain also has immense economic significance, as it contains or borders some of the world's most important trade corridors, export economies, semiconductor hubs, and energy shipping routes. The **Taiwan Strait is one of the sections of the Chain**, and can be used to control key trade flows, that would affect supply chains, global shipping prices, and insurance markets worldwide. A serious maritime blockade in or around the Strait would likely cause severe disruption to global trade, shipping costs, insurance markets, and supply chains.[47]

Furthermore, the Strait serves as a critical artery for Chinese energy security, with a significant proportion of the PRC's oil and liquified natural gas imports, travelling from the Middle East and Southeast Asia. Beijing has repeatedly expressed concerns regarding the

[46] Photograph: Gwydion M. Williams/Wikimedia Commons/CC4.0. Retrieved from: Bea Castañeda, "The First Island Chain: A Guide to Asia-Pacific's Most Contested Geographic Boundary," TheDefensePost, June 29, 2026, https://thedefensepost.com/2026/06/29/first-island-chain-guide/.

[47] Matthew P. Funaiole, Brian Hart, David Peng, Bonny Lin, and Jasper Verschuur, "Crossroads of Commerce: How the Taiwan Strait Propels the Global Economy," CSIS ChinaPower (Center for Strategic and International Studies, October 9, 2024), https://features.csis.org/chinapower/china-taiwan-strait-trade/.

vulnerability of these sea routes to foreign intervention, particularly in the event of conflict with the United States and its regional allies. Consequently, **Taiwan is not only viewed as a political objective by Beijing, but also as strategic asset capable of reducing perceived maritime encirclement and enabling greater Chinese naval access into the Pacific Ocean**.[48]

In parallel, the United States and its allies view the Taiwan Strait as essential to maintaining the maritime order established after World War II, centred upon freedom of navigation and unrestricted commercial shipping. The prospect of a single regional power exerting military dominance over the Strait raises concerns regarding economic coercion, access to trade routes, and destabilisation of global supply chains. The US has demonstrated their interest in the maintaining of this order through their Freedom of Navigation Operations (FONOPs), serving as active demonstrations of power in the South China Sea, claiming to operate in accordance with international law. This is particularly significant given Taiwan's dominant role in semiconductor manufacturing, essential for modern consumer electronics, artificial intelligence systems, and military technologies. As a result, the Taiwan Strait issue extends beyond a regional sovereignty dispute, representing a wider challenge to international trade stability, maritime governance, and the interconnected structure of the global economy.[49]

4. The Device You Are Reading This On

Statistically speaking, there is a strong chance that the device on which this guide is being read depends on chips made in Taiwan. Not artificially grown in a formaldehyde-filled glass jar, but laser-etched out of a silicon wafer in one of TSMC's factories. The **Taiwan Semiconductor Manufacturing Company (TSMC) holds a quasi-monopoly over the production of cutting-edge semiconductors**. Simply put, a serious disruption in Taiwan's

[48] Matthew P. Funaiole, Brian Hart, David Peng, Bonny Lin, and Jasper Verschuur, "Crossroads of Commerce: How the Taiwan Strait Propels the Global Economy," CSIS ChinaPower (Center for Strategic and International Studies, October 9, 2024), https://features.csis.org/chinapower/china-taiwan-strait-trade/.
[49] Funaiole, Matthew P., Brian Hart, David Peng, Bonny Lin, and Jasper Verschuur. "Crossroads of Commerce: How the Taiwan Strait Propels the Global Economy." Center for Strategic and International Studies, October 9, 2024. https://features.csis.org/chinapower/china-taiwan-strait-trade/.

semiconductor production or exports would affect a vast share of the global electronics industry. This reality has been deemed **"Taiwan's Silicon Shield",** playing as a key factor in the deterrence of a PRC invasion. [50]

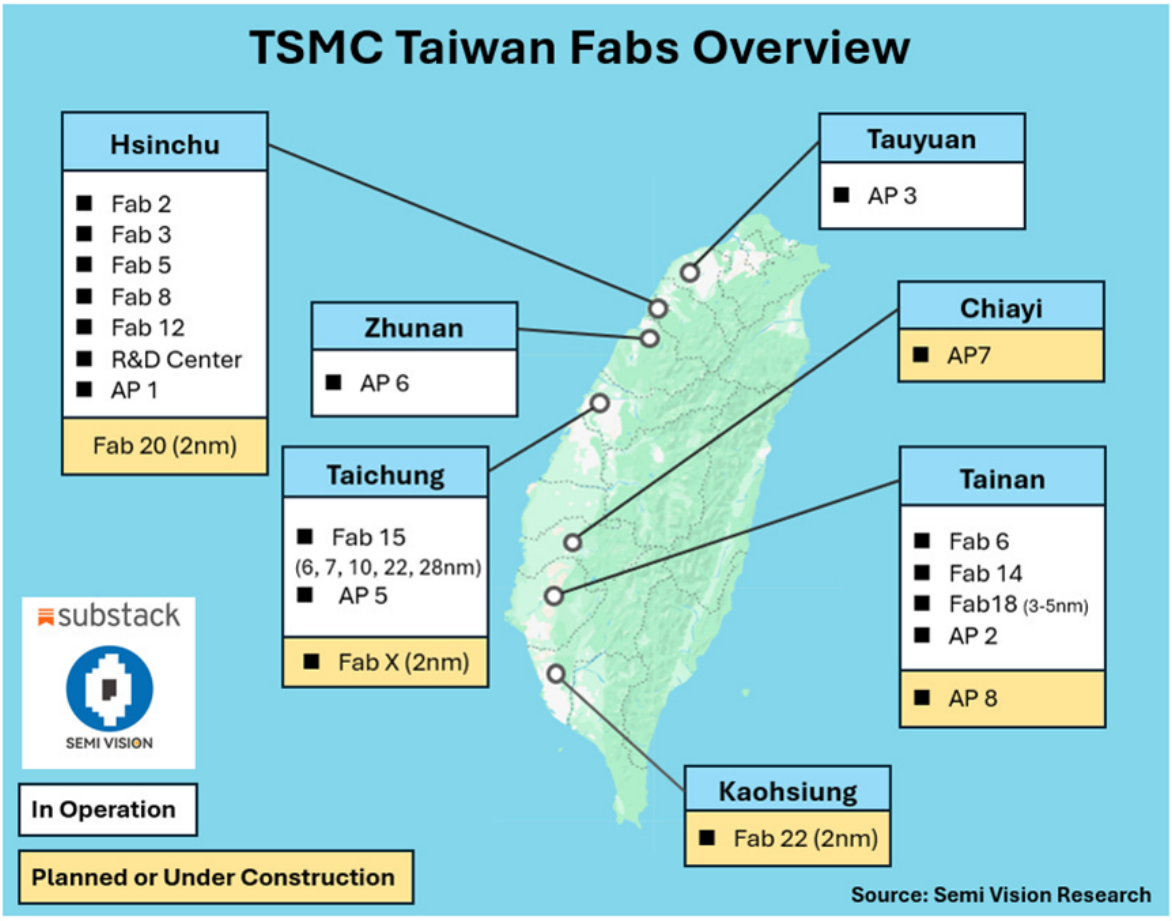


Figure 9: Position of existing, and under construction, TSMC facilities[51]

That so-called 'Silicon Shield' may, however, be gradually weakening. The **AI boom has fuelled a diversification of manufacturing of semiconductors**, including new TSMC facilities in the United States and broader diversification efforts elsewhere, as well as the growth of existing competitors. Should the vital position of Taiwan in the electronics market be further eroded, the island would lose what little political leverage it currently

[50] The Economist, "Taiwan's Dominance of the Chip Industry Makes It More Important," March 6, 2023, https://www.economist.com/special-report/2023/03/06/taiwans-dominance-of-the-chip-industry-makes-it-more-important.

[51] Photograph: Semi Vision Research. Retrieved from: Semi Vision Research, "TSMC's Mother Fab: The Heart of Advanced Process Development," March 7, 2025, https://tspasemiconductor.substack.com/p/tsmcs-mother-fab-the-heart-of-advanced.

has.[52] Global markets still behave as though the semiconductor *status quo* will broadly hold, but volatility remains high whenever cross-strait or U.S.-China tensions intensify.

The industry is currently under threat from Chinese cyber-incursions, aiming to steal advanced research technology, as well as talent-poaching. As a response, Taiwan has tightened restrictions on foreign investments, and measures relating to highly skilled workers in the sector. A major disruption to the industry in the event of war would likely result in losses measured in the trillions of dollars.[53]

5. Asking the People of Taiwan

Taiwan was governed under martial law from 1949 to 1987 before transitioning into a vibrant democracy. Since the emergence of a democratic government, both polls and government actions indicate that there is **substantial support for the upkeep of the *status quo***. 67% of adults in Taiwan consider themselves Taiwanese,[54] with 61% believing that a Chinese invasion will not occur in the next 3 years.[55] Taken together, these numbers suggest broad public support for preserving the *status quo*, maintaining security, and avoiding both forced unification and sudden moves toward a formal declaration of independence. Seeing that China is Taiwan's biggest trading partner, Taiwan further seeks to maintain this economic cooperation, without running into coercion from Beijing.

Taiwan's political leadership does not always mirror public sentiment on every aspect of the issue. Since being elected in 2024, the current President of Taiwan, Lai Ching-te, has

[52] National Institute of Standards and Technology, "Trump Administration Secures an Additional $100 Billion U.S. Semiconductor Manufacturing Investment for a Total of $265 Billion from TSMC," July 16, 2026, https://www.nist.gov/news-events/news/2026/07/trump-administration-secures-additional-100-billion-us-semiconductor.

[53] Reuters, "Taiwan Probes 11 Chinese Firms for Illegal Poaching of Tech Talent," March 30, 2026, https://www.channelnewsasia.com/east-asia/taiwan-probes-11-chinese-firms-illegal-poaching-tech-talent-6025431.

[54] Pew Research Center, "In Taiwan, Most Identify as Taiwanese, Few Say They're Primarily Chinese," January 16, 2024, https://www.pewresearch.org/short-reads/2024/01/16/most-people-in-taiwan-see-themselves-as-primarily-taiwanese-few-say-theyre-primarily-chinese/.

[55] Taipei Times, "Most Willing to Defend Taiwan: Survey," October 10, 2024, reporting a survey commissioned by the Institute for National Defense and Security Research, https://www.taipeitimes.com/News/front/archives/2024/10/10/2003825053.

been accused of 'blatantly promoting Taiwanese independence'.[56] This comes after Joe Biden's 2022 remarks, that the US would come to defend the ROC in the event of an unprecedented attack.[57]

It should be duly noted that the **official position of the Taiwanese government differs from that of the people and heavily depends on the current ruling party**. The KMT has favoured closer relations to China, with increased interest in negotiations based on the 1992 Consensus. The DPP emphasises Taiwan's separate democratic political identity; Beijing suspended official cross-strait communications following the DPP's return to power in 2016. The DPP has further financed a television series about a hypothetical invasion of Taiwan by the PLA.[58]



Figure 10: Local residents participate in a Taiwan National Day parade on Oct. 10, 2023, in New Taipei City[59]

[56] Xinhua, "Mainland Experts Say Taiwan Leader's Speech Shows Separatist Agenda Unchanged, Undiminished," October 11, 2026, https://english.news.cn/20261011/d4631d55bbbe418383c9417bd4903662/c.html.
[57] BBC News, "Biden Says US Troops Would Defend Taiwan if China Attacks," September 18, 2022, https://www.bbc.com/news/world-us-canada-62943673.
[58] Susan V. Lawrence, "Taiwan: Background and U.S. Relations," IF10275 (Washington, DC: Congressional Research Service, March 30, 2026), https://www.congress.gov/crs-product/IF10275.
[59] Photograph: Alex Wong. Retrieved from: gettyimages, "Taiwanese People Observe National Day," 2023, https://www.gettyimages.co.uk/detail/news-photo/local-residents-participate-in-a-national-day-parade-on-news-photo/1727575199?adppopup=true.

Main Issue I: Sovereignty and International Recognition

This section should guide you on:

- Is Taiwan a sovereign state?
- Does the PRC legally represent all of China?
- What is Taiwan's international status?

***De facto*, Taiwan is currently a sovereign state**. This answer is diplomatically ambitious, and serves primarily as an example to demonstrate the difference between de facto and de jure. Under the criteria commonly associated with the **Montevideo Convention**, **it meets all 4 requirements to be a state**: defined territory, permanent population, government, and capacity to enter relations with other states.[60] In fact, Taiwan has maintained all four over the last near-century.

***De jure*, there is no diplomatically and politically correct answer** (and delegates are heavily reminded to acknowledge the difference so as to avoid offending differing viewpoints). Legally, there never was a ruling on whether Taiwan is a sovereign state. On one hand, Article 1(2) of the UN Charter enshrines the principle of self-determination, which can be invoked in support of Taiwan's right to determine its own political future. On the other, lay historical territorial agreements, the result of the Chinese Civil War, and UN Resolution 2758. None give a direct answer.

The ambiguity has preserved stability. Neither side will make a push, without the certainty on how third parties will react to such developments. Should there be a definitive response to an alteration of the *status quo* laid out from all relevant major stakeholders, the status quo will shift.

Disputes over the issue stem from **UN Resolution 2758**, among other things. The resolution recognized the PRC as the only legitimate representative of China at the UN. The PRC sees this as a confirmation that not only is Taiwan Chinese, but that the PRC legally represents

[60] Montevideo Convention on the Rights and Duties of States, December 26, 1933, art. 1, https://www.jus.uio.no/english/services/library/treaties/01/1-02/rights-duties-states.html.

all of China. The counterargument is that the resolution only determined which government represents China at the UN, without explicitly addressing Taiwan's sovereignty.

The **right to self-determination** is also interpreted differently across the Strait. Taiwan claims it as its right to determine its own political status, and hence independence, while the PRC argues that any foreign influence in Taiwan constitutes a violation of the territorial integrity of China, leaning towards the belief that claims of self-determination in this context amount to separatism that threatens Chinese **sovereignty**. International law does not provide a clear resolution to the clash between these two principles.



Figure 11: PRC's debut at the UN - famous photo titled "Qiao's Laugh"[61]

Overview of the PRC's position:

There is only one China. Taiwan is viewed as an inseparable part of China, with the PRC being the sole legitimate government of all China, based on post-World War II territorial settlements, the outcome of the Chinese Civil War, UN Resolution 2758, and the One China Principle. Any Taiwanese independence movements, foreign military support, or official diplomatic contact with Taiwan is perceived as a violation of Chinese sovereignty. The

[61] Photograph retrieved from: Global Times, "Qiao's Laugh — China's Return to the United Nations," June 29, 2021, https://www.globaltimes.cn/page/202106/1227350.shtml.

Chinese government repeatedly states that it prefers 'peaceful reunification' but reserves the right to use force under the Anti-Secession Law of 2005.

Overview of the ROC's position:

Taiwan is viewed as a self-governing democracy, with independent economic, military, and political systems. Taiwan is perceived as having never been governed by the PRC, and its people are considered entitled to determine their own future under the right to self-determination. Internally, the KMT supports closer ties to China, while the DPP places a heavier emphasis on Taiwanese identity, resulting in significant policy changes between administrations. The people broadly support maintaining the *status quo*, in which Taiwan governs itself without formally declaring independence, while the PRC claims sovereignty and continues to seek unification. This arrangement allows countries to avoid formal recognition of Taiwan while maintaining unofficial ties with it.

Overview of the USA's position:

The U.S. acknowledges the Chinese position, but does not recognise PRC sovereignty over Taiwan, instead maintaining unofficial relations with the island, including the periodic supply of defensive arms. It maintains 'strategic ambiguity', under which it neither supports a Taiwanese declaration of independence nor supports a PRC invasion, without clearly stating whether it will come to Taiwan's aid.

Main Issue II: Military Escalation and Security

This section should guide you on:

- When might Taiwan be invaded?
- Who will come to Taiwan's aid in the event of an invasion?
- Should Taiwan continue investing in cheaper asymmetric systems?

The '**Davidson Window**' refers to a warning associated with Admiral Philip Davidson's 2021 testimony that the period up to 2027 could be especially dangerous with regard to Taiwan. This belief is further supported by the modernization of the PLA, including a naval build-up,

missile systems, and the frequency of military activity in and around Taiwan's air defence identification zone. Most notably, the **PLA has recently held an exercise simulating a blockade of Taiwan**, carrying a threat to both Taiwan and regional trade. While the Center for Strategic & International Studies (CSIS) has found that 83% of experts did not expect China to use significant military force against Taiwan by 2027,[62] the Davidson Window has contributed to broader debate about regional security and military preparedness. This is reflected in the U.S. Congress authorising greater budgets for the Pacific Theatre than requested, Japan's increased military spending, and the strengthening of security cooperation between the United States, the United Kingdom, and Australia in the Indo-Pacific through enhanced the trilateral security partnership known as AUKUS. China is a strong opponent of AUKUS, especially with regard to the plans for the United States and the United Kingdom to help Australia acquire its own nuclear-powered submarines.[63]

In response to this, Taiwan has been advancing its asymmetric warfare doctrine, often called the '**Porcupine Strategy**'. The doctrine prioritises small, mobile, lethal, cost-effective, decentralised capabilities, to deter an attack from a superior PLA invasion. The doctrine focuses on disrupting and defeating the initial landing forces, through drone swarms, sea mines, and anti-ship missiles, rather than engaging in conventional confrontation.[64] This approach makes Taiwan's defences more difficult to destroy in advance of a PLA offensive and acts as a deterrent, alongside Taiwan's **Silicon Shield** (*see chapter on Present State of Affairs – 4. Device You Are Reading This On*).

While having a heavy focus on civilian technology, the bulk of the technology and expertise within the Republic of China Army (ROCA) comes from American weapons sales and joint military exercises. While holding no formal military alliances, it banks on the U.S., alongside

[62] Bonny Lin, Brian Hart, Matthew P. Funaiole, Samantha Lu, Hannah Price, and Nicholas Kaufman, "Surveying the Experts: China's Approach to Taiwan," Center for Startegic & International Studies – China Power Project, November 8, 2023, https://chinapower.csis.org/survey-experts-china-approach-to-taiwan/.
[63] Luke A. Nicastro, "The Pacific Deterrence Initiative," IF12303 (Congressional Research Service, November 24, 2024), https://www.congress.gov/crs_external_products/IF/PDF/IF12303/IF12303.4.pdf.
[64] William S. Murray, "Revisiting Taiwan's Defense Strategy," *Naval War College Review vol. 61 no. 3,* 2008, https://digital-commons.usnwc.edu/nwc-review/vol61/iss3/3/.

regional powers, to intervene in an invasion of Taiwan, due to the economic implications of a security threat in the Strait (*see chapter on Present State of Affairs – 3. First Island Chain).*

The more uncertainty grows, in light of the **Security Dilemma**, the greater the risk of an accidental escalation, leading to the execution of the various invasion scenarios. These risks are further exacerbated by the **PLA's (alleged) use of 'gray-zone warfare'**, in which actions are taken to pressure the Taiwanese government without direct conflict. Examples include the aforementioned military exercises, alongside aerial incursions, economic pressure, and damage to undersea communications cables. These tactics seek to weaken Taiwan in the long term in order to redefine the *status quo*.[65]

In the event of a military escalation, Taiwan grows from a local to a regional issue. It would signal the potential involvement of U.S. bases in Japan, potentially escalate into a wider Indo-Pacific conflict, and bring about the discussion of the age-old nuclear question.

Overview of the PRC's position:

The PLA's centennial Military Building Goal seeks to modernise and accelerate the readiness and development of PLA forces by 2027. These reforms aim to deter foreign intervention and establish regional dominance, including the capability to act in a Taiwan contingency by 2027. Chinese military actions only persist in times where there is diplomatic disagreement. In anticipation of the 100th anniversary of the PLA's founding, there have been massive expansions in naval, ballistics, hypersonic, amphibious, long-range, and cyber capabilities.

Overview of the ROC's position:

Taiwan continues to prepare for the possibility of PLA military action through doctrinal reform, procurement, training, and broader societal awareness. It is heavily relying on its decentralised asymmetric defence system to deter PLA. As a result of strategic ambiguity, American aid is not guaranteed, especially under the current administration.

[65] Jacob Stokes, "Resisting China's Gray Zone Military Pressure on Taiwan," Center for a New American Security, December 6, 2023, https://www.cnas.uorg/publications/reports/resisting-chinas-gray-zone-military-pressure-on-taiwan.

Overview of the USA's position:

The United States maintains a policy of strategic ambiguity regarding Taiwan, seeking to deter both a unilateral declaration of Taiwanese independence and a forcible reunification attempt by the PRC. While holding no formal diplomatic relations with Taiwan, the U.S. remains the island's primary security partner through the Taiwan Relations Act, which provides the basis for defensive arms sales and other forms of support. The United States increasingly views the Taiwan Strait as central to maintaining the regional balance of power and the wider liberal maritime order in the Indo-Pacific. Consequently, American military posture in the Pacific has expanded through strengthened regional alliances, increased naval deployments, and defence cooperation with Japan, Australia, and the Philippines. However, uncertainty remains regarding the extent and speed of direct U.S. intervention in the event of a Chinese invasion, particularly given the economic risks, escalation concerns, and the potential for a broader great-power conflict between nuclear weapon states.

Main Issue III: International Law and Maritime Governance

This section should guide you on:

- Are foreign naval transits lawful?
- Can China claim jurisdiction over the Taiwan Strait?
- What constitutes provocation under international law?

The **United Nations Convention on the Law of the Sea (UNCLOS)** is the central legal framework for addressing maritime issues. It addresses maritime zones, jurisdiction, and rights of navigation and overflight. UNCLOS binds its States Parties; the United States has not ratified it, although it recognises some of its provisions as customary international law. Taiwan is not a party to UNCLOS. This leads to competing claims over the territory and control of the strait, including disputes over military transit, the median line, and air and sea access.

Standard **freedom of navigation** rules under UNCLOS state that ships may pass through high seas and exclusive economic zones (EEZs), without interference from other states (excluding piracy, slave trade, or unauthorised broadcasting). When transiting through territorial seas, ships retain the right of **innocent passage**, which allows them to travel unimpeded, as long as they do not threaten peace or security of the coastal state.[66]

The Taiwan Strait is also connected to the legal concept of **transit passage**, which protects the movement of commercial and military vessels through important international waterways. The legal status of different parts of the Strait affects what rights China, Taiwan, and other countries have when using it. These issues should guide delegates' discussions and further research.

'Provocation' is not a term that is legally defined in maritime contexts. Actions such as close-quarters naval manoeuvring ot intentional entry into disputed territorial waters are frequently considered as provocation, but are generally analysed through the framework of UNCLOS and related state practice.

Primarily, the concern is raised around the control of the Taiwan Strait: the PRC claims increasingly greater authority over the strait, opposing foreign patrols, surveillance, and demonstrations. The U.S. affirms that the Strait includes areas where freedoms of navigation and overflight apply under the law of the sea. The tensions have previously been reduced by a 'median line' - an unofficial operational reference line rather than an agreed maritime boundary. As of recent, this median line has been increasingly disregarded by the PRC, most notably through airspace incursions, seeking to erode the informal norm, and normalize the pressure tactics.[67]

The relevant law of the sea provides the framework for analysing these activities, but the parties disagree over which rules apply and how they should be interpreted. Although the

[66] United Nations, United Nations Convention on the Law of the Sea, December 10, 1982, arts. 17–19, 58, 87, and 110, https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf.
[67] Raul (Pete) Pedrozo, "Naval Operations and the Right to Operate Freely in the Taiwan Strait," U.S. Naval Institute , May 2, 2022, https://cimsec.org/naval-operations-and-the-right-to-operate-freely-in-the-taiwan-strait/.

United States has not ratified UNCLOS and Taiwan is not a party to the Convention, some of its navigational provisions are regarded as customary international law. This cannot be assumed for every provision, however, and each rule must be considered separately in light of state practice and legal opinion. The central legal question is therefore how customary international law and relevant UNCLOS provisions apply to military activity in the Taiwan Strait, particularly in areas beyond the territorial sea, and how competing maritime claims should be assessed.

Overview of the PRC's position:

China increasingly views the Strait as falling under its jurisdiction and argues that UNCLOS grants it the right to conduct military exercises in the area, as well as to make alterations to civilian aviation. The belief aligns with the idea of One China, and their desire to secure access to the Pacific and break free of what if views as American control of the First Island Chain (*see chapter on Present State of Affairs – 3. First Island Chain*).

Overview of the ROC's position:

Taiwan exercises effective self-government and challenges Beijing's claims to exclusive control over the Strait. The island wishes to uphold UNCLOS, although it is not a party to the treaty. It seeks to preserve the security and internationality of the strait, in order to maintain safe trade through the First Island Chain.

Overview of the USA's position:

The United States is very critical of Chinese maritime claims to the Strait, and the region. The U.S. argues that the Strait contains waters in which international navigation rights apply under UNCLOS and often conducts Freedom of Navigation Operations, an unofficial show of force in defiance of Chinese claims to a maritime region. U.S. recognises the trade importance of the Strait and maintains its desire to limit China's access to the Pacific, as it has been historically doing through the strategic militarily positioning of bases along the First Island Chain.

Main Issue IV: Economic Interdependence and Global Consequences

A Taiwan crisis can trigger a global recession, technological disruption, supply chain collapse, and overall financial panic. The Taiwan Strait accounts for over 20% of global maritime trade, with Taiwan being an exporter of 90% of the world's advanced semiconductors. Any alteration to the *status quo* risks increase to insurance premiums, and hence disruption of trade through the Strait.[68] Currently, the interconnected nature of economic interests and interdependent trade deters any form of conflict, but simultaneously increases global vulnerability in view of an attack. The TSMC itself is of geopolitical strategic importance, acting as Taiwan's Silicon Shield (*see chapter on Present State of Affairs – 4. Device You Are Reading This On*). There have been unofficial discussions among U.S. experts of a '**scorched earth policy**' involving the foundry's advanced technology, should there be an invasion.[69]

China has increasingly used this economic interdependence to economically coerce Taiwan, through sanctions, tourism bans, trade restrictions, and import controls. This raises questions over the legality of such measures, whether they constitute act of aggression, and whether they should be subject to international responses. As a result of these actions, the economic ties across the Strait have weakened over the past year, with Taiwan increasingly seeking greater economic independence from China. There has been limited talk of economic integration between the two sides.

Points a Resolution Should Address

1. MARITIME SECURITY

- How to enforce maritime security during tensions and potential invasions?

[68] Matthew P. Funaiole, Brian Hart, David Peng, Bonny Lin, and Jasper Verschuur, "Crossroads of Commerce: How the Taiwan Strait Propels the Global Economy," CSIS ChinaPower (Center for Strategic and International Studies, October 9, 2024), https://features.csis.org/chinapower/china-taiwan-strait-trade/.
[69] Jared M. McKinney and Peter Harris, "Broken Nest: Deterring China from Invading Taiwan," Parameters, 51, no. 4, 2021, pp. 67–80, https://press.armywarcollege.edu/parameters/vol51/iss4/6.

- Should internationally monitored buffer zones or exclusion zones be established in the Taiwan Strait?
- To what extent should foreign naval powers conduct freedom of navigation operations in the region?
- How can accidental naval or aerial clashes between military forces be prevented?

2. DE-ESCALATION MECHANISMS

- What mechanisms can be implemented to reduce the risk of military escalation in the Strait?
- Should states be required to provide prior notification of military exercises and missile tests?
- How can direct military-to-military communication channels be strengthened or restored?
- What role should regional organisations or neutral mediators play in de-escalation efforts?

3. DIPLOMATIC DIALOGUE

- How can formal diplomatic dialogue between Beijing and Taipei be resumed?
- Should the international community continue maintaining strategic ambiguity regarding Taiwan?
- What role should unofficial or Track II diplomacy play in reducing tensions?
- How can the international community address disinformation and conflicting political narratives surrounding the issue?

4. CONTINGENCY PLANNING

- How should the international community prepare for a potential humanitarian crisis in the region?
- What measures can be taken to minimise disruption to global trade and semiconductor supply chains?
- How should states coordinate civilian evacuations and refugee assistance during a conflict scenario?

- Should international economic contingency mechanisms be established in anticipation of a Taiwan Strait crisis?

5. MAINTENANCE OF THE STATUS QUO

- Should all parties commit to maintaining the current status quo in the Taiwan Strait?
- How can unilateral attempts to alter the status quo be discouraged?
- Should countries continue their current policy of diplomatic ambiguity regarding Taiwan?
- What actions constitute a violation of the existing balance in cross-strait relations?

6. ARMS CONTROL

- Should foreign powers continue selling defensive weapons to Taiwan?
- At what point do arms sales become escalatory rather than deterrent?
- Would regional arms-control agreements reduce tensions in the Strait?
- How can military transparency measures reduce the risk of miscalculation?

7. CYBERSECURITY AND INFORMATION

- What significance do cyberattacks hold in the broader geopolitical conflict surrounding Taiwan?
- Should cyberattacks on critical infrastructure be treated as acts of aggression under international law?
- How can states cooperate to counter disinformation and cyber warfare campaigns?
    - What mechanisms should exist to protect civilian infrastructure from cyberattacks during crises?

Additional Preparation Materials

NOTE FROM THE CHAIRS:

Within this section, you will find three articles to aid your general understanding of the topic covered in this part of the study guide. It is important to note that we encourage you to conduct research beyond the provided material, especially if your country's stance is

not fully represented in the bellow provided articles (this is to emphasise that non-Western countries are expected to do research from their own country's sources). Additionally, the YouTube videos provided below should serve as brief summaries of the topic, to either watch before the study guide, or just before the conference to jog your memory on the main talking points. Good luck!

VIDEO RESOURCES:

- DW News, "Why China and the US are so obsessed with Taiwan – Mapped Out," August 31, 2024. Available at: https://www.youtube.com/watch?v=kMhle4o0uk0.

NECESSARY READING:

- Peter Dutton, "What Does International Law Say About Taiwan?," *USALI Talking Points*, June 16, 2025. Available at: https://usali.org/publications/talking-points-what-does-international-law-say-about-taiwan.
- Pasha L. Hsieh, "An Unrecognized State in Foreign and International Courts: The Case of the Republic of China on Taiwan," *28 Mich. J. Int'l L. 765*, 2007. Available at: https://repository.law.umich.edu/mjil/vol28/iss4/2/.
- Davide Campagnola, "Understanding the Status Quo between Taiwan and China: International Law, the Power Transition Theory and Case Studies," *Taiwan Politics*, November 9, 2024. Available at: https://taiwanpolitics.org/article/124430-understanding-the-status-quo-between-taiwan-and-china-international-law-the-power-transition-theory-and-case-studies.

Topic B:

STRENGTHENING UN SANCTIONS



Figure 12: Luwowo coltan mine near Rubaya, North Kivu, Democratic Republic of the Congo, March 2014[70]

[70] Sylvain Liechti, "SRSG Visits Coltan Mine in Rubaya," photograph, March 19, 2014, MONUSCO Photos, Wikimedia Commons, https://commons.wikimedia.org/wiki/File:SRSG_visits_coltan_mine_in_Rubaya_(13406579753).jpg.

Introduction: The Gap Between Law and Reality

The Security Council has the possibility to impose sanctions e.g. asset freezes, arms embargoes, travel bans, etc., on designated individuals, entities, or in some cases entire governments, with the aim of coercing a change in behaviour, degrading the financial and operational capacity of armed actors, or signalling collective condemnation.[71] The legal basis is unambiguous, the formal authority of the Council to impose these measures is undisputed, and fifteen active regimes are currently in operation.[72]

One of the better known examples is the Coltan mined by a Rwandan-backed armed group in eastern Democratic Republic of Congo that moves across a notionally monitored border, gets processed in Rwanda, enters legitimate supply chains as 'Rwandan' product, and ends up in the capacitors of smartphones sold in European and North American markets. North Korean cyber units steal $2.8 billion from cryptocurrency firms in roughly twenty months and funnel the proceeds through mixing services and cross-chain hops that defeat the analytical tools of most national financial intelligence units.[73] Al-Shabaab exports charcoal from Somali ports in vessels sailing under flags of convenience, with falsified documentation, to buyers across the Arabian Peninsula in direct violation of a ban that has been in place since 2012.[74] Chainalysis has documented multi-billion-dollar cryptocurrency flows linked to sanctioned Iranian actors, although the ultimate uses of these funds require

[71] United Nations Security Council, "Sanctions," Security Council, accessed October 20, 2026, https://main.un.org/securitycouncil/sanctions.

[72] United Nations Security Council, "Current Sanctions Regimes," Security Council Sanctions Fact Sheet (2025), https://main.un.org/securitycouncil/sites/default/files/2026/2025%20Fact%20Sheet.pdf; United Nations Security Council, "Sanctions," accessed October 20, 2026, https://main.un.org/securitycouncil/sanctions.

[73] Multilateral Sanctions Monitoring Team, *The DPRK's Violation and Evasion of UN Sanctions through Cyber and Information Technology Worker Activities*, MSMT/2025/2 (October 22, 2025), 25, 42–44, https://www.mofa.go.jp/mofaj/files/100922718.pdf.

[74] United Nations Security Council, Report of the Monitoring Group on Somalia and Eritrea Pursuant to Security Council Resolution 2111 (2013), S/2014/726 (October 13, 2014), annex 9.4, https://digitallibrary.un.org/record/781898/files/S_2014_726-EN.pdf; United Nations Security Council, Report of the Monitoring Group on Somalia and Eritrea, S/2018/1002 (November 9, 2018), annex 7.3, https://digitallibrary.un.org/record/1652108/files/S_2018_1002-EN.pdf.

careful case-by-case attribution, while the Security Council is unable to agree on even the procedural question of how to discuss the relevant sanctions regime.[75]

This is a picture of a system in need of major technical adjustment. It is a picture of systematic evasion of international law, evasion that persists not despite the existence of UN sanctions but, in many cases, in full awareness of them. Understanding why requires engaging seriously with three distinct but interconnected problems: the architecture of conflict financing networks themselves, the structural deficiencies in how sanctions are implemented at the regional and national level, and the legitimate legal and humanitarian concerns that complicate the politics of any proposed reform.

NOTE FROM THE CHAIRS: The chairs have deliberately framed this topic broadly. A resolution focused narrowly on, say, cryptocurrency regulation would miss the forest for one particularly visible tree. The broader question is whether the Security Council can construct or incentivise the construction of an enforcement architecture that matches the sophistication of the networks it is trying to disrupt. That requires engaging with technology, with regional politics, with the economics of compliance, and with the genuine tension between effective coercion and the protection of civilians who had no part in creating the situation the sanctions are designed to address.

Historical Background: How Sanctions Became What They Are

The Security Council's **first major sanctions experiment against Southern Rhodesia** followed Ian Smith's white minority government's unilateral declaration of independence in 1965. Initial measures in 1965 were voluntary and limited, as the Council imposed selective mandatory economic sanctions in 1966 through **Resolution 232**, then comprehensive mandatory sanctions in 1968 through **Resolution 253**. The case became an important early test of UN sanctions practice during a Cold War period in which the Council was often paralyzed on major political questions. Enforcement was uneven, as many states formally supported the sanctions, but Rhodesia continued to trade through sanctions-

[75] Chainalysis Team, "Crypto Crime in 2025 Was Primarily Driven by 694% Surge in State-Driven Sanctions Evasion Volume," Chainalysis, March 5, 2026, https://www.chainalysis.com/blog/crypto-sanctions-2026/.

busting networks, especially involving neighbouring South Africa and Portuguese Mozambique. The sanctions were eventually terminated in December 1979 after the **Lancaster House Agreement**, shortly before Zimbabwe's internationally recognized independence in April 1980.[76]

The transformative moment came after 1990. The end of the Cold War removed the structural obstacle that had paralyzed the Council for four decades, and in August of that year, the Council imposed **comprehensive sanctions on Iraq** following the invasion of Kuwait.[77] What followed over the next decade was both a demonstration of the Council's newly unlocked potential and a cautionary lesson about the human cost of economic coercion at scale. The comprehensive Iraq embargo, which covered virtually all trade, was implemented through a naval blockade and administered through an oil-for-food programme that turned out to be riddled with corruption generated what United Nations Children's Fund (UNICEF) described in 1996 as a humanitarian catastrophe affecting primarily those who had no influence over Saddam Hussein's decision-making.[78]

By the late 1990s, the political consensus was shifting. A number of governments and independent scholars concluded that comprehensive sanctions were a blunt instrument capable of inflicting enormous suffering on civilian populations while leaving political and military elites largely insulated by their control of remaining resources. The Swiss and German governments, working with academic partners and practitioner networks, convened a series of expert processes: the **Interlaken Process** beginning in 1998, the **Bonn-Berlin Process** in 1999–2000, and the **Stockholm Process** in 2002, that **produced the**

[76] United Nations Security Council, Resolution 232 (1966), S/RES/232 (1966), December 16, 1966; Resolution 253 (1968), S/RES/253 (1968), May 29, 1968, https://digitallibrary.un.org/record/90750; Resolution 460 (1979), S/RES/460 (1979), December 21, 1979, https://digitallibrary.un.org/record/10494.

[77] United Nations Security Council, Resolution 661 (1990), S/RES/661 (1990), August 6, 1990, https://digitallibrary.un.org/record/94221.

[78] United Nations Children's Fund (UNICEF), *The State of the World's Children 1996* (New York: UNICEF, 1996), https://www.unicef.org/reports/state-worlds-children-1996; Richard Garfield, *Morbidity and Mortality among Iraqi Children from 1990 through 1998: Assessing the Impact of the Gulf War and Economic Sanctions*, Occasional Paper 16:3 (Notre Dame, IN: Joan B. Kroc Institute for International Peace Studies, University of Notre Dame, 1999), https://reliefweb.int/report/iraq/morbidity-and-mortality-among-iraqi-children-1990-through-1998-assessing-impact-gulf-war.

theoretical and procedural foundations of what became known as 'targeted' or 'smart' sanctions.[79]

The core idea was rather simple and compelling, as it proposed that instead of punishing an entire economy, the Council could designate the specific individuals and entities responsible for the threat to peace by freezing their assets, restricting their travel, and cutting off access to arms, while leaving the civilian population out of the coercive framework. **Resolution 1267** of 1999, which established the **first individual-listing regime for al-Qaeda and Taliban-associated individuals**, was the practical beginning of this shift.[80]

ESSENTIAL: The targeted sanctions model has now been in operation for over two decades. Its limitations are well understood: the capacity of sanctioned actors to adapt to financial pressure, route assets through shell companies and third-party jurisdictions, and exploit the enforcement gaps between states with different levels of institutional capacity and political will. However, its normative dominance within the Council's practice is complete. No serious proposal for a return to comprehensive economic warfare against entire state economies has any prospect of adoption. The debate has appropriately evolved from questioning the use of targeted sanctions to examining how their effectiveness can be meaningfully strengthened.

[79] United Nations Security Council, Repertoire of the Practice of the Security Council, 2000–2003, chap. XI, discussion of the Interlaken, Bonn–Berlin, and Stockholm processes, https://main.un.org/securitycouncil/sites/default/files/en/sc/repertoire/2000-2003/00-03_11.pdf; Thomas J. Biersteker, Sue E. Eckert, and Marcos Tourinho, eds., *Targeted Sanctions: The Impacts and Effectiveness of United Nations Action* (Cambridge: Cambridge University Press, 2016).

[80] United Nations Security Council, Resolution 1267 (1999), S/RES/1267 (1999), October 15, 1999, https://digitallibrary.un.org/record/287334.

Architecture of the Contemporary Sanctions System

1. Three Categories of Measures

Contemporary UN sanctions regimes work through three primary instruments, deployed separately or in combination. Each has a different logic, different implementation requirements, and different vulnerabilities.[81]

Arms embargoes are the most commonly used. They prohibit the supply, sale, or transfer of weapons, military equipment, or related materiel to a designated target, whether a state, a non-state armed group, or specific individuals. The intuitive logic is direct, armed actors cannot sustain military operations without a continuous supply of weapons, ammunition, and equipment, so cutting the supply should degrade operational capacity over time. In practice, the verification problem is severe. Borders in conflict-affected regions are typically porous, customs infrastructure is weak or non-existent, and both state and non-state intermediaries have strong financial incentives to facilitate transfers. The Panel of Experts that monitored the DRC regime documented, over years of reporting, a remarkably consistent flow of weapons to sanctioned armed groups through neighbouring states with detailed evidence that was duly noted, passed to the relevant Committee, and largely not acted upon.[82]

Asset freezes require Member States to identify and freeze the financial assets of listed individuals and entities, and to prevent those assets from being moved, converted, or otherwise made available. The measure depends entirely on two things: a) the willingness of financial institutions and national authorities to actually implement it, and b) the existence of the assets in a jurisdiction where they can be reached. Both conditions are frequently not met. Listed individuals often hold assets through nominee structures, shell companies, and informal systems that are difficult to identify without sophisticated

[81] United Nations Security Council, "Sanctions," Security Council, accessed October 20, 2026, https://main.un.org/securitycouncil/sanctions; United Nations Security Council, "Current Sanctions Regimes," Security Council Sanctions Fact Sheet (2025), https://main.un.org/securitycouncil/sites/default/files/2026/2025%20Fact%20Sheet.pdf.

[82] United Nations Security Council, *Final Report of the Group of Experts on the Democratic Republic of the Congo*, UN Doc. S/2024/432 (June 4, 2024), paras. 40–46, https://digitallibrary.un.org/record/4053693/files/S_2024_432-EN.pdf.

financial intelligence. And where assets are held in jurisdictions with limited regulatory frameworks or limited political will to cooperate, the freeze exists in law but not in practice.[83]

Travel bans prohibit entry or transit through Member States' territory for listed individuals. On paper, they are the simplest measure to implement: a matter of checking names against the Consolidated Sanctions List at border control points. In reality, the list is not consistently integrated into national border management systems, particularly in lower-income Member States, and the diplomatic and political sensitivities around actually detaining or turning away a listed individual who arrives at a border can make nominal compliance a more attractive option than effective enforcement. Several documented cases exist of listed individuals travelling freely through multiple jurisdictions, apparently without triggering any interdiction response.[84]

2. Sanctions Committees and the Monitoring Architecture

Every sanctions regime is overseen by a **dedicated Sanctions Committee** **comprising all fifteen UN Security Council members**. The Committee is responsible for managing the designation list: adding and removing individuals and entities, processing exemption requests, and overseeing compliance. Below the Committee, **Panels of Experts** typically **comprising five to eight independent specialists**, investigate sanctions violations, monitor implementation in the field, and report their findings to the Committee, which then publishes the **reports**. In principle, this is a reasonable architecture. A standing political body with oversight responsibility, supported by technically capable independent investigators, should be well placed to identify problems and recommend solutions.[85]

---

[83] United Nations Security Council, Al-Qaida Sanctions Committee, Assets Freeze: Explanation of Terms (February 24, 2015), paras. 1, 9, 19–21, 27, 29, https://main.un.org/securitycouncil/sites/default/files/eot_assets_freeze_-_english.pdf.

[84] United Nations Security Council, Midterm Report of the Panel of Experts on Mali, S/2020/158/Rev.1 (March 18, 2020), paras. 47–49, https://documents.un.org/api/symbol/access?l=en&s=S%2F2020%2F158%2FREV.1&t=pdf.

[85] United Nations Security Council, "Security Council Committee Established pursuant to Resolution 2140 (2014)," section "Work and Mandate of the Committee," accessed October 21, 2026, https://main.un.org/securitycouncil/en/sanctions/2140; United Nations Security Council, "Sanctions," accessed October 21, 2026, https://main.un.org/securitycouncil/en/sanctions/information.

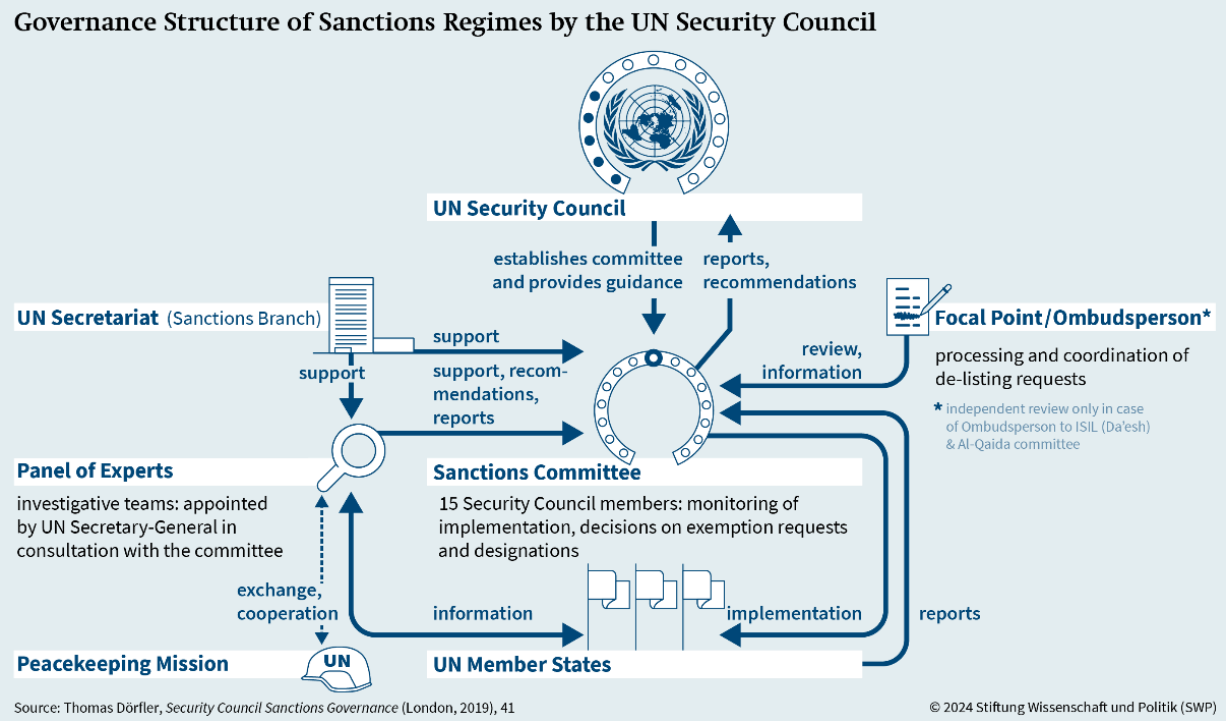


Figure 13: Governance structure of United Nations Security Council sanctions regimes, illustrating the institutional relationships and information flows between the Security Council, sanctions committees, Panels of Experts, Member States, and supporting UN bodies[86]

In practice, the system has **two fundamental weaknesses**. The first is *political* - the **Committee operates by consensus**, which means any P5 member can block a designation, a delisting, or any other substantive action. For example, the DRC Committee has for years been unable to agree on whether to designate Rwandan officials whose involvement in supporting M23 group is documented in the Panels' own reports. The second is *structural* - the **Panels of Experts are small, underfunded, and dependent on the cooperation** of the very states they are sometimes investigating. The most powerful illustration of the second weakness is the Russian veto of the DPRK Panel's mandate renewal in March 2024. The Panel had produced, over nearly two decades of operation, the most detailed and credible publicly available documentation of North Korea's nuclear programme financing and sanctions evasion network.[87] Russia vetoed its continuation not because the Panel had

[86] Judith Vorrath, *UN Arms Embargoes under Scrutiny: Obstacles and Options for an Effective Contribution to Conflict Resolution*, SWP Research Paper 12 (Berlin: Stiftung Wissenschaft und Politik, 2024), 13, fig. 2, based on Thomas Dörfler, *Security Council Sanctions Governance: The Power and Limits of Rules* (Abingdon and New York: Routledge, 2019), 41, https://doi.org/10.18449/2024RP12.

[87] United Nations Security Council, "Security Council Fails to Extend Mandate for Expert Panel Assisting Sanctions Committee on Democratic People's Republic of Korea," press release SC/15648, March 28, 2024,

made factual errors, but because its findings were politically inconvenient. The DPRK now operates its multi-billion-dollar crypto-theft programme and its extensive proliferation financing network without its former UN Panel of Experts, although a separate multinational monitoring initiative has since been established.

Main Issue I: Conflict Financing Networks

Conflict financing is not a side effect of war. For most armed groups operating today, it is a core organizational function as carefully managed, in the more sophisticated cases, as logistics or recruitment. Understanding how these networks work is a prerequisite for designing measures capable of disrupting them.

1. Eastern Democratic Republic of Congo: the Mineral Laundering Model

The situation in eastern Democratic Republic of Congo (DRC) is one of the most thoroughly documented cases of conflict-financed resource extraction in the contemporary world, and it deserves extended treatment in any serious discussion of sanctions effectiveness.[88]

Eastern DRC sits on mineral deposits of extraordinary value. Coltan (columbite-tantalite, the ore from which the tantalum essential for electronic capacitors is refined), gold, cassiterite, and wolframite are all present in significant quantities across North and South Kivu. The **March 23 Movement (M23)**, an armed group, which UN Panels of Experts have consistently documented as **operating with direct Rwandan material and logistical support**, captured the town of Rubaya in May 2024.[89] **Rubaya** matters because it **produces approximately 15 per cent of global coltan supply**. Whoever controls Rubaya controls a

https://press.un.org/en/2024/sc15648.doc.htm; Joseph DeThomas, "UN Panel of Experts: The Final Act," 38 North, April 11, 2024, https://www.38north.org/2024/04/un-panel-of-experts-the-final-act/.

[88] United Nations Security Council, Final Report of the Group of Experts on the Democratic Republic of the Congo, S/2024/432, June 4, 2024, https://digitallibrary.un.org/record/4053693; Zobel Behalal, "The War for Congo's Wealth: How Organized Crime Fuels the M23 Crisis in Eastern DRC," Global Initiative Against Transnational Organized Crime, January 30, 2025, https://globalinitiative.net/analysis/m23-organized-crime-rwanda-congo-drc-goma-conflict/.

[89] Zobel Behalal, "The War for Congo's Wealth: How Organized Crime Fuels the M23 Crisis in Eastern DRC," Global Initiative Against Transnational Organized Crime, January 30, 2025, https://globalinitiative.net/analysis/m23-organized-crime-rwanda-congo-drc-goma-conflict/; United Nations Security Council, Final Report of the Group of Experts on the Democratic Republic of the Congo, S/2024/432, June 4, 2024, https://digitallibrary.un.org/record/4053693.

significant share of one of the most commercially valuable minerals in the electronics supply chain.

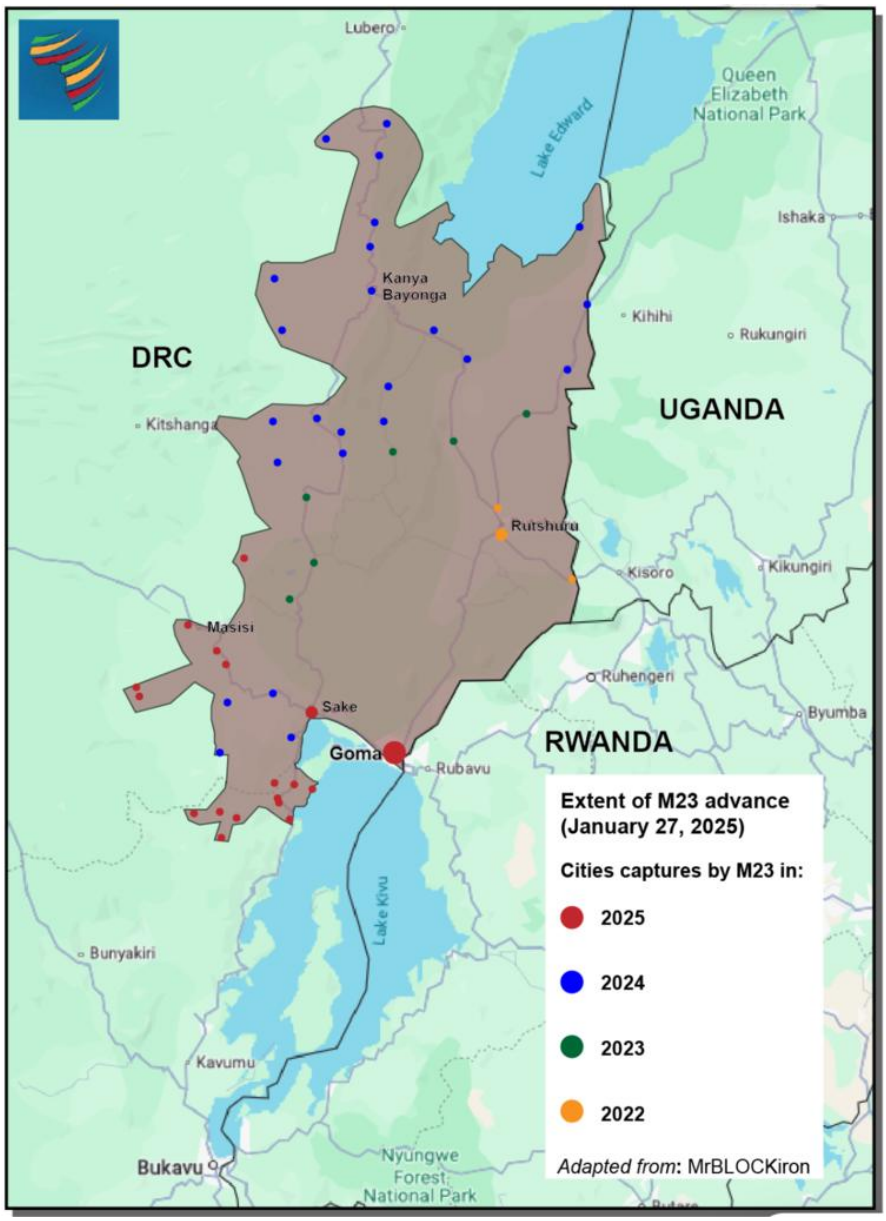


Figure 14: Strategic economic centres in eastern Democratic Republic of the Congo under M23 control in early 2025[90]

What M23 does with that control illustrates the mechanics of sanctions evasion with grave clarity.[91] Minerals extracted under M23's authority are transported often by motorbike

[90] Zobel Behalal, "The War for Congo's Wealth: How Organized Crime Fuels the M23 Crisis in Eastern DRC," Global Initiative Against Transnational Organized Crime, January 30, 2025, https://globalinitiative.net/analysis/m23-organized-crime-rwanda-congo-drc-goma-conflict/.

[91] Zobel Behalal, "The War for Congo's Wealth: How Organized Crime Fuels the M23 Crisis in Eastern DRC," Global Initiative Against Transnational Organized Crime, January 30, 2025, https://globalinitiative.net/analysis/m23-organized-crime-rwanda-congo-drc-goma-conflict/; Clarkson

along informal tracks, since the formal road network in the area is dysfunctional across the DRC-Rwanda border. UN investigators instead documented **coltan from M23-controlled areas being smuggled into Rwanda, mixed with minerals of Rwandan origin and then exported downstream**. This blending and the misrepresentation of mineral origin **allow conflict-linked ore to enter formally legitimate international supply chains**. The UN estimated that at least 150 metric tons of coltan were fraudulently exported to Rwanda in 2024; subsequent reporting described substantial continuing flows in 2025.[92]

The **DRC sanctions regime**, established under **resolution 1533** in 2004 and extended by numerous subsequent resolutions, includes an arms embargo and targeted individual measures. What **it has not managed to** do – and this is the critical point – is **address the mineral supply chain itself**. The Security Council Committee on DRC held a specific session on this question in June 2024, with representatives from the Organisation for Economic Co-operation and Development (OECD) briefing members on the challenges of responsible sourcing in the gold and 3T sector (tin, tungsten, tantalum).[93] The findings were not new. The **OECD** has published its **Due Diligence Guidance for Responsible Mineral Supply Chains from Conflict-Affected Areas** since 2011. After fifteen years of guidance, voluntary frameworks, and industry initiatives, coltan from eastern DRC is still flowing into legitimate supply chains.

In August 2025, the **United States** Treasury Department's Office of Foreign Assets Control (OFAC) imposed **sanctions** **on two Hong Kong-based companies, East Rise Corporation**

Kamurai, Brad Handler, and Morgan Bazilian, "Illicit Mineral Supply Chains Fuel the DRC's M23 Insurgency," Atlantic Council, April 23, 2025, https://www.atlanticcouncil.org/blogs/energysource/illicit-mineral-supply-chains-fuel-the-drcs-m23-insurgency/.; United Nations Security Council, Final Report of the Group of Experts on the Democratic Republic of the Congo, S/2025/446, July 3, 2025, paras. 109–112, https://digitallibrary.un.org/record/4085466/files/S_2025_446-EN.pdf.

[92] Zobel Behalal, "The War for Congo's Wealth: How Organized Crime Fuels the M23 Crisis in Eastern DRC," Global Initiative Against Transnational Organized Crime, January 30, 2025, https://globalinitiative.net/analysis/m23-organized-crime-rwanda-congo-drc-goma-conflict/; United Nations Security Council, Final Report of the Group of Experts on the Democratic Republic of the Congo, S/2024/432, June 4, 2024, https://digitallibrary.un.org/record/4053693.; United Nations Security Council, Final Report of the Group of Experts on the Democratic Republic of the Congo, S/2025/446, July 3, 2025, paras. 109–112, https://digitallibrary.un.org/record/4085466/files/S_2025_446-EN.pdf.

93 United Nations Security Council, "Security Council Sanctions Committee Concerning Democratic Republic of Congo Holds Meeting on Natural Resources," SC/15734 (June 14, 2024), https://press.un.org/en/2024/sc15734.doc.htm.

Limited and Star Dragon Corporation Limited, that had been purchasing minerals from the **Cooperative des Artisanaux Miniers du Congo (CDMC), the M23-affiliated entity running Rubaya's mines**.[94] This is a useful pressure point. But unilateral national sanctions by a single state, however powerful, cannot substitute for a multilateral framework. The companies sanctioned by OFAC can, and likely will, be replaced by other intermediaries operating from jurisdictions less willing to follow Washington's lead.

2. Somalia: The Charcoal Ban and Its Limits

Somalia offers a different model of the same underlying problem. A Security Council prohibition that is legally clear, operationally feasible in principle, and systematically evaded in practice because the enforcement mechanism depends on political will that is inconsistently present. **Al-Shabaab** is not primarily an ideological organization sustained by foreign donors. It is a functioning predatory economy. It taxes the movement of goods, extracts revenue from roadblocks, levies fees on businesses and households, and most relevant, trades in charcoal. The **charcoal trade from southern Somalia to markets in the Arabian Peninsula** was, for years, a major revenue source. The Security Council banned it in 2012 under **resolution 2036** and authorized maritime interdiction inspections of vessels suspected of carrying prohibited charcoal as the enforcement mechanism.[95]

However, the charcoal keeps moving. The **Panel of Experts' reports** over the past decade have documented a consistent pattern. **Vessels sailing under flags of convenience** (Panama, Comoros, Mongolia – flag-state jurisdictions that either cannot or do not exercise effective oversight over their registered fleets), **carrying falsified manifests** describing the cargo as gravel or aggregate, and **offloading at Gulf ports** whose customs authorities are not systematically screening for banned Somali charcoal. The **maritime interdiction authorization** has been **renewed annually**, most recently under **resolution 2776** in March

[94] United States Department of the Treasury, "Treasury Sanctions Entities Linked to Violence and Illegal Mining in the Democratic Republic of the Congo," August 12, 2025, https://home.treasury.gov/news/press-releases/sb0221; Office of Foreign Assets Control, "Democratic Republic of the Congo-related Designations," August 12, 2025, https://ofac.treasury.gov/recent-actions/20250812.

[95] United Nations Security Council, Resolution 2036 (2012), S/RES/2036 (2012), February 22, 2012 (charcoal prohibition); Resolution 2182 (2014), S/RES/2182 (2014), October 24, 2014 (maritime interdiction authorization).

2025.[96] The willingness of Member States to actually deploy naval vessels and conduct inspections is another matter entirely. The Strait of Guardafui and the waters around the Somali coast are not policed with any consistency by an international naval presence focused on the charcoal ban specifically.

The Panel's own analysis points to the demand side rather than the supply side. If the Gulf states, primarily the United Arab Emirates (UAE), Saudi Arabia, and Oman, subjected charcoal imports to rigorous certification-of-origin requirements, the trade would become considerably more difficult to sustain. This is a **regional implementation problem**. The Security Council can adopt binding measures under Chapter VII, but effective import controls still require implementation and enforcement by the relevant states. The resolution adopted in the Council chamber does not automatically produce the enforcement action that gives it meaning.[97]

3. Arms Trafficking and the Transit State Problem

The arms embargo is the sanctions instrument most visibly failing in the largest number of active regimes simultaneously. Libya, Darfur (Sudan), the Central African Republic, eastern DRC, and Al-Shabaab in Somalia are covered by arms embargo measures of differing scope. The UN sanctions regime for Mali ended in 2023; it should not be described as an active UN arms embargo.[98]

[96] United Nations Security Council, Resolution 2776 (2025), S/RES/2776 (2025), March 3, 2025, https://main.un.org/securitycouncil/en/content/sres2776-2025; Resolution 2806 (2025), S/RES/2806 (2025), December 12, 2025 (subsequent renewal), https://main.un.org/securitycouncil/en/content/sres28062025.

[97] United Nations Security Council, Report of the Monitoring Group on Somalia and Eritrea Pursuant to Security Council Resolution 2111 (2013), S/2014/726, October 13, 2014, annex 9.4, https://digitallibrary.un.org/record/781898/files/S_2014_726-EN.pdf; Report of the Monitoring Group on Somalia and Eritrea, S/2018/1002, November 9, 2018, annex 7.3, https://digitallibrary.un.org/record/1652108/files/S_2018_1002-EN.pdf.

[98] United Nations Security Council, "Current Sanctions Regimes," Security Council Sanctions Fact Sheet (2025), https://main.un.org/securitycouncil/sites/default/files/2026/2025%20Fact%20Sheet.pdf; United Nations Security Council, "Terminated Sanctions Regimes," https://main.un.org/securitycouncil/en/sanctions/terminated-sanctions. Note: UN sanctions measures concerning Mali expired on August 31, 2023; Mali is therefore not an active UN arms-embargo regime.

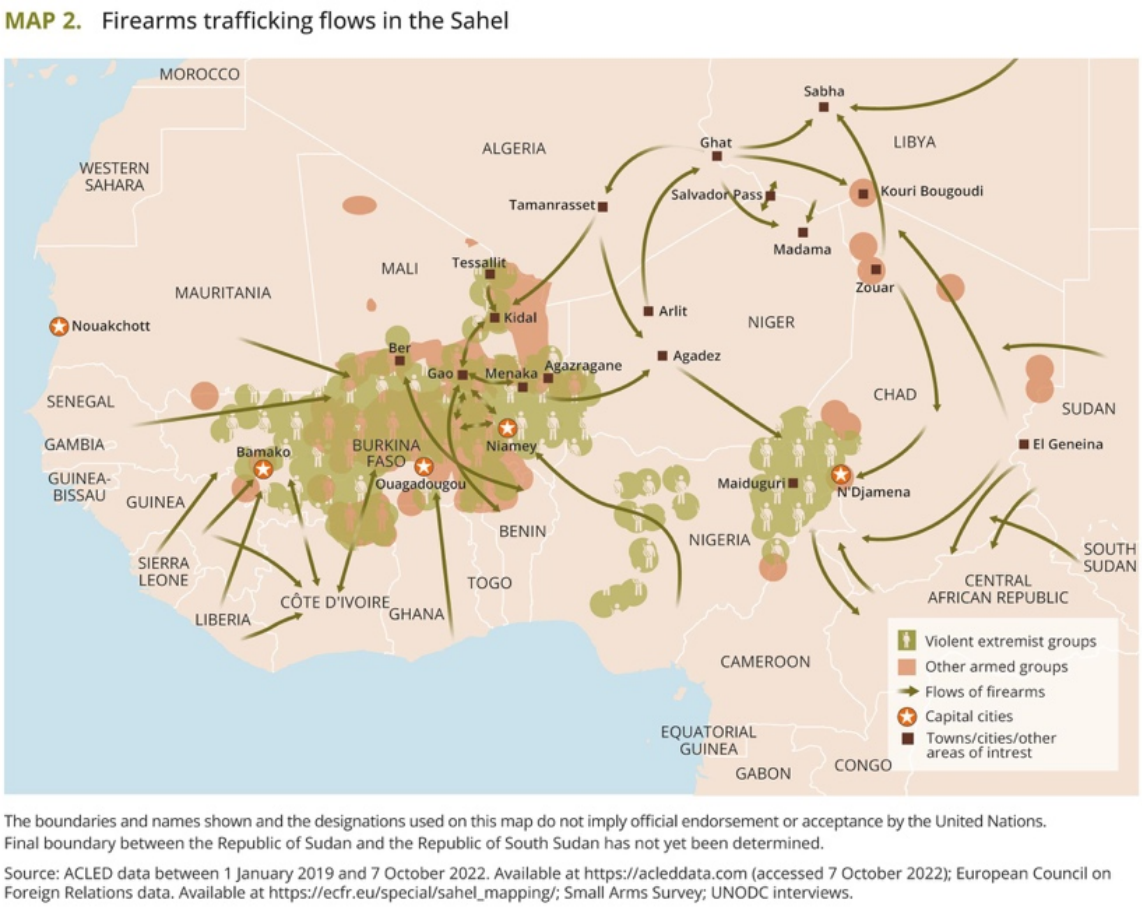


Figure 15: Firearms trafficking flows in the Sahel[99]

The **transit state problem is structural**. Illicit weapons transfers do not necessarily follow a direct route from manufacturer to end-user. Instead, they may involve multiple intermediaries, transit jurisdictions, and falsified or misleading documentation intended to conceal the weapons' origins or ultimate destinations.[100] The **collapse of Muammar Gaddafi's government in 2011** and the subsequent loss of control over Libya's extensive military stockpiles **triggered a major proliferation of weapons and ammunition across North Africa and the Sahel**. Assault rifles, machine guns, anti-tank weapons, mortar ammunition, and man-portable air defence systems (MANPADS) were among the materiel documented in regional trafficking investigations. UN Panels of Experts subsequently

[99] United Nations Office on Drugs and Crime, *Firearms Trafficking in the Sahel*, Transnational Organized Crime Threat Assessment—Sahel (New York: United Nations, 2022), 18, map 2, https://digitallibrary.un.org/record/4011455.

[100] United Nations Human Rights Council, *Role of Mercenaries, Mercenary-Related Actors and Private Military and Security Companies in the Trafficking and Proliferation of Arms*, A/HRC/57/45 (September 9, 2024), paras. 53–55, https://documents.un.org/doc/undoc/gen/g24/143/21/pdf/g2414321.pdf.

traced Libyan-origin weapons to **Mali and the Central African Republic** and identified suspected trafficking **routes towards northeastern Nigeria**.[101] These findings demonstrate how weapons diverted from national stockpiles can circulate across multiple jurisdictions, undermining arms embargoes and complicating regional efforts to prevent illicit transfers.

A further difficulty is the **treatment of dual-use goods**. Commercial drones, satellite communications equipment, thermal-imaging devices, navigation systems, precision machine tools and certain electronic components may all have legitimate civilian uses while also supporting military operations. **Whether such goods are prohibited depends on the wording of the individual regime**, including any technical thresholds, end-use restrictions or catch-all provisions.[102] Border customs agencies with limited technical capacity and limited time are poorly placed to distinguish a jeep purchased for a legitimate commercial purpose from a vehicle whose actual destination is a designated armed group's motor pool.

The **Central African Republic (CAR) sanctions regime**, extended under **resolution 2789** in January 2025, illustrates a specific variant of this problem.[103] The regime **prohibits weapons transfers to designated armed groups while authorizing transfers to government security forces**. The practical question is whether weapons delivered to the Forces armées centrafricaines (FACA) – a force of limited discipline and coherence, operating alongside Russian Wagner/Africa Corps personnel in circumstances that remain opaque – actually stay with government forces or find their way to other actors. The Panel of Experts has documented diversion in similar contexts elsewhere. The formal authorization does not guarantee the outcome.

[101] United Nations Security Council, Final Report of the Panel of Experts Established Pursuant to Resolution 1973 (2011) Concerning Libya, S/2014/106 (February 19, 2014), paras. 95–100, 108–109, 113–153, and annex XIII, https://documents.un.org/api/symbol/access?l=en&s=S%2F2014%2F106&t=pdf.
[102] United Nations Security Council, Resolution 2776 (2025), UN Doc. S/RES/2776 (2025), March 3, 2025, paras. 18–21 and annex B, https://docs.un.org/en/S/RES/2776(2025).
[103] United Nations Security Council, Resolution 2745 (2024), S/RES/2745 (2024), July 30, 2024; Resolution 2789 (2025), S/RES/2789 (2025), July 29, 2025; Resolution 2827 (2026), S/RES/2827 (2026), July 29, 2026, https://main.un.org/securitycouncil/en/sanctions/2127/resolutions.

Main Issue II: Cryptocurrency, Digital Finance, and Sanctions Evasion

The **integration of cryptocurrency into sanctions evasion** is the most significant development in this field over the past five years. It deserves particular attention in this study guide for two reasons. First, it is genuinely new – not a refinement of existing evasion techniques but a qualitatively different problem that the current institutional architecture of UN sanctions is not equipped to address. Second, it is a topic that almost never receives serious treatment in discussions of sanctions, which is partly a reflection of the difficulty of the technical material and partly a reflection of the fact that most MUN study guides are written before the issue has fully developed.[104]

1. North Korea: State-Level Crypto Theft Programme

The **DPRK's Lazarus Group, a state-directed cyber unit** operating under the Reconnaissance General Bureau, has become, over the past decade, the most prolific and sophisticated state-sponsored financial criminal operation in the world. Between January 2024 and September 2025, Lazarus and affiliated DPRK cyber actors stole an estimated $2.8 billion from cryptocurrency companies and their customers through more than forty documented heists.[105] The operational methodology is worth understanding in some detail, because it illustrates precisely why the standard sanctions enforcement toolkit is inadequate.[106] A typical DPRK cryptocurrency theft operation **begins with a social**

[104] Financial Action Task Force, *Complex Proliferation Financing and Sanctions Evasion Schemes* (Paris: FATF, June 2025), https://www.fatf-gafi.org/en/publications/Financingofproliferation/complex-proliferation-financing-sanction-evasion-schemes.html; Chainalysis Team, "Crypto Crime in 2025 Was Primarily Driven by 694% Surge in State-Driven Sanctions Evasion Volume," Chainalysis, March 5, 2026, https://www.chainalysis.com/blog/crypto-sanctions-2026/.

[105] Multilateral Sanctions Monitoring Team, *The DPRK's Violation and Evasion of UN Sanctions through Cyber and Information Technology Worker Activities*, MSMT/2025/2, October 22, 2025, https://www.mofa.go.jp/mofaj/files/100922718.pdf; Financial Action Task Force, "FATF Urges Stronger Global Action to Address Illicit Finance Risks in Virtual Assets," June 26, 2025, https://www.fatf-gafi.org/en/publications/Fatfrecommendations/targeted-update-virtual-assets-vasps-2025.html.

[106] Alex O'Neill, *Upholding North Korea Sanctions in the Age of Decentralised Finance* (London: Royal United Services Institute, March 2024), https://static.rusi.org/north-korea-sanctions-and-cryptomixers-op-march-2024.pdf; Financial Action Task Force, *Complex Proliferation Financing and Sanctions Evasion Schemes* (Paris: FATF, June 2025), https://www.fatf-gafi.org/en/publications/Financingofproliferation/complex-proliferation-financing-sanction-evasion-schemes.html.

engineering attack on employees of a cryptocurrency exchange or DeFi protocol fake job offers, LinkedIn connections with fabricated identities, phishing campaigns targeting private key holders. Once access is obtained, **large volumes of cryptocurrency are transferred to wallets controlled by DPRK operatives**. The **funds then move through a laundering chain**, conversion through decentralised exchanges (DEXs) that operate without identity verification. Fragmentation across hundreds of wallets to defeat pattern-detection, processing through mixing services such as Tornado Cash, which pool funds from multiple users and redistribute them in a way that breaks the transaction trail, and "chain hopping", the rapid conversion of funds from one blockchain (e.g., Ethereum) to another (e.g., Tron or Binance Smart Chain), exploiting the fact that cross-chain analytics are significantly harder than single-chain analysis.[107]

The DPRK laundered $147.5 million through Tornado Cash in the aftermath of the HTX exchange hack alone. The **total estimated volume of DPRK cryptocurrency theft over the 2018–2025 period is north of $6 billion**. This **revenue is thought to fund North Korea's nuclear and ballistic missile programs,** as directly stated by the UN Panel of Experts proving and making the connection repeatedly before the Panel was terminated.[108] The **dissolution of the DPRK Panel in March 2024** was not incidental to this problem, it was a direct response to it. The Panel was the primary public accountability mechanism for DPRK sanctions evasion. Russia's veto removed that accountability, creating a situation in which UN monitoring of this programme has become significantly weaker; the separate **Multilateral Sanctions Monitoring Team is not a UN Security Council Panel of Experts**.[109]

---

[107] Financial Action Task Force, *Complex Proliferation Financing and Sanctions Evasion Schemes* (Paris: FATF, June 2025), https://www.fatf-gafi.org/en/publications/Financingofproliferation/complex-proliferation-financing-sanction-evasion-schemes.html; Alex O'Neill, *Upholding North Korea Sanctions in the Age of Decentralised Finance* (London: Royal United Services Institute, March 2024), https://static.rusi.org/north-korea-sanctions-and-cryptomixers-op-march-2024.pdf.

[108] Multilateral Sanctions Monitoring Team, *The DPRK's Violation and Evasion of UN Sanctions through Cyber and Information Technology Worker Activities*, MSMT/2025/2, October 22, 2025, https://www.mofa.go.jp/mofaj/files/100922718.pdf; Chainalysis Team, "Crypto Crime in 2025 Was Primarily Driven by 694% Surge in State-Driven Sanctions Evasion Volume," Chainalysis, March 5, 2026, https://www.chainalysis.com/blog/crypto-sanctions-2026/.

[109] United Nations Security Council, "Security Council Fails to Extend Mandate for Expert Panel Assisting Sanctions Committee on Democratic People's Republic of Korea," press release SC/15648, March 28, 2024,

An interesting perspective was put in place in the Royal United Service Institute (RUSI) paper published in March 2024, which identified three requirements:

a) mandatory screening of cryptocurrency transactions by virtual asset service providers (VASPs) against the UN Consolidated Sanctions List,
b) coordinated law enforcement action against mixing services, following the precedent set by the U.S. Department of Justice's prosecution of Tornado Cash operators and
c) the development of blockchain analytics capacity within UN monitoring mechanisms, something that currently does not exist.[110]

2. Iran: Proxy Financing Through the Crypto Ecosystem

Iran's use of cryptocurrency differs structurally from that of North Korea. Pyongyang primarily acquires digital assets through theft and redirects the proceeds to state objectives. **Tehran uses digital assets primarily as a value-transfer mechanism**, moving funds to affiliated armed groups in ways that bypass the formal financial system and its sanctions controls.[111]

Islamic Revolutionary Guard Corps (IRGC)-linked entities accounted for a substantial share of **value received by Iranian-affiliated actors in cryptocurrency markets** over 2024–2025. Estimates vary, but the Chainalysis 2026 Crypto Crime Report documents **over three billion dollars in relevant flows**. Some identified flows have been **associated with sanctioned Iranian actors and networks**; the precise amount reaching particular armed groups cannot be inferred from aggregate transaction values alone. The **practical effect is to convert what would otherwise be a sanctioned financial transaction** into a series of

https://press.un.org/en/2024/sc15648.doc.htm; Joseph DeThomas, "UN Panel of Experts: The Final Act," 38 North, April 11, 2024, https://www.38north.org/2024/04/un-panel-of-experts-the-final-act/.

[110] Alex O'Neill, *Upholding North Korea Sanctions in the Age of Decentralised Finance* (London: Royal United Services Institute, March 2024), https://static.rusi.org/north-korea-sanctions-and-cryptomixers-op-march-2024.pdf; Financial Action Task Force, *Complex Proliferation Financing and Sanctions Evasion Schemes* (Paris: FATF, June 2025), https://www.fatf-gafi.org/en/publications/Financingofproliferation/complex-proliferation-financing-sanction-evasion-schemes.html.

[111] Chainalysis Team, "Crypto Crime in 2025 Was Primarily Driven by 694% Surge in State-Driven Sanctions Evasion Volume," Chainalysis, March 5, 2026, https://www.chainalysis.com/blog/crypto-sanctions-2026/; Financial Action Task Force, *Complex Proliferation Financing and Sanctions Evasion Schemes* (Paris: FATF, June 2025), https://www.fatf-gafi.org/en/publications/Financingofproliferation/complex-proliferation-financing-sanction-evasion-schemes.html.

pseudonymous blockchain transfers that are technically visible but operationally very difficult to interdict. The **collapse of the Joint Comprehensive Plan of Action (JCPOA)** complicates the analysis. The **Security Council's 2025 inability to agree on a framework following the snapback mechanism's activation** created a situation in which the **multilateral sanctions architecture on Iran's nuclear program is in genuine legal limbo**.[112] It should be noted that this is not a technical problem with cryptocurrency regulation but rather a P5 political failure that has spilled over into the enforcement architecture. It serves as a reminder that institutional reform has limits when the political substrate is dysfunctional.

3. Hawala and the Persistence of Informal Finance

Before cryptocurrency, the principal mechanism for moving value outside the formal financial system was hawala, and hawala remains heavily used in conflict zones where the banking infrastructure has collapsed, where recipients do not have bank accounts, and where cash is the dominant medium of exchange.[113]

Hawala is not, in its origins, a criminal system. It **evolved as a remittance mechanism in South Asia and the Middle East**, allowing migrant workers to send money home in contexts where formal banking was inaccessible or prohibitively expensive. For example, the hawaladar broker in London receives cash from a Somali migrant worker and calls his counterpart in Mogadishu, who pays out an equivalent sum in local currency from his own float, later reconciled through periodic net settlement. No money crosses a border, and no wire transfer is recorded. The **transaction leaves almost no financial trace**. The same mechanism that makes hawala efficient for legitimate remittances makes it extraordinarily difficult to monitor for sanctions evasion. **Al-Shabaab** uses hawala networks extensively for

[112] United Nations Security Council, “Security Council Fails to Adopt Resolution Extending Joint Comprehensive Plan of Action on Iran’s Nuclear Programme,” press release SC/16181, September 26, 2025, https://press.un.org/en/2025/sc16181.doc.htm.

[113] Financial Action Task Force, *The Role of Hawala and Other Similar Service Providers in Money Laundering and Terrorist Financing* (Paris: FATF, October 2013), https://www.fatf-gafi.org/en/publications/Methodsandtrends/Role-hawalas-in-ml-tf.html; Financial Action Task Force, *Investigating Professional Money Laundering, Underground Banking, and the Use of Hawala and Other Similar Service Providers* (Paris: FATF, September 3, 2026), https://www.fatf-gafi.org/en/publications/Methodsandtrends/pml-underground-banking-hawala-hossps.html.

moving revenue from charcoal exports and taxation to pay fighters and procure supplies. **Taliban-affiliated networks in Afghanistan** move funds through analogous systems. **Houthi financing in Yemen** operates partly through Yemeni money exchange houses that are functionally equivalent.[114]

The **Financial Action Task Force (FATF)'s 2024 assessment** identified **hawala and analogous systems as persistent structural gaps in the global anti-money-laundering architecture** not because they are new or poorly understood, but because regulating them effectively requires either dramatically expanding the reach of formal financial regulation into contexts where it has never functioned, or persuading the communities that use these systems to shift to formal channels that are often slower, more expensive, and in conflict zones, simply unavailable.[115]

Main Issue III: Regional Implementation and the Enforcement Gap

The single most important structural problem in UN sanctions enforcement is the distance between what the Security Council decides in New York and what happens on the ground. This is **partly a capacity problem:** many Member States in conflict-affected regions simply lack the institutional infrastructure to implement complex targeted sanctions effectively. It is **partly a political problem**: some states choose not to implement sanctions that conflict with their economic or strategic interests. And it is **partly an architectural problem**: the current system does not create effective linkages

[114] Financial Action Task Force, *Investigating Professional Money Laundering, Underground Banking, and the Use of Hawala and Other Similar Service Providers* (Paris: FATF, September 3, 2026), https://www.fatf-gafi.org/en/publications/Methodsandtrends/pml-underground-banking-hawala-hossps.html; United Nations Security Council, Report of the Monitoring Group on Somalia and Eritrea, S/2018/1002, November 9, 2018, https://digitallibrary.un.org/record/1652108/files/S_2018_1002-EN.pdf.

[115] Financial Action Task Force, *Investigating Professional Money Laundering, Underground Banking, and the Use of Hawala and Other Similar Service Providers* (Paris: FATF, September 3, 2026), https://www.fatf-gafi.org/en/publications/Methodsandtrends/pml-underground-banking-hawala-hossps.html; Financial Action Task Force, *The Role of Hawala and Other Similar Service Providers in Money Laundering and Terrorist Financing* (Paris: FATF, October 2013), https://www.fatf-gafi.org/en/publications/Methodsandtrends/Role-hawalas-in-ml-tf.html.

between UN-level decisions and the regional institutions that are present in affected areas.

1. African experience: the African Union, the Economic Community of West African States, and the Sahel Fragmentation

The **African Union (AU)'s** legal framework for peace and security establishes a significant departure from the traditional principle of non-intervention. Article 4(h) of the AU Constitutive Act recognises the Union's right to intervene in Member States, following a decision of the Assembly, in cases of war crimes, genocide, and crimes against humanity. The AU Peace and Security Council is empowered to authorise peace support missions, recommend interventions to the Assembly, and impose sanctions following unconstitutional changes of government.[116] Nevertheless, the effectiveness of regional enforcement mechanisms remains dependent on political cooperation and institutional coordination.

The **Economic Community of West African States (ECOWAS)**, historically an important actor in West African conflict management, has faced significant challenges following the withdrawal of Mali, Burkina Faso, and Niger on 29 January 2025, complicating regional cooperation and raising questions about the future effectiveness of collective security arrangements.[117]

Mali, Burkina Faso, and Niger, the three states that formed the **Alliance of Sahel States (AES)** following their respective military coups announced their withdrawal from ECOWAS in January 2024, with the withdrawal taking effect on January 29, 2025. **ECOWAS imposed targeted sanctions on the coup governments and the individuals responsible**. The sanctions have not been effectively enforced, for a straightforward reason, the **AES states have cultivated relationships with external actors**, e.g., Russia, whose Africa Corps

116 African Union, Constitutive Act of the African Union, adopted July 11, 2000, art. 4(h), https://archives.au.int/handle/123456789/6442; African Union, Protocol Relating to the Establishment of the Peace and Security Council of the African Union, July 9, 2002, arts. 4(j), 7(1)(c), (e), (g), https://www.peaceau.org/uploads/psc-protocol-en.pdf.

117 Economic Community of West African States, "Burkina Faso, Mali and Niger's Withdrawal from ECOWAS Is Now a Reality," January 30, 2025, https://www.ecowas.int/Burkina-faso-Mali-and-nigers-withdrawal-from-ECOWAS-is-now-a-reality/.

(successor to the Wagner Group) has a significant presence in all three countries, that provide an alternative to Western-aligned regional integration. States that can obtain security guarantees, mining concessions, and political legitimacy from Moscow have limited incentive to comply with ECOWAS measures or cooperate with the implementation of UN sanctions on actors operating in their territory.[118]

The **Security Council's Mali Sanctions Committee** held a consultative meeting with regional representatives in 2022 that documented, in considerable detail, the practical obstacles to enforcement. These included porous borders running for thousands of kilometres through desert terrain, banking penetration below 30 per cent in the majority of the country, customs infrastructure that exists principally in the capital, and a security environment in which UN Panels of Experts cannot safely conduct field investigations.[119] None of this has improved since 2022. The situation has, by most measures, deteriorated. The departure of UN Multidimensional Integrated Stabilization Mission in Mali (MINUSMA) from Mali in late 2023, the withdrawal of French forces, and the effective collapse of the G5 Sahel framework have reduced the international community's situational awareness and therefore its implementation capacity to something close to zero in the areas most affected by the conflict financing networks, the sanctions are supposed to disrupt.

2. The Capacity Deficit

Implementation of targeted sanctions requires institutional prerequisites that are not uniformly present. A functioning financial intelligence unit with trained staff, legal authority, access to financial records, and analytical capacity is necessary to identify and freeze assets. A legal framework that allows prompt executive-level asset freezing, rather than requiring a full judicial proceeding before any freeze can take effect, is necessary for

[118] Economic Community of West African States, “Burkina Faso, Mali and Niger’s Withdrawal from ECOWAS Is Now a Reality,” January 30, 2025, https://www.ecowas.int/Burkina-faso-Mali-and-nigers-withdrawal-from-ECOWAS-is-now-a-reality/; Festus B. Aboagye, “The Withdrawal of AES from ECOWAS: An Opportunity for Re-evaluating Existing Instruments for Regional Integration?,” Amani Africa, January 31, 2025, https://amaniafrica-et.org/the-withdrawal-of-aes-from-ecowas-an-opportunity-for-re-evaluating-existing-instruments-for-regional-integration/.

[119] United Nations Security Council, “Security Council 2374 Committee Holds Meeting with Mali, Regional States and Organizations to Discuss Implementation,” press release SC/14851, March 23, 2022, https://press.un.org/en/2022/sc14851.doc.htm.

the measures to be operationally useful. Real-time integration with the UN Consolidated Sanctions List is necessary for travel ban enforcement to function. This is the basic infrastructure of a rule-of-law financial system, but it is expensive to build and maintain, and it is absent or severely degraded in a substantial number of the Member States most relevant to active UN sanctions regimes. The **FATF's June 2026 monitoring list** identifies a range of **jurisdictions with significant Anti-Money Laundering / Combating the Financing of Terrorism (AML/CFT) deficiencies**.[120] Several of the states on that list are **directly relevant to active UN sanctions enforcement obligations**: Yemen, South Sudan, the Democratic Republic of the Congo, and several other jurisdictions. Consequently, sanctions are often most difficult to implement precisely where they are most urgently needed, creating a structural mismatch between their objectives and the institutional capacity required to achieve them.

3. Political Will and the Sovereignty Calculus

Institutional capacity is not the only constraint. Some states that have the capacity to implement UN sanctions choose not to, because **the costs of doing so outweigh the costs of non-compliance**. This is a rational calculation approach, and it is important to understand it as such rather than as simple bad faith.

Consider Rwanda's position with respect to the DRC mineral regime. Rwanda has a documented economic stake in the mineral flows from eastern DRC, the same flows that have been affected by the M23's control of Rubaya mining facilitates. Rwandan officials have consistently denied any involvement with M23, despite what the UN Panel of Experts describes as extensive documentation to the contrary. Implementing UN sanctions rigorously in a manner that would disrupt those flows would impose **direct economic costs on Rwanda**. The **diplomatic costs of non-compliance** – periodic Security Council censure

120 Financial Action Task Force, "Jurisdictions under Increased Monitoring," June 19, 2026, https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/increased-monitoring-june-2026.html; Institute for Financial Integrity, "Sanctions in 2024: Global Pressure Points in the UN, U.S., EU, and UK," December 30, 2024, https://finintegrity.org/sanctions-in-2024-global-pressure-points-in-the-un-us-eu-and-uk/.

that stops well short of any punitive action, given P5 division on the question – **are considerably lower**. The calculus is therefore straightforward.

Similar dynamics operate in different registers across multiple regimes. Gulf states that benefit from commercial relationships with actors designated under Yemen or Somalia sanctions, Central Asian states that have economic ties to Russian entities under sanctions, and Southeast Asian states through which North Korean commodity exports are laundered all illustrate this pattern. The **UN sanctions architecture has no effective mechanism for changing this calculus** beyond moral suasion and the remote prospect of secondary measures, which themselves are primarily tools of US and EU unilateral action, not UN collective enforcement.

Main Issue IV: the Humanitarian Dimension

No serious treatment of UN sanctions can avoid the humanitarian question. Sanctions that damage civilian welfare directly, through restricted access to goods and services, or indirectly, through macroeconomic disruption, raise both legal and political problems. They raise **legal problems** because the UN Charter's purposes include the protection of human rights, and there is at minimum a tension between that commitment and measures that produce civilian suffering. They raise **political problems** because sanctions that visibly harm ordinary people are politically unsustainable in democratic societies and provide sanctioned governments with a powerful rhetorical weapon.

1. Resolution 2664 and the Humanitarian Exemption

In December 2022, the Security Council adopted **resolution 2664**, which established a standing cross-regime **humanitarian exemption to the asset freeze measures imposed under all UN sanctions regimes**.[121] This was a genuine and meaningful reform, and it deserves credit as such. Prior to resolution 2664, **humanitarian organizations operating in conflict zones faced the risk that financial transactions with local partners** – money

121 United Nations Security Council, Resolution 2664 (2022), S/RES/2664 (2022), December 9, 2022, https://main.un.org/securitycouncil/en/content/sres2664-2022; Resolution 2761 (2024), S/RES/2761 (2024), December 6, 2024, https://main.un.org/securitycouncil/en/content/sres27612024.

exchangers, logistics providers, and local NGOs – **might inadvertently involve listed entities**, creating legal exposure that chilled legitimate humanitarian work and, in some cases, caused banks to refuse transactions with NGOs operating in sanctioned jurisdictions entirely.

The resolution 2664 exemption provides a **general authorization for transactions 'reasonably necessary' to deliver humanitarian assistance** by the UN, international organisations, eligible humanitarian organisations, certain bilaterally or multilaterally funded NGOs participating in UN-coordinated response activities, and their authorised partners. The exemption addresses the legal uncertainty that had contributed to excessive risk aversion among financial institutions. Its reach nevertheless remains limited, **extending solely to asset freezes while leaving arms embargoes and travel bans outside its scope**, despite the significant constraints these measures may impose on humanitarian operations. It does not automatically cover every national NGO or informal relief network; **eligibility depends on the categories in the resolution and any relevant committee decisions**. It also **fails to address the deeper problem of over-compliance by private financial institutions**, which often restrict transfers to entire conflict-affected jurisdictions because the reputational and regulatory risks associated with inadvertent sanctions violations outweigh the potential commercial benefits. Resolution 2664 clarified the law; it did not change the risk calculus of financial institutions whose legal departments take the view that any proximity to a sanctioned jurisdiction creates unacceptable exposure.[122]

2. Sanctions and Health: the Iranian Case

Iran represents the most extensively studied contemporary case of humanitarian harm from economic sanctions, and the findings from the medical literature are not comfortable

122 United Nations Security Council, Resolution 2664 (2022), S/RES/2664 (2022), December 9, 2022, https://digitallibrary.un.org/record/3990400; Thomas J. Biersteker and Larissa van den Herik, *Enhancing the Legitimacy of UN Security Council Sanctions by Strengthening Fair and Clear Procedures* (Bern: Swiss Federal Department of Foreign Affairs, 2025), https://www.fdfa.admin.ch/content/dam/eda/en/documents/das-eda/organisation-eda/dv/250820-Briefing-Paper-Enhancing-Legitimacy-UN-Security-Council-Sanctions-by-Strengthening-Fair-and-Clear-Procedures_EN.pdf.

reading for those who argue that humanitarian exemptions make targeted sanctions reliably civilian-neutral.[123]

The **comprehensive sanctions architecture on Iran** combining UN measures (prior to the JCPOA partial suspension), US primary and secondary sanctions, and EU measures has **disrupted pharmaceutical supply chains** in a well-documented way. The Central Bank of Iran's restricted access to the Society for Worldwide Interbank Financial Telecommunication (SWIFT) and to dollar-clearing relationships has **made it difficult for Iranian importers to pay for medicines that are nominally exempt from sanctions**, because the payment infrastructure needed to execute those transactions does not function. **Price increases of up to 300 per cent for specific medications**, including antiepileptics, immunosuppressants, and some oncology drugs, have been documented in the peer-reviewed literature. Two caveats are necessary here. First, the Iranian government has its own responsibility for the humanitarian situation. Sanctions evasion through oil exports conducted in defiance of international restrictions generates **revenue that the state chooses to allocate to military and proxy activities** rather than to importing medicine. Second, it is genuinely **difficult to disentangle the effects of sanctions from the effects of government mismanagement, corruption, and deliberate political choices about resource allocation**.[124] But the empirical evidence that civilian health outcomes have deteriorated in ways easily connected to sanctions restrictions is sufficiently robust that it cannot be dismissed.

An Arria-formula meeting on the humanitarian impact of unilateral coercive measures in November 2024 revealed the depth of the **political divide on this question within the**

123 Marita Mohammadshahi et al., "The Impact of Economic Sanctions on Health and Strategies for Mitigation: A Glance at the Case of Iran," International Journal of Preventive Medicine 16 (2025): 51, https://pmc.ncbi.nlm.nih.gov/articles/PMC12440346/; see also Center for Economic and Policy Research, *CEPR Sanctions Watch: November 2025* (Washington, DC: Center for Economic and Policy Research, 2025), https://cepr.net/publications/cepr-sanctions-watch-november-2025/.

124 On the Iranian government's resource allocation choices, see Mohammad Reza Farzanegan, Ruth Gibson, and Maziar Moradi-Lakeh, "Sanctions Are Not a Humane Alternative to War," Al Jazeera, November 12, 2025, https://www.aljazeera.com/opinions/2025/11/12/sanctions-are-not-a-humane-alternative-to-war; for the broader methodological challenge of disentangling sanctions effects from governance failures, see Thomas J. Biersteker, Sue E. Eckert, and Marcos Tourinho, eds., *Targeted Sanctions: The Impacts and Effectiveness of United Nations Action* (Cambridge: Cambridge University Press, 2016), 198–212.

Council itself. Several members – Russia and China most prominently – argued for a broad framework restricting the use of sanctions on humanitarian grounds. Western permanent members pushed back, arguing that the humanitarian effects of multilateral UN sanctions (which carry the Council's legitimacy and are subject to institutional oversight) should not be conflated with the humanitarian effects of unilateral coercive measures imposed outside the UN framework. The distinction is legally valid. Whether it is empirically adequate given that, in practice, UN and unilateral sanctions operate simultaneously on targets like Iran is a harder question.[125]

3. Due Process and the Rights of Listed Individuals

The listing of individuals under UN targeted sanctions regimes raises serious questions under international human rights law that have not been fully resolved despite two decades of debate. When the Security Council designates an individual under its sanctions regime, the practical consequences are severe: complete exclusion from the formal financial system, inability to travel internationally, loss of employment, potential criminal liability in Member States for any person who deals with them, and reputational destruction. These are **consequences of considerable magnitude, imposed on the basis of a decision taken by a political body** – the Sanctions Committee – that does **not conduct a hearing**, does **not share evidence with the designated person**, and does **not have to meet any specified standard of proof**. The fact that the consequences are described as 'administrative measures' rather than 'criminal punishment' does not change their character from the perspective of the person affected.[126]

[125] Security Council Report, "Arria-formula Concept Note: 'The Humanitarian Impact of Unilateral Coercive Measures,'" November 25, 2024, https://www.securitycouncilreport.org/un-documents/document/arria-formula-concept-note-the-humanitarian-impact-of-unilateral-coercive-measures.php; Security Council Report, "Arria-Formula Meeting on the Humanitarian Impact of Unilateral Coercive Measures," What's in Blue, November 2024, https://www.securitycouncilreport.org/whatsinblue/2024/11/arria-formula-meeting-on-the-humanitarian-impact-of-unilateral-coercive-measures.php.

[126] Bardo Fassbender, *Targeted Sanctions and Due Process: The Responsibility of the UN Security Council to Ensure That Fair and Clear Procedures Are Made Available to Individuals and Entities Targeted with Sanctions under Chapter VII of the UN Charter*, study commissioned by the United Nations Office of Legal Affairs (2006), https://www.un.org/law/counsel/Fassbender_study.pdf; Marko Milanovic, "The Human Rights of Listed Persons," in *Targeted Sanctions: The Impacts and Effectiveness of United Nations Action*, ed. Thomas J. Biersteker, Sue E. Eckert, and Marcos Tourinho (Cambridge: Cambridge University Press, 2016), 228–260; Malcolm N. Shaw, *International Law*, 9th ed. (Cambridge: Cambridge University Press, 2021), 1097–1101.

The **UN Ombudsperson**, established in 2009 and most recently renewed under **resolution 2734** (2024), addresses this problem **for the ISIL/Al-Qaeda sanctions regime specifically**. The Ombudsperson, an independent senior legal figure, receives delisting petitions from designated persons, conducts a review of the evidence, consults with Committee members, and produces a recommendation. Over fifteen years of operation, the Ombudsperson has processed over 90 petitions and recommended delisting in approximately 54 per cent of cases, a figure that implies, conservatively, that a **substantial proportion of listings under the ISIL/Al-Qaeda regime did not survive independent legal scrutiny**.[127]

The rest of the UN sanctions architecture lacks even this mechanism. In July 2024, the Security Council adopted **resolution 2744**, creating what it described as an **'enhanced' Focal Point mechanism for all other regimes**.[128] The enhancement is largely cosmetic. The Focal Point can receive petitions, relay information to the Committee, and produce a summary. It cannot make a recommendation on delisting, cannot compel the Committee to respond, and has no independent legal authority. For the majority of UN sanctions regimes, including those in Africa with the most active designation practices, the due process standard is materially below what any credible application of the International Covenant on Civil and Political Rights would require.[129] This is not simply an abstract human rights concern. Sanctions regimes that are perceived as arbitrary, that cannot explain designations, that do not provide any realistic avenue for challenge, that keep people listed

[127] United Nations Security Council, Resolution 2734 (2024), S/RES/2734 (2024), June 10, 2024; Devika Hovell, "Fifteen Years of the UN Ombudsperson: Due Process as Competitive Advantage," EJIL:Talk!, September 23, 2025, https://www.ejiltalk.org/fifteen-years-of-the-un-ombudsperson-due-process-as-competitive-advantage/; United Nations Security Council, "Office of the Ombudsperson: Procedure," https://main.un.org/securitycouncil/en/ombudsperson/procedure.

[128] United Nations Security Council, Resolution 2744 (2024), S/RES/2744 (2024), July 19, 2024; Security Council Report, "Sanctions: Vote on a Draft Resolution on the Focal Point for Delisting and Informal Working Group on UN Sanctions," What's in Blue, July 2024, https://www.securitycouncilreport.org/whatsinblue/2024/07/sanctions-vote-on-a-draft-resolution-on-the-focal-point-for-delisting-and-informal-working-group-on-un-sanctions.php.

[129] Thomas J. Biersteker and Larissa van den Herik, *Enhancing the Legitimacy of UN Security Council Sanctions by Strengthening Fair and Clear Procedures* (Bern: Swiss Federal Department of Foreign Affairs, 2025), 8–15, https://www.fdfa.admin.ch/content/dam/eda/en/documents/das-eda/organisation-eda/dv/250820-Briefing-Paper-Enhancing-Legitimacy-UN-Security-Council-Sanctions-by-Strengthening-Fair-and-Clear-Procedures_EN.pdf; Ruwanthika Gunaratne, "Sanctions under Scrutiny: Towards Better Justifications in UN Sanctions Listings," EJIL:Talk!, July 8, 2025, https://www.ejiltalk.org/sanctions-under-scrutiny-towards-better-justifications-in-un-sanctions-listings/; International Covenant on Civil and Political Rights, December 16, 1966, 999 U.N.T.S. 171, art. 14.

for years after the factual basis for their designation has become obsolete **lose legitimacy**. Governments and civil society in affected regions cite the due process deficit as a reason to resist cooperation with sanctions implementation. The efficiency argument and the rights argument point in the same direction – the listing system needs reform.[130]

Points a Resolution Should Address

NOTE FROM THE CHAIRS: The following is not a prescriptive outline. It represents the chairs' assessment of the minimum substantive ground that a credible resolution on this topic should cover. Delegates are free, indeed, and are expected to contest, revise, and improve on these suggestions through the negotiating process.

1. REGIONAL COORDINATION AND ENFORCEMENT ARCHITECTURE

- Establish formal cooperation frameworks between UN Sanctions Committees and relevant regional organisations, including the African Union, ECOWAS, the Arab League, and others as appropriate not limited to information sharing, but including coordination of implementation standards and regular reporting obligations.
- Create a mechanism for regional organisations to report to the relevant Sanctions Committee on implementation challenges within their geographic area, with the Committee obliged to acknowledge and respond to those reports.
- Authorise or request the Secretary-General to develop a technical assistance programme for Member States with demonstrated capacity deficits in sanctions implementation, including support for financial intelligence units, border control agencies, and customs authorities funded through assessed or voluntary contributions.
- Address the transit state problem directly: establish an obligation for Member States to notify the relevant Sanctions Committee when they become aware of prohibited

[130] Institute for Financial Integrity, "Sanctions in 2024: Global Pressure Points in the UN, U.S., EU, and UK," December 30, 2024, https://finintegrity.org/sanctions-in-2024-global-pressure-points-in-the-un-us-eu-and-uk/; United Nations University, "Enhancing Due Process in UN Security Council Targeted Sanctions Regimes," project overview, https://unu.edu/cpr/project/enhancing-due-process-un-security-council-targeted-sanctions-regimes.

transfers transiting their territory, with an exemption for intelligence-sensitive information.

2. CONFLICT FINANCING NETWORKS AND SUPPLY CHAINS

- Extend the scope of existing sanctions regimes to cover not only designated individuals and arms transfers but the financial flows derived from the natural resource exploitation conducted under the authority or for the benefit of designated armed groups a measure that would require corresponding national implementation but that is legally within the Council's Chapter VII authority.
- Call on Member States that are major importers of minerals, timber, and other natural resources from conflict-affected regions to implement due diligence frameworks consistent with the OECD Due Diligence Guidance, with national-level reporting requirements.
- Strengthen coordination between Sanctions Committees and the World Customs Organization, OECD, and relevant commodity regulators to identify and act on documented cases of commodity laundering through third-country processing.

3. CRYPTOCURRENCY AND DIGITAL FINANCE

- Direct relevant Sanctions Committees and their Panels of Experts to develop and maintain a capacity for blockchain analytics, including access to commercial-grade analytical tools of the kind routinely used by national financial intelligence units and law enforcement agencies.
- Call on all Member States to ensure that their legal frameworks for virtual asset service providers are consistent with FATF Recommendation 15, specifically the requirement for VASPs to implement targeted financial sanctions screening and file suspicious transaction reports.
- Address the mixer and chain-hopping problem: call on Member States to treat the use of mixing services or deliberate cross-chain obfuscation in connection with transactions involving a listed entity as a violation of sanctions obligations, and to establish corresponding criminal or administrative liability under national law.

- Request the Secretary-General to commission a report on options for UN-level cooperation with INTERPOL's Financial Crimes unit and with national financial intelligence units on cryptocurrency-related sanctions evasion, with a view to establishing a more systematic information-sharing framework.

4. HUMANITARIAN EXEMPTIONS

- Extend the scope of the humanitarian exemption established under resolution 2664 to cover a broader category of humanitarian actors, including established national and international NGOs operating under recognised accountability standards not simply the UN system and its immediate implementing partners.
- Direct the Secretary-General to report annually to the Council on the humanitarian impact of each active sanctions regime, with standardised methodology that allows comparison across regimes and over time.
- Address the private sector over-compliance problem by calling on Member States to issue clear guidance to financial institutions operating under their jurisdiction that the de-risking of entire conflict-affected jurisdictions beyond what UN sanctions require is inconsistent with the intent of the relevant Council resolutions.

5. DUE PROCESS AND REGIME LEGITIMACY

- Consider extending the Ombudsperson model or a functionally equivalent independent review mechanism to additional sanctions regimes, prioritised by number of active designations and severity of measures.
- Establish minimum evidentiary standards for new listings: specificity of conduct alleged, corroboration from at least two independent sources, and a temporal nexus between the evidence and the current listing.
- Direct the Informal Working Group on General Issues of Sanctions to review the delisting procedures under the Focal Point mechanism and propose concrete improvements, including the possibility of providing the Focal Point with authority to make formal recommendations to the Committee.

Strategic Questions for Debate

NOTE FROM THE CHAIRS: These questions are intended to frame the principal axes of disagreement the chairs anticipate in committee. They are designed to resist easy answers.

QUESTIONS:

- How can the Security Council create meaningful enforcement obligations on regional organisations without crossing into an interpretation of Article 52 that those organisations (and their Member States) regard as an infringement of their autonomy?
- What practical measures, beyond information sharing and voluntary frameworks, could actually change the calculus for transit states that benefit from facilitating prohibited transfers?
- Should the UN sanctions architecture treat cryptocurrency mixing services as per se sanctions-evasion tools and if so, what does that imply for the tens of thousands of users who use these services for entirely legitimate privacy reasons?
- The humanitarian exemption in resolution 2664 addressed the legal uncertainty facing UN implementing partners. It did not address the risk calculus of private banks. What, within the Council's Chapter VII authority, can actually change the behaviour of financial institutions whose decisions are driven by regulatory risk management rather than sanctions law?
- Is the two-tier due process structure; Ombudsperson for ISIL/Al-Qaeda, Focal Point for everything else politically achievable to reform given that extending the Ombudsperson model would require consensus among five permanent members who have strong incentives to preserve maximum flexibility in the listing process?
- The DPRK Panel was terminated by Russian veto in March 2024. The Panel's work was not in factual dispute. What does this episode reveal about the limits of institutional reform as a response to P5 political dysfunction and what, if anything, can be done within the Council's existing framework to mitigate those limits?

- Rwanda's facilitation of M23's mineral exports involves a UN Member State apparently acting in direct violation of obligations under the DRC sanctions regime. A new Security Council sanctions measure would require the necessary Council votes and no veto from a permanent member; sanctions committee listings are normally subject to consensus rules. What instruments formal or informal, within the UN system or beyond it remain available?
- Affected civilian populations in sanctioned states rarely have any formal role in the design or review of the sanctions regimes that constrain their lives. Is there a legally and politically feasible mechanism through which their interests could be more systematically represented in the Council's sanctions decision-making?

Additional Preparation Materials

NOTE FROM THE CHAIRS: The materials listed below were used in the preparation of this study guide and are recommended for further research. Delegates should also monitor the Security Council Report's What's in Blue service for the most recent Council developments.

VIDEO RESOURCES:

- **United Nations (2020). "Explainer: What Are United Nations Sanctions?"**
  Duration: 1 minute 47 seconds.
  A concise introduction to the objectives and functioning of UN sanctions, presented by Kelvin Ong, Chief of the Subsidiary Organs Branch within the Security Council Affairs Division.
  Available at YouTube: https://www.youtube.com/watch?v=wgS-aNJVEK4.
- **United Nations (2024). "Russia Vetoes Security Council Resolution Meant to Monitor UN Sanctions in DPR Korea."**
  Duration: 52 minutes.
  Footage of the March 2024 Security Council meeting in which Russia vetoed the renewal of the DPRK Panel of Experts' mandate. The video illustrates the political

constraints affecting sanctions monitoring and the consequences of disagreement among permanent Council members.

Available ay YouTube: https://www.youtube.com/watch?v=ipjJqk-xSVs.

- **United Nations (2023). "Humanitarian Carve Outs for UN Sanctions Regimes: The Impact and Implementation of Resolution 2664."**

  Duration: 47 minutes 48 seconds.

  A discussion involving UN Member States, humanitarian organisations and civil society on the implementation of Resolution 2664 and the practical challenges of ensuring that sanctions do not obstruct humanitarian assistance.

  Available at UN Web TV: https://webtv.un.org/en/asset/k1g/k1guzf3dth.

NECESSARY READING:

- **UN Security Council Sanctions information and Committee pages**: https://main.un.org/securitycouncil/en/sanctions.
- **UN Security Council Consolidated Sanctions List**: https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list.
- **UN Security Council Report Sanctions tracking:** https://www.securitycouncilreport.org/sanctions/.
- **UN Security Council resolutions:**
  - SC Res. 2664 (2022) – Humanitarian exemption
  - SC Res. 2734 (2024) – Ombudsperson renewal
  - SC Res. 2744 (2024) – Enhanced Focal Point
  - SC Res. 2776 (2025) – Somalia/Al-Shabaab

FURTHER READING:

Academic Books:

- Biersteker, Eckert, and Tourinho (eds.), Targeted Sanctions: The Impacts and Effectiveness of United Nations Action (Cambridge University Press, 2016).
  - the standard academic reference

- Cortright and Lopez, The Sanctions Decade (Lynne Rienner, 2000).
  - essential for the historical background
- Shaw, International Law, 9th ed. (Cambridge University Press, 2021), Chapter 23.
- Crawford, Brownlie's Principles of Public International Law, 9th ed. (Oxford University Press, 2019).

Policy and Analytical Reports:

- GI-TOC, 'The War for Congo's Wealth: M23 and Organized Crime in Eastern DRC' (2025).
- RUSI, 'Upholding North Korea Sanctions in the Age of Decentralised Finance' (March 2024).
- FATF, 'Report Highlights Major Gaps in Global Response to Proliferation Financing and Sanctions Evasion' (2024).
- Chainalysis, 'Crypto Sanctions 2026: Crypto Crime Report' (2026).
- Swiss FDFA, 'Enhancing the Legitimacy of UN Security Council Sanctions' (2025).
- Atlantic Council, 'Illicit Mineral Supply Chains Fuel the DRC's M23 Insurgency' (2025).
- EJIL:Talk!, 'Fifteen Years of the UN Ombudsperson' (2025).
- 38 North, 'UN Panel of Experts: The Final Act' (April 2024).
  - on the DPRK Panel termination

Additional Note

The topic this committee has been given is not easy.

Sanctions are one of the most institutionally complex instruments in international law as they sit at the intersection of Security Council politics, national implementation law, global financial regulation, commodity supply chain governance, and fundamental human rights standards. Understanding any one of those dimensions adequately requires sustained effort. Understanding how they interact requires more. This study guide has tried to lay out that interaction honestly, including in places where the honest answer is

that the current system is failing badly and that the obstacles to fixing it are partly political and partly structural.

A few things worth saying before you arrive in committee.

First, the legal framework matters. Knowing that the Council operates under Chapter VII, that Article 41 is the relevant authority, that due process standards in international human rights law create genuine constraints on listing procedures. It shapes what is legally achievable in a resolution and what arguments you can make in defence of your country's position.

Second, the facts matter more than the rhetoric. In a committee where some delegates will be representing P5 states with strong incentives to use this topic politically, and others will be representing smaller states with direct experience of what happens when sanctions are badly designed or badly enforced, the delegates who have done the most work on the specific cases (DRC, DPRK, Somalia, Iran, etc.), will have a decisive advantage in debate. The details are where the arguments are.

Third, and most important, there is no clean solution here. The gap between what the Security Council can decide and what actually happens on the ground is real, persistent, and driven by factors of P5 geopolitics, the sovereignty calculus of transit states, the technical sophistication of evasion networks, the limits of institutional capacity. No resolution, however well-drafted, can fully resolve. The value of the exercise is in developing, through serious engagement with the material and with each other, a clearer understanding of what is achievable, why, and at what cost.

See you in Ljubljana.

Štefan Grašič

Chair, Security Council (University)

MUNLawS 2026

Bibliography

Introduction to the Committee

- Akira Kato. “Revitalizing the Obligatory Abstention Rule in the UN Security Council: An Interpretation of the Proviso in Article 27(3) of the UN Charter,” Journal of Conflict and Security Law 30, no. 1 (2025): 3–22. https://doi.org/10.1093/jcsl/kraf002.
- Rome Statute of the International Criminal Court. Adopted July 17, 1998.
- United Nations. Charter of the United Nations. San Francisco, 1945.
- United Nations Security Council. “Current Members,” accessed October 20, 2026. https://main.un.org/securitycouncil/en/content/current-members.
- United Nations Peacekeeping. “Mandates and the Legal Basis for Peacekeeping,” accessed October 20, 2026. https://peacekeeping.un.org/en/node/132278.

Topic A

Legal Sources:

- United Nations. Charter of the United Nations. San Francisco, 1945.
- United Nations General Assembly. Resolution 2758 (XXVI). A/RES/2758(XXVI). October 25, 1971.
- United States and Republic of China. Mutual Defense Treaty between the United States of America and the Republic of China. Washington, D.C., 1954.
- United States Congress. Joint Resolution Authorizing the President to Employ the Armed Forces of the United States for Protecting the Security of Formosa, the Pescadores and Related Positions and Territories of That Area, January 29, 1955.
- United States Congress. Formosa Resolution. Washington, D.C., January 29, 1955.
- United States and People’s Republic of China. Joint Communiqué of the United States of America and the People’s Republic of China (Shanghai Communiqué). Shanghai, February 28, 1972.
- United States and People’s Republic of China. Joint Communiqué on the Establishment of Diplomatic Relations. Washington, D.C., January 1, 1979.

- United States Congress. Taiwan Relations Act. Washington, D.C., April 10, 1979.
- United States and People's Republic of China. Joint Communiqué on United States Arms Sales to Taiwan (Third Communiqué). August 17, 1982.
- United States. Six Assurances to Taiwan. Washington, D.C., July 14, 1982.
- Cross-strait representatives. "1992 Consensus." Informal and contested political understanding arising from contacts between Taiwan's Straits Exchange Foundation and China's Association for Relations Across the Taiwan Straits in 1992.
- People's Republic of China. Anti-Secession Law. Beijing, March 14, 2005.
- United States Congress. Six Assurances to Taiwan: Congressional reaffirmation. Washington, D.C., July 16, 2016.
- Montevideo Convention on the Rights and Duties of States. Montevideo, Uruguay, December 26, 1933.
- United Nations. United Nations Convention on the Law of the Sea. Montego Bay, 1982.

Other Sources:

- Bonny Lin, Brian Hart, Matthew P. Funaiole, Samantha Lu, Hannah Price, and Nicholas Kaufman. "Surveying the Experts: China's Approach to Taiwan," Center for Startegic & International Studies – China Power Project, November 8, 2023. https://chinapower.csis.org/survey-experts-china-approach-to-taiwan/.
- Brian Hart, Scott Kennedy, Jude Blanchette, Benny Lin. "Taiwan's 2024 Elections: Results and Implications," Center for Strategic & International Studies, January 19, 2024. https://www.csis.org/analysis/taiwans-2024-elections-results-and-implications.
- Chang, Harrison. "The '1992 Consensus' and Cross-Strait Agreements." SSRN Electronic Journal, November 12, 2018. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3259789.
- Congressional Research Service. Taiwan: The Origins of the U.S. One-China Policy. IF12503. September 27, 2023. https://www.congress.gov/crs-product/IF12503.
- CSIS ChinaPower Project. "Series: The Fourth Taiwan Strait Crisis." Center for Strategic and International Studies, April 25, 2023. https://chinapower.csis.org/series-fourth-taiwan-strait-crisis/.

- Funaiole, Matthew P., Brian Hart, David Peng, Bonny Lin, and Jasper Verschuur. “Crossroads of Commerce: How the Taiwan Strait Propels the Global Economy.” Center for Strategic and International Studies, October 9, 2024. https://features.csis.org/chinapower/china-taiwan-strait-trade/.
- Jared M. McKinney and Peter Harris. “Broken Nest: Deterring China from Invading Taiwan,” Parameters, 51, no. 4, 2021, pp. 67–80, https://press.armywarcollege.edu/parameters/vol51/iss4/6.
- J. Carter, “Establishment of Diplomatic Relations Between the United States and the People’s Republic of China”, 11 Case Western Reserve Journal of International Law 227, 1979, https://scholarlycommons.law.case.edu/cgi/viewcontent.cgi?article=1950&context=jil .
- Lawrence, Susan V. Taiwan: Background and U.S. Relations. IF10275. Congressional Research Service, March 30, 2026. https://www.congress.gov/crs-product/IF10275.
- Lawrence, Susan V. The U.S. ‘One-China Policy’ and Taiwan. IF1250. Congressional Research Service, August 15, 2025. https://www.congress.gov/crs-product/IF12503.
- Lin, Bonny, Brian Hart, Matthew P. Funaiole, Samantha Lu, Hannah Price, and Nicholas Kaufman. “Surveying the Experts: China’s Approach to Taiwan.” CSIS ChinaPower Project, September 11, 2022. https://chinapower.csis.org/survey-experts-china-approach-to-taiwan/.
- Murray, SWilliam S. “Revisiting Taiwan’s Defense Strategy,” Naval War College Review vol. 61 no. 3, 2008. https://digital-commons.usnwc.edu/nwc-review/vol61/iss3/3/.
- National Institute of Standards and Technology. “Trump Administration Secures an Additional $100 Billion U.S. Semiconductor Manufacturing Investment for a Total of $265 Billion from TSMC.” July 16, 2026. https://www.nist.gov/news-events/news/2026/07/trump-administration-secures-additional-100-billion-us-semiconductor.
- Nicastro, Luke A. “The Pacific Deterrence Initiative,” IF12303 (Congressional Research Service, November 24, 2024). https://www.congress.gov/crs_external_products/IF/PDF/IF12303/IF12303.4.pdf.

- Office of the President, Republic of China (Taiwan). “Opening Remarks by President Ma Ying-jeou at His Meeting with Mainland Chinese Leader Xi Jinping in Singapore.” November 7, 2015. https://english.president.gov.tw/NEWS/4779.
- Office of the People's Republic of China to the State of Palestine. “The Taiwan Question and China’s Reunification in the New Era (The People's Republic of China The Taiwan Affairs Office of the State Council and The State Council Information Office),”August 10, 2022. https://ps.china-office.gov.cn/eng/zxxx/202208/t20220810_10739896.htm.
- Pang Yang Huei. “Strait Rituals: China, Taiwan, and the United States in the Taiwan Strait Crises, 1954–1958” (1st ed., Hong Kong University Press, 2019).
- Pedrozo, Raul. “Naval Operations and the Right to Operate Freely in the Taiwan Strait,” U.S. Naval Institute , May 2, 2022. https://cimsec.org/naval-operations-and-the-right-to-operate-freely-in-the-taiwan-strait/.
- People’s Republic of China. “Anti-Secession Law.” National People’s Congress, March 14, 2005. http://www.china.org.cn/china/LegislationsForm2001-2010/2011-02/11/content_21898679.htm.
- Pew Research Center. “In Taiwan, Most Identify as Taiwanese, Few Say They’re Primarily Chinese.” January 16, 2024. https://www.pewresearch.org/short-reads/2024/01/16/most-people-in-taiwan-see-themselves-as-primarily-taiwanese-few-say-theyre-primarily-chinese.
- Seventh International Conference of American States. Convention on Rights and Duties of States (Montevideo Convention). December 26, 1933. 165 L.N.T.S. 19. https://www.diplomacy.edu/resource/montevideo-convention-on-the-rights-and-duties-of-states/.
- Stokes, Jacob. “Resisting China’s Gray Zone Military Pressure on Taiwan.” Center for a New American Security, December 6, 2023. https://www.cnas.org/publications/reports/resisting-chinas-gray-zone-military-pressure-on-taiwan.
- The Economist. “Taiwan’s Dominance of the Chip Industry Makes It More Important.” March 6, 2023. https://www.economist.com/special-report/2023/03/06/taiwans-dominance-of-the-chip-industry-makes-it-more-important.

- United Nations General Assembly. “Resolution 2758 (XXVI): Restoration of the Lawful Rights of the People’s Republic of China in the United Nations.” October 25, 1971. https://digitallibrary.un.org/record/192054.
- United Nations. United Nations Convention on the Law of the Sea. Adopted December 10, 1982; entered into force November 16, 1994. 1833 U.N.T.S. 397. https://www.un.org/depts/los/convention_agreements/texts/unclos/unclos_e.pdf.
- United States Congress. “Taiwan Relations Act.” Pub. L. No. 96-8, 93 Stat. 14. 1979. https://www.ait.org.tw/policy-history/taiwan-relations-act/.
- US–Taiwan Business Council. “FAQ: Is the Taiwan Strait in International Waters or Chinese Territory?” January 1, 2025. https://www.us-taiwan.org/resources/faq-the-taiwan-strait-is-international-waters/.
- US–Taiwan Business Council. “The U.S. ‘One China Policy’ vs. the PRC ‘One China Principle’.” January 1, 2025. https://www.us-taiwan.org/resources/faq-the-united-states-one-china-policy-is-not-the-same-as-the-prc-one-china-principle/.
- Viktor Friedmann. “Social Distancing? The Impact of the COVID-19 Pandemic on Cross-Strait Relations,” *Foreign Policy Review 14(3)*: 60-84, January 2021.
- VOA News. “Poll: Majority of Taiwanese Believe China Unlikely to Invade in Coming 5 Years.” October 9, 2024. https://www.voanews.com/a/poll-majority-of-taiwanese-believe-china-unlikely-to-invade-in-coming-5-years/7816390.html.
- Wei, Chi-hung. “China–Taiwan relations and the 1992 consensus, 2000–2008.” I*nternational Relations of the Asia-Pacific 16 (2016)*, pp. 67-95.

Topic B

Legal Sources:

- Treaties and Foundational Instruments
- African Union. Protocol Relating to the Establishment of the Peace and Security Council of the African Union. July 9, 2002. https://www.peaceau.org/uploads/psc-protocol-en.pdf.
- United Nations. Charter of the United Nations. San Francisco, 1945.

United Nations Security Council Resolutions:

- United Nations Security Council. Resolution 661 (1990). S/RES/661 (1990). August 6, 1990.
- United Nations Security Council. Resolution 1267 (1999). S/RES/1267 (1999). October 15, 1999.
- United Nations Security Council. Resolution 1533 (2004). S/RES/1533 (2004). March 12, 2004.
- United Nations Security Council. Resolution 2036 (2012). S/RES/2036 (2012). February 22, 2012.
- United Nations Security Council. Resolution 2374 (2017). S/RES/2374 (2017). September 5, 2017.
- United Nations Security Council. Resolution 2664 (2022). S/RES/2664 (2022). December 9, 2022.
- United Nations Security Council. Resolution 2734 (2024). S/RES/2734 (2024). June 10, 2024.
- United Nations Security Council. Resolution 2744 (2024). S/RES/2744 (2024). July 19, 2024.
- United Nations Security Council. Resolution 2762 (2024). S/RES/2762 (2024). December 13, 2024.
- United Nations Security Council. Resolution 2776 (2025). S/RES/2776 (2025). March 3, 2025.
- United Nations Security Council. Resolution 2789 (2025). S/RES/2789 (2025). July 29, 2025. Continued by Resolution 2827 (2026), S/RES/2827 (2026), July 29, 2026.

Other Sources:

- Aboagye, Festus B. “The Withdrawal of AES from ECOWAS: An Opportunity for Re-evaluating Existing Instruments for Regional Integration?” Amani Africa, January 31, 2025. https://amaniafrica-et.org/the-withdrawal-of-aes-from-ecowas-an-opportunity-for-re-evaluating-existing-instruments-for-regional-integration/.

- Amani Africa. “Discussion on AU Sanctions Regime.” October 23, 2023. https://amaniafrica-et.org/discussion-on-au-sanctions-regime/.
- Behalal, Zobel. “The War for Congo’s Wealth: How Organized Crime Fuels the M23 Crisis in Eastern DRC.” Global Initiative Against Transnational Organized Crime, January 30, 2025. https://globalinitiative.net/analysis/m23-organized-crime-rwanda-congo-drc-goma-conflict/.
- Biersteker, Thomas J., and Larissa van den Herik. Enhancing the Legitimacy of UN Security Council Sanctions by Strengthening Fair and Clear Procedures. Briefing paper. Swiss Federal Department of Foreign Affairs, 2025. https://www.fdfa.admin.ch/content/dam/eda/en/documents/das-eda/organisation-eda/dv/250820-Briefing-Paper-Enhancing-Legitimacy-UN-Security-Council-Sanctions-by-Strengthening-Fair-and-Clear-Procedures_EN.pdf.
- Biersteker, Thomas J., Sue E. Eckert, and Marcos Tourinho, eds. Targeted Sanctions: The Impacts and Effectiveness of United Nations Action. Cambridge: Cambridge University Press, 2016.
- Center for Economic and Policy Research. CEPR Sanctions Watch: November 2025. Washington, DC: Center for Economic and Policy Research, 2025. https://cepr.net/publications/cepr-sanctions-watch-november-2025/.
- Chainalysis Team. “Crypto Crime in 2025 Was Primarily Driven by 694% Surge in State-Driven Sanctions Evasion Volume.” Chainalysis, March 5, 2026. https://www.chainalysis.com/blog/crypto-sanctions-2026/.
- Cortright, David, and George A. Lopez. The Sanctions Decade: Assessing UN Strategies in the 1990s. Boulder, CO: Lynne Rienner, 2000.
- Council of the European Union. “Iran: Council Adopts New Sanctions over Serious Human Rights Violations and Iran’s Continued Support to Russia’s War of Aggression against Ukraine.” January 29, 2026. https://www.consilium.europa.eu/en/press/press-releases/2026/01/29/iran-council-adopts-new-sanctions-over-serious-human-rights-violations-and-iran-s-continued-support-to-russia-s-war-of-aggression-against-ukraine/.

- Crawford, James. Brownlie's Principles of Public International Law. 9th ed. Oxford: Oxford University Press, 2019.
- CYFIRMA Research. "DPRK Sanctions Violations in Cyber Operations Post UN Panel Demise." October 10, 2025. https://www.cyfirma.com/research/dprk-sanctions-violations-in-cyber-operations-post-un-panel-demise/.
- DeThomas, Joseph. "UN Panel of Experts: The Final Act." 38 North, April 11, 2024. https://www.38north.org/2024/04/un-panel-of-experts-the-final-act/.
- Economic Community of West African States. "Burkina Faso, Mali and Niger's Withdrawal from ECOWAS Is Now a Reality." January 30, 2025. https://www.ecowas.int/Burkina-faso-Mali-and-nigers-withdrawal-from-ECOWAS-is-now-a-reality/.
- Farzanegan, Mohammad Reza, Ruth Gibson, and Maziar Moradi-Lakeh. "Sanctions Are Not a Humane Alternative to War." Al Jazeera, November 12, 2025. https://www.aljazeera.com/opinions/2025/11/12/sanctions-are-not-a-humane-alternative-to-war.
- Fassbender, Bardo. Targeted Sanctions and Due Process: The Responsibility of the UN Security Council to Ensure That Fair and Clear Procedures Are Made Available to Individuals and Entities Targeted with Sanctions under Chapter VII of the UN Charter. Study commissioned by the United Nations Office of Legal Affairs, 2006. https://www.un.org/law/counsel/Fassbender_study.pdf.
- Financial Action Task Force. Complex Proliferation Financing and Sanctions Evasion Schemes. Paris: FATF, June 2025. https://www.fatf-gafi.org/en/publications/Financingofproliferation/complex-proliferation-financing-sanction-evasion-schemes.html.
- Financial Action Task Force. Guidance on Beneficial Ownership of Legal Persons. March 2023. https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Guidance-Beneficial-Ownership-Legal-Persons.html.
- Financial Action Task Force, INTERPOL, and United Nations Office on Drugs and Crime. "Critical Measures Needed to Fight Money Laundering and Terrorist Financing." Joint

statement, 2025. https://www.fatf-gafi.org/en/publications/Fatfgeneral/FATF-INTERPOL-UNODC-2025-Call-to-Action.html.

- Financial Action Task Force. Investigating Professional Money Laundering, Underground Banking, and the Use of Hawala and Other Similar Service Providers. Paris: FATF, September 3, 2026. https://www.fatf-gafi.org/en/publications/Methodsandtrends/pml-underground-banking-hawala-hossps.html.
- Financial Action Task Force. "Jurisdictions under Increased Monitoring." June 19, 2026. https://www.fatf-gafi.org/en/publications/High-risk-and-other-monitored-jurisdictions/increased-monitoring-june-2026.html.
- Financial Action Task Force. "Jurisdictions under Increased Monitoring." October 2024. https://www.fatf-gafi.org/content/fatf-gafi/en/publications/High-risk-and-other-monitored-jurisdictions/increased-monitoring-october-2024.html.
- Gunaratne, Ruwanthika. "Sanctions Under Scrutiny: Towards Better Justifications in UN Sanctions Listings." EJIL: Talk!, July 8, 2025. https://www.ejiltalk.org/sanctions-under-scrutiny-towards-better-justifications-in-un-sanctions-listings/.
- Hovell, Devika. "Fifteen Years of the UN Ombudsperson: Due Process as Competitive Advantage." EJIL: Talk!, September 23, 2025. https://www.ejiltalk.org/fifteen-years-of-the-un-ombudsperson-due-process-as-competitive-advantage/.
- Hufbauer, Gary Clyde, Jeffrey J. Schott, Kimberly Ann Elliott, and Barbara Oegg. Economic Sanctions Reconsidered. 3rd ed. Washington, DC: Peterson Institute for International Economics, 2007.
- Institute for Financial Integrity. "Sanctions in 2024: Global Pressure Points in the UN, U.S., EU, and UK." December 30, 2024. https://finintegrity.org/sanctions-in-2024-global-pressure-points-in-the-un-us-eu-and-uk/.
- Kamurai, Clarkson, Brad Handler, and Morgan Bazilian. "Illicit Mineral Supply Chains Fuel the DRC's M23 Insurgency." Atlantic Council, April 23, 2025. https://www.atlanticcouncil.org/blogs/energysource/illicit-mineral-supply-chains-fuel-the-drcs-m23-insurgency/.

- Karimou, Imane. “Unlocking Effective ECOWAS–AU Collaboration in UN-Backed Peace Operations.” Africa Policy Research Institute, October 30, 2025. https://afripoli.org/unlocking-effective-ecowas-au-collaboration-in-un-backed-peace-operations.
- Liechti, Sylvain. “SRSG Visits Coltan Mine in Rubaya.” Photograph. March 19, 2014. MONUSCO Photos. Wikimedia Commons. https://commons.wikimedia.org/wiki/File:SRSG_visits_coltan_mine_in_Rubaya_(13406579753).jpg.
- Mohammadshahi, Marita, et al. “The Impact of Economic Sanctions on Health and Strategies for Mitigation: A Glance at the Case of Iran.” International Journal of Preventive Medicine 16 (2025): 51. https://doi.org/10.4103/ijpvm.ijpvm_43_22.
- Multilateral Sanctions Monitoring Team. The DPRK’s Violation and Evasion of UN Sanctions through Cyber and Information Technology Worker Activities. MSMT/2025/2. October 22, 2025. https://www.mofa.go.jp/mofaj/files/100922718.pdf.
- O’Neill, Alex. Upholding North Korea Sanctions in the Age of Decentralised Finance. London: Royal United Services Institute, March 2024. https://static.rusi.org/north-korea-sanctions-and-cryptomixers-op-march-2024.pdf.
- Organized Crime and Corruption Reporting Project. “Report Describes Crypto’s $350 Billion Shadow War.” March 3, 2026. https://www.occrp.org/en/news/report-describes-cryptos-350-billion-shadow-war.
- Security Council Report. “Sanctions Publications.” https://www.securitycouncilreport.org/sanctions/.
- Shaw, Malcolm N. International Law. 9th ed. Cambridge: Cambridge University Press, 2021.
- United Nations Human Rights Council. Role of Mercenaries, Mercenary-Related Actors and Private Military and Security Companies in the Trafficking and Proliferation of Arms. A/HRC/57/45. September 9, 2024. https://documents.un.org/doc/undoc/gen/g24/143/21/pdf/g2414321.pdf.

- United Nations Office on Drugs and Crime. Firearms Trafficking in the Sahel. Transnational Organized Crime Threat Assessment—Sahel. New York: United Nations, 2022. https://digitallibrary.un.org/record/4011455.
- United Nations Security Council. “Sanctions,” accessed October 21, 2026. https://main.un.org/securitycouncil/en/sanctions/information.
- United Nations Security Council. “Security Council Committee Established pursuant to Resolution 2140 (2014),” section “Work and Mandate of the Committee.” accessed October 21, 2026, https://main.un.org/securitycouncil/en/sanctions/2140.
- United Nations Security Council. Final Report of the Group of Experts on the Democratic Republic of the Congo. S/2024/432. June 4, 2024. https://digitallibrary.un.org/record/4053693.
- United Nations Security Council. Final Report of the Group of Experts on the Democratic Republic of the Congo. S/2025/446. July 3, 2025. https://digitallibrary.un.org/record/4085466/files/S_2025_446-EN.pdf.
- United Nations Security Council. Final Report of the Panel of Experts Established Pursuant to Resolution 1973 (2011) Concerning Libya. S/2014/106. February 19, 2014. https://documents.un.org/api/symbol/access?l=en&s=S%2F2014%2F106&t=pdf.
- United Nations Security Council. Midterm Report of the Panel of Experts on Mali. S/2020/158/Rev.1. March 18, 2020. https://documents.un.org/api/symbol/access?l=en&s=S%2F2020%2F158%2FREV.1&t=pdf.
- United Nations Security Council. Report of the Monitoring Group on Somalia and Eritrea Pursuant to Security Council Resolution 2111 (2013). S/2014/726. October 13, 2014. https://digitallibrary.un.org/record/781898/files/S_2014_726-EN.pdf.
- United Nations Security Council. Report of the Monitoring Group on Somalia and Eritrea. S/2018/1002. November 9, 2018. https://digitallibrary.un.org/record/1652108/files/S_2018_1002-EN.pdf.
- United Nations Security Council. Resolution 2761 (2024). S/RES/2761 (2024). December 6, 2024. https://main.un.org/securitycouncil/en/content/sres27612024.

- United Nations Security Council. Resolution 2806 (2025). S/RES/2806 (2025). December 12, 2025. https://main.un.org/securitycouncil/en/content/sres28062025.
- United Nations Security Council. Resolution 2827 (2026). S/RES/2827 (2026). July 29, 2026. https://main.un.org/securitycouncil/en/sanctions/2127/resolutions.
- United Nations Security Council. “Security Council Extends Al-Shabaab Sanctions Regime, Renews Panel of Experts in Resolution 2776 (2025).” Press release SC/16011, March 3, 2025. https://press.un.org/en/2025/sc16011.doc.htm.
- United Nations Security Council. “Security Council Fails to Adopt Resolution Extending Joint Comprehensive Plan of Action on Iran’s Nuclear Programme.” Press release SC/16181, September 26, 2025.
- United Nations Security Council. “Security Council Fails to Extend Mandate for Expert Panel Assisting Sanctions Committee on Democratic People’s Republic of Korea.” Press release SC/15648, March 28, 2024. https://press.un.org/en/2024/sc15648.doc.htm.
- United Nations Security Council. “Security Council Sanctions Committee Concerning Democratic Republic of Congo Holds Meeting on Natural Resources.” Press release SC/15734, June 14, 2024. https://press.un.org/en/2024/sc15734.doc.htm.
- United Nations Security Council. “Security Council Told Political Upheaval, Violent Extremism Continue to Challenge West Africa, Sahel Region.” Press release SC/16257, December 18, 2025.
- United States Department of State. “The Democratic People’s Republic of Korea’s Violations and Evasions of UN Sanctions through Cyber and IT Worker Activities.” Fact sheet, January 12, 2026.
- United States Department of the Treasury. “Treasury Sanctions Entities Linked to Violence and Illegal Mining in the Democratic Republic of the Congo.” August 12, 2025. https://home.treasury.gov/news/press-releases/sb0221.
- Vorrath, Judith. UN Arms Embargoes under Scrutiny: Obstacles and Options for an Effective Contribution to Conflict Resolution. SWP Research Paper 12. Berlin: Stiftung Wissenschaft und Politik, 2024. https://doi.org/10.18449/2024RP12.

