



SUDAN: BYPASSING SANCTIONS, SUSTAINING THE WAR ECONOMY

Trends, effectiveness, unintended consequences, and recommendations for conflict related sanctions since April 2023

OCTOBER 2026



CONTENTS

EXECUTIVE SUMMARY	1
THE HISTORY OF SANCTIONS IN SUDAN.....	4
Sanctions imposed since April 2023	5
Differences between the pre- and post-2023 sanctions regimes	12
CRITIQUES OF SANCTIONS.....	12
Effectiveness of sanctions.....	13
Effectiveness in Sudan before 2023	14
Unintended consequences.....	16
Unintended consequences in Sudan	18
Process considerations	21
Public opinion.....	23
ASSESSING SANCTIONS SINCE 2023.....	23
Impacts on a sample of sanctioned Sudanese actors	23
SAF and related actors	23
Case Study: Zadna and Red Rock.....	28
Case Study: Merghani Idriss and the Defense Industries System	33
RSF and related entities	39
Algoney Dagalo	42
Al Junaid for Multi-Activities Co. Ltd.	44
Impact on civilians and civilian economic activity	47
Humanitarian access and delivery.....	48
Civilian private sector and market effects	48
RECOMMENDATIONS.....	49
Annex.....	51

FIGURES AND TABLES

1989 Sudanese coup d'état4

Timeline of designations, June 2023 to February 20268

Sanctioned actors, by authority 10

Civilian fatalities against the sanctions timeline24

Zadna International Company for Investment28

SAF-linked networks30

Red Rock Mining Company32

Merghani Idriss Suleiman33

Sudan Reconstruction Business Forum, London, February 202637

RSF-linked networks41

Algoney Hamdan Dagalo Musa.....42

Sudanese refugees in Chad, May 202347

EXECUTIVE SUMMARY

Sanctions have been a principal instrument for counteracting the devastating violence and humanitarian disaster caused by the outbreak of conflict in Sudan on April 15, 2023. The war has caused widespread destruction and led to Sudan being labeled “the world’s worst humanitarian disaster.” More than two-thirds of Sudan’s population are in need of humanitarian assistance, 13.4 million have been displaced and 37% of the country’s health facilities are estimated to be offline.¹

Mediation efforts between the two main belligerents of the conflict, the Sudanese Armed Forces (SAF) and the Rapid Support Forces (RSF), have failed, with both sides determined to achieve total military victory. Their ability to continue to pursue this strategy hinges on their ability to finance the war. Both parties have amassed enormous financial resources following years of state capture and the development of conglomerates and shell companies across the public and private sectors dating from the Omar al-Bashir era. SAF has built massive empires such as the military-industrial Defense Industries Systems (DIS), which earned an estimated US \$2 billion annually before the war. The RSF, SAF’s former ally, built its own wealth through the Al-Junaid conglomerate and wide portfolio of business interests, dating back to 2009, and through its control of the gold mining and trade relations with the United Arab Emirates (UAE).

Since the start of the war, Canada, the European Union (EU), the United Kingdom (UK), United Nations (UN), and United States (US) have sanctioned 32 individuals and 20 companies in relation to the conflict. The driving trend, though not absolute, has been the imposition of targeted sanctions; the exception to this are US sanctions related to the use of chemical weapons by the SAF implemented in 2025 and 2026. These sanctions have included high-profile companies and individuals on both sides, including both DIS and Junaid, and appear designed to both disrupt war economies and act as political pressure.

The current regime of sanctions, which focus on individuals and companies, as opposed to whole industries or national economies, is a relatively new phenomenon, quite distinct from the national sanctions imposed on Sudan in the 1990s. The increased use of this type of sanctions as a diplomatic tool to end conflict and effect behavioral change has led to increased demand for impartial assessment of their impact.

Common critiques of sanctions applicable to the Sudan case revolve around three main contentions: 1) they are ineffective; 2) they cause undue damage outside their core targets; and 3) they are imposed in a way that is unfair or inappropriate. Although targeted sanctions, as compared to country or sector wide sanctions, are intended to minimize unintended consequences that negatively economically impact ordinary citizens, the concern about such impacts has not gone away. This report focuses in on the first critique, seeking to assess whether, and if so to

¹ OCHA, “Sudan Key Facts and Figures (June 2026),” July 9, 2026, available at <https://www.unocha.org/publications/report/sudan/sudan-key-facts-and-figures-june-2026>

what extent, sanctions have had an impact on sanctioned entities. The other two questions may be addressed peripherally but are not the main focus of the report.

To do this, the report begins with a brief background to the current sanctions regimes in place, their sequencing, and the rationale behind each target. To assess the impact of sanctions on individual targets and companies, the report applies a framework examining three effects: i) deterrence (changes in behavior or entrenchment), ii) disruption (i.e., reduced capacity to continue proscribed activities), and iii) demonstration (which considers norm signaling and reputational effects). The period since sanctions were imposed has seen shifts that may be consistent with their intended effect, such as the installation of a civilian façade, with General Burhan appointing a civilian Prime Minister and General Hemedti forming a parallel Tasis government.

However, this report argues that those behavioral changes cannot be fully attributed to the sanctions and may reflect a broader set of factors, including international diplomatic pressure, military dynamics on the battlefield, and concerns about domestic and international legitimacy. Moreover, these shifts may not represent a fundamental or practical change, as both generals continue to dominate the political scene and military strategy.

In addition to their limited effectiveness, sanctions may also lead to a myriad of unintended consequences. General sanctions on Sudan pre-2023 were deeply unpopular for their impact on ordinary citizens. As noted by a delegation of Sudanese activists in September 2025 in a meeting with the US Office of Foreign Asset Control (OFAC), more could be done to communicate to the Sudanese public that sanctions are targeted in order to ensure sanctioned individuals do not manipulate them to bolster their power by positioning themselves as defenders against Western interference.

KEY FINDING

Documented procurement cases and open-source reporting reviewed for this report indicate that, in cases where sanctions have limited established weapon supply lines, the belligerents have sought alternative markets, reportedly including Pakistan, Iran, and Russia, or have turned to domestic weapon production through the import of precursor or dual-use materials that are harder to track.

The SAF and RSF-affiliated sanctioned individuals and entities have in documented cases either pre-positioned themselves by anticipating sanctions and concealed assets or shifted the jurisdictions in which they operate. ZADNA International Company for Investment Limited, owned by the SAF and sanctioned by the EU, UK, and the US, is reported to have shifted much of its business to Egypt and the Arab Gulf states, to have grown and to have positioned itself to take control of government infrastructural reconstruction programs post-conflict. Documented procurement cases and open-source reporting reviewed for this report indicate that, where sanctions have constrained access to established weapons supply channels, the belligerents have sought alternative markets, reportedly including Pakistan, Iran, and Russia, or have turned to domestic weapon production through the import of precursor or dual-use materials, which can be more difficult to track. These cases provide evidence of efforts to adapt procurement and supply arrangement in the context of sanctions but do not, on their own, establish that sanctions caused the shift to alternative markets or domestic production.

Finally, the report assesses the impact of sanctions on civilians and civilian economic activity, on humanitarian access and delivery, and on the private sector and market. The report concludes by offering recommendations on how to improve the efficacy of sanctions by including joint ventures and unsanctioned subsidiaries; increasing the range of sanctions by encouraging buy-in by other states; coordination amongst sanctioning authorities; diplomatic engagement with third countries, such as Egypt and the Gulf states, alongside enhanced due diligence and enforcement to disrupt sanctioned entities' dealings; expansion of the UN arms embargo to the entirety of the country, ensuring adequate attention to precursor materials to halt domestic production; monitoring civilian economic spillovers to mitigate against unintended harm; and calibrating sanctions within a broader political strategy to maximize the impact of their application.

Since the outbreak of the current war in Sudan on April 15, 2023, a number of entities, including Canada, the European Union, the United Kingdom and the United States have imposed sanctions on individuals and companies playing some role in the conflict. These sanctions have been imposed as part of a strategy intended to press the parties to the conflict to pursue a politically negotiated end to the violence.

These sanctions were imposed on a country that has a long history of being sanctioned. Since the 1990s, Sudan has been the target of a number of different sanctions regimes, from arms embargoes to broad terrorism related sanctions to individual sanctions. This history of sanctions impacts the way in which both the Sudanese public views the current sanctions regime and the way in which sanctioned actors, many of whom experienced the previous rounds of sanctions, react. Earlier rounds of sanctions also shape how individuals, businesses and humanitarian actors operate in Sudan today.

RECOMMENDATION

Even at their most effective, sanctions will not work alone. Sanctions should be embedded within a broader political strategy.

Despite both the sanctions imposed since the start of the 2023 war, and the previous sanctions regimes, violence continues to rage in Sudan. The situation remains, by many metrics, the world's worst humanitarian crisis. However, this does not necessarily mean that the sanctions are not having any impact. Sanctioned individuals and businesses may change the ways they work and make tactical shifts in business engagement and investment, with knock-on effects on the internal dynamics and financing of the warring parties.

This report seeks to analyze the extent to which the current sanctions regime has had an impact. To do that, it begins with a brief review of the historical context of sanctions on Sudan. From there, it proceeds to assess the impact of the current sanctions on Sudan from the perspective of the Sudan Armed Forces (SAF) and aligned actors, the Rapid Support Forces (RSF) and aligned actors, and then on civilians. It concludes with a set of recommendations on how the sanctions regime could be made more effective.

THE HISTORY OF SANCTIONS IN SUDAN



1989 SUDANESE COUP D'ÉTAT

Omar al-Bashir (center) addressing supporters after the June 1989 coup. The sanctions imposed on Sudan through the 1990s and 2000s (the arms embargoes, the state-sponsor-of-terrorism designation, and the 1997 trade restrictions) were levied against his governments Wikimedia Commons.

Sudan has been the target of numerous different sanctions over time, based on the North South civil war, accusations of support to international terrorism, in response to the war in Darfur in the early 2000s, and finally in response to the 2023 war. In 1992, the US imposed an arms embargo on Sudan.² In 1993, the US listed Sudan as a state sponsor of terrorism. The designation made Sudan ineligible for US foreign assistance other than humanitarian aid and required the US to vote against Sudan in international financial institutions.³ In 1994, the EU also imposed an arms embargo in response to the North-South civil war.⁴

In 1997, the US imposed broad sanctions for “continued support for international terrorism; ongoing efforts to destabilize neighboring governments; and the prevalence of human rights violations.”⁵ These sanctions were broad based and included banning the import of Sudanese products to the US or export of US products to Sudan, the involvement of US nationals in Sudanese import and export activities, or provision of loans to Sudan. Later in the same year, government assets were frozen and its ability to trade in US dollars was limited.

² Small Arms Survey, “Lifting Sanctions on Sudan: Rationale and Reality,” May 2018,

<https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

³ Center for Global Development, “Brief Timeline of Key Sanctions Events in Sudan,” October 6, 2011,

<https://www.cgdev.org/article/brief-timeline-key-sanctions-events-sudan-adapted-and-updated-hufbauer-et-al>

⁴ Stockholm International Peace Research Institute, “EU arms embargo on Sudan,” November 23, 2012,

https://www.sipri.org/databases/embargoes/eu_arms_embargoes/sudan

⁵ Executive Order 13067 – Blocking Sudanese Government Property and Prohibiting Transactions with Sudan,” November 3, 1997, <https://www.presidency.ucsb.edu/documents/executive-order-13067-blocking-sudanese-government-property-and-prohibiting-transactions>

Following the outbreak of conflict in Darfur in 2003, the rationale of sanctions shifted from Sudan's alleged affiliation with terrorist groups and prioritized the cessation of international crimes pursuant to the conflict. In 2004, the UN Security Council adopted resolution 1556, imposing a partial arms embargo, targeting non-governmental entities and individuals including the notorious Janjaweed militia in Darfur.⁶ In 2005 it passed resolution 1591, expanding the arms embargo to all signatories to the N'djamena Ceasefire Agreement and setting up a committee of experts to monitor the measures and designate individuals subject to sanctions.⁷ Resolution 1672 designated four individuals for sanctions under the framework of 1591: Musa Hilal, former leader of the Janjaweed militia and former advisor to the Sudanese Minister of Internal Affairs (also sanctioned by the US, UK, and EU), Jibril Abdulkarim Ibrahim Mayu, Commander of the National Movement for Reform and Development (also sanctioned by the US, UK, and EU), Gaffar Mohammed Elhassan, former Major General of the SAF, (also sanctioned by the US, UK, and EU), and Adam Yacub Shareif, Commander of the Sudan Liberation Army.⁸

US President George W. Bush implemented these designations by Executive Order the following day.⁹ At least three additional individuals, including Ahmed Harun, who was also charged by the International Criminal Court for war crimes and crimes against humanity in 2007, and a dozen companies, were later named under the same framework.¹⁰ The US also banned the engagement of US nationals in the Sudanese oil industry.¹¹ By the mid-2000s, the US had also developed a series of policies designed to ensure that humanitarian aid and other goods and services could enter the country. The 2006 Darfur Peace and Accountability Act eased sanctions on South Sudan.¹²

Over time, as hostilities in Darfur subsided, Sudan successfully lobbied for an improvement of its relationship with the West generally and the US in particular. Under President Obama, trade sanctions were eased in 2017¹³ and subsequently rescinded by the first Trump administration.¹⁴ Additionally, Trump removed the US' State Department's designation of Sudan as a state-sponsor of terrorism.¹⁵ Sanctions levied against individuals remained in place.

Sanctions imposed since April 2023

Since the start of the war, Canada, the EU, the UK, the UN and the US have sanctioned 32 individuals and 20 companies in relation to the war. Please see a review of all sanctioned individuals and companies in [Annex 1](#).

On June 1, 2023, the United States imposed sanctions on four companies, two affiliated with the RSF and two affiliated with the SAF for allegedly profiting from, and funding, the conflict and supplying weapons to the warring parties. These were Al Junaid Multi-Activities (RSF),

⁶ UN Security Council Resolution 1556, July 30, 2004, <https://main.un.org/securitycouncil/en/s/res/1556-%282004%29>

⁷ UN Security Council Resolution 1591, March 29, 2005, <https://main.un.org/securitycouncil/en/s/res/1591-%282005%29>

⁸ UN Security Council Resolution 1672, April 25, 2006.

⁹ Office of the Press Secretary, "US targeted sanctions on persons in connection with the conflict in Sudan's Darfur region," April 27, 2006.

¹⁰ US Office of Foreign Assets Control, "Sudan/Darfur Designations," May 29, 2007, <https://ofac.treasury.gov/recent-actions/20070529>

¹¹ Small Arms Survey, "Lifting Sanctions on Sudan: Rationale and Reality," May 2018, <https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

¹² Darfur Peace Agreement (DPA), Page 31, 2006. Available at: <https://www.un.org/zh/focus/southernsudan/pdf/dpa.pdf>

¹³ BBC, "Obama signs order to ease sanctions against Sudan," January 13, 2017, <https://www.bbc.com/news/world-africa-38612616>

¹⁴ Eric Reeves, "Trump administration has decided to lift permanently longstanding U.S. economic sanctions on the Khartoum regime," June 15, 2017, <https://sudanreeves.org/2017/06/15/trump-administration-has-decided-to-lift-permanently-longstanding-u-s-economic-sanctions-on-the-khartoum-regime-see-paragraph-8-patience-and-genocide-rewarded-indeed/>

¹⁵ ABC News, "Trump lifts sanctions on Sudan as he announces deal between African nation and Israel," October 23, 2020, <https://abcnews.com/Politics/trump-lifts-sanctions-sudan-announces-deal-israel/story?id=73788360>

Tradive General Trading LLC (RSF), Defense Industries System (SAF) and Sudan Master Technology (SAF).¹⁶ Al Junaid Multi Activities operates 11 subsidiaries mostly in the gold mining sector and Tradive has purchased vehicles for the RSF. On the SAF side, Defense Industries System (DIS) and Sudan Master Technology, have been described as the core of the SAF's economic empire.¹⁷ On July 12, 2023, the UK government-imposed sanctions on these same businesses, accusing them of providing "funding and supplies" to both warring parties.

The UK extended sanctions to two additional companies, GSK Advance Company and Zadna International Company for Development Ltd. (Zadna) GSK has provided financing and materiel to the RSF, and Zadna is a subsidiary of DIS¹⁸ and one of its largest revenue earners. Self-described as the largest public company in Sudan, it was characterized by the US as "one of the most important components of SAF's commercial empire."¹⁹ The US extended sanctions to GSK in September 2023 and Zadna in January 2024.²⁰ The EU sanctioned all six companies previously sanctioned by the UK in January 2024.²¹

In July 2023, the UK sanctioned Michail Sergeevich Potepkin, managing director of Meroe Gold and Andrei Sergeevich Mandel director of M-Invest, both associated with the Russian Wagner Group, for threatening peace in Sudan and elsewhere in Africa. On September 6, 2023, the US sanctioned Abdelrahim Hamdan Dagalo, deputy leader of the RSF and brother of Mohamed Hamdan Dagalo Musa ("Hemedti"), leader of the RSF, for his senior leadership of the RSF and its implication in the conduct of gross human rights violations.²² In April 2024, Canada followed suit, citing his role in "undermining peace, security and stability."²³ The EU did the same in November 2025²⁴ and the UK in December, in response to the violence in El Fasher.²⁵ Abdelrahim arrived in El Fasher just two days after the city fell, and this, among other factors, has highlighted his responsibility.

In September 2023, the US government issued sanctions against two RSF-linked companies, GSK (discussed above) and Aviatrade LLC, and one SAF-linked individual, Ali Karti. Karti is a former Bashir-era official and leader in the Sudanese Islamic Movement.²⁶ Aviatrade LLC is a Russian company providing Unmanned Aerial Vehicles (UAVs) and other military supplies to the RSF.²⁷ On December 4, 2023, the US imposed sanctions on three former high-level government

¹⁶ US Department of the Treasury, "Treasury Sanction Military-Affiliated Companies Fueling Both Sides of the Conflict in Sudan," June 1, 2023, available at <https://home.treasury.gov/news/press-releases/jy1514>

¹⁷ US Treasury Department, "Treasury Sanctions Military-Affiliated Companies Fueling Both Sides of the Conflict in Sudan," June 1, 2023, <https://home.treasury.gov/news/press-releases/jy1514>

¹⁸ Government of the UK, "UK sanctions businesses funding Sudan," July 12, 2023, <https://www.gov.uk/government/news/uk-sanctions-businesses-funding-sudan-war>

¹⁹ US Treasury, "Treasury Targets Entities Funding the Conflict in Sudan," January 31, 2024, <https://home.treasury.gov/news/press-releases/jy2066>

²⁰ US Department of the Treasury, "Treasury Designates Entities and Individual Exacerbating Sudan's Instability," September 28, 2023, <https://home.treasury.gov/news/press-releases/jy1769>

²¹ European Union, "EU Sanctions Map: Sudan Regime," accessed September 30, 2026, <https://sanctionsmap.eu/#/main/details/57/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D>

²² US Department of the Treasury, "Treasury Sanctions Sudanese Paramilitary Leader," September 6, 2023, <https://home.treasury.gov/news/press-releases/jy1712>

²³ Government of Canada, "Minister Joly announces sanctions in response to ongoing conflict in Sudan," April 15, 2024, <https://www.canada.ca/en/global-affairs/news/2024/04/minister-joly-announces-sanctions-in-response-to-ongoing-conflict-in-sudan.html>

²⁴ Gavin Blackburn, "EU sanctions Sudanese paramilitary leader after atrocities by his forces in Darfur," Euro News, November 21, 2025, <https://www.euronews.com/2025/11/21/eu-sanctions-sudanese-paramilitary-leader-after-atrocities-by-his-forces-in-darfur>

²⁵ Sudan War Monitor, "UK sanctions Abdelrahim Dagalo, RSF commanders over El Fasher atrocities," December 13, 2025, https://sudanwarmonitor.com/p/uk-sanctions-abdelrahim-dagalo-rsf?utm_source=post-email-title

²⁶ US Department of the Treasury, "Treasury Designates Entities and Individual Exacerbating Sudan's Instability," September 28, 2023, <https://home.treasury.gov/news/press-releases/jy1769>

²⁷ Ibid.

officials for obstructing the peace process. Those were Taha Osman Ahmed al Hussein, a former State Minister and Presidential Office Director; Salah Abdallah Mohamed Salah, also known as Salah Gosh, the former head of national intelligence, and Mohamed Etta Elmoula Abbas (Elmoula), who also served in the national intelligence service.²⁸ The EU and Canada joined in sanctioning Gosh on December 16, 2024²⁹ and March 2025, respectively.³⁰

In January 2024, the US imposed sanctions on three companies for their role in funding both the RSF and the SAF, Alkhaleej Bank, Al Fakher Advanced Works Co. Ltd, and Zadna (discussed above). Alkhaleej is controlled by the RSF and according to the EU, “plays an essential role in financing RSF operations.”³¹ Al Fakher is involved in exporting RSF gold.³² Canada sanctioned Al Khaleej in March 2025,³³ and the EU in July 2025. On May 15, 2024, the United States imposed sanctions against Ali Yagoub Gibril and Osman Mohamed Hamid Mohamed for leading RSF attacks in North Darfur. They were identified as having “impeded humanitarian access, increased the risk of mass atrocities” and having undermined “vital peace efforts.”³⁴ Mohamed was later sanctioned by the UN (11/24),³⁵ the UK (11/24)³⁶ and also the EU (12/24).³⁷ Gibril is believed to have been killed in fighting around El Fasher in mid-2024.

In June 2024, the EU imposed travel restrictions on Merghani Idriss Suleiman, the leading SAF procurement specialist; El Tahir Mohamed El Awad El Amin, Commander of the Sudanese Air Force³⁸ and implicated in bombings of civilian areas; Ali Karti, former Foreign Minister and head of the Sudanese Islamist Movement; Mustafa Ibrahim Abdel Nabi Mohamed, financial director of Al Khaleej Bank and financial advisor to the RSF;³⁹ and RSF affiliate Masar Abdurrahman Aseel Amir of the Mahamid clan and member of the Native Administration in West Darfur.⁴⁰ On October 8, 2024, the US sanctioned Merghani Idriss, citing his leadership of SAF “efforts to acquire weapons.”⁴¹ Canada imposed sanctions on Idriss in 2025⁴² citing concerns about widespread sexual violence.

²⁸ US Department of the Treasury, “Treasury Targets Sudanese Actors for Undermining Peace, Security and Stability in Sudan,” December 4, 2023, <https://home.treasury.gov/news/press-releases/jy1947>

²⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32024D3154>

³⁰ Global Affairs Canada, “Minister Joly Announces Additional Sanctions in Response to Ongoing Conflict in Sudan,” news release, March 6, 2025, <https://www.canada.ca/en/global-affairs/news/2025/03/minister-joly-announces-additional-sanctions-in-response-to-ongoing-conflict-in-sudan.html>

³¹ Council of the EU, “Council sanctions individuals and entities over serious human rights violations and threats to the peace, stability and security of the country,” July 18, 2025, <https://www.consilium.europa.eu/en/press/press-releases/2025/07/18/sudan-council-sanctions-individuals-and-entities-over-serious-human-rights-violations-and-threats-to-the-peace-stability-and-security-of-the-country/>

³² US Treasury, “Treasury Targets Entities Funding the Conflict in Sudan,” January 31, 2024, <https://home.treasury.gov/news/press-releases/jy2066>

³³ Government of Canada, “Minister Joly announces additional sanction in response to ongoing conflict in Sudan,” March 5, 2025, <https://www.canada.ca/en/global-affairs/news/2025/03/minister-joly-announces-additional-sanctions-in-response-to-ongoing-conflict-in-sudan.html>

³⁴ US Department of the Treasury, “Treasury Sanctions Sudanese Rapid Support Forces Commanders Expanding War,” May 15, 2024, <https://home.treasury.gov/news/press-releases/jy2340>

³⁵ UN, “Osman Mohamed Hamid Mohamed,” <https://main.un.org/securitycouncil/en/content/osman-mohamed-hamid-mohamed>

³⁶ UK Office of Financial Sanctions Implementation HM Treasury, “Consolidated List of Financial Sanctions Targets in the UK,” <https://assets.publishing.service.gov.uk/media/693bcfbf33c7ace9c4a420a6/Sudan.pdf>

³⁷ Council of the EU, “Sudan: Council adds four individuals to EU sanctions list for threatening the peace, stability and security of the country,” December 16, 2024, <https://www.consilium.europa.eu/en/press/press-releases/2024/12/16/sudan-council-adds-four-individuals-to-eu-sanctions-list-for-threatening-the-peace-stability-and-security-of-the-country/pdf/>

³⁸ EU Sanctions Tracker, “Mirghani Idriss Suleiman,” <https://data.europa.eu/apps/eusanctionstracker/subjects/167327>

³⁹ EU Sanctions Tracker, <https://data.europa.eu/apps/eusanctionstracker/subjects/167349>

⁴⁰ Ibid.

⁴¹ US Department of the Treasury, “Treasury Sanctions Sudanese Armed Forces Weapons Procurement Director,” October 24, 2024, available at <https://home.treasury.gov/news/press-releases/jy2672>

⁴² Government of Canada, “Background -- Additional sanctions in response to ongoing conflict in Sudan,” February 7, 2025, <https://www.canada.ca/en/global-affairs/news/2025/02/background---additional-sanctions-in-response-to-ongoing-conflict-in-sudan.html>

TIMELINE OF DESIGNATIONS, JUNE 2023 TO FEBRUARY 2026

Jun 2023	US designates the first four companies — Defense Industries System and Sudan Master Technology (SAF); Al Junaid and Tradive (RSF)
Jul 2023	UK mirrors the US list and adds GSK Advance and Zadna International
Sep 2023	US designates Abdelrahim Dagalo, Ali Karti and Aviatrade
Dec 2023	US targets three former officials, including Salah Gosh, for obstructing the peace process
Jan 2024	EU designates all six companies already listed by the UK; US adds Alkhaleej Bank, Al Fakher and Zadna
Jun 2024	EU designates the procurement principals, including Merghani Idriss Suleiman
Oct–Nov 2024	US designates Algoney Dagalo; UN and UK list the El Geneina commanders
Jan 2025	US designates Hemedti alongside its genocide determination, then Burhan nine days later
Apr 2025	US imposes country-level sanctions over the SAF's use of chemical weapons
Jul 2025	EU adds Red Rock Mining and Alkhaleej Bank, with Barsham and Kaikal
Dec 2025– Feb 2026	UK, EU and US designate the El Fasher commanders in sequence

On October 24, 2024, the US sanctioned Algoney Hamdan Dagalo Musa, for playing essentially the same procurement role for the RSF.⁴³ Canada also sanctioned Algoney in February 2025⁴⁴ and the EU did so in January 2026.⁴⁵ On November 8, 2024, the UN Security Council named Abdel Rahman Juma Barkalla and Osman Mohamed Hamid Mohamed (who had earlier been sanctioned by the United States) for sanctions for “engaging in actions or policies that threaten the peace, security or stability of Darfur, including acts of violence and human rights abuses.” The announcement went on to specifically mention violations associated with the RSF takeover of El Geneina in mid-2023.⁴⁶ On November 10, 2024, the UK imposed sanctions on the same individuals,⁴⁷ followed by the US in the same month⁴⁸ and the EU in December.⁴⁹

⁴³ US Department of the Treasury, “Treasury Sanctions Sudanese Rapid Support Forces Procurement Director,” October 8, 2024, <https://home.treasury.gov/news/press-releases/jy2635>

⁴⁴ Government of Canada, “Backgrounder -- Additional sanctions in response to ongoing conflict in Sudan,” February 7, 2025, <https://www.canada.ca/en/global-affairs/news/2025/02/backgrounder---additional-sanctions-in-response-to-ongoing-conflict-in-sudan.html>

⁴⁵ European Union, “Sudan: Council sanctions seven individuals in view of the dramatic escalation of violence in the country,” January 29, 2026, <https://www.consilium.europa.eu/en/press/press-releases/2026/01/29/sudan-council-sanctions-seven-individuals-in-view-of-the-dramatic-escalation-of-violence-in-the-country/>

⁴⁶ United Nations Security Council, “Abdel Rahman Juma Barkalla,” undated, <https://main.un.org/securitycouncil/en/content/abdel-rahman-juma-barkalla>

⁴⁷ Office of Financial Sanctions Implementation, “Final Sanctions Notice,” November 11, 2025, https://assets.publishing.service.gov.uk/media/67321be02cccb48648badb71/Notice_Sudan_111124.pdf

⁴⁸ US Department of the Treasury, “Treasury Sanctions Sudanese Commander Involved in Human Rights Abuses in West Darfur,” November 12, 2024, <https://home.treasury.gov/news/press-releases/jy2710>

⁴⁹ EU, Council Decision (CFSP) 2024/3154 of 16 December 2024 amending Decision (CFSP) 2023/2135 concerning restrictive measures in view of activities undermining the stability and political transition of Sudan, December 16, 2024, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32024D3154>

On December 16, 2024, the EU sanctioned Tijani Karshom and Mohamed Ali Ahmed Subir alongside Salah Gosh and Osman Mohamed Hamid (discussed above). Tijani Karshom is a former deputy governor of West Darfur and a member of the Gathering of Sudan Liberation Forces (GSLF), a coalition of Darfuri armed movements that are signatories to the 2020 Juba Peace Agreement. The EU accused him of responsibility for massacres in El Geneina in June 2023, instructing the RSF and other affiliated militias not to allow civilians to leave and helping to dispose of bodies and other evidence.⁵⁰ Karshom was also sanctioned by Canada in March 2025.⁵¹ Subir is a Lieutenant General in the SAF and is director of the directorate of military intelligence. He was accused of ordering arbitrary arrests and detention of activists.

ESCALATION

January 2025 was the inflection point. Hemedti was designated the same day the US determined the RSF had committed genocide; Burhan followed nine days later — the first time both principals were targeted.

The United States sanctioned the RSF leader, Hemedti on January 7, 2025, the same day as they determined that the RSF and its allied militias had committed genocide, war crimes, and crimes against humanity in Darfur.⁵² US Ambassador to the United Nations Linda Thomas Greenfield spoke about the need for accountability for these crimes and framed the sanctions as a step towards this.⁵³ Canada issued sanctions against Hemedti in March of the same year for both obstructing peace talks and overseeing gross human rights violations.⁵⁴

Also in January, the US designated one individual, Abu Dharr Abdul Nabi Habiballa, and seven companies accused of engagement with financing the RSF, including purchasing gold mined in RSF-controlled areas, and providing equipment.⁵⁵ On January 16, the US sanctioned General Abdelfattah Burhan of the SAF, who was the de facto head of state at the time of his sanctioning. The announcement cited attacks on civilians and civilian infrastructure, including schools and markets.⁵⁶ Alongside Burhan, the US sanctioned Ahmed Abdalla Khalafallah, a dual Sudanese Ukrainian national reported to be the right-hand man of primary SAF procurement operator Merghani Idriss (discussed above).⁵⁷

⁵⁰ EU, Council Decision (CFSP) 2024/3154 of 16 December 2024 amending Decision (CFSP) 2023/2135 concerning restrictive measures in view of activities undermining the stability and political transition of Sudan, December 16, 2024, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32024D3154>

⁵¹ Government of Canada, “Minister Joly announces additional sanction in response to ongoing conflict in Sudan,” March 5, 2025, <https://www.canada.ca/en/global-affairs/news/2025/03/minister-joly-announces-additional-sanctions-in-response-to-ongoing-conflict-in-sudan.html>

⁵² US Department of the Treasury, “Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier and Related Companies,” January 7, 2025, <https://home.treasury.gov/news/press-releases/jy2772>

⁵³ United States Mission to the United Nations, “Statement by Ambassador Linda Thomas Greenfield on the Determination of Genocide in Sudan,” January 7, 2025.

⁵⁴ Government of Canada, “Minister Joly announces additional sanctions in response to ongoing conflict in Sudan,” March 5, 2025, <https://www.canada.ca/en/global-affairs/news/2025/03/minister-joly-announces-additional-sanctions-in-response-to-ongoing-conflict-in-sudan.html>

⁵⁵ US Department of the Treasury, “Treasury Sanctions Sudanese Paramilitary Leader, Weapons Supplier and Related Companies,” January 7, 2025, <https://home.treasury.gov/news/press-releases/jy2772>

⁵⁶ US Department of the Treasury, “Treasury Sanctions Leader of Sudanese Armed Forces and Weapons Supplier,” January 16, 2025, <https://home.treasury.gov/news/press-releases/jy2789>

⁵⁷ US Department of Treasury, OFAC List Search, available at: <https://sanctionssearch.ofac.treas.gov/Details.aspx?id=52601>

SANCTIONED ACTORS, BY AUTHORITY

Authority	Individuals Designated	Companies and Entities Designated
Canada 	SAF Salah Gosh SAF Mohamed Etta Elmoula Abbas SAF Merghani Idriss Suleiman RSF Hemedti RSF Abdelrahim Dagalo RSF Algoney Dagalo RSF Tijani Karshom	RSF Tradive General Trading RSF Alkhaleej Bank
European Union 	SAF Ali Karti SAF Salah Gosh SAF El Tahir Mohamed El Awad El Amin SAF Mohamed Ali Ahmed Subir SAF Abu Aqla Mohamed Kaikal SAF Abu Zaid Talha Al Misbah SAF Al Tayyib Al Imam Joda SAF Merghani Idriss Suleiman RSF Abdelrahim Dagalo RSF Algoney Dagalo RSF Osman Mohamed Hamid Mohamed RSF Hussein Barsham RSF Abdelrahman Juma Barkalla RSF Gedo Hamdan Ahmed RSF Al Fateh Abdallah Idris RSF Tijani Ibrahim Moussa Mohamed RSF Edris Kafuti RSF Tijani Karshom RSF Masar Abdurahman Aseel RSF Mustafa Ibrahim Abdel Nabi Mohamed	SAF Defense Industries System SAF Sudan Master Technology SAF Zadna International SAF Red Rock Mining RSF Al Junaid for Multi-Activities RSF Tradive General Trading RSF GSK Advance RSF Alkhaleej Bank
United Kingdom 	RSF Abdelrahim Dagalo RSF Osman Mohamed Hamid Mohamed RSF Abdelrahman Juma Barkalla RSF Gedo Hamdan Ahmed RSF Al Fateh Abdallah Idris RSF Tijani Ibrahim Moussa Mohamed	SAF Defense Industries System SAF Sudan Master Technology SAF Zadna International SAF Red Rock Mining RSF Al Junaid for Multi-Activities RSF Tradive General Trading RSF GSK Advance RSF Alkhaleej Bank RSF Al Fakher Advanced Works
United Nations 	RSF Osman Mohamed Hamid Mohamed RSF Abdelrahman Juma Barkalla	None
United States 	SAF Abdel Fattah al-Burhan SAF Ali Karti SAF Salah Gosh SAF Taha Osman Ahmed al Hussein SAF Mohamed Etta Elmoula Abbas SAF Mohamed Ali Ahmed Subir SAF Gebreil Ibrahim Mohamed Fedeil SAF Merghani Idriss Suleiman SAF Ahmed Abdalla Khalafallah RSF Hemedti RSF Abdelrahim Dagalo RSF Algoney Dagalo RSF Osman Mohamed Hamid Mohamed RSF Abdelrahman Juma Barkalla RSF Ali Yagoub Gibril RSF Gedo Hamdan Ahmed RSF Al Fateh Abdallah Idris RSF Tijani Ibrahim Moussa Mohamed RSF Abu Dharr Abdul Nabi Habiballa	SAF Defense Industries System SAF Sudan Master Technology SAF Zadna International SAF Al Baraa Bin Malik Brigade RSF Al Junaid for Multi-Activities RSF Tradive General Trading RSF GSK Advance RSF Alkhaleej Bank RSF Al Fakher Advanced Works RSF Capital Tap Holding RSF Creative Python RSF Al Zumoroud & al Yaqoot Gold RSF Al Jil Al Qadem General Trading RSF Horizon Advanced Solutions

In April 2025, the US government imposed sanctions on Sudan as a whole, including restrictions on US exports to Sudan and access to US government lines of credit.⁵⁸ These differ from the individual sanctions that are the primary focus of this report, but they are important to consider, because all sanctions influence one another and also because interlocutors may not be able to distinguish precisely which sanction is related to which impact. The sanctions stem from findings that the SAF had used chemical weapons in 2024.

In September 2025, the US sanctioned Jibril Ibrahim Mohamed Fediel and the Al Baraa Malik Brigade, aiming to limit Islamist influence in Sudan and limit ties with Iran. Jibril is Finance Minister and chairman of the Darfuri armed group Justice and Equality Movement, which is fighting with SAF against the RSF. The Al Baraa Bin Malik Brigade is an Islamist militia fighting alongside the government. On December 9, 2025, the US sanctioned four Colombian nationals in relation to the situation in Sudan, Mateo Andres Duque Botero, Monica Munoz Ucros (both linked to Maine Global Corp SAS), Claudia Viviana Oliveros Forero (linked to International Services Agency) and Alvaro Andres Quijano Becerra.⁵⁹

On December 12, 2025, the UK sanctioned four commanders allegedly responsible for mass atrocities in El Fasher: Abdelrahim Dagalo (discussed above), Gedo Hamdan Ahmed, also known as Abu Nshouk; Al Fateh Abdallah Idris, also known as Abu Lulu; and Tijani Ibrahim Moussa Mohamed.⁶⁰ Idris, aka Abu Lulu, is infamous for videos posted on social media showing himself committing serious human rights violations, including shooting unarmed civilians in the wake of the fall of El Fasher. The EU extended sanctions to these same commanders in January 2026⁶¹ and the US followed suit on February 19, 2026.⁶²

The EU also targeted a fourth field commander, Edris Kafuti, whom they identified as a “key perpetrator” of the atrocities which occurred in El Fasher in October 2025.⁶³ The EU also sanctioned two SAF affiliated individuals in the same sanctions decision, Abu Zaid Talha Al Misbah, the Commander of the Islamist militia Al Baraa Bin Malik Brigade, and Al Tayyib Al Imam Joda, Emir of the Nafeidiya clan of the Kawahla tribe and affiliate of the Sudan Shield Forces, who often fight alongside the SAF.⁶⁴ Sanctioning Al Misbah aligns with the US strategy of sanctioning Al Baraa Bin Malik and recognizes the role of Sudan’s Islamist Movement in fueling the ongoing violence. These sanctions entail travel bans and asset freezes. Joda was reportedly involved in the systematic targeting of civilians, including through mass killings and burning of villages of the Kanabi people in Gezira and Sennar States.⁶⁵

⁵⁸ US Department of State, “Imposing Measures on Sudan for its Use of Chemical Weapons,” May 22, 2025, <https://www.state.gov/releases/2025/05/imposing-measures-on-sudan-for-its-use-of-chemical-weapons>.

⁵⁹ Office of Foreign Assets Control, “Sudan-related designations,” December 9, 2025, <https://ofac.treasury.gov/recent-actions/20251209>.

⁶⁰ UK government, “UK sanctions commanders responsible for Sudan atrocities and pledges additional humanitarian support as Cooper says atrocities must not go unpunished,” December 12, 2025, <https://www.gov.uk/government/news/uk-sanctions-commanders-responsible-for-sudan-atrocities-and-pledges-additional-humanitarian-support-as-cooper-says-atrocities-must-not-go-unpunished>

⁶¹ EU, “Council Decision (CFSP) 2026/254 of 29 January 2026 amending Decision (CFSP) 2023/2135 concerning restrictive measures in view of activities undermining the stability and political transition,” January 29, 2026, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202600254

⁶² Office of Foreign Assets Control, “Sudan-related designations and designations update,” February 19, 2026, <https://ofac.treasury.gov/recent-actions/20260219>

⁶³ EU, “Council Decision (CFSP) 2026/254 of 29 January 2026 amending Decision (CFSP) 2023/2135 concerning restrictive measures in view of activities undermining the stability and political transition,” January 29, 2026, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202600254

⁶⁴ Ibid.

⁶⁵ Ibid.

Differences between the pre- and post-2023 sanctions regimes

Sudan has experienced some of the same patterns as have been seen globally. Following the global trend, the primary difference between the pre- and post- 2023 sanctions are the individual, rather than blanket, nature of the sanctions. This distinction is not absolute: individual sanctions were imposed in relation to the conflict in Darfur from 2006, and the US sanctions levied in 2005 in relation to the SAF's use of chemical weapons⁶⁶ are broader, but overall, there has been a notable move from trade sanctions to individual ones. Because individual sanctions have been used for a shorter period, they have been less analyzed. In the Sudan, however, negative experiences with broad sanctions have colored public reception of the post-2023 regime.

Reflecting of the global pattern to proliferation, the number of sanctions imposed is relatively large. Since the start of the war, new rounds of sanctions have been imposed every couple of months. This means that the landscape of sanctions is changing every few months, showing an increased reliance on sanctions as a tool.

Also following the global trend, there has been a proliferation of regimes. Canada, the EU, UK, and the US have all imposed sanctions on their own lists. To date, about half of all targets have been subjected to sanctions by more than one actor, whereas about half have been subjected to sanctions by only one. This shows both the divergence of regimes and that there are likely efforts ongoing at coordination. In part, there may be a question of timing, as in many cases where actors have been sanctioned by more than one entity, these have been imposed more than a year apart. This could be an indication that alignment may increase over time. In addition, unlike previous blanket sanctions that focused on the government, these sanctions have balanced individuals on both sides of the conflict.

Another difference between individual and other types of sanctions is that they appear to have pursued a strategy of moving slowly from lower-level operators on both sides up to the leadership. This appears to have been a deliberate effort to maximize the potential for continued engagement.⁶⁷ This approach is different from that of the country wide sanctions which appear intended to cause immediate broad consequences. The strategy also raises questions about approach and engagement of individuals at the top of their hierarchies after their sanctioning, as incentives to engage in peace talks and mediation may decrease after they have already been targeted for sanctions.

CRITIQUES OF SANCTIONS

Critiques of sanctions, both globally and in Sudan, revolve around three main contentions: 1) that they are ineffective, 2) that they cause undue damage outside their core targets, and 3) that they are imposed in a way that is unfair or inappropriate.

⁶⁶ US Department of State, "Imposing Measures on Sudan for its Use of Chemical Weapons", May 22, 2025, available at <https://www.state.gov/releases/2025/05/imposing-measures-on-sudan-for-its-use-of-chemical-weapons>.

⁶⁷ Mostafa El Saiegh, "Can US Sanctions Stop the War in Sudan?" February 19, 2025, <https://aps.aucegypt.edu/en/articles/1473/can-u-s-sanctions-stop-the-war-in-sudan>

Effectiveness of sanctions

A key critique of sanctions is that they are rarely effective in achieving the desired change. Key failures of cited include that of the US' blockade against Cuba to effect regime change, the failure of sanctions against Iraq to remove Saddam Hussein, and the failure of 2014 sanctions against Russia to either bring about a withdrawal from Crimea or to prevent the 2022 full scale invasion.⁶⁸

Some efforts have been made to quantify the success of sanctions, although different methodologies and subsets of data have produced starkly different results. At the more positive end of the literature reviewed for this report, Sabatini and Isard found that of sanctions that had an articulated human rights aim between 1950 and 2023, more than half (436 of 858) were determined to be successful in the view of the sanctioning country (though there is obviously an incentive for states to overstate their own success).⁶⁹ Another source assesses sanctions to have been effective about 40% of the time.⁷⁰ Marinov, looking only at the objective of regime change, argues that sanctions increased the baseline risk of a leader losing power by 28%.⁷¹

Another study by Oechslin analyzing sanctions regimes covering the period from 1914 to 2000 concluded that only 21% were effective. Craze notes that as sanctions proliferated after 2000, their effectiveness declined from between 25 and 40% to less than 20% by 2016.⁷² Comparing these assessments is complicated by several factors including who defines success or failure (sanctioning states have a clear incentive to overstate the success of their regimes, whereas sanctioned states have an incentive to understate their impact), what metrics to apply, and how to establish causality. They are also hampered by a lack of comparison among a widely diversifying set of types of sanctions.⁷³

Some, however, have tried to address this question. O'Driscoll argues that targeted sanctions are less likely to be effective.⁷⁴ However, STPT's literature review did not come across any quantitative assessments of targeted sanctions regimes specifically, nor comparative quantitative assessments of blanket versus targeted sanctions. Nor are success rates compared with those of other possible interventions, a comparison that would seem critical for guiding policy-makers.

A number of factors affecting the success rate of sanctions have been identified, including political, economic, policy and international factors. Indeed, Sabatini refers to a 'sanctions para-

⁶⁸ Craze, Joshua, 2022, "War by Another Name: Sanctions are not a gentler alternative to conflict," The Baffler, May 2022, available at: <https://thebaffler.com/latest/war-by-another-name-craze>

⁶⁹ Sabatini, Christopher and Lydia Isard, "Understanding and improving sanctions today," Chatham House, July 2025, <https://www.chathamhouse.org/sites/default/files/2025-07/2025-07-14-understanding-improving-sanctions-sabatini-and-isard.pdf>

⁷⁰ Crispino et al, "Financial Levers of Peace: Targeting Economic Networks to Support Conflict Resolution in Sudan," School for International and Public Affairs, 2024, available at https://www.sipa.columbia.edu/sites/default/files/2024-06/For_Publication_SENTRY_JACQUAND.pdf?utm_source=chatgpt.com

⁷¹ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

⁷² Craze, Joshua, 2022, "War by Another Name: Sanctions are not a gentler alternative to conflict," The Baffler, May 2022, available at: <https://thebaffler.com/latest/war-by-another-name-craze>

⁷³ Sabatini, Christopher and Lydia Isard, "Understanding and improving sanctions today," Chatham House, July 2025, <https://www.chathamhouse.org/sites/default/files/2025-07/2025-07-14-understanding-improving-sanctions-sabatini-and-isard.pdf>

⁷⁴ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

dox' within which sanctions are more likely to be successfully applied to allies than adversaries.⁷⁵ A similar pattern was noted by Crispino.⁷⁶ Another factor observed to impact effectiveness is whether there is a strong domestic constituency for the sanctions and alternative leadership.⁷⁷ Sabatini and Isard also point to these constituencies as raising the likelihood that sanctions will be imposed, as they can advocate for such measures.⁷⁸

On the economic side, sanctions are more likely to be successful if the target has a minimal black market, a significant import market and interdependence with global markets. On the policy side, sanctions are more likely to be effective if the target has strong state institutions, if they struggle to create new international relationships, if the leadership has a low risk tolerance and if sanctions have a clear goal related to a specific issue. Internationally, sanctions are more likely to be successful if there is greater international support, if they are imposed multilaterally, and if there are fewer or no "sanction busters."⁷⁹ In other words, the willingness of actors outside the target state to support sanctions evasion has a considerable impact.

In the worst-case scenario, sanctions not only fail to achieve their aim, but they also actually undermine it. Francis and Duncan cite several instances of this. They claim, for example, that US sanctions on Cuba reinforced Havana's relationship with the Soviet Union, rather than encouraging a break in relations. If democracy was the aim, as stated, they argue that economic engagement should be encouraged rather than discouraged as economic ties tend to encourage openness.⁸⁰ Some, such as Pape and Kirshner, argue that sanctions fail because they end up entrenching nationalism and hardening resistance.⁸¹ Others, such as Escriba-Folsch and Folch and Wright, argue they can be used to drum up national support, including using nationalist rhetoric.⁸²

These conclusions can be critiqued. Poverty alone does not necessarily lead to an increase in terrorism. Another weakness in these studies is that although they document correlation, they do not necessarily establish causation. For example, many sanctions are imposed for engagement with terrorism or terrorists, so although the pathway proposed by Choi and Luo is clear, it is also possible that both increased terrorist recruitment and sanctions are proceeding from the same underlying cause and additional investigation would be needed to address this possibility.

Effectiveness in Sudan before 2023

As in global critiques of sanctions, many critics of sanctions in Sudan argue that they were ineffective. Policy analysis by Crispino et al points out that few of the criteria that positively

⁷⁵ Sabatini, Christopher and Lydia Isard, "Understanding and improving sanctions today," Chatham House, July 2025, <https://www.chathamhouse.org/sites/default/files/2025-07/2025-07-14-understanding-improving-sanctions-sabatini-and-isard.pdf>

⁷⁶ Crispino et al, "Financial Levers of Peace: Targeting Economic Networks to Support Conflict Resolution in Sudan," School for International and Public Affairs, 2024, available at https://www.sipa.columbia.edu/sites/default/files/2024-06/For_Publication_SENTRY_JACQUAND.pdf?utm_source=chatgpt.com

⁷⁷ Ibid.

⁷⁸ Sabatini, Christopher and Lydia Isard, "Understanding and improving sanctions today," Chatham House, July 2025, <https://www.chathamhouse.org/sites/default/files/2025-07/2025-07-14-understanding-improving-sanctions-sabatini-and-isard.pdf>

⁷⁹ Crispino et al, "Financial Levers of Peace: Targeting Economic Networks to Support Conflict Resolution in Sudan," School for International and Public Affairs, 2024, available at https://www.sipa.columbia.edu/sites/default/files/2024-06/For_Publication_SENTRY_JACQUAND.pdf?utm_source=chatgpt.com

⁸⁰ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

⁸¹ Ali, Malaika, Maryam Zahra Sagheer, and Ayesha Naveed Malik Malik, "The Effectiveness of Western Sanctions on Sudan's Warring Factions: Do they Work or Worsen the Crisis," June 3, 2025, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5278028

⁸² Ibid.

influence the likelihood of success (friendliness, economic ties, lack of a black market, etc.) apply to Sudan.⁸³ Prendergast and Brooks-Rubin argue that elites were able to mitigate the impact of sanctions by selling oil to other allies, such as China, while simultaneously using starvation and poverty as a weapon against elements of their own population.⁸⁴ Small Arms Survey argues that the sanctions regime “did not prevent the Sudanese government from obtaining the air and ground materiel it needed to execute its counter-insurgency operations.”⁸⁵

Indeed, Sudan’s Air Force increased in size during the time of the sanctions. Relatively easy access to inexpensive and durable Soviet made alternatives to US air⁸⁶ and ground resources reportedly facilitated this. For example, in one case, a German company that had been providing truck kits refused to continue to do so once sanctions were imposed, but a Dutch supplier ended up doing so through a front company.⁸⁷

On the other hand, the US government has argued that sanctions were, in fact, effective. The US Office of Foreign Assets Control (OFAC) concluded that “U.S. sanctions against Sudan have applied constructive pressure that has affected key Sudanese officials’ decision-making calculi”⁸⁸ and “provided useful leverage to advance U.S. foreign policy in Sudan.”⁸⁹

They noted that from May 2007 to May 2008, OFAC blocked 65 transactions worth \$1.1 million and US banks rejected an additional 576 transactions worth \$133 million in business for Sudan.⁹⁰ Although a significant sum, this represented less than 0.5% of Sudan’s GDP. Nevertheless, the impact is larger than the blocked transactions because some would have been avoided by participants before being blocked formally, although the extent to which they did so is difficult to measure.⁹¹

OFAC reporting from 2009 acknowledged the difficulties of attributing causes of behavior, but pointed to a number of indications of sanctions having impact following the imposition of individual and company sanctions in May 2007:

- The convening of Sudanese parliament to denounce sanctions,
- The efforts to sell off government shares in the telecom company Sudatel, which OFAC had previously identified as state-owned.
- Sudanese government acceptance of the deployment of the joint AU-UN peacekeeping mission in Darfur, UNAMID, in June 2007.⁹²

In addition, they pointed out that Sudanese officials complained about the increased cost of transactions and the unavailability of US dollars.⁹³ Giad Motors, one of the sanctioned compa-

⁸³ Crispino et al, “Financial Levers of Peace: Targeting Economic Networks to Support Conflict Resolution in Sudan,” School for International and Public Affairs, 2024, available at https://www.sipa.columbia.edu/sites/default/files/2024-06/For_Publication_SENTRY_JACQUAND.pdf?utm_source=chatgpt.com

⁸⁴ Dylan O’Driscoll, “Impact of Economic Sanctions on Poverty and Economic Growth,” Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

⁸⁵ Small Arms Survey, “Lifting US Sanctions on Sudan: Rationale and Reality,” 2018, available at: <https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

⁸⁶ Ibid.

⁸⁷ Ibid.

⁸⁸ US Office of Foreign Assets Control, “Report to Congress: Effectiveness of U.S. Economic Sanctions with Respect to Sudan,” 2009, available at: https://reliefweb.int/attachments/ca22fb07-2f6f-36de-a9ac-dd938bbd096f/9F0F94C530D51DF04925765D00105DB5-Full_Report.pdf

⁸⁹ Ibid.

⁹⁰ Ibid.

⁹¹ Ibid.

⁹² Ibid.

⁹³ Ibid.

nies, had to cancel its offering on the Dubai stock market and the Sudanese government increasingly explored Asian markets as the end points for their crude oil.⁹⁴ Foltyn points out that the country did sever ties with extremists such as Osama Bin Laden, who was expelled from Sudan in 1996.⁹⁵

They also assessed that “U.S. sanctions are being implemented with great fidelity by the U.S. private sector, by non U.S. companies and beyond our borders.”⁹⁶ Critics countered that the fact that 17 banks, including almost every major international banking group, were fined for violating the sanctions showed both that the sanctions were not functioning as intended and also that they increased the costs for institutions to offer services to sanctioned entities.⁹⁷ For example, on October 17, 2025, a Manhattan court ordered BNP Paribas to pay \$20 million in damages for their role in facilitating genocide in Darfur through sanctions violations.⁹⁸

In these assessments, one can notice a difference of standards. Critics who assess sanctions to be unsuccessful focus on top level policy outcomes and more immediate indicators, such as assessing whether arms flows and procurement were disrupted. However, those who emphasized successes rely more proximate changes in banking and disruptions in supply chains. In this sense, one could suggest that there is consensus that some disruption was achieved, but that it did not necessarily fundamentally change the calculus of the regime.

Unintended consequences

Another recurring critique of sanctions is that whether or not they are effective, they cause undue damage to individuals other than those who are targeted. Much of this critique focuses on economic indicators. Indeed, Craze argues that sanctions “all too often lead to starvation” and may indeed not be gentler than armed action.⁹⁹ Craze does acknowledge that the overall trend towards targeted sanctions mentioned above and the fact that this is intended to minimize this.¹⁰⁰ His piece, however, does not lay out a detailed framework for assessment of success or failure so it is difficult to assess this assertion.

CRITIQUE

“Like sieges, sanctions ‘all too often lead to starvation’ and may not, in the end, be gentler than armed action.”

Many studies have correlated sanctions with negative impacts on the economy, including increasing poverty. For example, Neuenkirch and Neumeier argue that countries subjected to UN sanctions between 1976 and 2012 suffered a 25.5 percent decline in per capita GDP and a 5 percent reduction in growth. US sanctions had a smaller impact, reducing GDP growth by 0.75

⁹⁴ Ibid.

⁹⁵ Foltyn, Simona, “Sudan Sanctions Enriched the Powerful at the Expense of the Weak,” Bloomberg, November 21, 2017, available at <https://www.bloomberg.com/news/articles/2017-11-21/sudan-sanctions-enriched-the-powerful-at-the-expense-of-the-weak>.

⁹⁶ US Office of Foreign Assets Control, “Report to Congress: Effectiveness of U.S. Economic Sanctions with Respect to Sudan,” 2009, available at: https://reliefweb.int/attachments/ca22fb07-2f6f-36de-a9ac-dd938bbd096f/9F0F94C530D51DF04925765D00105DB5-Full_Report.pdf

⁹⁷ Small Arms Survey, “Lifting US Sanctions on Sudan: Rationale and Reality,” 2018, available at: <https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

⁹⁸ DiCello Levitt LLP, “Historic Human Rights Verdict: Jury Awards 20M to Sudanese Refugees in Landmark Genocide Litigation,” October 17, 2025, <https://www.prnewswire.com/news-releases/historic-human-rights-verdict-jury-awards-20m-to-sudanese-refugees-in-landmark-genocide-litigation-302587988.html>

⁹⁹ Craze, Joshua, 2022, “War by Another Name: Sanctions are not a gentler alternative to conflict,” The Baffler, May 2022, available at: <https://thebaffler.com/latest/war-by-another-name-craze>

¹⁰⁰ Ibid.

to one percentage point. Declining GDP is accompanied by decreased imports and exports, a decrease in international capital, and inflation. Import and export industries tend to employ more unskilled workers and, in this way, make these groups more vulnerable.¹⁰¹ Neuenkirch and Neumeier in a 2016 study said that US sanctions from 1982 to 2011 led to an average 3.8% increase in the poverty gap.¹⁰² Alnasrawi noted a similar pattern in Iraq, leading to a loss in nutritional standards and life expectancy.¹⁰³

Authors also argue that sanctions can damage the ability of vulnerable citizens to access key resources, like health and food. Rarick associates sanctions in Myanmar with failing health and other social services.¹⁰⁴ Using FAO data on food prices and the prevalence of undernutrition and the World Bank's development indicators against a global sanctions database, Afesorgbor et al argue that sanctions are correlated with an increase in food prices and food insecurity.¹⁰⁵ Although food items are generally exempted from sanctions regimes, this is not universally so.

Russian countersanctions, retaliatory measures imposed by targeted states in response to inflict reciprocal economic damage and protect domestic industries, targeted 48 products including food items such as meat, dairy, fruits and vegetables. Even where foodstuffs are exempted, these authors argue, sanctions can impact food prices by making the transfer of agricultural inputs more difficult and/or expensive. They assessed the impact of various types of sanctions, including financial, trade and travel sanctions, finding that trade sanctions had the strongest impact, and a combination of various types of sanctions intensified the effect.¹⁰⁶

Other authors argue that sanctions can increase inequality. Lee argues that in the context of North Korea, sanctions increased the gap between rural and urban areas.¹⁰⁷ In a large study, Drury and Peksen argued that falling economic conditions have a disproportionately negative impact on women, decreasing access to economic and social status and increasing patriarchy.¹⁰⁸

Of course, such analyses are complicated because the conflicts that often spark sanctions can also cause negative economic consequences and these can be difficult to distinguish from the impact of the sanctions independently. Studies have also noted that rather than being a direct impact of sanctions, such negative economic consequences could be the result of the responses of sanctioned regimes which actively exacerbate economic suffering. Intentionally worsening the economic situation, and blaming the sanctioning entity for the situation, can be a strategy for both rallying support and increasing the cost of opposition.¹⁰⁹

¹⁰¹ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

¹⁰² Ibid.

¹⁰³ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

¹⁰⁴ Ibid.

¹⁰⁵ Afesorgbor, Sylvanus Kwaku, Luka Kornher and Fabio Santeramo, "The Impacts of Economic Sanctions on Food Security: Evidence from Targeted Countries," *The World Economy*, May 2025, <https://onlinelibrary.wiley.com/doi/epdf/10.1111/twec.13739>

¹⁰⁶ Ibid.

¹⁰⁷ Ibid.

¹⁰⁸ Ibid.

¹⁰⁹ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

Sanctions may also have perverse political consequences. In a quantitative study of 157 countries, Wood found that the imposition of sanctions was associated with an increase in repression.¹¹⁰ Drury and Peksen, in a similar study of 102 countries sanctioned between 1972 and 2000, found that they undermined democracy.¹¹¹ Looking at a sample of 152 countries, Choi and Luo argued that by raising poverty levels amongst citizens and growing resentment, sanctions can increase terrorist recruitment.¹¹²

Unintended consequences in Sudan

Similar arguments have been made about the impact of the sanctions on the overall Sudanese economy before 2023. The Small Arms Survey argued that sanctions were a significant barrier to Sudanese banking,¹¹³ and indeed, continued disruption of the banking sector was cited as a concern in our data collection as well. Eissa reports that sanctions negatively affected agriculture and trade.¹¹⁴ Alouch pointed to significant economic turmoil between 2011 and 2013, including 65% inflation on food and fuel and overall contraction of the economy.¹¹⁵ It is not clear why the focus is on that period, as sanctions had been in place both before and after, or whether rising costs were a result of either sanctions directly, the government's response, or other factors such as the loss of Southern oil revenue. Overall, during that period, there was very little growth outside the oil sector, and the author argues that sanctions had a particularly negative impact on access to technology and local research and development.¹¹⁶

Crispino et al argue that sanctions likely played a role in crippling companies like Sudan Airways. They also argue that it raised the cost of transacting internationally, with the greatest impact on the middle class, who had the means to transact but not the access enjoyed by the political elites.¹¹⁷ Similarly Foltyn notes that small and medium sized companies were disproportionately affected. Government aligned companies could take advantage of preferential access to hard currency and tax breaks to maneuver around the sanctions, whereas small and medium companies were less able to do so.¹¹⁸

US government statistics on trade show that over the last 13 years, trade started at a relatively low level, increased, and then decreased again. Between 2012 and 2015, exports averaged about \$70 million per year, rising to \$95 million in 2018 after sanctions were removed. Levels lowered again in 2019 and 2020, perhaps because of the disruption of the revolution and the COVID-19 pandemic. Trade increased to \$153.1 million in 2021 and \$142.8 million in 2022, perhaps combining the effects of recovery from the pandemic, a hopeful transitional period and the removal of the final state sponsor of terrorism designation in 2020.¹¹⁹

¹¹⁰ Ibid.

¹¹¹ Ibid.

¹¹² Ibid.

¹¹³ Small Arms Survey, "Lifting US Sanctions on Sudan: Rationale and Reality," 2018, available at:

<https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

¹¹⁴ Eissa, Ishag Ahmed Mohamed, "US Sanctions and Their Impact on the Sudanese Economy," Rihan Journal, March 2023, available at: <https://rjsp.org/us-sanctions-and-their-impact-on-the-sudanese-economy/>

¹¹⁵ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at:

https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

¹¹⁶ Ibid.

¹¹⁷ Prosecutions for transport of goods indicate that there was strong incentive to transport goods in violation of sanctions.

¹¹⁸ Foltyn, Simona, "Sudan Sanctions Enriched the Powerful at the Expense of the Weak," Bloomberg, November 21, 2017, available at <https://www.bloomberg.com/news/articles/2017-11-21/sudan-sanctions-enriched-the-powerful-at-the-expense-of-the-weak>

¹¹⁹ US Census Bureau, "Trade Goods with Sudan," <https://www.census.gov/foreign-trade/balance/c7321.html>

Following global critiques, commentators on Sudan also pointed to disruption in access to basic resources like food and health care.¹²⁰ Crispino et al assert that sanctions constrained the government's ability to provide services such as clean water and healthcare. Although there were humanitarian carve-outs in the sanctions, they argue sanctions decreased the pool of entities willing to operate there and raised costs.¹²¹ Foltyn pointed out that sanctions interrupted the government of Sudan's financing of electric, rail and postal companies which provide key services to the public. It also made it difficult for the Radiation and Isotopes Centre in Khartoum to procure spare parts to repair its radiation machines. Although these were intended to be exempted, in practice the hospital had difficulty in completing the transactions and found that they took longer and were more expensive, which deprived patients of care. Meanwhile private hospitals, not formally associated with the government (although they provided care to government elites), were more able to transact.¹²²

As in global critiques, commentators also argued that sanctions increased inequality in Sudan. Elsheikh and Elamin argue that sanctions increased the poverty gap between men and women.¹²³ Others argue that sanctions negatively impacted the academic sector. Bezuidenhout et al point out that access to technical training was limited and, for example, Google would not allow distribution of its certificates in the country. In a survey of academics, 98.67% said that sanctions had had an impact on their work, including through difficulties accessing funding, databases, laboratory equipment and software. Others were unable to publish in US based journals, leading to an overall dip in research publications following the 1997 sanctions, despite significant growth of such publications in Uganda and Ethiopia.¹²⁴ The US OFAC also noted incidents of increased harassment of US aid workers and others as a negative unintended consequence.¹²⁵

Commentators also point out that sanctions created new markets for evasion. US prosecutions for transporting goods in violation of sanctions indicate that there was a strong incentive to do so. A 2018 Small Arms Survey report noted that 17 international banks, including almost every major global banking group, were fined between 2009 and 2016 for violating the banking ban on Sudan.¹²⁶ This increased the opportunities for criminal actors and drew liquidity away from the formal banking sector,¹²⁷ an effect probably exacerbated by corruption.

¹²⁰ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

¹²¹ Crispino et al, "Financial Levers of Peace: Targeting Economic Networks to Support Conflict Resolution in Sudan," School for International and Public Affairs, 2024, available at https://www.sipa.columbia.edu/sites/default/files/2024-06/For_Publication_SENTRY_JACQUAND.pdf?utm_source=chatgpt.com

¹²² Foltyn, Simona, "Sudan Sanctions Enriched the Powerful at the Expense of the Weak," Bloomberg, November 21, 2017, available at <https://www.bloomberg.com/news/articles/2017-11-21/sudan-sanctions-enriched-the-powerful-at-the-expense-of-the-weak>

¹²³ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

¹²⁴ Bezuidenhout et al. "Economic Sanctions and Academia: Overlooked Impact and Long-Term Consequences," 2019, available at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0222669>

¹²⁵ US Office of Foreign Assets Control, "Report to Congress: Effectiveness of U.S. Economic Sanctions with Respect to Sudan," 2009, available at: https://reliefweb.int/attachments/ca22fb07-2f6f-36de-a9ac-dd938bbd096f/9F0F94C530D51DF04925765D00105DB5-Full_Report.pdf

¹²⁶ Small Arms Survey, "Lifting US Sanctions on Sudan: Rationale and Reality," 2018, available at: <https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

¹²⁷ Crispino et al, "Financial Levers of Peace: Targeting Economic Networks to Support Conflict Resolution in Sudan," School for International and Public Affairs, 2024, available at https://www.sipa.columbia.edu/sites/default/files/2024-06/For_Publication_SENTRY_JACQUAND.pdf?utm_source=chatgpt.com

REGIME PRIORITIES

The Sudanese government under Omar Al Bashir spent less than 4% of its annual budget on public health and education, whereas more than 60% was spent on the military and security sectors.

Analysis of the economic impact of sanctions in Sudan is complicated by the diversity of other factors that have an impact. Researchers acknowledged the difficulty of distinguishing the impact of sanctions from other factors such as limited international investment, high debt and the loss of South Sudanese oil following the 2011 secession.¹²⁸ Further they may more easily establish correlation than causation, noting that certain outcomes are linked with sanctions but might not necessarily have been caused by them.

Researchers also, as they did globally, recognized the impact of the regime's responses in worsening economic impacts. In the face of sanctions and its overall contraction of the economy, the Bashir regime chose to prioritize its allies and control over the well-being of the Sudanese people. As Prendergast and Brooks-Rubin point out, the Sudanese government under the regime of Omar Al Bashir spent less than 4% of its annual budget on public health and education, whereas more than 60% was spent on the military and security sectors.¹²⁹ Alouch also argues that the regime's choices to focus on military spending increased conflict and allowed them to exercise ever more oppression through military actors while economic hardship limited the opportunities for the population to resist.¹³⁰

It must be acknowledged that exemptions were put in place to address humanitarian consequences. In the mid-2000s exemptions were created to allow goods and services to reach South Sudan. Nonetheless, OFAC acknowledged that it was difficult to stop sanctions from having any impact as transshipped goods or transfers through third party institutions could be blocked. They noted that they had issued specific licenses allowing third country banks to transact for the bank of South Sudan and had worked to ease the operations of UNAMID in Darfur.¹³¹ An additional constraint, as pointed out by former OFAC staff, was insufficient manpower to review exemptions. In 2016, OFAC received 10,000 applications for sanctions exemptions, but had only about 30 people available to process them, leading to long delays. Further, publicly available data showed that at least some licenses ended up benefitting government aligned institutions. For example, licenses benefitted Al Amal Hospital, owned by Sudan's notorious intelligence services and Universal Hospital, managed by two retired NISS officers.¹³²

¹²⁸ Small Arms Survey, "Lifting US Sanctions on Sudan: Rationale and Reality," 2018, available at: <https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

¹²⁹ Dylan O'Driscoll, "Impact of Economic Sanctions on Poverty and Economic Growth," Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

¹³⁰ Ibid.

¹³¹ US Office of Foreign Assets Control, "Report to Congress: Effectiveness of U.S. Economic Sanctions with Respect to Sudan," 2009, available at: https://reliefweb.int/attachments/ca22fb07-2f6f-36de-a9ac-dd938bbd096f/9F0F94C530D51DF04925765D00105DB5-Full_Report.pdf

¹³² Foltyn, Simona, "Sudan Sanctions Enriched the Powerful at the Expense of the Weak," Bloomberg, November 21, 2017, available at <https://www.bloomberg.com/news/articles/2017-11-21/sudan-sanctions-enriched-the-powerful-at-the-expense-of-the-weak>

Process considerations

Another key critique is that sanctions are decided, imposed, and implemented in problematic ways. Such critiques may focus on due process considerations; e.g. can a target of individual sanctions challenge that designation? Or they may focus on the extent to which criteria are clear for both starting and ending sanctions.

In some cases, it is argued that no clear demands may be associated with sanctions, making it hard for sanctioned actors to comply and bring about an end to sanctions. Craze argues that sanctions on Russia lack the “clear policy objective within a broader U.S. government strategy” that the Treasury says that they should have and are instead intended to broadly weaken Russia, meaning that the country has no reasonable way of complying.¹³³ In such a scenario, resistance and disruptive behaviors could be expected.

PROCESS

“The process was flexible enough to disregard some of the original human rights criteria for the sanctions’ initial imposition and did not set concrete benchmarks for compliance on each of the five tracks.” — Small Arms Survey

Relatedly, critics argue that it can be hard to end sanctions, and that even when they formally do, their impacts may endure. Grauvogel and Attia argue that countries find it harder to remove sanctions than impose them.¹³⁴ Vlasova points to a statistical rarity of removing sanctions, relying on the global sanctions database,¹³⁵ which shows that in 2023 only 121 of 615 cases (20%) were new.¹³⁶ Craze argues that once imposed, it is hard for the US to remove sanctions because those who advocate for their removal risk being portrayed as “weak” on America’s enemies.¹³⁷ Sabatini and Isard note that at times, decisions around sanctions may be more motivated by virtue signaling than a realistic assessment of impact.¹³⁸ Even when sanctions are lifted, Grauvogel and Attia point out, it may be unclear why they were removed, as the reasons for lifting sanctions can vary from case to case.¹³⁹

Afesorgbor and Mahadevan argue that when sanctions are lifted, their impact on the economy is difficult to reverse.¹⁴⁰ Some of the critique of sanctions in Sudan focuses on the processes through which they were imposed and then, eventually, repealed. The US removal of sanctions in 2017 followed an “unusually structured process of review and assessment along well-defined

¹³³ Craze, Joshua, 2022, “War by Another Name: Sanctions are not a gentler alternative to conflict,” The Baffler, May 2022, available at: <https://thebaffler.com/latest/war-by-another-name-craze>

¹³⁴ Grauvogel and Attia, “Easier in than out: the protracted process of ending sanctions,” GIGA Focus Global, 2019, <https://www.giga-hamburg.de/en/publications/giga-focus/easier-in-than-out-the-protracted-process-of-ending-sanctions>

¹³⁵ Olga Vlasova, “why Terminating sanctions is more difficult than initiating them,” The Loop, 2024, <https://theloop.ecpr.eu/why-terminating-sanctions-is-more-difficult-than-initiating-them/>

¹³⁶ Global sanctions database, <https://www.globalsanctionsdatabase.com/data/>

¹³⁷ Craze, Joshua, 2022, “War by Another Name: Sanctions are not a gentler alternative to conflict,” The Baffler, May 2022, available at: <https://thebaffler.com/latest/war-by-another-name-craze>

¹³⁸ Sabatini, Christopher and Lydia Isard, “Understanding and improving sanctions today,” Chatham House, July 2025, <https://www.chathamhouse.org/sites/default/files/2025-07/2025-07-14-understanding-improving-sanctions-sabatini-and-isard.pdf>

¹³⁹ Grauvogel and Attia, “Easier in than out: the protracted process of ending sanctions,” GIGA Focus Global, 2019, <https://www.giga-hamburg.de/en/publications/giga-focus/easier-in-than-out-the-protracted-process-of-ending-sanctions>

¹⁴⁰ Dylan O'Driscoll, “Impact of Economic Sanctions on Poverty and Economic Growth,” Assets Publishing Service. UK Government, June 2017, available at: https://assets.publishing.service.gov.uk/media/5bace471ed915d259c43d848/136_Impact_of_Economic_sanctions_on_poverty_and_economic_growth.pdf

‘tracks’.”¹⁴¹ The review was part of a broader shift in US policy towards taking a more constructive, rather than punitive, approach and structured sanctions removal around progress on five pillars including cessation of hostilities in Darfur, humanitarian access, cooperation on ending the conflict in South Sudan, and efforts to combat the Lord’s Resistance Army and terrorism.¹⁴²

According to the Small Arms Survey Report, “the process was flexible enough to disregard some of the original human rights criteria for the sanctions’ initial imposition and did not set concrete benchmarks for compliance on each of the five tracks.”¹⁴³ Some criticized these as shifting the goal posts in relation to the reasons for initial imposition of the sanctions. For example, the five-track process called for progress on ending South Sudan’s civil war, whereas the 1997 sanctions referred to destabilizing neighbors, which was a reference to support for an assassination attempt against then Egyptian President Hosni Mubarak rather than South Sudan,¹⁴⁴ which had yet to become independent at the time.

Although some criticized this change in framing, others embraced a broader view. For example, US Representative Chris Smith queried in a congressional hearing on the sanctions easing whether or not it was appropriate to ease sanctions in light of the overall human rights situation in the country saying that even “though human rights improvement is not one of the requirements in the executive order, we must not as a government ignore this aspect.”¹⁴⁵ Representative Smith also criticized the lack of consultation with Congress on the easing of sanctions as a procedural matter.¹⁴⁶ For its part, bodies such as the UN Fact-finding Mission on Sudan established by the UN Human Rights Council have also made recommendations in 2025 on sanctions, including an expansion of the existing arms embargo on Darfur to the entirety of the country, and levying targeted sanctions, such as asset freezes and travel bans, on individuals most responsible for crimes committed.¹⁴⁷ The attempt to add additional criteria related to Khartoum’s relations with North Korea at the 11th hour was seen as undermining the overall track of the negotiations.¹⁴⁸ They were also criticized as inconsistent, as other regional powers had closer relationships with North Korea than did Sudan.¹⁴⁹

As in the global research, research in Sudan shows that ending sanctions can be problematic. Bezuidenhout et al report that Sudanese officials interviewed for the research reported that not enough had been done to communicate the end of sanctions within the US to encourage companies to engage with Sudan. They note that the impact of sanctions can persist long after they are lifted and that broader corrective action after sanctions should be undertaken to limit the damage.¹⁵⁰ Similarly, Chavkin acknowledges, in drawing out lessons from the Sudan experience

¹⁴¹ Small Arms Survey, “Lifting US Sanctions on Sudan: Rationale and Reality,” 2018, available at: <https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

¹⁴² Ibid.

¹⁴³ Ibid.

¹⁴⁴ Small Arms Survey, “Lifting US Sanctions on Sudan: Rationale and Reality,” 2018, available at: <https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

¹⁴⁵ Rep Chris Smith, Remarks on the Questionable Case for Easing Sudan Sanctions,” April 26, 2017, available at https://chrissmith.house.gov/uploadedfiles/2017-04-26_updated_sudan_hearing_opening_statement.pdf.

¹⁴⁶ Ibid.

¹⁴⁷ UN Commission of Inquiry on Sudan, “Sudan: A War of Atrocities Report of the Independent International Fact-Finding Mission for the Sudan”, page 17, 5 September 2025. Available at: <https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/ffm-sudan/a-hrc-60-22-auv.pdf>

¹⁴⁸ Small Arms Survey, “Lifting US Sanctions on Sudan: Rationale and Reality,” 2018, available at: <https://www.smallarmssurvey.org/sites/default/files/resources/HSBA-Report-Sudan-Sanctions.pdf>

¹⁴⁹ Ibid.

¹⁵⁰ Bezuidenhout et al. “Economic Sanctions and Academia: Overlooked Impact and Long-Term Consequences,” 2019, available at: <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0222669>

for Venezuela, that although sanctions were removed, positive inducements arrived too slowly to have a significant impact.¹⁵¹

Public opinion

Studies overwhelmingly show that the broad-based sanctions in Sudan were deeply unpopular and that the removal of sanctions was welcomed by the Sudanese public. However, many Sudanese were disappointed that the removal of sanctions did not have the anticipated positive economic impact. Particular concern has been raised in relation to difficulties in creating banking relationships even after sanctions were removed. There is also suspicion about the underlying motives of US actions and criticism of the lack of clarity in terms of timing and criteria that govern sanctions decisions. Opinion research also shows that there are critical gaps in public understanding about sanctions, which can pose problems for diplomacy outside of the concrete impact of sanctions.¹⁵²

PUBLIC OPINION

Studies overwhelmingly show that the broad-based sanctions in Sudan were deeply unpopular and that the removal of sanctions was welcomed. However, many were disappointed that the removal of sanctions did not have the anticipated positive economic impact.

In 2025, Sudanese civil society members met with OFAC, the US Government's body responsible for identifying actors for targeted sanctions and implementing frameworks to limit the actions of actors, institutions, and contributors of violence, including some companies contributing funds to the belligerents identified in this literature review, such as Zadna, and both leaders of the SAF and RSF. The delegation stressed that US policymaking regarding sanctions should be communicated to Sudanese civilians to enhance their understanding that these sanctions are targeted and not imposed on the entirety of the country. The impact of sanctions has been mixed: the imposition of sanctions has damaged both belligerents' credibility before the international community, but has also been used as a mobilizing force, with Burhan using a reactionary stance of Western imposition on Islamic actors, and also defiantly noting that sanctions have limited impact on him, stating that he does not hold any money abroad.

ASSESSING SANCTIONS SINCE 2023

Impacts on a sample of sanctioned Sudanese actors

Against the backdrop of the critiques above, this section seeks to address the effectiveness critique by assessing the impacts of sanctions on individual targets and companies using a framework that considers possible impacts as deterrence (changes in behavior or entrenchment), disruption (i.e., reduced capacity to continue proscribed activities), and demonstration (which considers norm signaling and reputational effects).

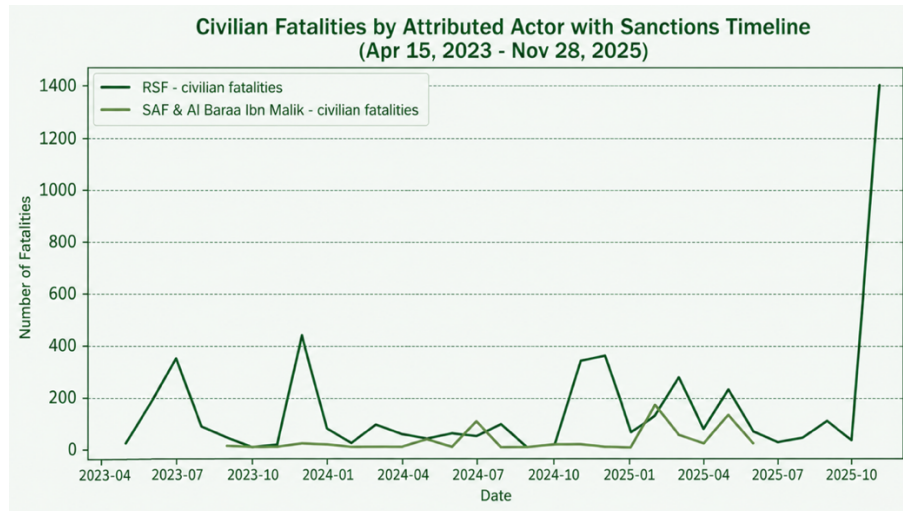
SAF and related actors

¹⁵¹ Lesley Chavkin, "Lessons from Sudan for US economic engagement with Venezuela," The Atlantic Council, February 26, 2026, <https://www.atlanticcouncil.org/dispatches/lessons-from-sudan-for-us-economic-engagement-with-venezuela/>

¹⁵² Verjee, Aly, "Sudan after Sanctions: Sudanese Views of Relations with the United States," USIP, 2018.

Human Rights: no short-term improvement linked to sanctions

Overall, the research uncovered only a few clear instances in which sanctions operated as deterrent. One possible area for such deterrence explored was human rights. One objective of sanctions is to spare civilians the worst excesses of the warring parties, curbing their violations of the laws of war and human rights. Amongst the rationales given for sanctions imposed since the start of the war are genocide and other atrocity crimes, arbitrary arrests, and targeting of civilian infrastructure. However, an analysis of ACLED data showed little connection between the imposition of sanctions and rates of violence, either at the party level or across the conflict as a whole. ACLED monitors incidents of explosions or remote violence, violence against civil-



CIVILIAN FATALITIES AGAINST THE SANCTIONS TIMELINE

Monthly civilian fatalities attributed to the RSF and to the SAF and the Al Baraa Ibn Malik Brigade, April 15, 2023 to November 28, 2025. The largest single spike, El Fasher in late October 2025, came after most sanctions had already been imposed, indicating entrenchment rather than deterrence.

ians, and protests nationwide, pulling from a variety of news reporting and human rights monitoring organizations.

A decline in the number of incidents nationwide per month appears to follow the imposition of sanctions in December 2023 and 2024. However, given that other sanction dates show no similar reduction and both declines occur at the same time of year, the reductions in violence could be attributed to other causes. The head of a local monitoring organization reflected that the level of violations from his perspective has remained relatively constant over the course of the war.¹⁵³ In other words, there is little evidence that supports the conclusion of a short-term impact of sanctions announcements on respect for human right, at least by the SAF.

Our research also considered the phenomenon of airstrikes. Airstrikes are an important type of violation to consider because they are an area where the SAF and the RSF have come under considerable criticism for attacking civilian areas and civilian infrastructure. The RSF has offset the SAF's aerial monopoly by acquiring armed drones. This has been cited as a specific concern in sanctions imposition decisions. In particular, the report examines a database of airstrikes compiled by Sudan Witness.¹⁵⁴

¹⁵³ Interview with key informant, February 2026.

¹⁵⁴ Sudan Witness, "Airstrikes in Sudan," <https://storymaps.arcgis.com/stories/2026be9cb3164d7db565c9188c0e06fa>

In addition, in May 2025, Burhan announced the formation of a national committee to investigate US allegations of chemical weapons use, calling the accusations “baseless” and reaffirming SAF’s commitment to the Chemical Weapons Convention.¹⁵⁸ Although the committee was likely window dressing, its formation indicates that felt compelled to make political concessions. However, the SAF has yet to make the findings of this investigation public. Similarly, in January 2025, Burhan ordered an inquiry into the conduct of SAF fighters accused of carrying out ethnically motivated mass killings of agricultural workers from western and southern Sudan following the SAF’s recapture of Medani and much of Gezira State.¹⁵⁹ Subsequent independent investigations documented widespread and indiscriminate killings perpetrated by certain SAF units during this period.¹⁶⁰ As of this writing, however, there is no evidence that the SAF has held any of those responsible to account.

IMPUNITY

Both Burhan (SAF) and Hemedti (RSF) appear to have mastered the art of seemingly responding to mounting international outrage over atrocities committed by forces under their command — without relinquishing the impunity they continue to guarantee those forces.

In October 2025, RSF commander Hemedti—who is under international sanctions—publicly acknowledged that RSF forces committed mass atrocities following the fall of El Fasher, the capital of North Darfur, and announced an internal investigation. The RSF subsequently claimed to have arrested several perpetrators, including a commander who appeared on camera admitting to personally overseeing the killing of hundreds of civilians. The subsequent release of this commander, coupled with the RSF’s failure to disclose the results of its investigation, underscores a pattern of impunity and raises serious questions regarding the enforcement of command responsibility within the RSF’s leadership structure.

As these stillborn investigations illustrate, both Burhan and Hemedti appear to have mastered the art of seemingly responding to mounting international outrage over atrocities committed by forces under their command, which have been the target of individual sanctions, without relinquishing the impunity they continue to guarantee those forces.

Sanctions also appear to have had some limited disruptive impact on Burhan’s ability to engage internationally. In 2023 and 2024, General Burhan addressed the UN General Assembly in New York; however, in 2025, after the imposition of sanctions both on Burhan personally and on the country generally in response to charges of the use of chemical weapons, Prime Minister Kamil Idriss replaced Burhan at the UN.¹⁶¹ This shift may point to a form of disruption because of sanctions, although it may also reflect the broader international pressure on the SAF-backed authorities and a wish to present a civilian face at the UN. Sanctions may have created practical obstacles to travel to the United States, constrained decision-making due to concerns about potential legal exposure on US soil, or generated reputational costs that encouraged Burhan to deploy a civilian proxy to mitigate international criticism of the regime.

¹⁵⁸ Radio Dabanga, “Sudan U.S. Steps Up Pressure on Sudan Govt Over Chemical Weapons Allegations,” December 1, 2025, https://allafrica.com/stories/202512020012.html?utm_campaign=daily-headlines&utm_medium=email&utm_source=newsletter&utm_content=aans-view-link

¹⁵⁹ Human Rights Watch, “Sudan: Armed Group Allied to the Military Attacks Village,” February 25, 2025, available at: <https://www.hrw.org/news/2025/02/25/sudan-armed-group-allied-military-attacks-village>

¹⁶⁰ Lighthouse Reports, “The Kanabi killings,” December 16, 2025, available at: <https://www.lighthousereports.com/investigation/the-kanabi-killings/>

¹⁶¹ Video of the address is available here: <https://www.youtube.com/watch?v=PvGnfbDc-So&t=257>

Algoney Hamdan Dagalo, who is subject to sanctions by the US and Canada for his role in weapons procurement for the RSF, brushed aside these concerns when he traveled to Washington at the invitation of the US government in mid-October 2025 to participate in indirect truce talks between the SAF and the RSF mediated by the US. The visit happened around the time of the RSF's killings of civilians in El-Fasher, prompting two US senators to send a letter to the US sanctioning authorities, the US Treasury and State Departments, and the Attorney General, questioning why an individual known for his role in ongoing atrocities in Darfur was allowed in the US.¹⁶² The incident illustrates how diplomatic efforts to engage commanders of abusive forces in peace negotiations can lead to diplomatic accommodations linked to mediation efforts that appear difficult to reconcile with existing sanctions designations. There is no concrete evidence that a formal waiver, license, or exemption was issued in this case, and the visit should not be read as a suspension or de facto freeze of the sanctions themselves. It does, however, highlight the tension between accountability demands and the pursuit of negotiations aimed at ending the killings.

Demonstration: signaling and reputational effects

As a signaling mechanism, sanctions appear to have helped consolidate US opposition to engagement with the SAF. For example, a government representative in the US told us that exposure of the SAF's chemical weapons program (and the associated sanctions) made it politically unpalatable for American politicians to consider a conciliatory approach to SAF at a time when discussions had been underway about the possibility of backing them against the RSF.¹⁶³ At the same time, the limitations of such signaling are also on view. Like the Bashir regime before him, Burhan has attempted to mobilize opposition by presenting sanctions as an external attack and portraying them as a cause of domestic economic ills.

Burhan reacted to the imposition of US sanctions with disdain, saying, "I haven't even bothered to read the US decision." He argued that the sanctions would have no impact on him because he does not have foreign assets.¹⁶⁴ This response allowed him to simultaneously accuse the West of bigotry and highlight his own "simple" background as a soldier for a domestic audience. One key informant stated that sanctions had boosted the popularity of some sanctioned actors among some segments of the Sudanese public.¹⁶⁵

A prominent Sudanese intellectual has argued that the sanctions on Burhan, while symbolic, had no practical impact and should be judged largely in how they will affect bilateral relations. Previous rounds of sanctions, he argues, were not merely ineffectual, they rather increased the government's leeway, allowing it to rally public opposition and act more freely. He also criticized the relatively even sanctioning of both army and RSF, arguing that the RSF's crimes are clearly the more serious.¹⁶⁶

While Burhan and the SAF have sought to publicly highlight the appointment of civilian authorities, they do not appear committed to their effective functioning. In practice, they have focused on consolidating power over the executive, judicial, and legislative branches of the government, leaving only token representations of allied armed groups and minimal civilian membership. In

¹⁶² US Senate's Foreign Relations Committee, "Senators Shaheen, Booker Seek Information on Sanctioned RSF Commander's Presence in the United States," January 21, 2026, available at: <https://www.foreign.senate.gov/press/dem/release/senators-shaheen-booker-seekinformation-on-sanctioned-rsf-commanders-presence-in-the-united-states>

¹⁶³ Interview with US politician, September 2025.

¹⁶⁴ Sudan Tribune, "Sudan's Burhan dismisses US sanctions, assumes direct command of military operations," January 19, 2025, <https://sudantribune.com/article/296242>

¹⁶⁵ Interview with key informant, October 5, 2025.

¹⁶⁶ Elwathig Kameir, "U.S. Sanctions: Where Lies the Impact?" January 27, 2025, available at <https://sudantransparency.org/u-s-sanctions-where-lies-the-impact/>

addition, Burhan took personal control over military operations, an apparent effort to consolidate his position internally.¹⁶⁷

In this context, sanctions may have had limited impact on other SAF actors. Burhan is understood to run a highly centralized government in which few others hold real power, so even if other SAF actors experience pressure from sanctions, their ability to affect policy is limited. Burhan has reportedly made contingency plans for exile in Türkiye,¹⁶⁸ which has not generally aligned its sanctions policy with that of the US and other Western governments. Some analysts have read this reported planning as an indication that Burhan anticipates needing to be insulated from the impact of sanctions if he were forced to leave Sudan. That reading is reported analysis rather than established fact, and STPT has not independently verified either the contingency planning or the reasoning attributed to him.

Case Study: Zadna and Red Rock

The case study focuses on a DIS-linked commercial network including Zadna International Company for Investment and Red Rock Mining Company. These entities have been subject to sanctions based on their alleged roles in conflict financing and resource extraction. Examining these entities together allows for an assessment of whether sanctions imposed on one node of the network have produced indirect effects on affiliated firms, including disruption or changes in behavior.

Zadna International Company for Investment



Zadna's experience is an example of a company whose domestic and regional operations do not appear to have been significantly disrupted by sanctions. On the contrary, the company appears to have benefited from renewed government support and financing that enabled it to expand its operations within Sudan and its engagement in import and export trade activities regionally. Zadna's director, Taha El Hussein Yousif, explained the impact of international sanctions that targeted the company after the war and the survival strategy it developed to respond. While the sanctions disrupted Zadna's access to external sources of funding, he explained,

¹⁶⁷ Sudan Tribune, "Sudan's Burhan dismisses US sanctions, assumes direct command of military operations," January 19, 2025, <https://sudantribune.com/article/296242>

¹⁶⁸ IM Arabic, "The Turkish Al Burhan and his palace in Ankara," January 15, 2024, <https://en.imarabic.com/the-turkish-al-burhan-and-his-palace-in-ankara/>

“financial engineering” allowed it to use internally generated financing to sustain and even expand its operations.¹⁶⁹

According to an extract from the Dutch commercial registry, Zadna had established a subsidiary in the Netherlands on January 26, 2023, under the name “Zadna International for Investment” with the intention of conducting import, export and sales of Sudanese products such as fruits, raw cotton, semi-finished textile products, and dates.¹⁷⁰ STPT’s investigation established a direct link between the email domains of the managers who established the company, @zadna-int.com, and the domain listed in the UK sanctions list for the Sudanese company (<https://zadna-int.com>).¹⁷¹ The UK sanctioned Zadna in 2023 and the EU in January 2024. Two months later, the name of the company was dropped from the Netherlands commercial registry.

The picture is different for Zadna’s commercial and other activities in Sudan, Egypt and the Arab Gulf countries. Zadna remains one of the top revenue earners in the SAF’s economic network. Despite designations by the UK, US, EU, and Canada, the company continues to operate across multiple sectors both domestically and regionally and its influence appears only to have grown since the start of the war, drawing on government support. Since the outbreak of the war, Zadna appears to be the primary beneficiary of government infrastructural rehabilitation and reconstruction programs in SAF-controlled states. This is consistent with the findings of an STPT 2024 brief, which identified early evidence that the SAF was positioning its companies to take part in large-scale reconstruction projects in the post-war period.¹⁷²

CASE STUDY: ZADNA

Given Zadna’s near-monopoly and the awarding of large-scale contracts across SAF-controlled areas without apparent bidding, sanctions appear to have neither disrupted Zadna’s domestic and regional operations nor caused SAF to deviate from its strategy of relying on the company for its domestic agenda.

Zadna has been actively engaged in securing large contracts in the roadbuilding, agricultural, and construction sectors from state governments in relatively stable SAF-controlled areas in central, northern, and eastern Sudan. The government of Gezira state awarded Zadna a contract valued at approximately US \$7 million in mid-December 2025 to resurface 20 km of roads in Wad Medani, the state’s capital. The value of the contract was ten times higher than the cost estimates for the rehabilitation of the same roads in the memorandum of understanding the state signed with Zadna in 2022.¹⁷³ At the time, Zadna inaugurated Wad Medani’s truck and bus terminal, a project for which it was paid the equivalent of US \$34 million in 2022.¹⁷⁴ The management of the Gezira Scheme, a major irrigated agricultural area, similarly signed a memorandum of understanding in mid-December 2025 with Zadna to rehabilitate the canals, machinery, and internal railway system for an undisclosed amount.¹⁷⁵

¹⁶⁹ Alzarga TV, “An Audit (of Zadna),” April 20, 2025, available at: <https://www.facebook.com/share/v/16vYEik7zy/>

¹⁷⁰ Copy of the extract on file.

¹⁷¹ UK Sanctions List Service, at: <https://search-uk-sanctions-list.service.gov.uk/designations/SUD0011/Entity>

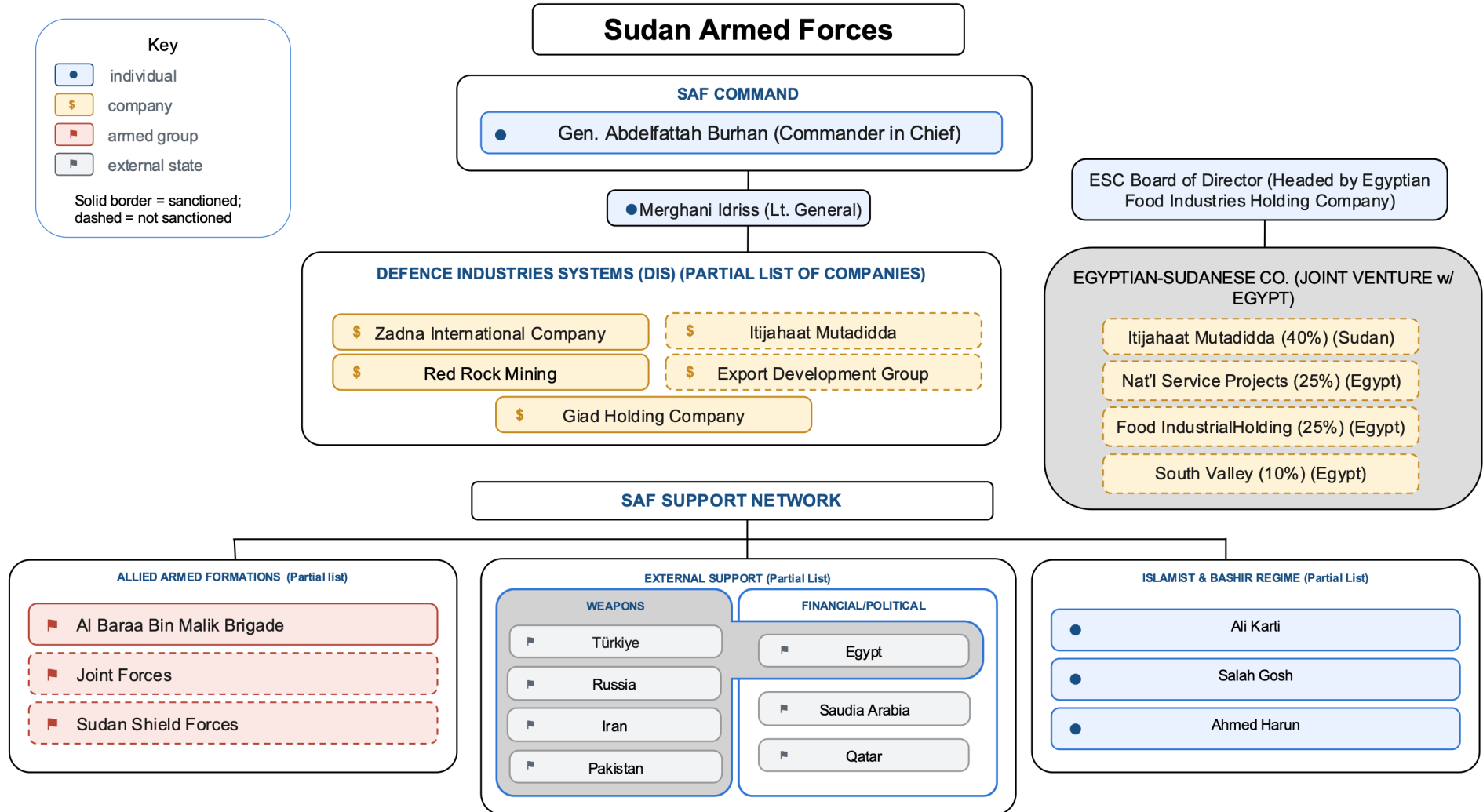
¹⁷² Sudan Transparency & Policy Tracker, “How SAF is Positioning to Dominate Post-War Reconstruction and the Economy, and What to Do About It,” October 30, 2024, a blogpost by Suliman Baldo, available at: <https://sudantransparency.org/how-saf-is-positioning-to-dominate-post-war-reconstruction-and-the-economy-and-what-to-do-about-it/>

¹⁷³ Ard Al-Mahana Media, “The Gezira State government signs a contract valued at 24 billion pounds for the rehabilitation of 20 km in Medani,” December 18, 2025, in Arabic, available at: <https://www.facebook.com/share/p/1Ap9Y9hKae/?mibextid=wwXlfr>

¹⁷⁴ Assayha newspaper, “Inauguration of Wad Medani Land Port,” February 10, 2022, available at: <https://www.assayha.net/92501/>. See also Al Sudani newspaper coverage of the same event here: <https://alsudaninews.com/?p=146849>

¹⁷⁵ Alwan Daily, “Understandings have been reached between Al Gezira Scheme and Zadna International to implement a package of projects,” December 9, 2025, available at: <https://alwandaily.net/newspaper/40307>

SAF-LINKED NETWORKS



In late December 2025, a planning workshop between officials from the White Nile State and Zadna personnel concluded with the designation of Zadna as the implementing partner for the state's 2026 projects across the engineering, agriculture, construction, and social responsibility sectors.¹⁷⁶ The state had already awarded Zadna contracts to build the road between Kosti and El Naeim and to construct two bus and truck terminals in its twin capital cities of Kosti and Rabak.

In River Nile State, Zadna launched, with considerable publicity, a “Gold City” in Atbara, comprising a complex of buildings to be leased to investors in the gold sector and managed by Zadna.¹⁷⁷ The aim of the project appears to be to increase Zadna's role in the trade of gold, as the concentration of facilities in one central business complex would improve the collection of government royalties and other taxes and allow Zadna to enter the market as a buyer. Zadna also reportedly intends to expand Atbara airport for use in exports.

Zadna is a principal partner in the joint Egyptian–Sudanese Company for Development and Multi-Investment (ESC; see detailed profile and overview of ESC's trading activities below), creating a structured channel for cross-border commercial activity between Sudan and Egypt. As one of the leading companies affiliated with the DIS, particularly in the food and agricultural sectors, and with an expanding presence in the gold sector, Zadna presents significant sanctions evasion and compliance risks.

According to its director Taha El Hussein Yousif in a televised speech in a conference discussing the economic partnership between Sudan and Egypt, Zadna exported seven tons of gold to Egypt in 2022 through official channels.¹⁷⁸ Given Zadna's affiliation with the DIS, a military-linked economic conglomerate, these activities raise concerns that ostensibly civilian trade could generate revenue for military actors, facilitate sanctions evasion through cross-border transactions, or obscure the ultimate beneficiaries of trade flows.

Zadna also owns grain silos with a capacity of 100,000 tons. The National Bank of Omdurman, which is owned by the military, has acquired 40% ownership in the Sein Grain Company.¹⁷⁹ Zadna and its affiliated companies reportedly continue to benefit from the sesame trade, which has become an important source of foreign currency in a context in which other sources are limited.¹⁸⁰

Given Zadna's dominant position in the market and the awarding of large-scale contracts across SAF-controlled areas without evidence of competitive bidding, sanctions appear to have neither disrupted Zadna's domestic and regional operations nor caused the SAF to alter its strategy of relying on the company for its domestic agenda. Indeed, the disruption to Zadna's international operations may create greater incentives to expand its domestic activities.

¹⁷⁶ Sudan National TV, December 24, 2025, available at: <https://www.facebook.com/share/v/17v7agFWyP/?mibextid=wwXlfr>

¹⁷⁷ See Zadna's promotional video, here: <https://web.facebook.com/share/v/189vqtJ4g1/>

¹⁷⁸ Al Adassa, “The Egyptian-Sudanese Economic Partnership: Activating regional and bilateral agreement,” in Arabic, <https://www.facebook.com/share/v/1TZqTEngDw/>

¹⁷⁹ Al-Tabia News Network, “The army-affiliated company ‘Zadna’ announces the start of operations at grain mills in Al-Jazira,” <https://altabia.net/2021/08/17/%D8%B4%D8%B1%D9%83%D8%A9-%D8%B2%D8%A7%D8%AF%D9%86%D8%A7-%D8%A7%D9%84%D8%AA%D8%A7%D8%A8%D8%B9%D8%A9-%D9%84%D9%84%D8%AC%D9%8A%D8%B4-%D8%AA%D8%B9%D9%84%D9%86-%D8%A8%D8%AF%D8%A1-%D8%AA%D8%B4%D8%BA%D9%8A>

¹⁸⁰ Ahmed Soliman and Dr. Bel Abatse Demisse, “The ‘conflict economy’ of sesame in Ethiopia and Sudan,” Chatham House, April 2024, <https://www.chathamhouse.org/2024/04/conflict-economy-sesame-ethiopia/05-role-sesame-sudans-war-economy>



RED ROCK MINING COMPANY

Corporate mark of Red Rock Mining, a DIS affiliate and subsidiary of Sudan Master Technology, which the US designated in 2023. Red Rock was designated by the UK in April 2024, the EU in July 2025, and by Canada, yet reports operations in Tanzania, Ethiopia, the UAE and the Netherlands. Source: company materials.

Red Rock Mining Company

DIS affiliate Red Rock Company was sanctioned by the UK, EU and Canada, as described above, for its role in financing the SAF. The US sanctioned Red Rock's parent company, Sudan Master Technology, in 2023, potentially exposing Red Rock to secondary sanctions risk. These designations require assets within the relevant jurisdictions to be frozen and prohibit nationals and companies subject to the designating authorities' jurisdiction from transacting with the designating entities. Nonetheless, it appears that the sanctions have not significantly affected the operations of Red Rock in Sudan. In a post on the company's LinkedIn page dated November 2025, Red Rock Mining indicated that it had a presence and operations in Tanzania, Ethiopia, the UAE, and the Netherlands.¹⁸¹ The company's website indicates that in the Netherlands, it has a partnership with Red Diamond Industries, seemingly based in Rotterdam.¹⁸² This partner's website refers to Red Rock Mining as its "sister company."¹⁸³

The parallel use of Egypt-based partnerships (via Zadna) and Europe-based corporate vehicles (via Red Rock) suggests that sanctions may have constrained some international operations while leaving the companies able to maintain or develop commercial relationships through other jurisdictions.

Zadna's case also provides no evidence of deterrence, as the company's behavior and strategic positioning have not shifted in response to sanctions. The evidence reviewed for this report indicates limited disruption to Zadna's domestic and regional operations: sanctions have not prevented Zadna's access to contracts, finance, logistics, or markets; domestic state support in SAF-controlled territories and preferential treatment appear to have offset external restrictions. The demonstration effects of sanctions also appear limited within SAF-controlled territories: while sanctions signal international disapproval, there is limited evidence that they have translated into significant reputational or operational costs for Zadna in those areas. Overall, the Zadna case illustrates how domestically embedded, military-linked businesses can adapt to sanctions through state-backed demand, preferential access to domestic markets, and a shift toward internal revenue streams.

¹⁸¹ Red Rock LinkedIn's Page, at: https://www.linkedin.com/posts/red-rock-mining_redrockmining-sustainablemining-ethicalmining-activity-7379824370174742528-vGOS

¹⁸² Red Rock Mining web page, at: <https://redrockmining.com>.

¹⁸³ See: <https://reddiamondindustries.com/about-us/#portfolio>

Case Study: Merghani Idriss and the Defense Industries System



MERGHANI IDRIS SULEIMAN

Merghani Idriss Suleiman, director of the Defense Industries System (DIS) and the SAF's principal weapons-procurement figure. Sanctioned by the EU in June 2024, the US in October 2024, and Canada in 2025.

Source: [Facebook](#).

While sanctions seem to clearly target weapons flows, the experience of Merghani Idriss Suleiman, the powerful director of the Defense Industries System (DIS) and a confidante of Burhan, shows that these sanctions have not significantly disrupted operations. Idriss was individually targeted for his efforts to acquire arms, including Iranian and Russian weapons,⁹⁷ while DIS itself was sanctioned by the UK and the US in June 2023, and by the EU in January 2024. However, the sanctions appear to have temporarily disrupted weapons flows to the SAF.

The DIS is the largest of the companies through which the SAF is estimated to dominate four-fifths of the national economy; DIS alone is estimated to generate US \$2 billion in profits per year. This network is so extensive that comprehensive targeting of DIS would likely have significant effects on the Sudanese economy, already in tatters, as a whole.¹⁸⁴

Prior to the war, DIS had several weapons manufacturing complexes that made Sudan the third largest weapons producer in Africa. The RSF occupied these complexes when the war erupted in the capital in April 2023, seizing SAF's abundant weapon depots and bringing weapons production to a halt. This appears to have been a severe setback for the SAF.

As a result, the SAF suffered severe weapon and ammunition shortages at the beginning of the war and had to seek outside supplies using the limited resources initially available to it. Within

¹⁸⁴ Crispino et al, "Financial Levers of Peace: Targeting Economic Networks to Support Conflict Resolution in Sudan," School for International and Public Affairs, 2024, available at https://www.sipa.columbia.edu/sites/default/files/2024-06/For_Publication_SENTRY_JACQUAND.pdf?utm_source=chatgpt.com

months, the SAF was able to rebuild its weapons supply chain despite the sanctions in place reportedly with assistance from its regional and international partners. Open-source reporting and interviews conducted for this study describe assistance including from Egypt, Türkiye, Russia, Iran, and more recently, Saudi Arabia. The SAF imports weapons directly through Port Sudan's seaport and airport, while smaller weapons systems also reportedly flow through the country's porous borders with Eritrea and Ethiopia.¹⁸⁵

C4ADS has documented evidence of adaptation toward domestic production following the SAF's relaunch of some of its weapons-making factories. For example, they reported on a transfer of 100,000 brass cups by an Indian company called Rashtriya Metal Industries to the DIS with the indication that the raw material from the brass could be used for indigenous weapon production. This sale was executed via Giad Elsewdy Cables, a DIS subsidiary, despite the sanctions already in place.¹⁸⁶ These shipments continued at least from April to October 2023, indicating that sanctions did not prevent this supply arrangement. C4ADS also reported that the Sudan Armed Forces have begun to produce ammunition domestically.¹⁸⁷ Domestic production can make weapons supply chains more difficult to track because it requires monitoring a wider range of precursor and dual-use materials rather than a narrower range of finished weapons.

The expansion of domestic SAF weapons production is also reflected in the DIS's participation in the Turkish International Defense Industry Fair in July 2025, where it displayed drones and precision bombs.¹⁸⁸ The SAF has also been able to restart its domestic drone production, which is significant given the role of drones in the war.¹⁸⁹ The DIS's public participation in this international forum indicates that sanctions had limited impact in disrupting their business operations.

Further evidence that the impact of sanctions have had limited effects on domestic behavior is that Merghani Idriss remains the head of the DIS and leads all SAF procurement. Not only did Merghani Idriss maintain his position, but he was also rumored to be a candidate for the Transitional Sovereignty Council following the adoption of an amended constitution in February 2025.¹⁹⁰

Heavily sanctioned by Western governments, Iran and Russia had their own strategic interests in providing weapons the SAF needed, including their reported interest in reviving long-standing attempts to establish naval bases on Sudan's Red Sea coast. Months into the war, Türkiye provided Bayraktar TB2 and Akinci drones. This engagement echoes previous relationships with Russian military corporations such as the private military company Wagner Group, which has denied any engagement in the current conflict despite allegations of the provision of surface-to-air missiles to the RSF in the early months of the war.¹⁹¹

¹⁸⁵ Amnesty International, "New Weapons Fueling Sudan Conflict: Expanding Existing Arms Embargo Across Sudan to Protect Civilians," 2024 =, <https://www.amnestyusa.org/wp-content/uploads/2024/07/New-Weapons-Fueling-the-Sudan-Conflict-Expanding-Existing-Arms-Embargo-Across-Sudan-to-Protect-Civilians.pdf>

¹⁸⁶ C4ADS, "Indirect Fire: Tracing Sudan's Ammunition Pipeline," April 29, 2025, <https://c4ads.org/commentary/indirect-fire/#:~:text=Trade%20data%20indicates%20that%20Giad,reach%E2%80%9D%20that%20extends%20to%20Sudan.>

¹⁸⁷ Ibid.

¹⁸⁸ Facebook post, Inside Africa, <https://www.facebook.com/InsideAfricas/posts/sudan-shines-at-idef-2025-in-turkey-%EF%B8%8Fdefense-minister-sudan-is-reclaiming-its-re/1222045673270725/>

¹⁸⁹ ADF, "Drones Take on Growing Role in Sudan's Conflict as Technology Advances," October 14, 2025, <https://adf-magazine.com/2025/10/drones-take-on-growing-role-in-sudans-conflict-as-technology-advances/>

¹⁹⁰ Africa Intelligence, "Burhan forces through new constitution giving the army more control." February 28, 2025, <https://www.africaintelligence.com/eastern-africa-and-the-horn/2025/02/28/burhan-forces-through-new-constitution-giving-army-more-control.110381105-art>

¹⁹¹ Al Jazeera, "US accuses Wagner Group of supplying missiles to Sudan's RSF," May 25, 2023, <https://www.aljazeera.com/news/2023/5/25/us-accuses-wagner-group-of-supplying-missiles-to-sudans-rsf>

In addition, it was reported that Merghani Idriss led a large DIS delegation to Pakistan to sign a US \$230 million arms deal in October 2025, including 30 K-8 trainer/attack aircraft, 40 Shahpar-2 drones, 200 MR-10 drones, and 230 ASV Mohafiz-IV armored vehicles. Media reports about this deal noted that an earlier attempt to broker a sale in August of the same weapons had failed because China refused to authorize Pakistan's reexport of the Chinese-origin HQ-9 and -16 air defense systems, citing international sanctions.¹⁹² China's decision to block the re-export provides an example of sanctions-related restrictions affecting an arms transaction, while the reported negotiations over other weapons in the deal illustrate the limitations of sanctions imposed by Western countries alone. Such restrictions may not prevent arms deals between warring parties and suppliers in countries that are not committed to abiding by the sanctions.

Reuters reported in early January 2026 that Pakistan was nearing the signing of a US \$1.5 billion deal to supply weapons and fighter jets to Sudan and suggested that Saudi Arabia facilitated and likely financed the deal.¹⁹³ The reported weapons deliveries include 10 Karakoram-8 light attack aircraft, more than 200 surveillance and attack drones and "advanced air defense systems." There is no indication whether the advanced air defense systems included in the deal were the same systems whose sale to Sudan China blocked in August 2025 in compliance with international sanctions.

CASE STUDY: DEFENSE INDUSTRIES SYSTEMS

A militarized procurement system embedded in regional alliances and commercial networks can absorb and offset targeted sanctions, limiting their effectiveness as a tool for disrupting war-sustaining capabilities.

Another indication of the limitations of third parties' compliance with international sanctions, even when those third parties have close relationships with allies of the UK and the US, is reporting that the RSF deployed sophisticated Chinese-made drones in Sudan which, according to that reporting, were supplied by the UAE after it had likely received them as the declared end user.¹⁹⁴

Further, it is reported that Merghani Idriss created a new company called the African Company in Egypt to export gold produced or bought by the DIS.¹⁹⁵ The proceeds from these sales are reportedly used for the procurement of drones, weapons, and ammunition.

STPT also found evidence of the DIS's central role in rebuilding the SAF's capacity to procure weapons, despite being sanctioned by authorities in the UK, the EU, the US, and Canada. The DIS continues SAF's engagement in the export of Sudanese traditional commodities (livestock, oilseeds, gum arabic, crude oil, etc.) and the import of strategic consumer goods, mainly wheat,

¹⁹² The Guardian, "DIS renegotiates arms supply deal with Pakistan," October 14, 2025, available at: <https://guardian.ng/news/world/dis-renegotiates-arms-supply-deal-with-pakistan/>

¹⁹³ Reuters, "Exclusive: Pakistan nears \$1.5 billion deal to supply weapons, jets to Sudan, sources say," January 9, 2026, available at: <https://www.reuters.com/business/aerospace-defense/pakistan-nears-15-billion-deal-supply-weapons-jets-sudan-sources-say-2026-01-09/>

¹⁹⁴ STPT has not independently verified the chain of custody for these transfers. Wall Street Journal, "How U.A.E. Arms Bolstered a Sudanese Militia Accused of Genocide," October 28, 2025, available at: https://www.wsj.com/world/how-u-a-e-arms-bolstered-a-sudanese-militia-accused-of-genocide-781b9803?gaa_at=eafs&qaa_n=AWETsqdjrHBqS4-lkn-11R_hhXopY4q-AYndvtd49DsY5AISUxE-Wta0B1-6xJRV5w%3D%3D&qaa_ts=6976dbf3&qaa_sig=ujraporHrd67wFGQ4b4KupKDmmJNbXBEi638HfDhblN0VjTg2T7S1snGZxAOIJMr02nWjHIN9NJ51Qc4qvYQJA%3D%3D. See also:

Middle East Eye, "UAE increasing support to Sudan's RSF with new Chinese drones: Report," October 28, 2025, available at: <https://www.middleeasteye.net/news/uae-increasing-support-sudans-rsf-new-chinese-drones-report>

¹⁹⁵ Al Tanwir Electronic Newspaper, "The army dominates most of Sudan's gold production and exports it to Egypt," June 30, 2025, <https://altanwir.news/3472/>

sugar, and refined petroleum products. This suggests that the DIS has continued to generate foreign-currency revenues through commercial activity outside Sudan to finance the procurement of weapons and other military supplies.

ESC's market share of bilateral trade between Egypt & Sudan

In a video statement, posted on Facebook at the end of October 2025, Mojed Youssef, Business Development Director at the Egyptian–Sudanese Company for Development and Multi-Investment (ESC), told Asharq TV Channel that “ESC accounts for 25% of bilateral trade between Egypt and Sudan in 2025, estimated at approximately USD 1 billion, and 50% of Sudanese exports in 2025.” According to the ESC manager, “ESC imports from Sudan include livestock, processed meats, agricultural products, and gold and ESC exports to Sudan, which account for 10% of Egypt’s exports to Sudan, include food products, construction materials, medicines, and fertilizers. He added, “Egypt’s imports of Sudanese gold increased after the war to about 3 tons annually. ESC started importing Sudanese gold in 2024 and expects to increase its share of Sudanese gold exports following the fallout between Sudan and the UAE, which received an average of 30-40 tons annually from Sudan. We expect Egypt’s exports of construction materials to Sudan to increase fivefold over the coming years, from the current levels of cement (500,000-600,000 tons annually) and iron reinforcement rods (20,000-30,000 tons annually). Sudan has abundant resources but lacks infrastructure. It will need at least [US] \$200b. in reconstruction funding in the next decade. Egypt and the ESC stand ready to provide the required reconstruction expertise.”

The referenced Facebook post is available at <https://www.facebook.com/watch/?v=133>

Among other front companies the DIS is using to maintain and expand its sanctioned commercial and weapons procurement activities despite sanctions, the *Egyptian Sudanese Company for Development and Multi-Investments* (ESC) emerges as its primary channel for ongoing trading and weapons procurement.¹⁹⁶

It took over a decade for the ESC to achieve its current status as a conduit for SAF-linked wartime trade and procurement. This strategic partnership was built upon a 2014 bilateral trade agreement between Egypt and the Sudanese firm *Itijahaat Mutadidda* (“Multiple Directions”)—a holding company and subsidiary of the DIS—initially centered on a contract to supply 800,000 head of Sudanese livestock.

The ESC’s trajectory from a bilateral commercial venture to a critical logistical hub was solidified in April 2021 when it was established as a joint-stock company with EGP 500 million in capital (approximately US \$31 million at the time). Notably, the company was founded by a decree from the Egyptian cabinet at a time when Sudan was nominally under civilian rule.¹⁹⁷ This move underscored the Sudanese military’s success in maintaining its economic autonomy and bypassing state oversight even during the civilian-led democratic transition.

¹⁹⁶ The ESC offices are at :18 A Sizostrees Street, El Korba, Misr El Gadida, Cairo, Egypt. Its website is at www.egysudan.com; and it can be reached at info@egysudan.com.

¹⁹⁷ State Information “The Supply Ministry: The Establishment of the Egyptian Sudanese Company,” May 24, 2024, available at: <https://tinyurl.com/2fbta33m>

Today, the ESC has expanded to include a network of public companies from both nations, including entities closely linked to the Egyptian military. By leveraging these entrenched strategic relations, the ESC has evolved into a vital mechanism for securing military and economic stability for the SAF leadership.

During 2021–2022, the company positioned itself as a platform for creating additional joint economic entities, expanding trade, and generating employment in both countries. It prized itself as a driver of trade and economic integration between Egypt and Sudan with the strategic goals of achieving food security and providing strategic goods to the people of the two countries.¹⁹⁸ *Itijahaat* and its sister companies under the DIS, including the *Export Development Group Co. For Trading (EDG – Khartoum, Cairo & Dubai)* and their respective subsidiaries, have not been subject to sanctions by any designating authority in the UK or elsewhere.

C4ADS reported in 2025 that numerous Sudanese arms companies were able to sidestep sanctions by working through companies that are not immediately identifiable as SAF companies. They suggested that improved due diligence would expose alternative arms procurement pathways.¹⁹⁹ The evidence indicates that sanctions targeting Merghani Idriss and the DIS have produced limited deterrence and have not prevented the SAF from maintaining access to weapons procurement channels. Although traditional partners showed some hesitation in providing material assistance early in the war, it is not clear if that was because of sanctions or other political dynamics. While sanctions have demonstrated increased reputational costs and narrowed access to some supply channels, these effects have not translated into sustained constraints on weapons flows. The DIS case thus illustrates how a militarized procurement system supported by regional alliances, commercial networks and cross border trade channels can adapt to targeted sanctions, thereby limiting their effectiveness as a tool for disrupting war-sustaining capabilities.



¹⁹⁸ Egyptian Sudanese Company website, https://egyptiansudanese.com/?page_id=18163

¹⁹⁹ Center for Advanced Defense Industries, "Indirect Fire: Tracing Sudan's Ammunition Pipeline," 2025, available at: <https://c4ads.org/commentary/indirect-fire/>

SUDAN RECONSTRUCTION BUSINESS FORUM, LONDON, FEBRUARY 2026

Cover of the official attendee booklet. The Export Development Group (EDG), an unsanctioned DIS subsidiary, appears twice among the listed sponsors alongside the Arab British Chamber of Commerce, the Embassy of Sudan in London and the Sudanese Business Federation. Source: event booklet.

The structure and operation of the ESC illustrate a potentially formalized circumvention pathway through which DIS-linked commercial activity has continued despite post-2023 sanctions. By embedding DIS subsidiaries within a bilateral joint venture involving military-affiliated public companies on both sides, the ESC has provided a legally constituted platform for trade, financing, and logistics through entities that fall outside the scope of current designations. The absence of sanctions on *Itijhaat Mutadidda* and EDG has enabled the continuation of exports, imports, and settlement mechanisms despite restrictions on DIS itself. As a result, the existing sanctions regime has had a limited disruptive effect on some SAF-linked commercial and procurement activities, while the arrangement has reduced transparency, prevented regulatory oversight, and allowed sanctioned actors and individuals to sustain operations through formally civilian, economic, and regional structures.

The Sudan Reconstruction Business Forum held in London on February 10, 2026, offers another clear example of how DIS deploys some of its less known and unsanctioned subsidiaries to take the lead in its ventures abroad. The announcement of the event on the Arab British Chamber of Commerce website referenced the Exports Development Group (EDG) among the official co-sponsors,²⁰⁰ as did a local news website.²⁰¹ The official attendee booklet also included the EDG's logo among other sponsors of the event.

Lieutenant General Mohamed Ali Ahmed Subir

As the Director of SAF's Directorate of Military Intelligence (DMI) and a top advisor to General al-Burhan, Lt.-Gen. Subir is reportedly a primary architect of the SAF's internal security strategy, wielding significant power over surveillance, the detention of political activists, and the oversight of military operations against the RSF.²⁰²

In late 2024 and early 2025, the European Union, Switzerland, and Monaco imposed sanctions on Subir, including travel bans and asset freezes. These measures were based on allegations of his direct involvement in serious human rights violations, including the arbitrary detention and torture of civilians in "ghost houses," the use of sexual violence as a tool of war, and the systematic obstruction of humanitarian aid.

As of early 2026, General Subir remained in his position despite these sanctions. Reports also indicate that the DMI has continued to conduct operations against civilian aid groups and pro-democracy activists following the imposition of sanctions.

Salah Abdallah Mohamed Salah (Salah Gosh)

In April 2025, UAE authorities intercepted millions of rounds of ammunition at an airport en route to Sudan. The UAE accused a group of Sudanese, including the US-sanctioned former intelli-

²⁰⁰ Arab British Chamber of Commerce website, available at: <https://abcc.glueup.com/event/sudan-reconstruction-business-forum-167717/>

²⁰¹ Almohagig, "Britain hosts a major economic forum for reconstruction in Sudan," January 2026, https://almohagig.com/27793/#google_vignette

²⁰² Al Arabiya. 2025. "Burhan Issues Decisions Forming a New Leadership for Sudan's General Staff." August 18, 2025.

gence chief Salah Gosh, of having facilitated the shipment. A press release from the UAE Ministry of Foreign Affairs did not reference sanctions, but rather the need to uphold standards against arms trafficking.²⁰³

The SAF-backed government denied this claim, stating that the UAE was only trying to obfuscate their own engagement in shipping weapons to the RSF.²⁰⁴ The incident suggests that Gosh and his colleagues may be maintaining weapons supply chains despite of the sanctions. The incident indicates that the SAF continues to procure weapons and munitions from underground suppliers, in addition to friendly states. The incident also highlights the impact that regional dynamics can play outside of formal sanctions and international diplomacy mechanisms.

RSF and related entities

Human rights: entrenchment rather than deterrence

Regarding human rights violations and civilian violence, the patterns of violence captured by ACLED in the case of RSF show continued violence rather than evidence of deterrence. Although violations have continued throughout the war, they have tended to increase when the RSF takes new territory. Further, the worst of the violations, by a significant margin, occurred in El Fasher at the end of October 2025, after most sanctions had been imposed. This suggests that the imposition of sanctions has not prevented the RSF from committing serious violations.

Disruption: finance, procurement, and network adaptation

Not only were there no discernable short-term responses to sanctions announcements, there is no evidence that the sanctions deterred the RSF's conduct; in some instances, the violence escalated. Despite significant signaling that the situation in El Fasher was well monitored, the RSF committed further serious violations. Even before the city fell, the RSF had been denying civilians in the city access to humanitarian assistance. Since the city fell, civilians have been subjected to ethnically targeted massacres, humiliation and degrading treatment and sexual violence.²⁰⁵

Weapons procurement: parallel supply mechanisms

Despite the multiple sanctions targeting its top commanders, in particular Algoney Dagalo, chief of RSF procurement, and the private businesses that provide the financial structures of the RSF, the RSF was still able to acquire new weapon technologies in 2024 and 2025 - including armed drones, drone jammers, anti-tank guided missiles, truck-mounted rocket launchers, and mortar munitions - reportedly sourced from companies in China, Iran, Russia, Türkiye, Serbia, and the UAE, according to the arms-monitoring reporting cited here. Ammunition bears 2023 lot numbers, suggesting transfers since the start of the war.²⁰⁶ Some of these weapons were reportedly diverted into Darfur and others are directly transferred there, in violation of the UNSC arms

²⁰³ United Arab Emirates, "UAE Concludes Investigations into Military Equipment Smuggling to Port Sudan Authority and Refers the Accused to Trial," November 14, 2025, <https://www.mofa.gov.ae/en/mediahub/news/2025/11/14/14-11-2025-uae-uae#:~:text=The%20Ministry%20noted%20that%20the,General>

²⁰⁴ Sudan Tribune, "Sudan army denies UAE arms claim, accuses Emirates of backing RSF militia," April 30, 2025, <https://sudantribune.com/article/300343>

²⁰⁵ See, for example, Sudan Human Rights Hub, "From Hell to the Dark: The journey from El Fasher to Tawilah, leaving a burning home, facing an uncertain future and struggling with severe constraints," December 2025, available at <https://sudanhrh.org/en/articles/ElFasher-Investigation>

²⁰⁶ Center for Advanced Defense Industries, "Indirect Fire: Tracing Sudan's Ammunition Pipeline," 2025, available at: <https://c4ads.org/commentary/indirect-fire/>

embargo.²⁰⁷ Taken together, this indicates the limited ability of sanctions to disrupt the RSF's access to weapons procurement channels.

Supply lines for weapons, vehicles, and fuel for the RSF run through Chad, South Sudan, Libya and the Central African Republic. The government of Sudan has accused Chad of allowing its territory to be used as a base of operations for Emirati-purchased war materiel.

According to public reporting and open-source investigations cited in this report, the UAE is reported to be the largest external arms supplier to the RSF, and it is able to import weapons from a wide variety of countries, including the UK²⁰⁸ to facilitate that supply. The UK Foreign Secretary has acknowledged that UK-made items were found there. These two facts — licenses issued to the UAE, and UK-manufactured equipment reportedly identified in Sudan — do not in themselves establish the route of transfer, the end user, or any direct UK supply to the RSF.²⁰⁹ Campaigners have nonetheless called on the UK government to suspend arms sales to the UAE. The RSF is also reported, on the basis of public information and interviews conducted for this study, to benefit from high-level access within the government of Kenya; STPT has not independently verified that claim.

ARMS SUPPLY

The UAE is widely reported to be the largest arms supplier to the RSF, yet it is able to import weapons from a wide variety of countries to facilitate that supply.

With no corporate holdings of its own and its inability to rely on SAF procurement systems after the war, the RSF became increasingly dependent on the private businesses of the Dagalo family and its foreign backers to provide for its military needs. Before the war, RSF finances were managed by two trusted individuals, the head of the RSF Financial Department, Mustafa Ibrahim Abdelnabi, a former employee of the Central Bank of Sudan, and Algoney Dagalo.

The RSF experience shows the limitations of sanctions in deterring violence, disrupting weapons acquisition, or altering strategic incentives. Instead, the evidence reviewed here suggests that sanctions have coincided with, and may have reinforced, continued RSF adaptation through parallel supply chains and external networks.

Hemedti: signaling, reputational costs, and countermobilization

The RSF has sought to downplay the impact of sanctions by challenging the legitimacy of the signal they represent. Hemedti's advisor, El Basha Tabeq, said that the US sanctions decision reflected its failure to deal with the crisis and "the double standards it followed." He continued to argue that the sanctions would only complicate the resolution of the conflict.²¹⁰

²⁰⁷ Amnesty International, "New Weapons Fuelling the Sudan Conflict: Expanding Existing Arms Embargo Across Sudan to Protect Civilians," 2024, available at https://www.amnesty.org/en/wp-content/uploads/2024/07/AFR5482522024_SudanArmsEmbargo_EN.pdf

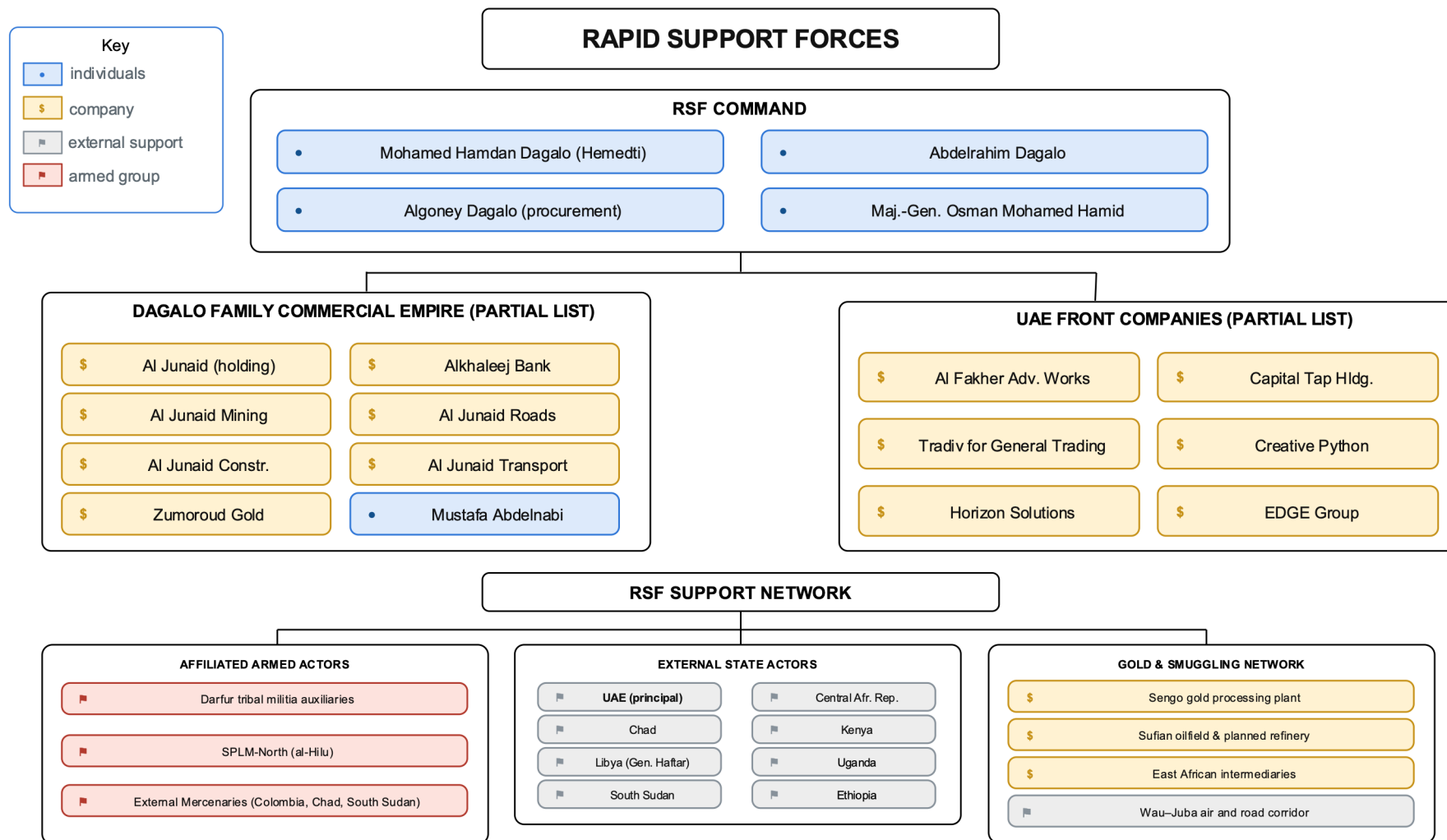
²⁰⁸ News 4, "Millions of pounds worth of UK arms exported to UAE since 2004," November 25, 2025,

<https://www.channel4.com/news/factcheck/factcheck-millions-of-pounds-worth-of-uk-arms-exported-to-uae-since-2024>

²⁰⁹ Esther Webber, "UK government admits that a 'small number' of military items found in Sudan," Politico, October 30, 2025, <https://www.politico.eu/article/uk-government-admits-small-number-military-items-sudan/>

²¹⁰ Basillioh Rukanga & Mohanad Hashim, "US accuses RSF of Sudan genocide and sanctions its leader," January 8, 2025, <https://www.bbc.com/news/articles/c8j9j72lvdvo>

RSF-LINKED NETWORKS



As with the SAF, signaling helped clarify US positions on the RSF. Donald Booth, former Special Envoy to Sudan and South Sudan, said that US sanctions against RSF leaders sent a strong signal that the US government was not buying the RSF's rhetoric that it is promoting democracy and sparing the people of Sudan from the scourge of Islamists.²¹¹ This could increase the reputational costs of engaging with the RSF, at least among like-minded actors.

Sanctioning authorities have identified several companies aiding the Dagalo family businesses and sanctioned them as well. These front companies include:

- Alkhaleej Bank: sanctioned by the US (January 2024), UK (April 2024), Canada (March 2025), and the EU (July 25);
- Al Fakher Advanced Works: sanctioned by the UK (April 24);
- Capital Tap Holding LLC: sanctioned by the US (January 25)
- Capital Tap Management Consultancies LLC: sanctioned by the US (January 2025);
- Creative Python LLC: sanctioned by the US (January 25);
- Al Zumoroud and al Yaqoot Gold and Jewelers LLC: sanctioned by the US (January 2025)
- Horizon Advanced Solutions General Trading LLC: sanctioned by the US (January 25).



ALGONEY HAMDAN DAGALO MUSA

Algoney Hamdan Dagalo Musa, brother of RSF commander Hemedti and the RSF's principal weapons-procurement figure. Sanctioned by the US in October 2024, Canada in February 2025, and the EU in January 2026. Source: [Radio Dabanga](https://radio.dabanga.com/en/news/2025/01/2025-01-20-sudan-rsf-leader-hamedti-sanctioned-by-us-canada-eu/).

Algoney Dagalo

In September 2024, Algoney Dagalo reportedly negotiated with executives from the Turkish company Arca Defense, which produces the Bayraktar TB2 armed drones, as part of a bid by the RSF to procure advanced military drones and other military equipment. He was said to have

²¹¹ Donald Booth, "US Declares Genocide in Sudan, Sanctions RSF Leader Hemedti," January 15, 2025, <https://www.wilsoncenter.org/video/us-declares-genocide-sudan-sanctions-rsf-leader-hemedti>

offered a higher financial package than the SAF had paid, hoping to secure the deal. However, the deal fell through because the RSF is a paramilitary group rather than Sudan's official national military. As such, it did not possess the legal standing to provide the required "end-user certificate" that weapons manufacturers demand.²¹²

This suggests that measures other than sanctions, including end-user and other due diligence requirements, may also play a role in controlling weapons flows and influencing belligerent behavior more broadly.

Faced with a tightening net of targeted and network sanctions, the Dagalo family nonetheless managed to maintain a limited autonomous capacity for weapons procurement. The family appears to have relied on core assets like Al Junaid for Multi Activities and the EDGE Group, an Emirati defense and technology conglomerate of 25 state-owned defense industry companies, employing 12,000 workers and producing a range of products, including small arms to APCs such as NIMR, seen in operations in Darfur, and other front entities.²¹³²¹⁴

Evidence of sanctions-related disruption within RSF commercial networks is partial and episodic rather than structural. Measures such as restricted access to personal bank accounts, regulatory delisting of shell companies in the UAE, and failed procurement attempts because of due-diligence requirements may have increased transaction costs and introduced friction, though it is not clear whether these effects were directly attributable to sanctions. Whatever impacts have been incurred were mitigated through anticipatory asset shifts, clan-based redistribution, and the rapid creation of front entities, allowing the RSF to maintain key financing and procurement functions.

Abdelrahim Dagalo

The responses of the RSF to the US, Canadian, UK, and EU sanctions on Abdelrahim Dagalo were similarly dismissive. Abdelrahim Dagalo took to the air shortly after the announcement of the US sanctions and attempted to deflect responsibility for the violations by attributing them to a "tribal war" instigated by the SAF rather than committed by the RSF.²¹⁵

Both the SAF and the RSF have continued to be implicated in violations of their obligations under international humanitarian law to protect civilians and noncombatants. The continued leadership positions that both Burhan and Abdelrahim Dagalo hold provide evidence that the sanctions have not, to date, impacted their authority.

Maj.-Gen. Osman Mohamed Hamid Osman

Originally a SAF officer seconded to the RSF for command improvement, Osman was one of only three officers among hundreds who refused to rejoin the SAF when conflict erupted in April 2023. As the head of RSF operations, he was described as a senior figure in RSF military operations during the offensives that captured Khartoum, Gezira state, and other strategic regions in central and eastern Sudan during the war's first two years. Following the SAF's successful campaign to retake the capital and surrounding regions by early 2025, Osman's public and military profile diminished significantly.

²¹² Washington Post, "A Turkish arms firm helped fuel Sudan's brutal civil war, records show," March 7, 2025, available at: <https://www.washingtonpost.com/world/2025/03/07/sudan-war-turkey-baykar-rsf-saf/>

²¹³ The Sentry. 2023. "Breaking: U.S. Sanctions Businesses Fueling Sudan Conflict." June 1, 2023. <https://thesentry.org/2023/06/01/7700/breaking-us-sanctions-businesses-sudan-conflict/>

²¹⁴ Warner, Kelsey "Abu Dhabi defence group Edge looks to smart technology to tackle low-tech militants," Defense News, November 20, 2019, available at: <https://www.defensenews.com/digital-show-dailies/dubai-air-show/2019/11/06/uae-launches-edge-conglomerate-to-address-its-antiquated-military-industry/>.

²¹⁵ AlShark Al-Awsat, "RSF Condemns US Sanctions on Abdelrahim Dagalo," September 7, 2023, available at: <https://english.aawsat.com/arab-world/4533211-rsf-condemns-us-sanctions-abdelrahim-dagalo>

Al Junaid for Multi-Activities Co. Ltd.

Al Junaid for Multi Activities represented the crown jewel of the Dagalo family's private businesses at the peak of their rise to military power and wealth during Omer al-Bashir's rule. It is a network of Sudan-registered companies that were active in numerous commercial sectors. Al-Junaid for Multi Activities Co. Ltd. Engineers & Contractors is a holding company with the following subsidiaries: Al-Junaid for Mining Waste Treatment; Al-Junaid for Roads and Bridges; Al-Junaid for Construction and Subcontracting; and Al-Junaid for Road Transport. The companies are involved in mining, construction, and procurement in numerous regions across Sudan.²¹⁶

Al Junaid Company and its subsidiaries enjoyed the same access to government financing, contracts, and concessions that the Bashir regime extended to the DIS network of companies. Radio Dabanga reported in July 2018 that Sudan's National Roads and Bridges Corporation signed a contract with "El Junaid Company" for the construction of the 90-kilometer Nierteti-Rokoro-Tarny-Tabit road in Darfur.²¹⁷ According to a press release from the government of South Darfur state, dated September 2018, Al-Junaid Company for Roads and Bridges was operating in the district of Al-Radoum building wells, a school, and a mosque for the local community. The press release expressed gratitude to the company, under Chairman Abdelrahim Dagalo, for completing roads that linked at least five mines (Songo, Agbash, Dharabeh, Kafi, and Umm Hajara) to remote villages and to each other so that local youth could work in mines rather than turning to drugs.²¹⁸

RSF ADAPTATION

The RSF appears able to manage complex international supply chains, leveraging Al-Junaid's infrastructure and East African trade hubs appears to bypass traditional sanctions, reportedly sustaining a flow of hard currency via the UAE.

It is noteworthy that these infrastructure projects directly facilitated access to and integration of mining areas of high economic value as Al Junaid operated a gold tailings processing factory in Sengo, thereby advancing the company's commercial interests. The government's erstwhile public praise of Al-Junaid, coupled with the framing of its activities as socially beneficial, illustrate features associated with grand corruption, including the convergence of political power and private economic interests, the use of public resources and authority to entrench military corporate dominance, and the presentation of commercially strategic investments as benevolent development. These practices were among the broader features of governance under the Bashir regime that contributed to the popular uprising against it, and which ultimately led to the ongoing war.

Sanctioned after the ongoing war by the UK, the US, the EU, and Canada for its role in funding the RSF, Al Junaid for Multi-Activities Co. Ltd. nonetheless resumed gold production in November 2025 from tailings acquired from thousands of artisanal gold miners working in Sengo, after

²¹⁶ Incorporation dates, company numbers, and shareholders of the holding company its subsidiaries are available in a PDF copy of the now discontinued website of company www.algunade.com. Copy on file.

²¹⁷ Radio Dabanga, "Contract signed for new Darfur highway," July 11, 2018, available at: <https://www.dabangasudan.org/en/all-news/article/contract-signed-for-new-darfur-highway>
See www.algunade.com.

²¹⁸ "The head of the mines committee in the response: mining extracted young people from the drug and unemployment solution," transcript taken in November 2018 from the now discontinued website of the State of South Darfur, September 13, 2018, available then at: <http://southdarfurncp.org/index.php/ar/news-and-activities/390-2018-09-13-21-06-35>.

SAF Air Force strikes had disrupted production in June 2024.²¹⁹ However, the gold production facility remains vulnerable to air strikes.

By seizing Greater Darfur and key sectors of Kordofan, the RSF has established a self-sustaining war economy. These territories serve a dual purpose: securing vital supply corridors for military materiel and while also potentially providing a launchpad for commodity smuggling to fund continued operations. Of particular interest to this study are the possible roles Al Junaid company plays in these RSF-UAE pipelines.

A high-value gold shipment recently illustrated the reported logistics linking an Al-Junaid facility to the UAE. Approximately US \$ 25 million worth of gold, processed at an Al-Junaid Company facility in Sengo, South Darfur, was transported via a multi-modal route: by road to Wau, then flown to Juba, South Sudan. There, the shipment was loaded onto a waiting private Emirati jet and flown to the UAE on March 6, accompanied by an RSF representative, according to the flight manifest reviewed by a *New York Times* reporter.²²⁰

Further, Kenya, Uganda, and Tanzania are reported to be emerging as regional hubs for smuggling. According to STPT's sources in the region, the RSF increasingly relies on a network of Sudanese, Somali, and Indian intermediaries based in East Africa to move artisanal gold into international markets. In 2025, Kenya's gold exports to the UAE spiked to 42.1 tons in the first nine months—a 13-ton increase over 2024. Regional analysts and media (including *The Standard*) suggest this surge is not domestic production, but rather the movement or laundering of "conflict gold" smuggled from RSF-controlled areas in Sudan, South Sudan, and the DRC.²²¹

Reporting on "Darfur 24," an online newspaper, later provided additional reporting consistent with these accounts. According to our sources, the Sufian field is small and has limited production capacity. Local tribal chiefs protested when they saw signs of RSF's interest in developing the field. Sources told STPT that Hemedti intervened personally and assured them that the area would receive its share of revenue from the planned refinery's operations. According to STPT sources, Abdelrahim Dagalo reportedly made generous donations to the different clan chiefs of the local Ma'alia tribe, including four-wheel-drive vehicles and large sums of money, to secure their acceptance of the plan. The RSF stationed armed vehicles and personnel to protect the field and later sent excavators and earth-moving heavy machinery to begin the preparations for the installation of the refinery.

Based on this reporting, and on source interviews that STPT has not been able to corroborate independently, the RSF appears to have developed greater capacity to manage complex international supply chains to support its military activities. Its ability to leverage Al-Junaid's infrastructure and East African trade hubs may help it to sustain a flow of hard currency via the UAE despite sanctions.

Al Fakher

Other targeted entities have taken another tactic, claiming that they were wrongly accused, rather than addressing the legitimacy of sanctions. As an example, Al Fakher responded to US sanctions in March 2024 by denying allegations that the company was connected to the RSF. The company alleged that the connection was based simply on a malicious rumor. Further, it argued that they had made important contributions to the Sudanese economy by encouraging

²¹⁹ Darfur 24, "Al Junaid Company resumes gold production in Sengo mining area in Darfur," in Arabic, November 22, 2025, available at: <https://tinyurl.com/4v6hkbcx>

²²⁰ Declan Walsh, "The Gold Rush at the Heart of a Civil War," a New York Times report, December 11, 2024, available at: https://www.nytimes.com/2024/12/11/world/africa/sudan-gold-rush-heart-civil-war.html?unlocked_article_code=1.gk4.3el5.lvmolgRvmPUf&smid=url-share

²²¹ The Standard, "The mystery gold exports to UAE: why Nairobi is accused of illicit trade," December 7, 2025, available at: https://www.standardmedia.co.ke/national/article/2001535901/the-mystery-gold-exports-to-uae#google_vignette

the legal export of gold. The company claimed that the sanctions “have caused serious material and moral damage to the company’s business and reputation in the local and regional markets” and reserved its right to take legal action in the United States.²²² Although the company clearly has reasons to misstate the impact of sanctions, its decision to issue a response to the sanctions indicates that its leaders were at least concerned about potential impacts to address them publicly. It may indicate that the damages they cite are real.

Capital Tap Holding Company: Pressure from the UAE

In another example, when Capital Tap Holding, alongside *Al Jil Al Qadem* General Trading LLC and five other RSF-linked companies were sanctioned in January 2025, the sanctions designation announcement noted that the companies were UAE-based.²²³ The UAE government responded by saying that the companies did not have active business licenses nor were they operating in the UAE.²²⁴

Other front companies

On the basis of the reporting presented above, the RSF’s main external weapons supply channel appears to remain the UAE, which is assessed to retain both the political will and the ability to continue providing the RSF with the weapons it needs to sustain the war. The UAE government has publicly denied supplying the RSF. One UAE company reported to be engaged in sanctions circumvention is the EDGE Group, which open-source investigations cited here report to have produced armored personnel carriers now in use by the RSF in Sudan.²²⁵ The APCs, made in the UAE, were reported by Amnesty International to include the French-made Gallix system, which has reactive defense capabilities through releasing decoys, smoke, and projectiles to hide and protect such vehicles.²²⁶ By passing the system through UAE-based manufacturing, EDGE may have enabled the Gallix system to reach RSF forces. EDGE may also be developing strategies for operating despite sanctions, including through its reported hiring of Russian engineers, potentially indicating collaboration with Russia, which is also under sanctions.²²⁷

BOTTOM LINE

Where disruption has occurred — most notably through regulatory responses in the UAE — it has been selective and reputational rather than structurally constraining, leaving the RSF’s core military supply channels largely intact.

²²² Brown Land News, “Al-Fakher Advanced Business Co. Ltd rejects US sanctions,” March 14, 2024, <https://blnews.net/2024/03/al-fakher-for-advanced-businesses-co-ltd-condemns-the-u-s-treasury-department-unjustified-sanctions/>

²²³ Business and Human Rights Center, “US Sanctions RSF-Linked Firms Operating in the UAE,” January 7, 2025, available at: <https://www.business-humanrights.org/en/latest-news/sudan-us-sanctions-rsf-linked-firms-operating-in-uae/>

²²⁴ The National (UAE), “The UAE says seven RSF-linked companies do not hold active business licenses in the Emirates,” April 5, 2025, available at <https://www.business-humanrights.org/en/latest-news/sudan-the-uae-says-seven-rsf-linked-companies-do-not-hold-active-business-licences-in-the-emirates/>

²²⁵ According to the company’s website, at: EDGE Group is a defense and technology conglomerate of 25 state-owned defense industry companies, employing 12,000 workers and producing a range of products, including small arms to APCs such as NIMR. <https://edgegroup.ae/>

²²⁶ Amnesty International, “French-manufactured weapons system identified in conflict – new investigation,” November 14, 2024, <https://www.amnesty.org/en/latest/news/2024/11/sudan-french-manufactured-weapons-system-identified-in-conflict-new-investigation/>

²²⁷ Matthew Edges, “UAE Throws Lifeline to Beleaguered Russian Tech Sector,” May 15, 2023, <https://cepa.org/article/uae-throws-lifeline-to-beleaguered-russian-tech-sector/>

Across the deterrence–disruption–demonstration spectrum, sanctions against RSF leaders and affiliated businesses have had greater demonstrative than deterrent or disruptive effects. While the designations clarified international positions, raised reputational costs, and narrowed the political space for engagement with RSF leadership among like-minded states, they have not meaningfully constrained the RSF’s ability to finance or equip its forces. Economic impacts on individuals, such as Algoney Dagalo, appear partial, and anticipatory asset shifts, clan-based



SUDANESE REFUGEES IN CHAD, MAY 2023

Sudanese refugees who fled across the border into Chad in the weeks after fighting broke out in April 2023. Humanitarian practitioners interviewed for this report attribute obstacles to moving funds into Sudan to the legacy of earlier blanket sanctions rather than to the current targeted designations. Source: Wikimedia Commons.

redistribution, and the rapid proliferation of front companies have appeared to limit the effect of sanctions. Where disruption has occurred—most notably through regulatory responses in the UAE—it has been selective and reputational rather than structurally constraining, leaving the RSF’s core military supply channels largely intact.

Impact on civilians and civilian economic activity

There has been comparatively little reflection on the impact of the sanctions imposed since the start of the 2023 war, given the comparatively shorter time that they have been in effect. As noted previously, the research did not find any evidence that sanctions had a positive impact on civilian protection. Despite sanctions explicitly citing genocide, mass atrocities, and attacks on civilians, available data show no corresponding reduction in civilian harm. On the other hand, the research found no direct evidence that civilians were being harmed by disrupted access to humanitarian aid as a result of the sanctions either, indicating that the focus on application of targeted sanctions had limited the risk of knock-on effects associated with broader general sanctions against the country, even where broader measures included humanitarian exemptions. However, some have argued that the current sanctions have impacted trade by disrupting trade finance and payment systems and by raising insurance and transportation costs. For example, restrictions on bank transfers have forced businesspeople to use intermediaries who

generally charge a higher fee. Port Sudan is now considered a high-risk port, which means higher insurance premiums for shippers and, in turn, higher shipping costs.²²⁸ Some may have adopted risk avoidance strategies that could end up limiting access to services in-country.

Humanitarian access and delivery

In theory, the individual sanctions that are now being imposed should minimize the possibility of inadvertent impacts on civilians because they target individuals and not whole countries or sectors. A verification of the names of individuals with whom they are doing business through sanctions databases should allow both businesses and humanitarian organizations to comply with sanctions requirements. Even the more general sanctions put in place by the US government in response to the chemical weapons allegations relate only to arms and national security sensitive goods and technologies, which are unlikely to be used by civilian corporations or humanitarian organizations.

Although key informants could not point to any direct impact of the current, individualized sanctions, they did point to the “legacy” of prior, blanket sanctions imposed by the US as posing continuing obstacles to operations.²²⁹ The prior sanctions disrupted banking connections between Sudan and the US, and more broadly the West, and by and large these have not been resumed, despite the removal of sanctions several years ago. Various explanations for this have been advanced, including overcompliance by the banks and a lack of business demand.

Whatever the reasons, this reality has presented a serious obstacle to humanitarian organizations that are trying to move money into Sudan for critical programming. Most Western banks refuse to make transfers to Sudan. The impact is significant. This forces those trying to get money into the country to pass funds through either Gulf banks or hawala cash transfers, both of which charge higher fees than standard banks. Hawala cash transfers are also trust-based, which can carry risk. The increased transaction fees draw down resources that could otherwise go to humanitarian aid. In response to these challenges, organizations are experimenting with creating a new national instant payment system using cryptocurrency stablecoins to try to make these transfers more feasible.

US foreign assistance to Sudan far exceeded trade in 2024, with US \$790 million in aid compared with US \$56.6 million in bilateral trade. The US decision to impose sanctions on Sudan in relation to chemical weapons could have threatened that, but in fact, most aid had already been cut in the first months of the Trump administration as part of broader USAID cuts.²³⁰

On the other hand, it has been reported that one of the mechanisms that has been deployed by the Rapid Support Forces to maintain access to funds despite sanctions has been to register several entities in Kenya and Uganda, moving funds under the guise of moving humanitarian aid.

Civilian private sector and market effects

There is limited evidence of large-scale civilian business disruption directly caused by targeted sanctions. However, US trade data has tracked a decrease overall since the start of the war, though not necessarily in direct response to sanctions. Exports decreased in 2023 and 2024,

²²⁸ Sidahmed, Omer, “Sudan’s Foreign Trade under Sanctions and War, and the implications of recent UAE measures: Gold as a case study,” *Al Taghyeer*, August 2025, available at <https://www.altaghyeer.info/en/2025/08/14/sudans-foreign-trade-under-sanctions-and-war-and-the-implications-of-recent-uae-measures-gold-as-a-case-study/>

²²⁹ Key informant interview, February 2026.

²³⁰ Holleis, Jennifer, “US Sanctions on Sudan to hurt civilians more than army,” May 23, 2025, <https://www.dw.com/en/us-sanctions-on-sudan-to-hurt-civilians-more-than-army/a-72648419>

with 2025 on track to be the lowest volume of trade since 2012.²³¹ This decline is likely due to the broader impact of the war. There was no marked decline between May, June, and July (the last months for which data is available), following the US' chemical weapons-based sanctions.²³²

Some private firms appear to have adopted risk-avoidance strategies, including reduced trade engagement, reliance on informal channels, and avoidance of Sudan-linked transactions due to compliance uncertainty. These dynamics may contribute to higher prices, reduced supply, and increased informality, particularly for essential goods, though attribution remains partial.

RECOMMENDATIONS

PRIORITY

Sanctions targets have so far proven more able to create and deploy front companies than sanctioning authorities have been to adapt — closing that gap means designating the joint ventures and unsanctioned subsidiaries that carry the traffic.

Based on the findings above, the following recommendations aim to strengthen deterrence and disruption while mitigating unintended civilian harm:

1. **Adapt more nimbly and expand sanctions to include joint ventures and unsanctioned subsidiaries:** To date, it appears that sanctions targets are more able to create and deploy front companies than sanctioning authorities are to adapt. Sanctioning authorities should systematically assess and, where evidence supports it, designate commercial arms, logistics entities, and joint ventures (e.g., ESC, EDG-linked structures) that facilitate transactions or other activities involving sanctioned actors.
2. **Increase the range of sanctions:** At present, the impact of sanctions is potentially limited by the fact that they are only being implemented and respected by a small section of international actors. This could be addressed in three ways:
 - a) Encourage other states and relevant authorities, through diplomatic engagement, to adopt aligned sanctions measures in order to create greater international alignment and reduce alternative channels for circumvention available to sanctioned individuals. OFAC also noted that sanctions are more effective when they are multilateral, however, in the case of Sudan sanctions, US Sanctions were much more expansive than those applied by other institutions.²³³ The African Union Peace and Security Council has called on its secretariat to produce a strategy on sanctions, creating an opening for dialogue and coordination.
 - b) Coordinate sanctions designations among sanctioning authorities, where appropriate and consistent with each authority's legal framework, to ensure more effective application and compliance with sanctions.
 - c) Engage third-country jurisdictions in which relevant logistics hubs, financial intermediaries, and commodity-trade conduits are based, including the UAE and Egypt. Options

²³¹ US Census Bureau, "Trade Goods with Sudan," <https://www.census.gov/foreign-trade/balance/c7321.html>

²³² US Census Bureau, "Trade Goods with Sudan," <https://www.census.gov/foreign-trade/balance/c7321.html>

²³³ US Office of Foreign Assets Control, "Report to Congress: Effectiveness of U.S. Economic Sanctions with Respect to Sudan," 2009, available at: https://reliefweb.int/attachments/ca22fb07-2f6f-36de-a9ac-dd938bbd096f/9F0F94C530D51DF04925765D00105DB5-Full_Report.pdf

include structured diplomatic engagement, coordination of designations with those jurisdictions, clearer enhanced due diligence expectations for the sectors concerned, and, where warranted, enforcement action or secondary measures. The research underpinning this report indicates that the conduct of these intermediaries is a significant factor in the implementation and potential impact of sanctions.

3. **Expand the arms embargo:** There is currently a UN arms embargo in place, but it applies only to Darfur. Based on an extensive review of weapons records, Amnesty International argued that the current arms embargo on Darfur was “both too narrowly focused – covering only the Darfur region – and too poorly implemented to have any meaningful impact on curbing these weapons flows.”²³⁴ They also noted that the UN Panel of Experts in January 2024 reported transfers of arms or weapons into Darfur amidst an ongoing conflict.²³⁵ Other activists have also argued that the arms embargo needs to both be expanded and better enforced.²³⁶ In light of these concerns, relevant actors should consider both expanding the geographic scope of the arms embargo and strengthening its implementation and enforcement.
4. **Ensure adequate attention to precursor materials:** Given growing domestic production, there is a clear need to address precursor components, which are harder to track but critical to sustaining weapons manufacturing. This comes with inherent challenges as many such materials are dual-use and have legitimate non-military uses. However, enhanced due diligence and, where feasible, improved tracking of these materials could help reduce the risk that they are diverted to military production.
5. **Monitor civilian economic spillovers:** Although this report found limited direct evidence of unintended civilian consequences from the 2023 targeted sanctions, there is a continuing need to continue to monitor for such effects. If needed, governments could issue clear guidance to banks and humanitarian actors to address over-compliance, facilitate lawful transfers, and protect aid delivery.
6. **Calibrate signaling to diplomatic strategy:** Sanctions should be embedded within a broader political strategy. Even at their most effective, sanctions are unlikely to achieve their objectives in isolation. As Cameron Hudson pointed out in 2024, US sanctions suffered from the failure to integrate them into a broader diplomatic strategy using multiple levers.²³⁷

²³⁴ Amnesty International, “New Weapons Fueling the Sudan Conflict: Expanding Existing Arms Embargo Across Sudan to Protect Civilians,” 2024, available at https://www.amnesty.org/en/wp-content/uploads/2024/07/AFR5482522024_SudanArmsEmbargo_EN.pdf

²³⁵ Amnesty International, “New Weapons Fuelling the Sudan Conflict: Expanding Existing Arms Embargo Across Sudan to Protect Civilians,” 2024, available at https://www.amnesty.org/en/wp-content/uploads/2024/07/AFR5482522024_SudanArmsEmbargo_EN.pdf

²³⁶ Hixon, Kate and Kehinde Togun, “A roadmap for Sudan in Trump’s first 100 days,” Center for International Policy, January 21, 2025, <https://internationalpolicy.org/publications/a-roadmap-for-sudan-in-trumps-first-100-days/>

²³⁷ Hudson, Cameron, “Washington is Becoming Irrelevant in Sudan. A Sanctions Strategy Could Change That,” CSIS, July 11, 2024.

Annex

Annex 1: Sudan's conflict economy: Principal actors, blocs and external enablers

Tier	Sudanese Armed Forces and affiliated networks	Rapid Support Forces and Dagalo family networks
1. Apex command	Gen. Abdel Fattah al-Burhan SAF commander; de facto head of state at time of designation US (1/25)	Mohamed Hamdan Dagalo Musa ("Hemedti") RSF leader US (1/25); Canada (3/25)
2. Political and family core	Ali Karti Former foreign minister; leader, Sudanese Islamic Movement US (9/23); EU (6/24) Salah Abdallah Mohamed Salah (Salah Gosh) Former head of national intelligence US (12/23); EU (12/24); Canada (3/25) Taha Osman Ahmed al Hussein Former state minister and presidential office director US (12/23) Mohamed Etta Elmoula Abbas Former national intelligence service US (12/23); Canada (3/25)	Abdelrahim Hamdan Dagalo RSF deputy leader; brother of Hemedti US (9/23); Canada (4/24); EU (11/25); UK (12/25) Algoney Hamdan Dagalo Musa RSF procurement US (10/24); Canada (2/25); EU (1/26) Osman Mohamed Hamid Mohamed Head of RSF operations; reported resident in the UAE since 2025 US (5/24); UN (11/24); UK (11/24); EU (12/24) Hussein Barsham Leading role in Darfur atrocities EU (7/25)
3. Military command and field commanders	El Tahir Mohamed El Awad El Amin Commander, Sudanese Air Force; implicated in bombing of civilian areas EU (6/24) Mohamed Ali Ahmed Subir Lt. Gen.; director of the directorate of military intelligence US (12/24); EU (12/24) Abu Aqla Mohamed Kaikal	Abdelrahman Juma Barkalla Cited for violations linked to the RSF takeover of El Geneina UN (11/24); UK (11/24); US (11/24); EU (12/24) Ali Yagoub Gibril North Darfur attacks; believed killed in fighting mid-2024 US (5/24) Gedo Hamdan Ahmed ("Abu Nshouk") El Fasher commander

An Assessment of the Impact of Sanctions in Sudan

Tier	Sudanese Armed Forces and affiliated networks	Rapid Support Forces and Dagalo family networks
	Militia leader; RSF-appointed Gezira governor who later defected to the SAF; EU (7/25)	UK (12/25); EU (1/26); US (2/26) Al Fateh Abdallah Idris (“Abu Lulu”) El Fasher commander UK (12/25); EU (1/26); US (2/26) Tijani Ibrahim Moussa Mohamed El Fasher commander UK (12/25); EU (1/26); US (2/26) Edris Kafuti Field commander; EU-identified “key perpetrator” at El Fasher EU (1/26)
4. Allied militias, clan and political networks	Al Baraa Bin Malik Brigade Islamist militia fighting alongside the government US (9/25) Abu Zaid Talha Al Misbah Commander, Al Baraa Bin Malik Brigade EU (1/26) Al Tayyib Al Imam Joda Emir, Nafeidiya clan of the Kawahla; affiliate of the Sudan Shield Forces EU (1/26) Gebreil Ibrahim Mohamed Fedeil Finance minister; chairman, Justice and Equality Movement US (9/25) Tijani Karshom Former deputy governor of West Darfur; Gathering of Sudan Liberation Forces EU (12/24); Canada (3/25)	Masar Abdurahman Aseel Amir of the Mahamid clan; Native Administration, West Darfur EU (6/24)

Tier	Sudanese Armed Forces and affiliated networks	Rapid Support Forces and Dagalo family networks
5. Procurement and finance operators	Merghani Idriss Suleiman Director, Defense Industries System; head of SAF weapons procurement EU (6/24); US (10/24); Canada (2/25) Ahmed Abdalla Khalafallah Dual Sudanese Ukrainian national; reported right-hand man of Merghani Idriss US (1/25)	Mustafa Ibrahim Abdel Nabi Mohamed Financial director, Alkhaleej Bank; financial adviser to the RSF EU (6/24) Abu Dharr Abdul Nabi Habiballa Designated for engagement in financing the RSF US (1/25)
6. Commercial and financial arms	Defense Industries System (DIS) Core of the SAF economic empire; parent of the SAF commercial network US (6/23); UK (6/23); EU (1/24) Sudan Master Technology Core of the SAF economic empire; parent company of Red Rock Mining US (6/23); UK (6/23); EU (1/24) Zadna International Company DIS subsidiary and one of its largest revenue earners; agriculture, construction, gold UK (6/23); EU (1/24); US (1/24) Red Rock Mining Company DIS affiliate; subsidiary of Sudan Master Technology UK (4/24); EU (7/25) National Bank of Omdurman Military-owned; holds 40% of the Sein Grain Company Not designated	Al Junaid for Multi-Activities Co. Ltd. Dagalo family holding company; 11 subsidiaries, mainly gold mining US (6/23); UK (6/23); EU (1/24) Tradive General Trading LLC Vehicle purchases for the RSF US (6/23); UK (6/23); EU (1/24); Canada (3/25) GSK Advance Company Financing and materiel to the RSF UK (6/23); US (9/23); EU (1/24) Alkhaleej Bank RSF-controlled; per the EU, “essential role in financing RSF operations” US (1/24); UK (4/24); Canada (3/25); EU (7/25) Al Fakher Advanced Works Co. Ltd. Export of RSF gold; publicly denied any RSF connection US (1/24); UK (4/24) Capital Tap Holding LLC / Capital Tap Management Consultancies LLC RSF finance vehicles US (1/25)

An Assessment of the Impact of Sanctions in Sudan

Tier	Sudanese Armed Forces and affiliated networks	Rapid Support Forces and Dagalo family networks
		Creative Python LLC; Al Zumoroud and al Yaqoot Gold and Jewelers LLC; Al Jil Al Qadem General Trading LLC; Horizon Advanced Solutions General Trading LLC Among seven companies designated in January 2025 for RSF financing, gold purchasing and equipment supply US (1/25)
7. External enablers, suppliers and jurisdictions	Türkiye — Baykar TB2 and Akinci drones; deal reported with Merghani Idriss in November 2023, five months after DIS was sanctioned Supplier not designated Pakistan \$230 million arms deal signed by a DIS delegation in October 2025 Not designated Egypt Egyptian–Sudanese Company (ESC) joint venture with Zadna; the African Company created to export DIS gold Not designated Saudi Arabia DIS delegation to the World Defense Show, Riyadh, February Not designated Netherlands Zadna subsidiary de-registered in 2024; Red Rock partnership with Red Diamond Industries, Rotterdam Not designated	United Arab Emirates EDGE Group, a conglomerate of 25 state-owned defense companies; destination of RSF gold flights Not designated Russia — Wagner-linked network Meroe Gold; M-Invest; Al Solag Mining Company Ltd; Aviatrade (UAV and military supply) UK (7/23) for the first three; US (9/23) for Aviatrade Michail Potepkin / Andrei Sergeevich Mandel Managing director, Meroe Gold; director, M-Invest EU (2/23); UK (7/23) South Sudan, Kenya, Uganda, Tanzania Gold transit (Sengo–Wau–Juba–UAE) and regional laundering hubs Not designated Colombia Four nationals designated in relation to Sudan, linked to Maine Global Corp SAS and International Services Agency US (12/25)