

# Taking the Pulse of Major Sanctions Lists

January – June 2022



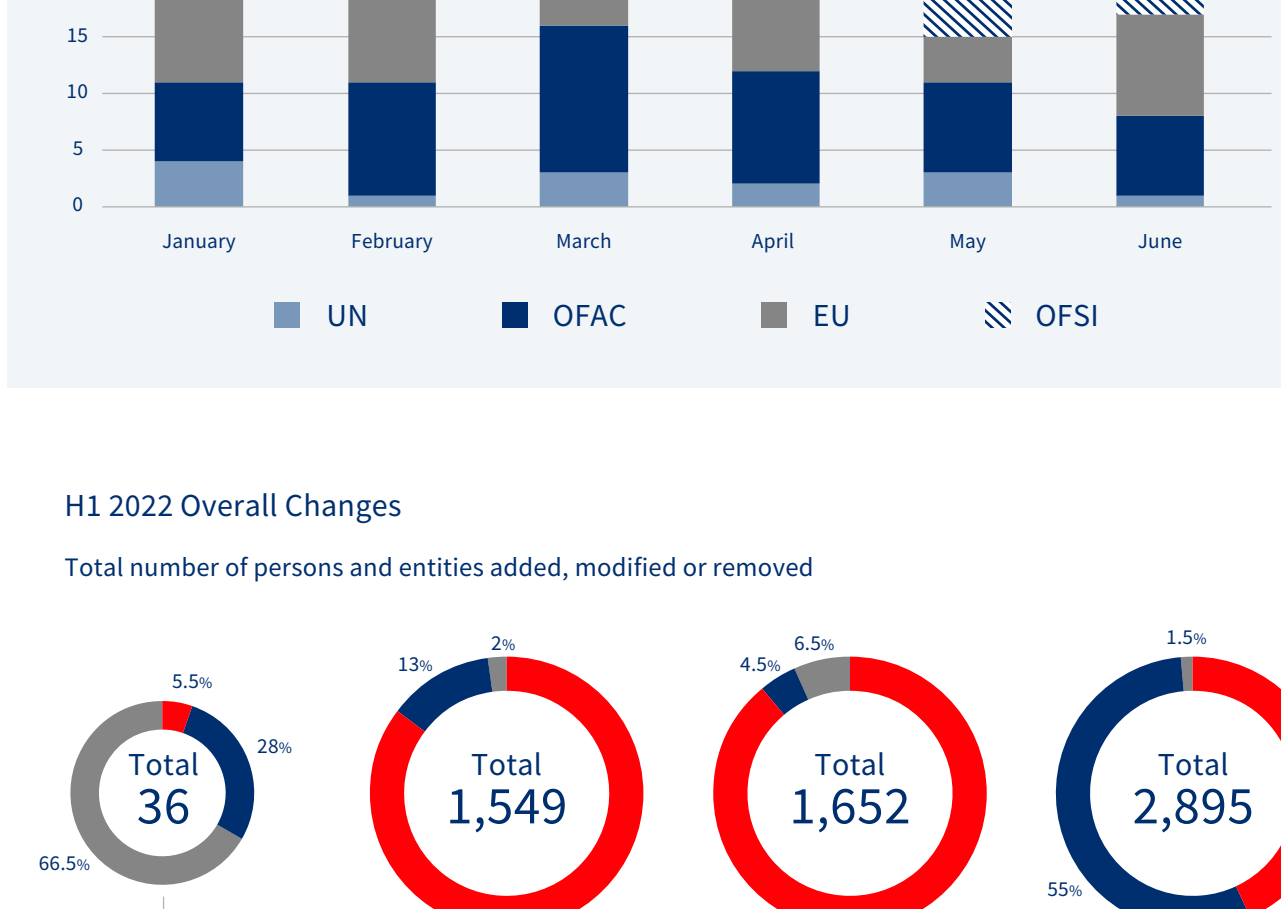
LexisNexis® Risk Solutions regularly analyzes sanctions data from core regulators – the United Nations (UN), Office of Foreign Assets and Control (OFAC), European Union (EU), and the Office of Financial Sanctions Implementation (OFSI – UK) – to identify trends and changes in policy.

Sanctions activity in 2022 has been at an unprecedented scale and speed due to the ongoing situation in Ukraine. While activity has slowed since the peak in February and March, it remains significantly higher than for the same period in recent years.

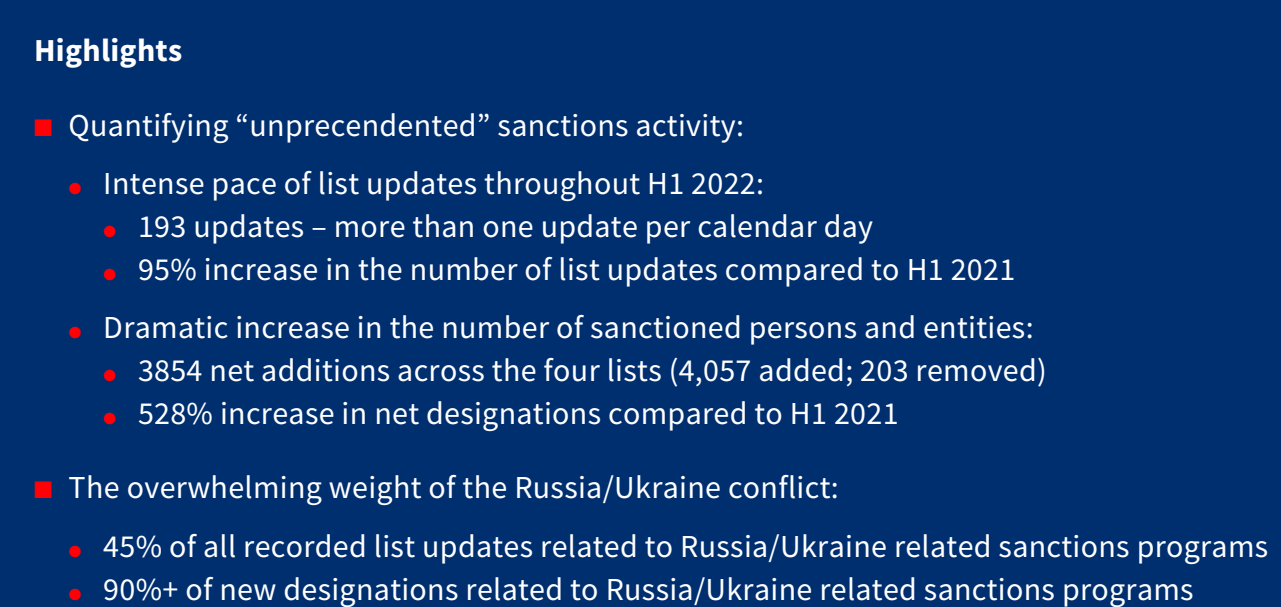
It is also important to note that while Russia-related sanctions programs have seen the most updates (and filled the most headlines), regulators continue to focus on other international issues such as terrorism, cybercrime, narcotics and human rights abuses.

The data in this infographic relates to the period of January 1 to June 30 2022.

## Key Takeaways



Number of List Updates per Agency H1 2022



H1 2022 Overall Changes

Total number of persons and entities added, modified or removed

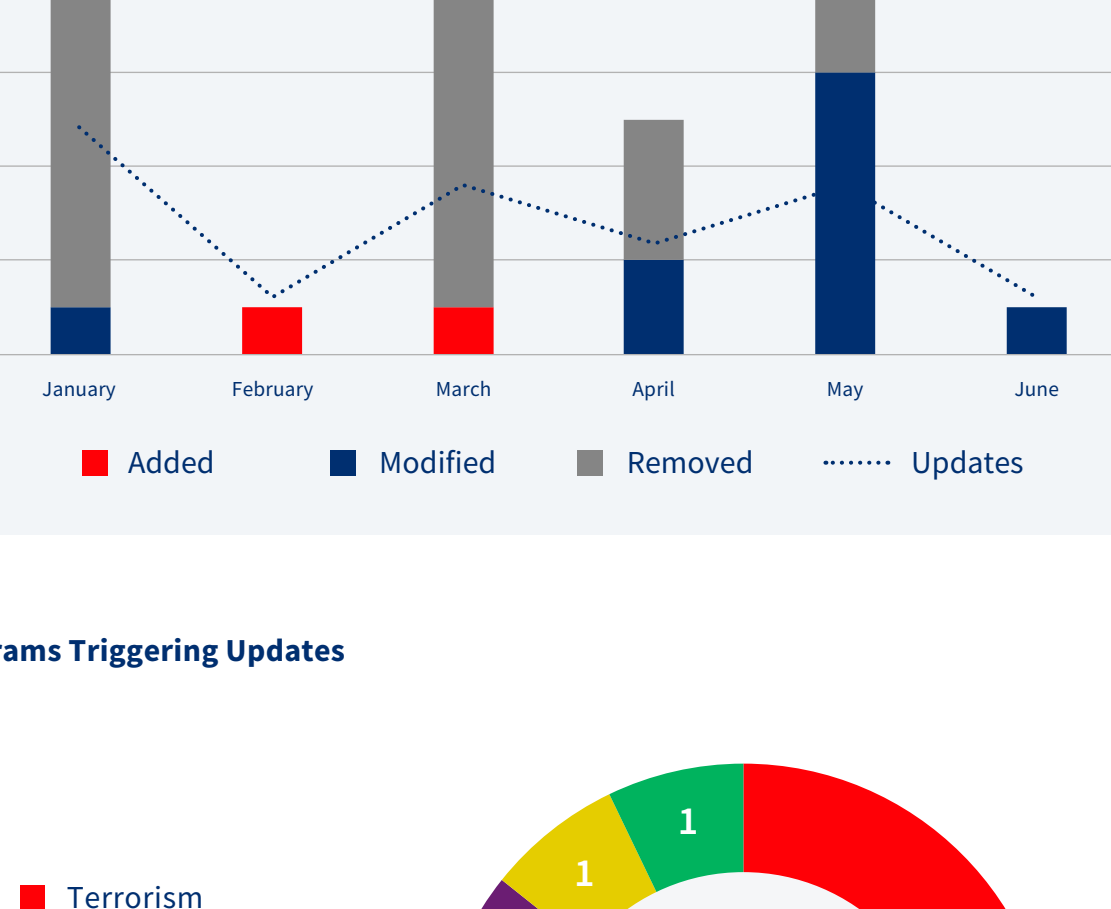


Legend: Added (Red), Modified (Blue), Removed (Grey)

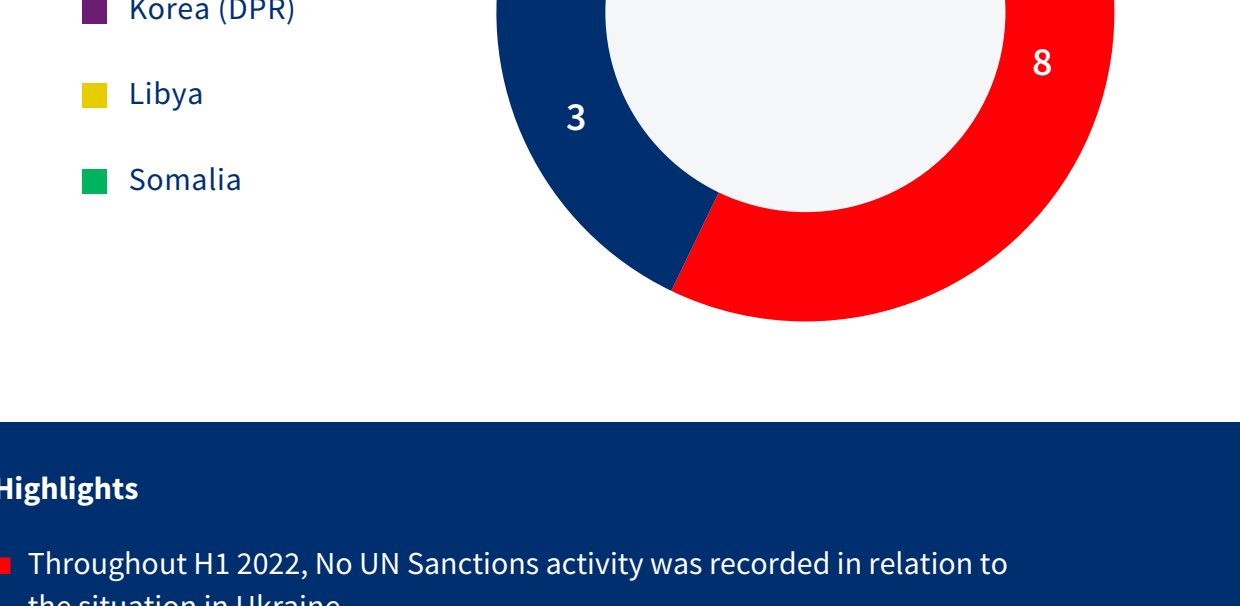
### Highlights

- Quantifying "unprecedented" sanctions activity:
  - Intense pace of list updates throughout H1 2022:
    - 193 updates – more than one update per calendar day
    - 95% increase in the number of list updates compared to H1 2021
  - Dramatic increase in the number of sanctioned persons and entities:
    - 3,854 net additions across the four lists (4,057 added; 203 removed)
    - 528% increase in net designations compared to H1 2021
- The overwhelming weight of the Russia/Ukraine conflict:
  - 45% of all recorded list updates related to Russia/Ukraine related sanctions programs
  - 90%+ of new designations related to Russia/Ukraine related sanctions programs
  - No UN Sanctions response to the Russia/Ukraine conflict
- Other emergencies continued to trigger sanctions designations:
  - Continued sanctions activity for tackling terrorist groups globally
  - The situation in North Korea and Myanmar triggered sanctions responses
  - Beyond terrorism, global issues such as cybercrime, weapons of mass destruction (WMD) proliferation, corruption, and human rights abuses continued to prompt sanctions activity

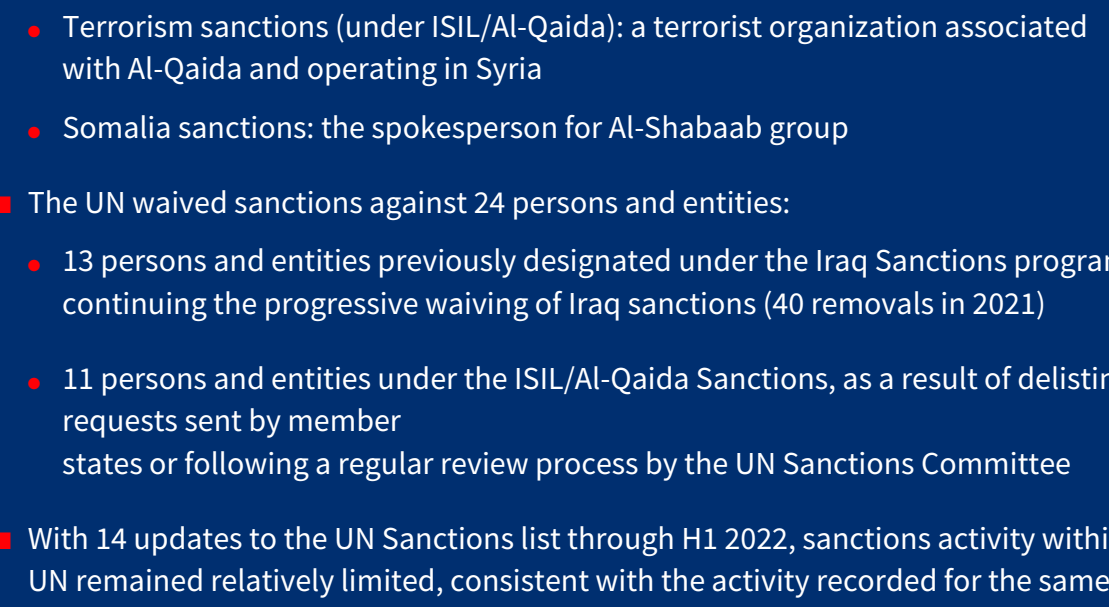
## A Closer Look by Agency



UN Updates: Scale and Nature of Changes

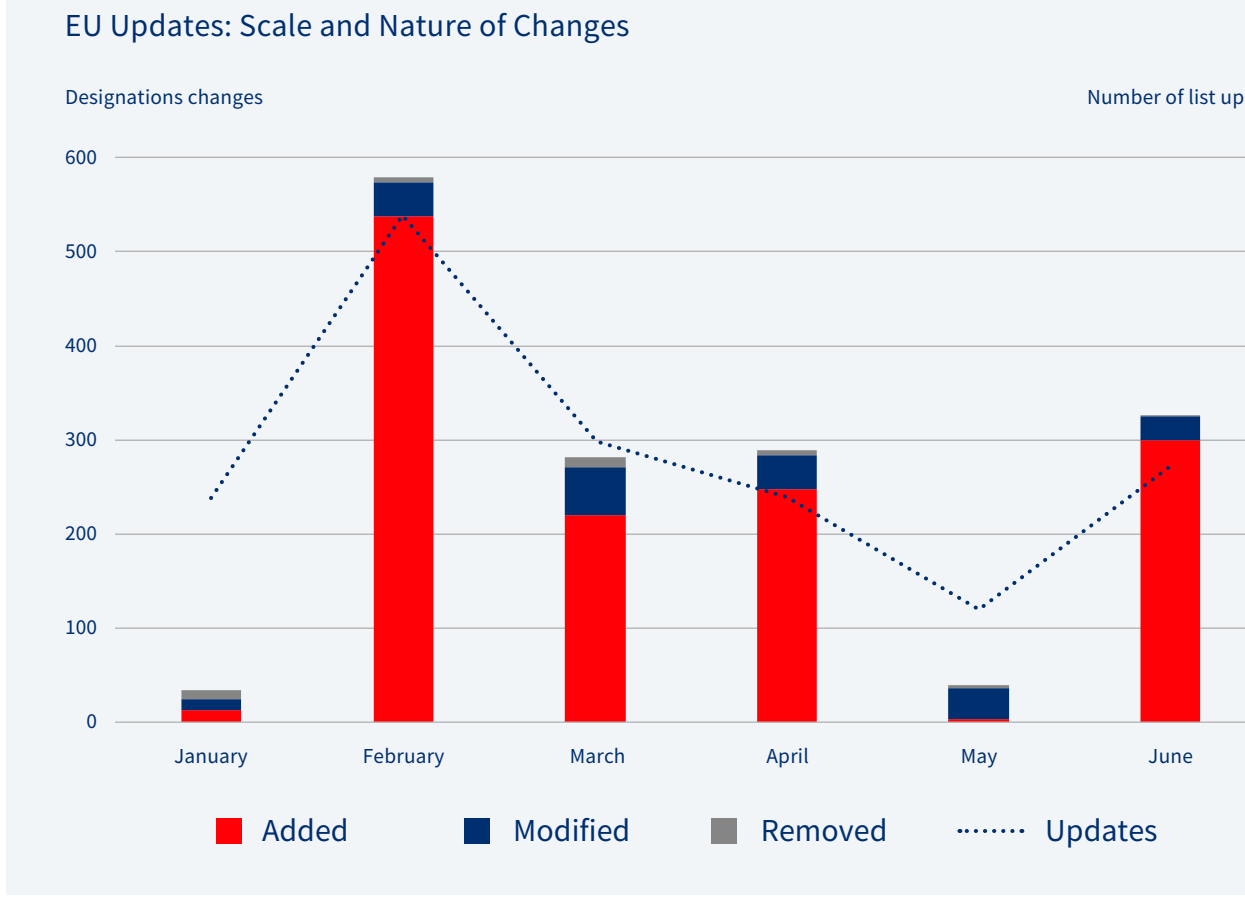


### UN Programs Triggering Updates

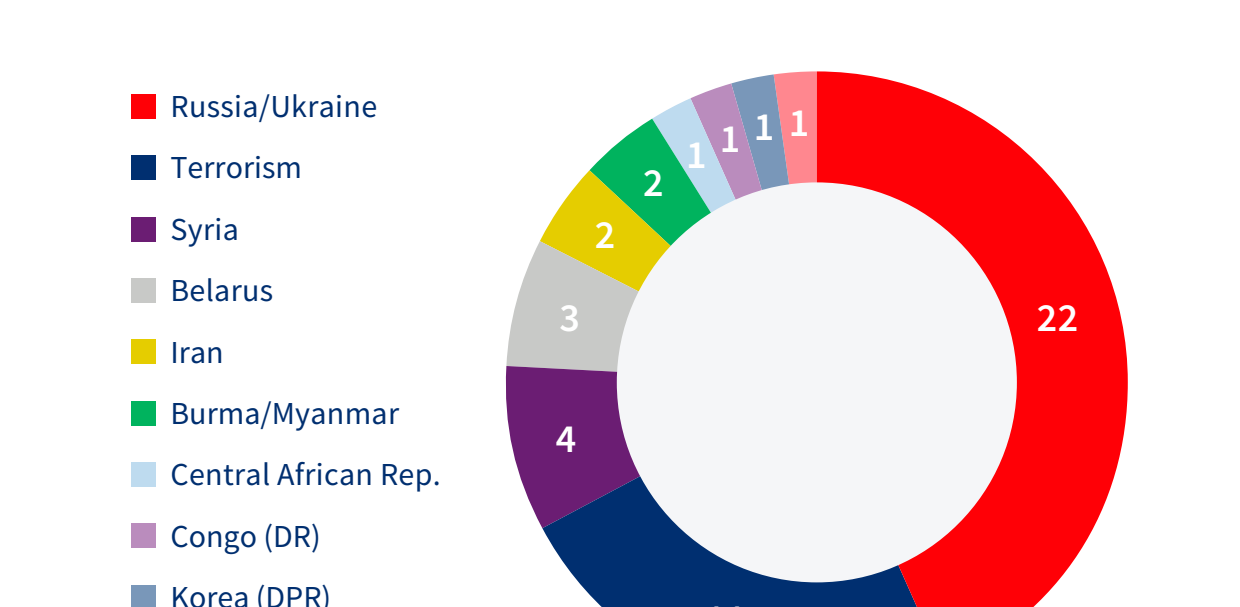


### Highlights

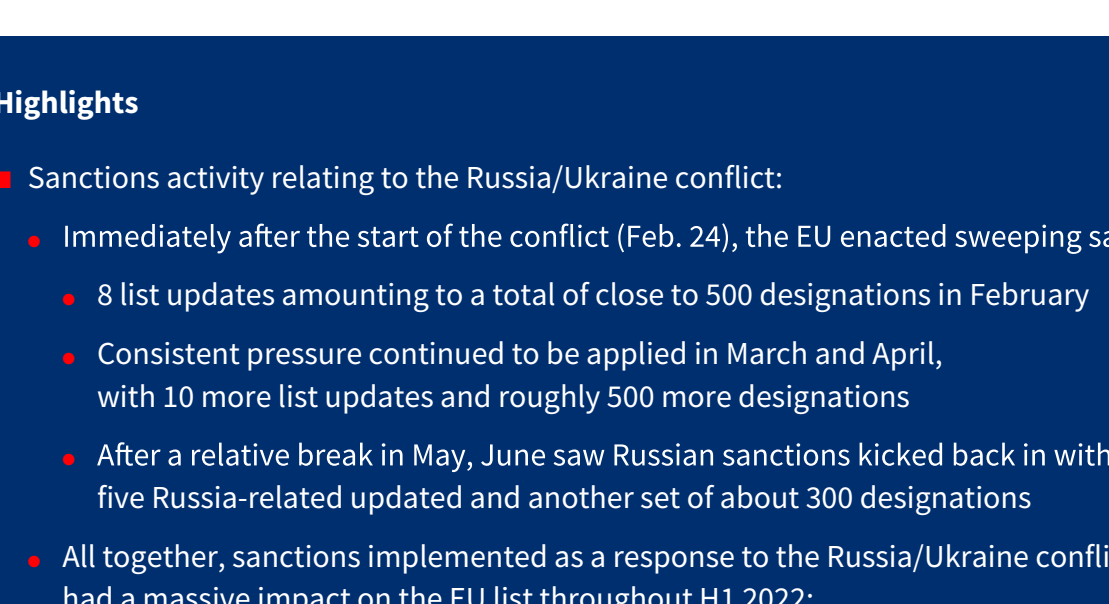
- Throughout H1 2022, No UN Sanctions activity was recorded in relation to the situation in Ukraine.
- Throughout H1 2022, the UN list updates were limited to five programs. Only two new designations were made:
  - Terrorism sanctions (under ISIL/Al-Qaida): a terrorist organization associated with Al-Qaida and operating in Syria
  - Somalia sanctions: the spokesperson for Al-Shabaab group
- The UN waived sanctions against 24 persons and entities:
  - 13 persons and entities previously designated under the Iraq Sanctions program, continuing the progressive waiving of Iraq sanctions (40 removals in 2021)
  - 11 persons and entities under the ISIL/Al-Qaida Sanctions, as a result of delisting requests sent by a regular review process by the UN Sanctions Committee
- With 14 updates to the UN Sanctions list through H1 2022, sanctions activity within the UN remained relatively limited, consistent with the activity recorded for the same period in 2021.



EU Updates: Scale and Nature of Changes

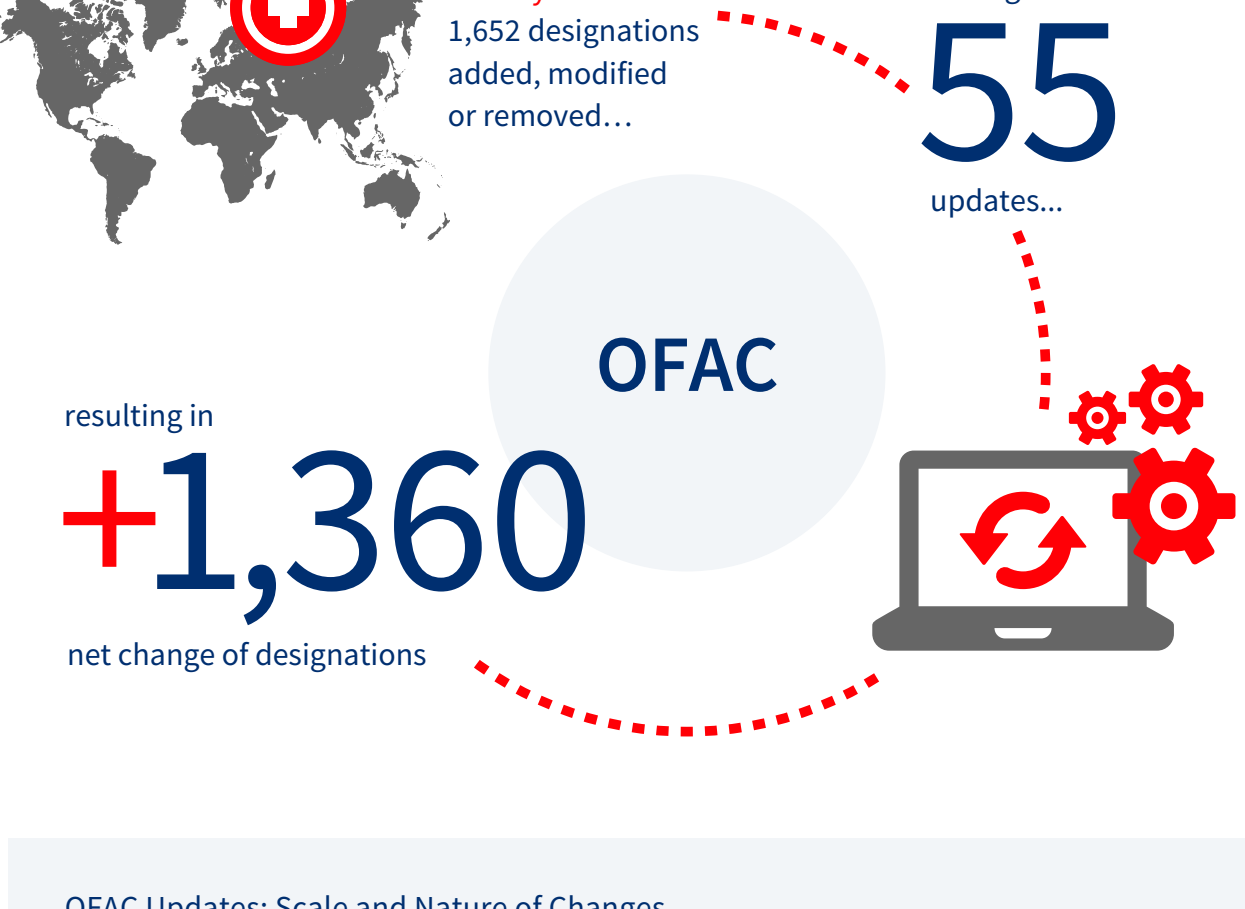


### EU Programs Triggering Updates (Top 10)

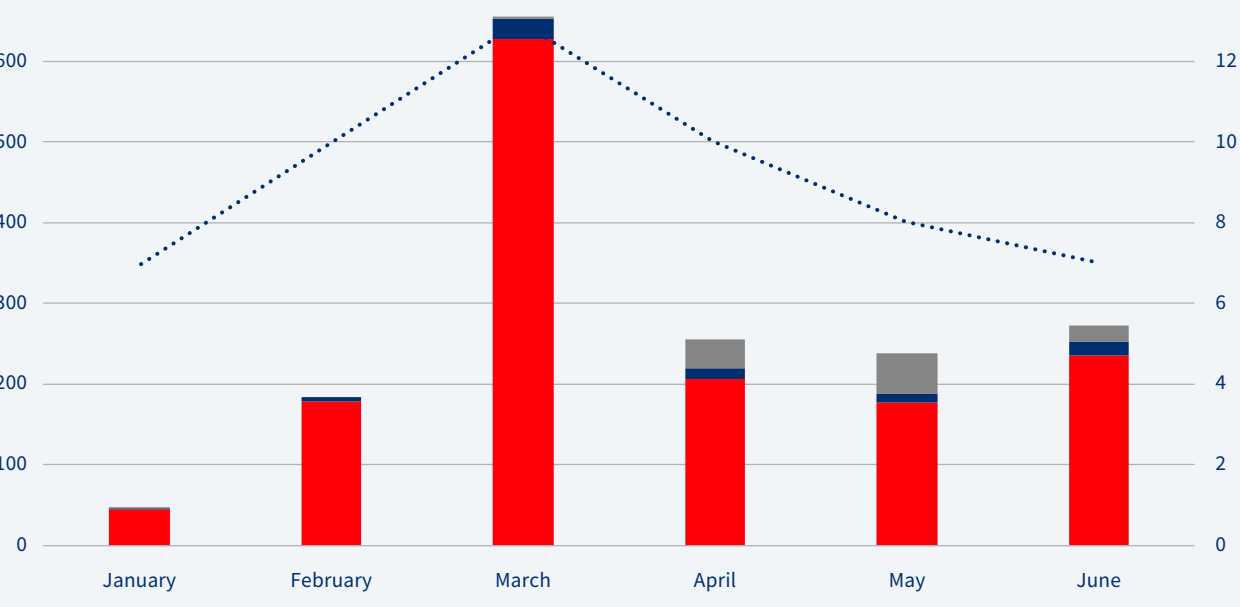


### Highlights

- Sanctions activity relating to the Russia/Ukraine conflict:
  - Immediately after the start of the conflict (Feb. 24), the EU enacted sweeping sanctions:
    - 8 list updates amounting to a total of close to 500 designations in February
    - Consistent pressure continued to be applied in March and April, with 10 more list updates and roughly 500 more designations
    - After a relative break in May, June saw Russian sanctions kicked back in with five Russia-related updated and another set of about 300 designations
  - All together, sanctions implemented as a response to the Russia/Ukraine conflict had a massive impact on the EU list throughout H1 2022:
    - 22 list updates
    - 1,227 net designations
- Continued sanctions activity for a variety of programs:
  - Key country programs:
    - 26 designations in scope of Myanmar sanctions, 12 for North Korean entities, 10 for Nicaragua sanctions
  - Key thematic programs in relation to terrorism, with no net additions (14 designations, 14 removals)
  - No other noticeable change to other thematic sanctions programs
- A significant concentration of EU sanctions activity related to Russia-related programs:
  - 39% of list updates
  - 95% of net additions



OFAC Updates: Scale and Nature of Changes



### OFAC Programs Triggering Updates (Top 10)

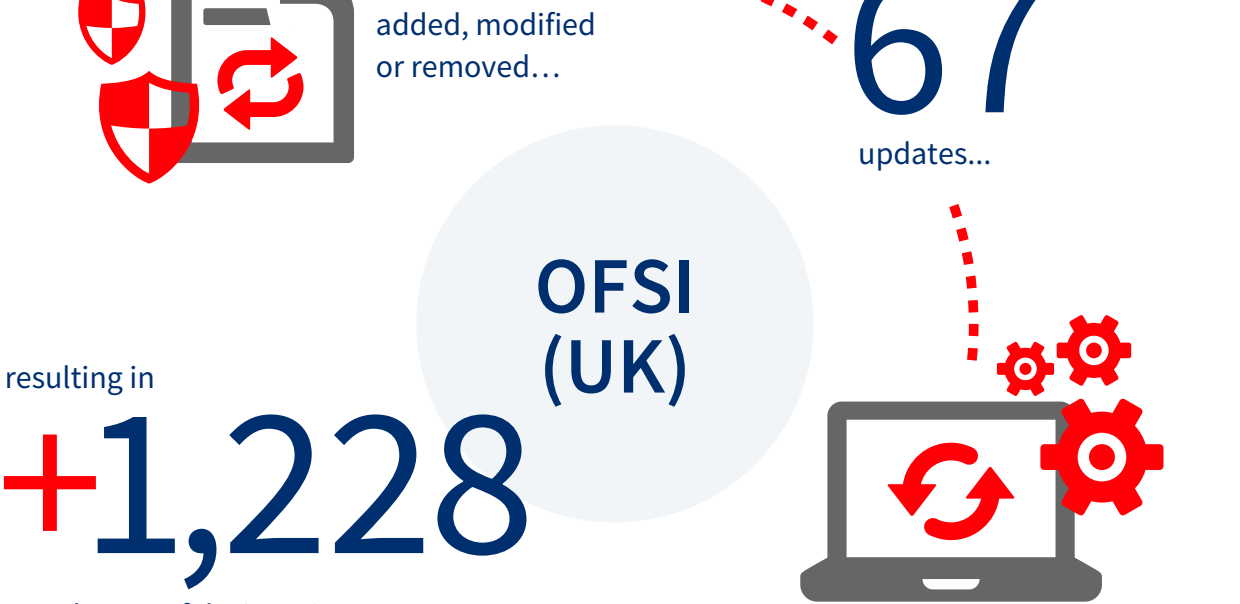


### Highlights

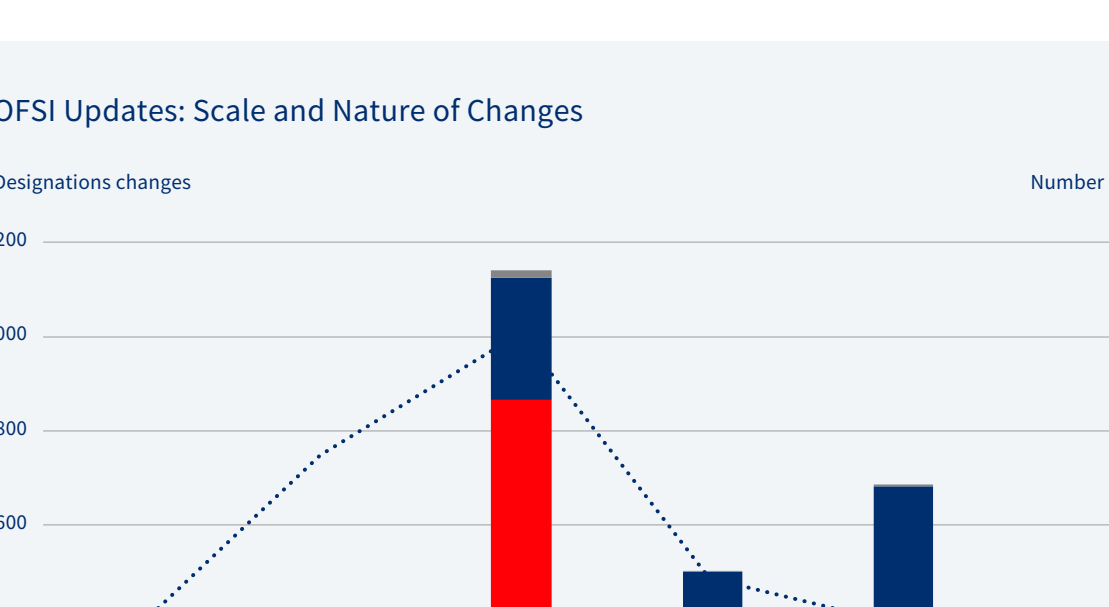
- Sanctions activity relating to the Russia/Ukraine conflict:
  - OFAC ramped up its sanctions response against Russia, culminating in March:
    - Steady activity for OFAC across H1, largely dominated by Russia-related developments
    - March stands out with a significant peak in sanctions activity, with close to 600 Russia-related designations
    - The top 12 OFAC updates by number of added designations all had a Russia-nexus.
  - All together, sanctions implemented as a response to the Russia/Ukraine conflict triggered significant changes to the OFAC list throughout H1 2022:
    - 20 list updates
    - 1,246 net designations
- Continued sanctions activity for a variety of programs:
  - Key country programs:
    - North Korea sanctions : five updates and six targets added.
    - OFAC implemented 11 new designations under its Balkans program, targeting corrupt officials and organized crime groups operating in Albania, Bosnia and Herzegovina, Montenegro, and North Macedonia.
  - Key thematic programs:
    - 15 list updates in relation to Terrorism; resulting in a net increase of 65 designations.
    - Sanctions against narcotics trafficking and WMD proliferation continued to be implemented, with six and four list updates, respectively, resulting in a decrease of 17 targets for narcotics trafficking and an increase of 21 targets for WMD proliferation.
- A significant concentration of OFAC sanctions activity related to Russia-related programs:
  - 32% of list updates
  - 86% of net additions



OFSI Updates: Scale and Nature of Changes



### OFSI Programs Triggering Updates (Top 10)



### Highlights

- Sanctions activity relating to the Russia/Ukraine conflict:
  - OFSI implemented sweeping sanctions against Russia, through numerous list updates:
    - With 45 updates related to the Russia/Ukraine conflict (33%), OFSI's pace of change was the most intense among all four agencies
    - March stands out with a significant peak in sanctions activity, with over 850 Russia-related designations
    - Over the period, all but one update implementing five or more designations were implemented for Russia-related sanctions (16 out 17 updates with five+ added designations)
  - All together, sanctions implemented as a response to the Russia/Ukraine conflict triggered unprecedented changes to the OFSI list throughout H1 2022:
    - 45 list updates
    - 1,234 designations
- Continued sanctions activity for a variety of programs:
  - Key country programs:
    - Iran sanctions : 11 updates consisting mostly in amending existing entries, four targets were removed
    - Myanmar sanctions: 15 new designated persons through five updates
  - Key thematic programs:
    - Frequent updates on programs relating to countering terrorism (16), mostly for amending and correcting existing entries, four new designations only
    - Aside from terrorism, 11 updates amended various thematic sanctions programs: cybercrime (four), global human rights (three), global corruption (two) and chemical weapons (one)
- A significant concentration of OFSI sanctions activity related to Russia-related programs:
  - 40% of list updates
  - 97% of net additions

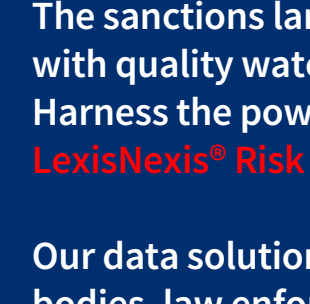
## Summary

- These figures highlight the degree to which the Russia/Ukraine conflict has dominated the sanctions agenda. During H1 2022, new sanctions designations were overwhelmingly from Russia-related sanctions programs : 97% of the total for EU and OFSI ; 86% of net additions to the OFAC list.
- At the same time, regulators have shown efforts to maintain other programs and address persistent international issues, such as terrorism or the situations in countries like North Korea, Myanmar and others.
- The magnitude of sanctions activity recorded throughout H1 2022 was so unprecedented that it will long be remembered by sanctions professionals.

The sanctions landscape is in constant flux. More than ever, being equipped with quality watch list data is essential for sanctions compliance programs. Harness the power of accurate, timely information with data from LexisNexis® Risk Solutions.

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