



House of Commons  
Foreign Affairs Committee

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# Fragmented and incoherent: the UK's sanctions policy

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Seventeenth Report of Session  
2017–19

*Report, together with formal minutes relating  
to the report*

*Ordered by the House of Commons  
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## The Foreign Affairs Committee

The Foreign Affairs Committee is appointed by the House of Commons to examine the expenditure, administration, and policy of the Foreign and Commonwealth Office and its associated public bodies.

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### Contacts

All correspondence should be addressed to the Clerk of the Foreign Affairs Committee, House of Commons, London SW1A 0AA. The telephone number for general enquiries is 020 7219 6105; the Committee's email address is [fac@parliament.uk](mailto:fac@parliament.uk).

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## Summary

A robust, effective and coherent sanctions policy is indispensable to the UK as a global actor. The centrality of sanctions to UK foreign policy, national security and the functioning of the rules-based international system cannot be overstated. As it prepares to leave the EU, the UK must be ready to take responsibility for designing, implementing and enforcing its own sanctions.

Yet the Government does not have a clear strategy for sanctions. Little high-level thought appears to have been given to UK priorities for post-Brexit sanctions. Moreover, the Government's failure to establish a clear legal view on whether the UK can independently sanction human rights abusers while still an EU member state, and its obfuscation on this issue in response to the Committee's questioning, risk signalling that the UK is reluctant to use those powers. The Government must rectify this mistake by agreeing on a clear legal position and publishing it before the end of June.

The cross-Whitehall structures underpinning sanctions policy-making, implementation and enforcement are highly fragmented, further undermining strategic coherence and enabling departments to avoid taking responsibility. The Government should address this by appointing a Senior Responsible Officer for sanctions policy who will be personally accountable to the National Security Council.

The Foreign and Commonwealth Office also seems unwilling to acknowledge that it has a vital role to play in helping to keep the UK and our allies safe by cracking down on the laundering of dirty money. As this Committee has said in previous Reports, dirty money is a national security issue, especially in the light of London's importance in the global financial system. It is simply not good enough for the Minister of State to assert that financial crime is "not quite" the Foreign and Commonwealth Office's "patch".

The Government has spent the last two years running as fast as it can just to stay in the same place. The time is right for a major review of the Government's approach to sanctions at every stage. Without such a review, the UK runs the risk of allowing its sanctions policy to be dictated by the decisions of others. The UK must now seize the opportunity to become a global leader in sanctions policy. We hope the Government will take this warning to heart.

## Introduction

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1. Sanctions are essential to UK foreign policy, providing key levers by which the Government can exert pressure on terrorist groups, rogue regimes and individuals connected to those regimes. They also enable the UK and its partners to demonstrate solidarity with one another and to support the rules-based international system in the face of threats and unacceptable behaviour. A robust, effective and coherent sanctions policy is therefore indispensable to the UK's foreign policy and national security strategy.
2. The UK adopts sanctions primarily through the UN and the EU, with about two thirds of its current sanctions regimes deriving from the EU.<sup>1</sup> Leaving the European Union will thus bring about a seismic shift in how the UK adopts, imposes and implements economic and financial sanctions. For this reason, Parliament passed the Sanctions and Anti-Money Laundering Act 2018 (SAMLA) which provides the legal foundation for the UK to have an autonomous sanctions policy.<sup>2</sup> Since that Act became law in May 2018, the Government's activity on sanctions has been focused on ensuring that the UK will be legally able to maintain existing EU sanctions under UK law, even in a no-deal exit scenario.
3. In our May 2018 report, *Moscow's Gold: Russian Corruption in the UK*, we welcomed the introduction of SAMLA and called on the Government to consider broadening its approach to sanctions by including individuals closely connected to hostile regimes.<sup>3</sup> The Government did not address this recommendation in its response to that report.<sup>4</sup> This report picks up many of the themes we initially explored in *Moscow's Gold*, and also explores some of the issues we first identified in our March 2018 report on *Global Britain*.<sup>5</sup>
4. The Committee would like to thank all the individuals and organisations who submitted written evidence to this inquiry, and all of the witnesses who gave oral evidence.<sup>6</sup>

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1 In its written submission to this inquiry, the FCO said that "The UK currently implements sanctions agreed through the UN, the EU and the Organisation for Security and Cooperation in Europe (OSCE). The UK maintains 38 multilateral sanctions regimes: 10 UN, 21 EU, 5 mixed UN/EU, and 2 OSCE regimes. In total, 1488 individuals and 640 entities are subject to sanctions under these regimes (as of 20 December 2018)." Foreign and Commonwealth Office ([FSP0015](#)), para 12.

2 [Sanctions and Anti-Money Laundering Act 2018](#)

3 Foreign Affairs Committee, Eighth Report of Session 2017–19, [Moscow's Gold: Russian Corruption in the UK](#), HC 932, para 31

4 Foreign Affairs Committee, Twelfth Special Report of Session 2017–19, [Moscow's Gold: Russian Corruption in the UK: Government response to the Committee's Eighth Report](#), HC 1488

5 Foreign Affairs Committee, Sixth Report of Session 2017–19, [Global Britain](#), HC 780

6 We took oral evidence from Tom Keatinge (Royal United Services Institute), Dr Justine Walker (UK Finance), William Browder (CEO, Hermitage Capital Management), Lord Barker of Battle (Executive Chairman, En+ Group), William McGlone (Latham and Watkins, LLP), Maya Lester QC (Brick Court Chambers), The Rt Hon Sir Alan Duncan MP (Minister of State at the Foreign and Commonwealth Office) and Mr Qudsi Rasheed (Head of Sanctions, Foreign and Commonwealth Office).

# 1 Lack of clear Government strategy

## Muddled responses on key issues

5. In the light of the UK's departure from the EU, witnesses emphasised the need for the Government to have a clear strategy and set of objectives for sanctions policy.<sup>7</sup> Asked whether the UK had a such a strategy, Tom Keatinge of the Royal United Services Institute (RUSI) told the Committee:

Not obviously is, I suppose, where I would start... The standard phraseology is sanctions being an extension of foreign policy, being part of a toolkit, etc. I think we are all used to hearing from all Governments when it comes to sanctions. But in terms of what the strategy is and what we are trying to achieve, that is not clear at this stage.<sup>8</sup>

6. We asked Sir Alan Duncan, Minister of State at the FCO with responsibility for sanctions, to set out the goal of UK sanctions policy. He said:

There are two aspects to this. One is to make sure that we have our own policy regime once we have left the EU. An essential part of the policy is the structure of sanctions. The other is about the efficacy, as we would wish to see it, of sanctions. It is to promote our wider foreign policy objectives and values across the world, bear down on those who we think offend those values in a number of ways across the world, and work in concert with our partners and allies wherever we can, as we have done within the current structure of the EU and UN... The purpose is to deter, change behaviour and restrict the actions of people we believe should be the focus of sanctions. This has led to the designation of individuals and entities, and things like that. They are designed to change unacceptable behaviour by coercing or constraining a target's ability to carry out such behaviour.<sup>9</sup>

7. While the Minister's description of the basic objectives of economic and financial sanctions is unobjectionable, it does not constitute a strategy or a clear statement of how the UK believes sanctions should be deployed in concert with other foreign policy instruments. The Government's lack of coherent strategy in this area was further illustrated by the muddled answers we received on three core elements of Government activity on sanctions since the passage of SAMLA: the legal process for rolling over EU sanctions, the introduction and use of Magnitsky powers, and the development of a plan for post-Brexit co-operation with the EU.

## Rolling over EU sanctions

8. Since SAMLA received Royal Assent in May 2018, the FCO's main priority on sanctions has been to roll over existing EU sanctions regimes so that the UK can continue to implement them even if it leaves the EU with no deal. This process has two main elements: the replication of EU regimes via Statutory Instruments, and the replication of

7 [Q2](#); Royal United Services Institute ([FSP0012](#)); Dr Matthew Moran ([FSP0003](#)); Dr Erica Moret ([FSP0004](#)); UK Finance ([FSP0008](#)); United Nations Association - UK ([FSP0011](#))

8 [Q1](#)

9 [Qq401-402](#)

EU designations of individuals.<sup>10</sup> Sir Alan and Mr Qudsi Rasheed, Head of the Sanctions Unit and the UK's Sanctions Envoy at the FCO, confirmed to the Committee that, as at 14 May 2019, these processes were either complete or nearing completion.<sup>11</sup> Sir Alan also assured us that, had the UK left the EU with no deal on 29 March or 12 April 2019, there would have been no gap in UK sanctions policy.<sup>12</sup>

9. We noted in the evidence session that the Government laid the Statutory Instrument for rolling over the EU's sanctions regime on Russia, imposed in response to the annexation of Crimea and Russian support for separatists in Eastern Ukraine, on 10 April 2019. Asked why this vital legislation was laid so late, Qudsi Rasheed said:

The reason we had it is that we were ready to lay it in advance of 29 March, but because we knew a few days earlier that 29 March was not going to be exit day and that we had the two-week extension, we were ready to do it for 12 April. That is why we laid it in advance of the 12 April deadline... These SIs are obviously contingent on a no-deal scenario, so if we know there is not going to be no deal, then we do not need to rely on these pieces of legislation.<sup>13</sup>

He later added:

The Act came in in May [2018], so we could not do anything before May, and it has been a considerable amount of work. Our intention was to try to do them by exit day; it was pretty clear quite early on that we could not. If you look at the Russia piece of legislation for later today, it is 100 pages and probably four or five months'-worth of work just on that one piece of legislation.<sup>14</sup>

**10. We welcome the FCO's diligence in ensuring that there would not have been a gap in UK sanctions regimes if the UK had left the EU with no deal in March or April 2019. We also recognise the technical complexity of this process and the hard work of the FCO's sanctions team in completing this task against a strict deadline. We are concerned, however, that vital elements of this work were completed mere days before that deadline. Given that the SI process has evidently taken up the vast majority of the FCO's capacity on sanctions over the last year, we question whether sufficient resources have been allocated to a policy area that is essential to the UK's role in upholding the rules-based international system.**

### ***UK power to implement Magnitsky sanctions***

11. Since SAML A received Royal Assent in May 2018, we have repeatedly asked Government representatives whether the UK has the power to make and implement its own sanctions on individuals accused of human rights violations while it is still a member

10 The FCO set out this process in more detail in paras 50-55 of its written evidence to this inquiry: Foreign and Commonwealth Office ([FSP0015](#)).

11 Mr Rasheed told us that there were 15 sanctions regimes that had not yet been rolled over, but that the FCO was confident these could be replicated based on retained EU law, rather than requiring secondary legislation, in a no-deal scenario. The Minister said that some individual designations might not be carried over if they did not meet the threshold of evidence set by SAML A, but said these were "one or two cases" only. [Qq405-414](#).

12 [Q413](#)

13 [Qq406-407](#)

14 [Q411](#)

of the EU (and during any possible implementation period after exit). As the table below demonstrates, the answers we have received have been at best unclear, and at worst have appeared to contradict one another outright.

**Table 1: Government responses on UK Magnitsky powers**

Witness	Date	Comments
The Rt Hon Jeremy Hunt MP, Foreign Secretary	31 October 2018	The Magnitsky legislation, which is obviously in the Sanctions and Anti-Money Laundering Act, does not come into force until we have control of our own trade policy, which is obviously a post-Brexit measure.
Sir Simon McDonald, Permanent Under-Secretary at the FCO	13 November 2018	We have looked into this since the Foreign Secretary's evidence session and, as you say, the Bill is now an Act, but the SIs that are needed to implement the Act are not yet in place. It will be some months before the full structure is in place... there are a group of SIs in support of the Act, which will take some time to put in place. My understanding is that that time cannot be before the end of March next year, so in effect it is the same thing [as saying the UK cannot use Magnitsky powers before exiting the EU].
Mr Qudsi Rasheed, Head of Sanctions at the FCO	14 May 2019	What we are saying is that there are some limitations by virtue of being an EU member state; there are questions around EU competence and the duty of sincere co-operation. Those are precisely some of the issues that we are trying to resolve at the moment, before we can bring forward any proposals.

Sources: Oral evidence taken on 31 October 2018, [HC 538](#), Q357; Oral evidence taken on 13 November 2019, [HC 1711](#), Qq162-174; [Q425](#)

12. William Browder, CEO of Hermitage Capital Management, sent a written submission on this question authored by Tim Otty QC, of Blackstone Chambers and Maya Lester QC, of Brick Court Chambers. Mr Otty and Ms Lester concluded:

The use of Magnitsky powers does not seem to us to conflict with EU law. The fact that the EU does not itself have a "Magnitsky list" does not mean that the UK is somehow breaching EU law by doing so, indeed the EU regularly imposes sanctions on regimes / individuals for undermining human rights and the rule of law. We have not seen it suggested that the Magnitsky powers are inconsistent with EU law, nor on what basis this could be the case... For those reasons, in our view there is no legal impediment to the "Magnitsky powers" in the Sanctions & Money Laundering Act 2018 being brought into force before the United Kingdom leaves the European Union.<sup>15</sup>

13. When Ms Lester appeared before the Committee, we asked her to elaborate on her views regarding whether the UK could legally impose Magnitsky sanctions while still an EU member state.<sup>16</sup> Asked why Estonia, Latvia and Lithuania have their own Magnitsky legislation and have designated lists of individuals under those laws, she said:

They are, indeed, taking the view that there is nothing stopping an individual member state from imposing sanctions unconnected with the regime for human rights abuses—in colloquial terms, from having their own Magnitsky list, even when the EU does not have one. My joint legal opinion, which you have seen, is that there is nothing legally stopping us from doing that either. My understanding, but I might be wrong about this, is that the Foreign and Commonwealth Office do not disagree with that, but you will have to ask them... I don't understand there to be a principled or legal objection to starting to have UK listings, even if we are still a member state.<sup>17</sup>

14. Asked whether she thought the FCO might be dragging its feet deliberately, Ms Lester said:

I have no idea. You will have to see what they say about this, but my understanding is that at this stage there is not a principled objection to beginning these designations now. It has simply been a question of time pressure—they have prioritised doing what they have to do in a very compressed time period to prepare for a potential no-deal scenario, but they will come on to this. My understanding of the Foreign Office's position is different from the Committee's, so it might be useful to clarify with them whether their view now is that they simply cannot do this, or whether they have not had time to do it.<sup>18</sup>

15. We asked Sir Alan Duncan whether the uncertainty around whether the UK can implement Magnitsky sanctions resulted from a political decision to de-prioritise or avoid introducing them. He said that

it is more about the legal preparation and the legal work that needs to be done through the resources that we have—who have been going full tilt, and still are, as we will see with the Russian SI later—to put all this in place. We are not going slow for any reason other than the burden of work.<sup>19</sup>

Later in the session, Sir Alan added:

I point out that we have had to go on a bit of a journey of working out what we can and can't do, as the whole Brexit process and debate has unfolded. Working out quite what we would be able to do autonomously, given what may or may not be happening with the process of withdrawal, has been something we have had to have the lawyers on in some considerable depth.<sup>20</sup>

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16 [Qq362–374](#)

17 [Q368](#)

18 [Q374](#)

19 [Q419](#)

20 [Q425](#)

Sir Alan then committed to sharing with the Committee the legal advice on which the Government has based its assessment, which he said had been drawn up after consultation with internal (but no external) legal expertise.<sup>21</sup> In a letter sent to the Committee on 29 May, he promised to write to us on this matter “in due course”.<sup>22</sup>

16. **In oral evidence, the Minister of State noted that SAMLA requires the Government to lay before Parliament an annual report on human rights sanctions, “as soon as reasonably practicable after the end of each reporting period”. The first reporting period ended on 22 May 2019, a year after SAMLA received Royal Assent. In his follow up letter of 29 May, the Minister of State committed to laying this report in June. We expect him to do so.**

17. **The Government has repeatedly failed to give the Committee clear answers about whether the UK can adopt and implement Magnitsky-style sanctions against individuals who have committed human rights abuse while it is still a member of the EU, and during any potential implementation period following UK withdrawal from the EU. We accept that there is legal debate around these questions and were somewhat reassured to learn that the Government’s incoherent responses to our questioning reflect the fact that it has not yet arrived at a settled legal position, rather than a deliberate political choice to delay the use of Magnitsky legislation. In our view, however, the Government’s obfuscation has damaged the UK’s credibility in the international community and risks signalling to human rights abusers that the UK is reluctant to use its powers to sanction them.**

18. *The Government must rectify its mistakes as soon as possible by agreeing on a clear legal position regarding the UK’s ability to adopt and implement Magnitsky sanctions while still an EU member and during any possible post-Brexit implementation period. We call on the FCO to publish that position either in a letter to the Committee or in its response to this report. In any event it should do so before the end of June: the Government’s confusion in this area has dragged on for too long.*

19. **The Home Office has not provided a list of people who are prevented from entering the UK as sanctioned individuals. In particular it has not published the names of those to whom entry visas are denied by virtue of their involvement in human rights abuses, money laundering and corruption. We believe it would be far more effective to publish this list so as to demonstrate beyond doubt the UK’s commitment to the rule of law.**

### **Conflicting assertions on co-operation**

20. **The Government has asserted that it aims to maintain close co-operation with the EU on sanctions policy after Brexit, although it has thus far been vague on details about how that co-operation might work in practice.<sup>23</sup> The desire to ensure continued co-operation echoes the overwhelming majority of our witnesses, who emphasised that sanctions are**

21 [Qq426–431](#)

22 Foreign and Commonwealth Office ([FSP0020](#))

23 Department for Exiting the European Union, [Foreign policy, defence and development - a future partnership paper](#), 12 September 2017, p 18; [Government response to House of Lords EU External Affairs Sub-Committee report on “Post-Brexit Sanctions”](#), 8 February 2018, p 3; Foreign and Commonwealth Office ([FSP0015](#))

by far the most effective when closely co-ordinated and implemented with allies.<sup>24</sup> It also reflects the conclusions of our 2018 report on *Moscow's Gold: Russian corruption in the UK*.<sup>25</sup> Asked what structures have been put in place to facilitate post-Brexit co-operation, Sir Alan re-iterated the Government's desire to co-operate closely with the EU and other allies, although he conceded that talks have not yet begun on precisely how that will be organised post-Brexit.<sup>26</sup>

21. Asked whether the UK might adopt a more aggressive autonomous sanctions regime against certain actors after Brexit, Sir Alan said:

I don't think I am going to make judgments of that sort in this Committee on the hoof. That has to be a considered matter of policy through the National Security Council, and should be debated in Parliament. I am not going to redesign sanctions priorities at the flick of a switch today.<sup>27</sup>

Later in the session, however, Sir Alan said that

if we were to apply our autonomous sanctions, when we are able, we could strike out differently from the way we behaved, or were able to behave, within the EU. It is possible that we could determine our sanctions to be tougher or more individually focused if we so chose.<sup>28</sup>

**22. Sanctions are most effective when applied multilaterally. We therefore welcome the Government's commitment to co-operate as closely as possible with the EU and other allied nations on sanctions policy after Brexit. We also accept in principle that there may be circumstances under which it would be appropriate for the UK to enact tougher sanctions on its own, particularly given the UK's leverage as a global financial services hub. We are deeply concerned, however, that three years after the referendum so little high-level thought appears to have gone into considering the UK's strategy and policy approach to these issues. What are the costs and benefits of divergence on key sanctions regimes? How can the UK make the most of its power in financial services? Where do UK interests most closely align with those of our key international partners? How will we influence their decision-making in future? We have seen no evidence that the FCO or wider Government have even begun to explore these questions.**

**23. *Sanctions are too essential to the preservation of the rules-based international system and the defence of our national interests to be treated as an afterthought. The National Security Council (NSC) must designate sanctions strategy to be an urgent priority and must allocate time and resources accordingly. We call on the NSC to begin an urgent review of UK sanctions strategy, consulting both internal Government stakeholders and external experts, and to report its findings to Parliament by the end of 2019.***

24 Professor Paul James Cardwell ([FSP0007](#)); europeansanctions.com ([FSP0014](#)); Royal United Services Institute ([FSP0012](#)); UK Finance ([FSP0008](#)); Mr Neil Whiley ([FSP0002](#)); Dr Erica Moret ([FSP0004](#)); Dr Matthew Moran ([FSP0003](#))

25 Foreign Affairs Committee, Eighth Report of Session 2017–19, [Moscow's Gold: Russian Corruption in the UK](#), HC 932, para 30

26 [Q437](#)

27 [Q423](#)

28 [Q489](#)

## 2 Cross-Government co-ordination

### A fragmented system

24. The fragmented and dispersed nature of sanctions policy across Whitehall may be another factor contributing to the absence of a clear Government strategy. In a written submission, for example, the United Nations Association in the UK warned that “Without a cross-departmental strategy, supported by a joint unit or similar, sanctions policy risks becoming piecemeal and reactive.”<sup>29</sup>

25. Although the Foreign and Commonwealth Office is responsible for sanctions policy making, implementation and enforcement fall to a number of different Government departments, including the Home Office, the Department for International Trade, the Department for Business, Energy and Industrial Strategy, and the Department for Transport.<sup>30</sup> Since 2017, financial sanctions have been implemented and enforced by the Office of Financial Sanctions Implementation (OFSI), which is based in HM Treasury.<sup>31</sup> Qudsi Rasheed, the FCO’s Sanctions Envoy, explained further in oral evidence:

There is a cross-Government board of senior officials that sits on a periodic basis to look at questions such as the sanctions Bill as it went through Parliament, the drafting of legislation, and difficult or controversial issues. Pretty much every Department that works on sanctions is represented on that board, including the NCA and others.<sup>32</sup>

### Cross-Whitehall confusion

26. The cross-Whitehall nature of sanctions policy implementation can lead to confusion and can make the area difficult to manage for NGOs and private sector bodies who must navigate sanctions regimes in order to avoid breaking the law. In the case of humanitarian licensing to allow NGOs to move money across borders where local banks may be sanctioned, for example, Dr Justine Walker of UK Finance told us:

These are all cross-cutting issues. They don’t sit with any one Department. You can go and have a very good conversation with DFID, and they will be very sympathetic, and then you say to them, “Well, why are you not providing an up-front licence to the programmes you are funding? Why are you not using the tools that are available to you?” They say, “Well, do we have to?” Then you will speak to OFSI, the sanctions enforcement body, and you will ask them to issue guidance on this, and they will be very reluctant to issue detailed guidance, because they are worried that people will then look to evade it.

You will then ask the Foreign and Commonwealth Office, and they will say, “Well, our sanctions are designed to change the behaviour of the Government of Syria and to ensure that they are not using chemical weapons on their

29 United Nations Association - UK ([FSP0011](#))

30 Foreign and Commonwealth Office ([FSP0015](#)); United Nations Association - UK ([FSP0011](#))

31 Foreign and Commonwealth Office ([FSP0015](#))

32 [Q451](#)

people and innocent civilians.” So the foreign policy objective is very clearly what is driving their viewpoint, but they are then not focusing on the wider objectives that we also have, of getting money in.<sup>33</sup>

27. Qudsi Rasheed told us that there is “quite a good system of co-operation” between Government departments on sanctions.<sup>34</sup> Asked how he might change the system to improve coherence, he said

It is probably slightly premature to give recommendations at this stage. One of the challenges you always have in this area is that, although there is an instinct towards integration being better because we are more joined up, actually, in the area of sanctions, there is quite a lot of different expertise. You have the policy design and objective, which sits with the Foreign Office; you have the implementation, which probably sits with line Departments in different ways; and then you have enforcement, which sits with other Departments, such as the NCA and HMRC at times. It is that balance between the two.<sup>35</sup>

Sir Alan Duncan, meanwhile, lauded what he described as “very close cross-Whitehall co-operation” on sanctions and said that he had not come across any “argy-bargy” or “territorial defensiveness” between different Whitehall departments.<sup>36</sup>

**28. As economic tools of foreign policy, sanctions necessarily require the input of experts across several Government departments and close co-operation to ensure effective implementation. While we welcome the Government’s assurances that co-operation between departments is currently working well, we believe there is room for improvement, which should in turn support the development of a more coherent overall strategy on sanctions. In particular we believe it would benefit Government coherence to have a single senior civil servant primarily based in the FCO who is accountable for sanctions policy and implementation. *The Government should appoint a Senior Responsible Officer (SRO) for sanctions policy who will be personally accountable to the National Security Council.***

### ***Improving the Office of Financial Sanctions Implementation***

29. The Treasury Select Committee assessed the performance of OFSI to date in its March 2019 report on *Economic Crime - Anti-money laundering supervision and sanctions implementation*.<sup>37</sup> The Committee concluded that it was “necessary for the Government to review the effectiveness of OFSI”, and called on the Government to conduct such a review in 2019, two years after OFSI became operational.<sup>38</sup> The Government did not agree to implement that recommendation.<sup>39</sup>

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33 [Q19](#)

34 [Q450](#)

35 [Q452](#)

36 [Q455](#)

37 Treasury Committee, Twenty-Seventh Report of Session 2017–19, [Economic Crime - Anti-money laundering supervision and sanctions implementation](#), HC 2010, paras 205-213

38 Treasury Committee, Twenty-Seventh Report of Session 2017–19, [Economic Crime - Anti-money laundering supervision and sanctions implementation](#), HC 2010, para 213

39 Treasury Committee, Eleventh Special Report of Session 2017–19, [Government Response to the Committee’s Twenty-Seventh Report: Economic Crime - Anti-money laundering supervision and sanctions implementation](#), HC 2187

30. In a written submission to this inquiry, Tom Keatinge and Emil Dall of RUSI wrote that OFSI “has yet to show its full potential in terms of being a central coordinating body for sanctions guidance, implementation and monitoring”, and that “this needs to change”.<sup>40</sup> Mr Keatinge expanded on this assessment in oral evidence and compared OFSI unfavourably to its US counterpart, the Office of Financial Assets Control (OFAC). He told us that

looking at it over time the US has made a strategic application of sanctions as part of the financial hegemony it has enjoyed until relatively recently and continues to some extent to enjoy now. If we are going to be global Britain and so on, the question that needs to be answered is how we are going to use our central position in the global financial sector. How are we going to make people be as concerned about OFSI as they are by OFAC? To me, that is a question we have not answered.<sup>41</sup>

31. Maya Lester QC agreed that “could do better” was “probably the general feeling” about OFSI’s performance, although she cautioned that it has only been operational for a short time.<sup>42</sup> Given the opportunity that the establishment of this new agency might have provided for the Government to engage more effectively with financial institutions, lawyers and others involved in implementing sanctions, she highlighted a “great deal of frustration on the part of the private sector with the lack of real proactive engagement on sanctions enforcement”.<sup>43</sup>

32. We presented these criticisms to Sir Alan Duncan and asked if he was satisfied with OFSI’s performance. He said:

I don’t really think that I am in a position to judge; I think it is for others. It is a Treasury body, not a Foreign Office one. It is money rather than conduct, if you like... I don’t think I know one way or the other, so the premise, of course, is yes.<sup>44</sup>

We also asked the Minister and the FCO Sanctions Envoy, Qudsi Rasheed, whether the Government had considered creating a single body with responsibility for both designing and implementing financial sanctions, following the model of OFAC in the United States. Mr Rasheed said that questions about whether a single body would be better or worse are “definitely the right questions to ask”, but that it would be “premature” to come to a judgment before weighing the arguments on both sides.<sup>45</sup> Asked for his view, Sir Alan said:

I am sure some clever person will come up with a plan to improve [the current structures] and we will say, “We should have thought of that,” and we will improve it, but at the moment I would say it is in a pretty good condition.<sup>46</sup>

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40 Royal United Services Institute ([FSP0012](#))

41 [Q7](#)

42 [Q383](#)

43 [Q382](#)

44 [Qq461–462](#)

45 [Qq453–454](#)

46 [Q456](#)

*33. Two years after the Office of Financial Sanctions Implementation (OFSI) became operational, reviews of its performance so far have been mixed at best. We agree with the Treasury Select Committee that the Government should now review the effectiveness of OFSI, and we regret that the Government has not yet taken up that Committee's recommendation. That review should establish and assess the potential costs and benefits of placing responsibility for financial sanctions design and implementation within a single body, as opposed to the current bifurcated system, and should come to a judgment on whether that should be done. The review should also address as a matter of urgency how OFSI can improve its engagement with the private sector bodies on the front line of sanctions implementation, including through consultation with those bodies. We urge the Government to complete and publish this review before the end of 2019.*

## 3 Sanctions and stopping dirty money

### Sanctions and Anti-Money Laundering: closing the gap

34. As we stated in our report on *Moscow's Gold: Russian corruption in the UK*, money laundering is a foreign policy issue: it allows those who would do harm to the UK to hide their ill-gotten wealth and obscure their sources of financial support.<sup>47</sup> These individuals use increasingly sophisticated and untraceable methods to launder their dirty money and to evade the attention of UK law enforcement agencies. Carefully targeted sanctions against individuals who are known associates of corrupt regimes can therefore provide one tool in the Government's overall toolbox for combatting dirty money, although as Maya Lester QC warned the Committee, individuals should not be sanctioned on the basis of "untested, uncorroborated" allegations that would not meet standards of evidence for criminal prosecution.<sup>48</sup>

35. We were therefore surprised by the FCO's insistence that sanctions and anti-money laundering (AML) policies are strictly separate and should be kept that way. Qudsi Rasheed told us that "at the moment we draw quite a distinction between sanctions policy and AML dirty money policy in Government".<sup>49</sup> Sir Alan Duncan confirmed Mr Rasheed's assessment, stating that

if you were asking me about war criminals or something, I could give you a much clearer Foreign Office view. When you are asking me about people who are financial criminals, or who have ill-gotten gains, or something like that, it's not quite our patch.<sup>50</sup>

36. **We recognise that sanctions and anti-money laundering are two distinct policy areas, but there is greater overlap between them than the Government is willing to acknowledge. As our report on *Moscow's Gold: Russian corruption in the UK* argued, the assets laundered in London by hostile and corrupt regimes are used to subvert the rules-based international system, undermine our allies, and erode the mutually-reinforcing international networks that support UK foreign policy. While sanctions should not be used to criminalise individuals against whom there is no evidence of criminal activity, it is simply not good enough for the Minister of State to assert that financial crime is "not quite" the Foreign Office's "patch". The FCO should be able to see that it has a vital role to play in helping to keep the UK and our allies safe by cracking down on the laundering of dirty money.**

47 Foreign Affairs Committee, Eighth Report of Session 2017–19, [Moscow's Gold: Russian Corruption in the UK](#), HC 932, para 45

48 [Q381](#)

49 [Q510](#)

50 [Q509](#)

## Oleg Deripaska's companies: a test case in designing effective sanctions

### *Listing on the London Stock Exchange*

37. En+ Group is an energy firm that, at the time of its initial public offering (IPO) on the London Stock Exchange in November 2017, was controlled by Kremlin associate Oleg Deripaska. En+, in turn, held a controlling stake in Rusal, a major Russian aluminium firm. VTB Capital and Gazprombank—both subject to sanctions since 2014—were among the banks involved in the listing.<sup>51</sup> In our *Moscow's Gold: Russian corruption in the UK* report, we raised questions regarding the appropriateness of the listing, and how it was permitted to go ahead.<sup>52</sup>

38. The Treasury Select Committee also explored the listing of En+ on the London Stock Exchange (LSE) in its recent report on *Economic Crime*.<sup>53</sup> In evidence to that Committee, the Director of OFSI, the Director of Specialist Supervision at the Financial Conduct Authority and the Economic Secretary to the Treasury all emphasised that the FCA (which was ultimately responsible for allowing the listing) acted correctly within its remit and followed all proper procedures.<sup>54</sup> The Committee concluded that the listing occurred “due to a weakness in sanctions policy, not implementation”, because “while the proposed listing was carefully analysed given its sensitivities, the narrowness of the sanctions regime meant that the listing could not be blocked”.<sup>55</sup>

39. The Economic Secretary to the Treasury also told the Treasury Committee that there should be a power for the Government to block a listing on national security grounds.<sup>56</sup> The Government confirmed in its response to the Committee's report that it is currently investigating whether such a power would be appropriate, and promised to undertake a full consultation.<sup>57</sup>

**40. The listing of En+ on the London Stock Exchange in 2017 is a clear example of the risks inherent in the Government's fragmented approach to sanctions design and implementation. Although the involvement of an individual such as Oleg Deripaska may have raised red flags at the FCO and elsewhere, there was evidently no mechanism for those concerns to be conveyed, and no requirement for the Financial Conduct Authority to consult national security experts. Nor would it be reasonable to expect a body such as the FCA to recognise a potential national security threat on its own and act to block a listing accordingly, even if it had the power to do so.**

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51 For more information see [Qq114–121](#)

52 Foreign Affairs Committee, Eighth Report of Session 2017–19, [Moscow's Gold: Russian Corruption in the UK](#), HC 932, paras 15–21

53 Treasury Committee, Twenty-Seventh Report of Session 2017–19, [Economic Crime – Anti-money laundering supervision and sanctions implementation](#), HC 2010, paras 214–223

54 Treasury Committee, Twenty-Seventh Report of Session 2017–19, [Economic Crime – Anti-money laundering supervision and sanctions implementation](#), HC 2010, paras 218–220

55 Treasury Committee, Twenty-Seventh Report of Session 2017–19, [Economic Crime – Anti-money laundering supervision and sanctions implementation](#), HC 2010, para 222

56 Treasury Committee, Twenty-Seventh Report of Session 2017–19, [Economic Crime – Anti-money laundering supervision and sanctions implementation](#), HC 2010, para 223

57 Treasury Committee, Eleventh Special Report of Session 2017–19, [Government Response to the Committee's Twenty-Seventh Report: Economic Crime – Anti-money laundering supervision and sanctions implementation](#), HC 2187

41. *We welcome the Government's confirmation that it is exploring the possibility of introducing a way to block a listing on national security grounds, and that it intends to set out a robust justification for the power, the scenarios in which it could be used, how the power would work in practice, and the timing of the new legislation. As part of this work, we call on the Government to consider what role the National Security Council and its secretariat should play in the use of this power, and how best to formalise links between the Government departments responsible for sanctions and arms-length bodies including the FCA. We will follow this process closely and we ask the Government to update us on its progress in its response to this report.*

### **De-listing in the USA**

42. On 6 April 2018, the US used the Countering America's Adversaries Through Sanctions Act (CAATSA) to impose sanctions on seven Russian oligarchs and their associated companies, and seventeen Russian officials. These included Oleg Deripaska and En+ Group, in which Deripaska held a controlling stake. Between April 2018 and December 2019, the then non-executive Chair of the Board of En+, Lord Barker of Battle, led efforts to conclude a framework agreement with OFAC that would enable En+ Group to be de-listed from sanctions in exchange for major restructuring and corporate governance changes that would reduce Deripaska's ownership stake and influence.<sup>58</sup> OFAC notified Congress of its intention to lift the sanctions on En+ Group on 19 December 2018, and formally did so on 27 January 2019.

43. Lord Barker and lawyer William McGlone, who assisted with the restructuring effort, stressed to us in oral evidence that the de-listing of En+ was the result of "a regulatory process and a legal process", and that OFAC was "a very rigid, rigorous and careful office" that "looked at this in great detail and imposed very strict requirements".<sup>59</sup> They also emphasised that the de-listing of En+ Group might serve as a model for the future, since it demonstrated how to remove a designated individual from control of a company to the point where that company would no longer need to be subject to sanctions.<sup>60</sup>

44. Maya Lester QC echoed this view, stating:

OFAC are very aggressive in this field. I do not use that word pejoratively, but if there were ever an agency that was interested in enforcing sanctions and making sure there was no level of ownership or control, it would be OFAC. On the level of detail in the agreement and the ongoing monitoring by which they try to ensure that what you have said is the case is not the case, I have never seen anything like it before. Of course, it could be the case that the wool has absolutely been pulled over OFAC's eyes, and that even though every phone call and meeting is reported to them, something entirely different is going on. I have no knowledge of whether that is true or not. All I am saying is that the most aggressive agency is looking at it. There is a separate firm of auditors looking at this on an ongoing basis. That level of detailed scrutiny has never happened before as far as I know.<sup>61</sup>

58 For details of the corporate restructuring, please see the written submission by Lord Barker of Battle, Executive Chairman of En+ Group ([FSP0017](#)) and the Committee's oral evidence session with Lord Barker, [Qq88-361](#)

59 [Q252](#)

60 [Qq287-288](#)

61 [Q391](#)

45. We asked Sir Alan Duncan and Qudsi Rasheed for their views on the OFAC process. Mr Rasheed told us:

The way we saw it was that the fact that the US system had in place such stringent conditions on Deripaska's shareholding of those companies and the supervision that OFAC had over them showed that it was a positive outcome. From our perspective, we simply take what the US have said about it, which is, "We are going after Oleg Deripaska for his behaviour and we are going after En+ and Rusal because of their association with Oleg Deripaska." So the US were obviously satisfied, according to their standards, which are quite high, that those two companies were no longer sufficiently associated with Oleg Deripaska.<sup>62</sup>

There was no indication, however, that UK policymakers had followed the En+ Group case very closely or had learned any lessons from it with respect to the design of future sanctions.

46. We also asked Sir Alan to share with us the guidelines that OFSI uses to determine that a legal person or entity is "controlled" by another legal person or entity. He did so in a letter of 29 May.<sup>63</sup> The criteria are broadly legalistic in nature, focusing on the formal rights that any legal person or entity may have over another. As Dr Justine Walker of UK Finance noted in oral evidence to this inquiry, however:

If you are talking about a regime such as Russia, we have found that defining ownership is incredibly complex—ownership is the 50% threshold—but control is even more so. Somebody may sell their shares and step away from their ownership, but are they really still pulling the strings on decision making?<sup>64</sup>

The current criteria are based on EU guidelines, but the Government has not indicated, including in oral evidence to this inquiry, that it is considering making any changes after the UK leaves the EU.

**47. The listing and subsequent de-listing of En+ Group by OFAC highlights several issues that the UK must consider carefully in redesigning and implementing future sanctions. We are not certain that the outcome of the de-listing process takes sufficient account of the nature of the relationship between oligarchs such as Oleg Deripaska and the Russian state as we outlined in our 2018 Moscow's Gold report. Nor are we convinced that the UK's current definition of "control" over a company or legal entity can encompass the informal and non-transparent relationship networks underpinning the Kremlin's activities.**

**48. Combating the activities of autocratic and hostile regimes such as Russia, without compromising our own adherence to the rule of law, constitutes one of the most complex and daunting challenges that we face in our efforts to preserve the rules-based international system. This is precisely the type of difficult problem with which the Government should be grappling in its efforts to develop a clear and coherent strategy**

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62 [Q487](#)

63 Foreign and Commonwealth Office ([FSP0020](#))

64 [Q23](#)

**for sanctions policy after the UK leaves the EU, especially given the importance of London to the international financial system. It is disheartening that we have seen no evidence that any such efforts have yet taken place.**

## Towards global leadership on sanctions

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49. Sanctions will be more directly affected by the UK's departure from the EU than almost any other foreign policy tool. As the UK prepares to take responsibility for designing, implementing and enforcing sanctions on its own, we hoped to discover that the FCO and wider Government had a strong sense of its goals and strategic priorities for the use of these tools. We also hoped to find that serious thought had gone into the best way to ensure co-ordination and coherence across Government given the number of departments and bodies involved in sanctions implementation. Instead, we have learned that the Government has spent the last two years running as fast as it can just to stay in the same place.

50. We believe the time is right for a major review of the Government's approach to sanctions at every stage: overall strategic goals, policy planning and formation, implementation and enforcement. As this report has set out, any sanctions strategy must be supported by coherent and co-ordinated Government structures, coupled with more effective engagement with the private sector bodies on the front lines of sanctions compliance.

51. The centrality of sanctions to the preservation and functioning of the rules-based international system cannot be overstated. As a champion of that system, the UK cannot afford the risk of allowing its sanctions policy to be dictated by the decisions of others. Instead, the UK must seize the opportunity to become a global leader in sanctions policy and must aim to set the international gold standard for strategy, design and implementation. We hope the Government will take this warning to heart and look forward to following its progress closely.

## Conclusions and recommendations

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### Lack of clear Government strategy

1. We welcome the FCO's diligence in ensuring that there would not have been a gap in UK sanctions regimes if the UK had left the EU with no deal in March or April 2019. We also recognise the technical complexity of this process and the hard work of the FCO's sanctions team in completing this task against a strict deadline. We are concerned, however, that vital elements of this work were completed mere days before that deadline. Given that the SI process has evidently taken up the vast majority of the FCO's capacity on sanctions over the last year, we question whether sufficient resources have been allocated to a policy area that is essential to the UK's role in upholding the rules-based international system. (Paragraph 10)
2. In oral evidence, the Minister of State noted that SAMLA requires the Government to lay before Parliament an annual report on human rights sanctions, "as soon as reasonably practicable after the end of each reporting period". The first reporting period ended on 22 May 2019, a year after SAMLA received Royal Assent. In his follow up letter of 29 May, the Minister of State committed to laying this report in June. We expect him to do so. (Paragraph 16)
3. The Government has repeatedly failed to give the Committee clear answers about whether the UK can adopt and implement Magnitsky-style sanctions against individuals who have committed human rights abuse while it is still a member of the EU, and during any potential implementation period following UK withdrawal from the EU. We accept that there is legal debate around these questions and were somewhat reassured to learn that the Government's incoherent responses to our questioning reflect the fact that it has not yet arrived at a settled legal position, rather than a deliberate political choice to delay the use of Magnitsky legislation. In our view, however, the Government's obfuscation has damaged the UK's credibility in the international community and risks signalling to human rights abusers that the UK is reluctant to use its powers to sanction them. (Paragraph 17)
4. *The Government must rectify its mistakes as soon as possible by agreeing on a clear legal position regarding the UK's ability to adopt and implement Magnitsky sanctions while still an EU member and during any possible post-Brexit implementation period. We call on the FCO to publish that position either in a letter to the Committee or in its response to this report. In any event it should do so before the end of June: the Government's confusion in this area has dragged on for too long.* (Paragraph 18)
5. The Home Office has not provided a list of people who are prevented from entering the UK as sanctioned individuals. In particular it has not published the names of those to whom entry visas are denied by virtue of their involvement in human rights abuses, money laundering and corruption. We believe it would be far more effective to publish this list so as to demonstrate beyond doubt the UK's commitment to the rule of law. (Paragraph 19)
6. Sanctions are most effective when applied multilaterally. We therefore welcome the Government's commitment to co-operate as closely as possible with the EU and

other allied nations on sanctions policy after Brexit. We also accept in principle that there may be circumstances under which it would be appropriate for the UK to enact tougher sanctions on its own, particularly given the UK's leverage as a global financial services hub. We are deeply concerned, however, that three years after the referendum so little high-level thought appears to have gone into considering the UK's strategy and policy approach to these issues. What are the costs and benefits of divergence on key sanctions regimes? How can the UK make the most of its power in financial services? Where do UK interests most closely align with those of our key international partners? How will we influence their decision-making in future? We have seen no evidence that the FCO or wider Government have even begun to explore these questions. (Paragraph 22)

7. *Sanctions are too essential to the preservation of the rules-based international system and the defence of our national interests to be treated as an afterthought. The National Security Council (NSC) must designate sanctions strategy to be an urgent priority and must allocate time and resources accordingly. We call on the NSC to begin an urgent review of UK sanctions strategy, consulting both internal Government stakeholders and external experts, and to report its findings to Parliament by the end of 2019.* (Paragraph 23)

### Cross-Government co-ordination

8. As economic tools of foreign policy, sanctions necessarily require the input of experts across several Government departments and close co-operation to ensure effective implementation. While we welcome the Government's assurances that co-operation between departments is currently working well, we believe there is room for improvement, which should in turn support the development of a more coherent overall strategy on sanctions. In particular we believe it would benefit Government coherence to have a single senior civil servant primarily based in the FCO who is accountable for sanctions policy and implementation. *The Government should appoint a Senior Responsible Officer (SRO) for sanctions policy who will be personally accountable to the National Security Council.* (Paragraph 28)
9. *Two years after the Office of Financial Sanctions Implementation (OFSI) became operational, reviews of its performance so far have been mixed at best. We agree with the Treasury Select Committee that the Government should now review the effectiveness of OFSI, and we regret that the Government has not yet taken up that Committee's recommendation. That review should establish and assess the potential costs and benefits of placing responsibility for financial sanctions design and implementation within a single body, as opposed to the current bifurcated system, and should come to a judgment on whether that should be done. The review should also address as a matter of urgency how OFSI can improve its engagement with the private sector bodies on the front line of sanctions implementation, including through consultation with those bodies. We urge the Government to complete and publish this review before the end of 2019.* (Paragraph 33)

## Sanctions and stopping dirty money

10. We recognise that sanctions and anti-money laundering are two distinct policy areas, but there is greater overlap between them than the Government is willing to acknowledge. As our report on *Moscow's Gold: Russian corruption in the UK* argued, the assets laundered in London by hostile and corrupt regimes are used to subvert the rules-based international system, undermine our allies, and erode the mutually-reinforcing international networks that support UK foreign policy. While sanctions should not be used to criminalise individuals against whom there is no evidence of criminal activity, it is simply not good enough for the Minister of State to assert that financial crime is “not quite” the Foreign Office’s “patch”. The FCO should be able to see that it has a vital role to play in helping to keep the UK and our allies safe by cracking down on the laundering of dirty money. (Paragraph 36)
11. The listing of En+ on the London Stock Exchange in 2017 is a clear example of the risks inherent in the Government’s fragmented approach to sanctions design and implementation. Although the involvement of an individual such as Oleg Deripaska may have raised red flags at the FCO and elsewhere, there was evidently no mechanism for those concerns to be conveyed, and no requirement for the Financial Conduct Authority to consult national security experts. Nor would it be reasonable to expect a body such as the FCA to recognise a potential national security threat on its own and act to block a listing accordingly, even if it had the power to do so. (Paragraph 40)
12. *We welcome the Government’s confirmation that it is exploring the possibility of introducing a way to block a listing on national security grounds, and that it intends to set out a robust justification for the power, the scenarios in which it could be used, how the power would work in practice, and the timing of the new legislation. As part of this work, we call on the Government to consider what role the National Security Council and its secretariat should play in the use of this power, and how best to formalise links between the Government departments responsible for sanctions and arms-length bodies including the FCA. We will follow this process closely and we ask the Government to update us on its progress in its response to this report.* (Paragraph 41)
13. The listing and subsequent de-listing of En+ Group by OFAC highlights several issues that the UK must consider carefully in redesigning and implementing future sanctions. We are not certain that the outcome of the de-listing process takes sufficient account of the nature of the relationship between oligarchs such as Oleg Deripaska and the Russian state as we outlined in our 2018 *Moscow's Gold* report. Nor are we convinced that the UK’s current definition of “control” over a company or legal entity can encompass the informal and non-transparent relationship networks underpinning the Kremlin’s activities. (Paragraph 47)
14. Combating the activities of autocratic and hostile regimes such as Russia, without compromising our own adherence to the rule of law, constitutes one of the most complex and daunting challenges that we face in our efforts to preserve the rules-based international system. This is precisely the type of difficult problem with which the Government should be grappling in its efforts to develop a clear and coherent

strategy for sanctions policy after the UK leaves the EU, especially given the importance of London to the international financial system. It is disheartening that we have seen no evidence that any such efforts have yet taken place. (Paragraph 48)

### Towards global leadership on sanctions

15. Sanctions will be more directly affected by the UK's departure from the EU than almost any other foreign policy tool. As the UK prepares to take responsibility for designing, implementing and enforcing sanctions on its own, we hoped to discover that the FCO and wider Government had a strong sense of its goals and strategic priorities for the use of these tools. We also hoped to find that serious thought had gone into the best way to ensure co-ordination and coherence across Government given the number of departments and bodies involved in sanctions implementation. Instead, we have learned that the Government has spent the last two years running as fast as it can just to stay in the same place. (Paragraph 49)
16. We believe the time is right for a major review of the Government's approach to sanctions at every stage: overall strategic goals, policy planning and formation, implementation and enforcement. As this report has set out, any sanctions strategy must be supported by coherent and co-ordinated Government structures, coupled with more effective engagement with the private sector bodies on the front lines of sanctions compliance. (Paragraph 50)
17. The centrality of sanctions to the preservation and functioning of the rules-based international system cannot be overstated. As a champion of that system, the UK cannot afford the risk of allowing its sanctions policy to be dictated by the decisions of others. Instead, the UK must seize the opportunity to become a global leader in sanctions policy and must aim to set the international gold standard for strategy, design and implementation. We hope the Government will take this warning to heart and look forward to following its progress closely. (Paragraph 51)

# Formal minutes

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**Wednesday 5 June 2019**

Members present:

Tom Tugendhat, in the Chair

Chris Bryant	Andrew Rosindell
Stephen Gethins	Royston Smith
Conor McGinn	Catherine West
Ian Murray	

Draft Report (*Fragmented and incoherent: the UK's sanctions policy*), proposed by the Chair, brought up and read.

*Ordered*, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 51 read and agreed to.

Summary agreed to.

*Resolved*, That the Report be the Seventeenth Report of the Committee to the House.

*Ordered*, That the Chair make the Report to the House.

*Ordered*, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[Adjourned till Tuesday 11 June at 2.15pm]

## Witnesses

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The following witnesses gave evidence. Transcripts can be viewed on the [inquiry publications page](#) of the Committee's website.

### Wednesday 23 January 2019

**Tom Keatinge**, Director, Centre for Financial Crime and Security Studies, Royal United Services Institute, **Dr Justine Walker**, Head of Sanctions Policy, UK Finance

[Q1–25](#)

### Wednesday 13 February 2019

**Bill Browder**, CEO, Hermitage Capital Management

[Q26–87](#)

### Wednesday 27 February 2019

**Lord Barker of Battle** and **William McGlone**, Partner, Latham & Watkins

[Q88–361](#)

### Tuesday 2 April 2019

**Maya Lester QC**, Brick Court Chambers

[Q362–400](#)

### Tuesday 14 May 2019

**Rt Hon Sir Alan Duncan KCMG MP**, Minister of State, **Qudsi Rasheed**, Head of the Sanctions Unit and the UK's Sanctions Envoy, Foreign and Commonwealth Office

[Q401–529](#)

## Published written evidence

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The following written evidence was received and can be viewed on the [inquiry publications page](#) of the Committee's website.

FSP numbers are generated by the evidence processing system and so may not be complete.

- 1 BICOM ([FSP0010](#))
- 2 Browder, Bill ([FSP0019](#))
- 3 Burma Campaign UK ([FSP0006](#))
- 4 Cardwell, Professor Paul James ([FSP0007](#))
- 5 Embassy of Ukraine, United Kingdom ([FSP0001](#))
- 6 europeansanctions.com ([FSP0014](#))
- 7 Lord Barker of Battle, Executive Chairman of En+ Group ([FSP0017](#))
- 8 Foreign and Commonwealth Office ([FSP0015](#))
- 9 Foreign and Commonwealth Office ([FSP0020](#))
- 10 GML ([FSP0009](#))
- 11 Jewish Leadership Council/Board of Deputies of British Jews ([FSP0005](#))
- 12 The Law Society ([FSP0013](#))
- 13 Moran, Dr Matthew ([FSP0003](#))
- 14 Moret, Dr Erica ([FSP0004](#))
- 15 The National Crime Agency ([FSP0018](#))
- 16 Ratcliffe, Richard – Free Nazanin Campaign ([FSP0016](#))
- 17 Royal United Services Institute ([FSP0012](#))
- 18 UK Finance ([FSP0008](#))
- 19 United Nations Association – UK ([FSP0011](#))
- 20 Whiley, Mr Neil ([FSP0002](#))

## List of Reports from the Committee during the current Parliament

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All publications from the Committee are available on the [publications page](#) of the Committee's website. The reference number of the Government's response to each Report is printed in brackets after the HC printing number.

### Session 2017–19

First Report	Violence in Rakhine State and the UK's response	HC 435
Second Report	The future of UK diplomacy in Europe	HC 514
Third Report	Kurdish aspirations and the interests of the UK	HC 518
Fourth Report	2017 elections to the International Court of Justice	HC 860
Fifth Report	The UK's response to hurricanes in its Overseas Territories	HC 722
Sixth Report	Global Britain	HC 780
Seventh Report	Global Britain and the 2018 Commonwealth Summit	HC 831
Eighth Report	Moscow's Gold: Russian Corruption in the UK	HC 932
Ninth Report	The FCO's preparations for the 2018 World Cup	HC 1011
Tenth Report	Global Britain and the Western Balkans	HC 1013
Eleventh Report	UK arms exports during 2016	HC 666
Twelfth Report	Global Britain: The Responsibility to Protect and Humanitarian Intervention	HC 1005
Thirteenth Report	Global Britain: Human rights and the rule of law	HC 874
Fourteenth Report	Global Britain: FCO Skills	HC 1254
Fifteenth Report	Global Britain and the British Overseas Territories: Resetting the relationship	HC 1464
Sixteenth Report	China and the Rules-Based International System	HC 612
First Special Report	The United Kingdom's relations with Russia: Government Response to the Committee's Seventh Report of Session 2016–17	HC 322
Second Special Report	The UK's relations with Turkey: Government Response to the Committee's Tenth Report of Session 2016–17	HC 333

Third Special Report	'Political Islam', and the Muslim Brotherhood Review: Government Response to the Committee's Eighth Report of Session 2016–17	HC 334
Fourth Special Report	Violence in Rakhine State and the UK's response: Government Response to the Committee's First Report	HC 868
Fifth Special Report	The future of UK diplomacy in Europe: Government response to the Committee's Second Report	HC 918
Sixth Special Report	Kurdish aspirations and the interests of the UK: Government response to the Committee's Third Report	HC 983
Seventh Special Report	2017 elections to the International Court of Justice: Government response to the Committee's Fourth Report	HC 1012
Eighth Special Report	Article 50 negotiations: Implications of "No Deal": Government response to the Committee's Ninth Report	HC 1053
Ninth Special Report	The UK's response to hurricanes in its Overseas Territories: Government response to the Committee's 5th Report	HC 1052
Tenth Special Report	Global Britain: Government response to the Committee's 6th Report	HC 1236
Eleventh Special Report	Global Britain and the 2018 Commonwealth Summit: Government response to the Committee's 7th Report	HC 1427
Twelfth Special Report	Moscow's Gold: Russian Corruption in the UK: Government response to the Committee's 8th Report	HC 1488
Thirteenth Special Report	The FCO's preparations for the 2018 World Cup in Russia: Government response to the Committee's 9th Report	HC 1507
Fourteenth Special Report	Global Britain and the Western Balkans: Government Response to the Committee's Tenth Report	HC 1572
Fifteenth Special Report	Global Britain: The Responsibility to Protect and Humanitarian Intervention: Government response to the Committee's Twelfth Report	HC 1719
Sixteenth Special Report	Global Britain: Human rights and the rule of law: Government response to the Committee's Thirteenth Report	HC 1759
Seventeenth Special Report	Global Britain and the Western Balkans: Supplementary Government response to the Committee's Tenth Report	HC 1760
Eighteenth Special Report	UK arms exports during 2016: Government Response to the Committees' First Joint Report	HC 1789
Nineteenth Special Report	Delivering Global Britain: FCO Skills: Government Response to the Committee's Fourteenth Report	HC 1937

Twentieth Special Report      Global Britain and the British Overseas Territories:  
Resetting the relationship: Government response  
to the Committee's Fifteenth Report      HC 2174