

Overview of the Starvation-Related UK Sanctions Regimes

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The UK Sanctions regimes of relevance to starvation-related conduct are regulated by the Sanctions and Anti-Money Laundering Act 2018 ('Sanctions Act'),¹ which enables the maintenance of existing UN and multilateral sanctions and the creation of new sanctions regimes. Under Chapter 1 of the Sanctions Act, sanctions regulations may be enacted to comply with UN and other international obligations, when they would:

(a) further the prevention of terrorism, in the United Kingdom or elsewhere, (b) be in the interests of national security, (c) be in the interests of international peace and security, (d) further a foreign policy objective of the government of the United Kingdom, (e) promote the resolution of armed conflicts or the protection of civilians in conflict zones, (f) provide accountability for or be a deterrent to gross violations of human rights, or otherwise promote— (i)

compliance with international human rights law, or (ii) respect for human rights, (g) promote compliance with international humanitarian law, (h) contribute to multilateral efforts to prevent the spread and use of weapons and materials of mass destruction, or (i) promote respect for democracy, the rule of law and good governance.²

Similar to the US and Canada, the UK launched in July 2020 its own 'Magnitsky-style' national human rights sanctions programme that provides for state sanctions, including travel bans and asset freezes, against individuals, entities and organisations ('persons') who have committed serious human rights abuses or been involved in significant acts of corruption.³ This programme is labelled the UK Global Human Rights Sanctions ('UK GHRS') regime.⁴ The UK GHRS enables the UK for the first time to unilaterally impose its own human

¹ Sanctions and Anti-Money Laundering Act 2018, <https://www.legislation.gov.uk/ukpga/2018/13/contents>; restrictive measures and sanction may also apply under other UK legislations, such as the Immigration Act 1971 and the Export Control Order 2008. Guidance: UK Sanctions, <https://www.gov.uk/guidance/uk-sanctions>.

² Supra note 1, Chapter 1, 1(2).

³ Explanatory Memorandum to the Global Human Rights Sanctions Regulations 2020, art. 5, https://www.legislation.gov.uk/uksi/2020/680/pdfs/uksiem_20200680_en.pdf.

⁴ Global Human Rights Sanctions Regulations 2020, UK Statutory Instrument 2020 No. 680, <https://www.legislation.gov.uk/uksi/2020/680/2020-07-22>.

rights-based sanctions for activities carried out by State or non-State actors.⁵ It was established pursuant to Section 1 of the Sanctions Act⁶ and has been subsequently regulated by the Global Human Rights Sanctions Regulations 2020.⁷ It has the aim of deterring and providing accountability for “activities which, if carried out by or on behalf of a State, within the territory of that State, would amount to a serious violation by that State of an individual’s [human rights]”.⁸ Sanctions under the UK GHRS may be imposed where an action or an omission, amounting to a serious human rights violation affecting certain rights, is committed either outside the UK, by any person, or in the UK, by a non-UK person.⁹ The human rights protected under the UK GHRS Regulations include:¹⁰

1. the right to life;
2. the right to not be subjected to torture or cruel, inhumane or degrading treatment or punishment; or
3. the right to be free from slavery, not be held in servitude or required to perform forced or compulsory labour, whether or not the activity is carried out by or on behalf of a State.

⁵ Supra note 3, para. 7.2.

⁶ Supra note 3.

⁷ Supra note 4.

⁸ Id. art. 4(2); See also supra note 3, para. 7.2.

⁹ Id. art. 4(3), art. 4(4). Designated persons may include individuals, entities, and organisations. Supra note 3, para. 7.3.

¹⁰ Id. art. 4(2).

Secretary of State

The Secretary of State may designate persons by name for the purposes of an asset-freeze (Regulations 11 to 15) and immigration restrictions (Regulation 17)¹¹ where there are reasonable grounds to believe that the person has been involved in human rights violations or abuses listed above. An “involved person”, as set out by Regulation 6(2) - (3) of the UK GHRS, “is responsible for or engages in such an activity; facilitates, incites, promotes or provides support for such an activity; conceals evidence of such an activity; provides certain goods or services that contribute to such an activity or to a person who is engaged in such an activity; profits or benefits from such an activity; fails to fulfil a duty to investigate such an activity; or contravenes the Regula-

tions. A person is also involved if they are owned or controlled by a person who is or has been so involved, is acting on behalf of or at the direction of a person who is or has been so involved, or is a member of, or associated with, a person who is or has been so involved.”¹²

The asset-freeze ensures a “designated person’s funds and economic resources (non-monetary assets, e.g., property or vehicle) are not dealt with and [ensures] that funds and economic resources are not made available to or for the benefit of a designated person, either directly or indirectly.”¹³ A designation may also entail a travel ban and renders Section 8B of the Immigration Act 1971 applicable to the designated person, who is consequently banned from “travelling to or via the UK and any permission to stay in the UK that they

¹¹ See id.

¹² Policy paper – Global Human Rights Sanctions: consideration of designations, 6 July 2020,

<https://www.gov.uk/government/publications/global-human-rights-sanctions-factors-in-designating-people-involved-in-human-rights-violations/global-human-rights-sanctions-consideration-of-targets#fn:2>.

¹³ Supra note 3, para. 7.4.

¹⁴ Id. para. 7.5.

may have is cancelled.”¹⁴ The UK Treasury Department’s Office for Financial Sanctions Implementation may issue specific licences or exceptions to prohibitions and requirements provided for under the UK GHRS and may, for example, issue a licence allowing funds to be released, for instance to pay for basic commodities, such as food.¹⁵ The Secretary of State, in certain circumstances may also lift the travel ban.¹⁶

The UK’s consolidated sanctions list is available [here](#).

¹⁵ Id. para. 7.6.

¹⁶ Id. para. 7.6.

Scholarly Comments on Sanctions Regimes



Proponents of sanctions programmes argue that sanctions are one of the most powerful coercive foreign policy tools, while also being less dangerous or destructive than engaging in war.¹⁷ However, sanctions regimes are often met with criticism in relation to sanctions' potential unintended negative humanitarian consequences, for example when sanctions impede the flow of humanitarian assistance to targeted areas.¹⁸

Critics of sanctions regimes note that the most food insecure countries, according to the Global Hunger Index ("GHI"), are often sanctioned states, including Burundi, Eritrea, Yemen, Afghanistan, Chad, Ethiopia, Sudan, Somalia and North Korea.¹⁹ One study found that the imposition of sanctions contributes to hunger and starvation in many sanctioned countries even after

accounting for several other factors such as conflict and natural disasters, and that the imposition of sanctions increases the GHI composite index measure of food security on average by about 1.247 – 2.225 points.²⁰ The asserted reasons for this causal relationship between the imposition of sanctions and food insecurity include the following factors: (i) the central government in a sanctioned state can under-supply essential resources thereby reducing private-sector (i.e., agricultural) productivity; and (ii) governments can deliberately centralise the distribution of essential goods (e.g., food) in order to use access to food as a defence mechanism to punish dissent against the leadership.²¹

Critics also note that sanctions can cause obstacles that impede the flow of humanitarian assistance.²² Such

¹⁷ See, e.g., Sasha Lohmann, Judith Vorrath, *International Sanctions: Improving Implementation through Better Interface Management*, at page 3 (August 1, 2021). Available at https://www.swp-berlin.org/publications/products/arbeitspapiere/WP_International_Sanctions.pdf.

¹⁸ Grégoire Mallard, Sabet Farzan, and Jin Sun, *The Humanitarian Gap in the Global Sanctions Regime*, *Global Governance: A Review of Multilateralism and International Organizations* 26.1 (2020) p. 121-153. Available at: https://brill.com/view/journals/gg/26/1/article-p121_6.xml?language=en#FN000001. See also for example comments made by former OCHA chief, Mark Lowcock on the over-compliant application of sanctions and their negative effect hampering the passage of humanitarian relief. UN Web TV, Mark Lowcock (OCHA) on the Political and Humanitarian situation in Syria - Security Council VTC (28 April 2021). Available at <https://media.un.org/en/asset/k1e/k1ekd0x66y>.

¹⁹ See Afesorgbor, Sylvanus Kwaku, *Sanctioned to Starve? The Impact of Economic Sanctions on Food Security in Targeted States*, at page 1 (July 25, 2020). Forthcoming as a chapter in the *Research Handbook on Economic Sanctions*, Edward Elgar Publishing, UK., Available at SSRN: <https://ssrn.com/abstract=3660536> or <http://dx.doi.org/10.2139/ssrn.3660536>.

²⁰ See id. at page 17.

²¹ See id. at page 1 (citing Oechslin, M, *Targeting autocrats: Economic sanctions and regime change*, *European Journal of Political Economy*, 36, 24–40 (2014))

²² Grégoire Mallard, Sabet Farzan, and Jin Sun, *The Humanitarian Gap in the Global Sanctions Regime*, *Global Governance: A Review of Multilateralism and International Organizations* 26.1 (2020) p. 121-153. Available at: https://brill.com/view/journals/gg/26/1/article-p121_6.xml?language=en#FN000001.

obstacles include the fact that humanitarian organisations must often work with sanctioned leaders and individuals to get humanitarian aid into a country, therefore when humanitarian organisations are required to pay taxes, registration fees or checkpoint fees in order to function and accomplish their purposes, they may be forced to violate sanctions laws by paying a sanctioned entity or (unwittingly) paying its affiliates.²³ Critics also find that humanitarian exemptions to sanctions are often ineffective because malign actors may exploit the exemptions by masquerading as either people in need of humanitarian aid or as humanitarian actors.²⁴ Its proponents, however, believe that they are necessary to legally facilitate the provision of humanitarian aid, and that humanitarian actors have developed internal policies and procedures to help prevent or mitigate the diversion of aid.²⁵ Further, proponents generally believe

that even if some funds do go to sanctioned individuals and entities, the damage will likely be minimal and will be offset by the benefits that the humanitarian organisations offer.²⁶

Additionally, targeted sanctions regimes have been criticized as ineffective, given that individuals and entities might evade sanctions through the use of black markets, trade diversions, safe havens, strategic reserves, and economic adjustments.²⁷ One study notes that targeted sanctions are plagued by unintended consequences in 91 percent of cases, including negative impacts on a country's overall economy or political structure, higher corruption and criminality, the strengthening of authoritarian rule, greater political splintering, humanitarian costs, and unintended harms to neighbouring countries.²⁸

²³ King, Katie, Naz K. Modirzadeh, Dustin A. Lewis, *Understanding Humanitarian Exemptions: UN Security Council Sanctions and Principled Humanitarian Action*, at pages 5-6, Harvard Law School Program on International Law and Armed Conflict Counterterrorism and Humanitarian Engagement Project (2016), <http://nrs.harvard.edu/urn-3:HUL.InstRepos:29998395>; Alice Debarre, *Making Sanctions Smarter: Safeguarding Humanitarian Action* (December 2019) at page 3. Available at: https://reliefweb.int/sites/reliefweb.int/files/resources/1912_Making-Sanctions-Smarter.pdf.

²⁴ GLOBAL INVESTIGATIONS REVIEW, *The Guide to Sanctions*, at pages 14-15 (2020), <https://globalinvestigationsreview.com/guide/the-guide-sanctions/first-edition?page=1>.

²⁵ King, Katie, Naz K. Modirzadeh, Dustin A. Lewis, *Understanding Humanitarian Exemptions: UN Security Council Sanctions and Principled Humanitarian Action*, at pages 8-9, Harvard Law School Program on International Law and Armed Conflict Counterterrorism and Humanitarian Engagement Project (2016), <http://nrs.harvard.edu/urn-3:HUL.InstRepos:29998395>.

²⁶ See *id.*

²⁷ Laura Kanji, *Moving Targets: The Evolution and Future of Smart Sanctions*, *Harvard International Review*, 4 January 2017, <https://www.jstor.org/stable/26445616?refreqid=excelsior%3A7f63fc3fc9df7cbdda735bc568cef033>.

Chart: Starvation-Related Sanctions within the UK Sanctions Regimes:

The digest below outlines the relevant UK sanctions-related measures dealing with starvation, objects indispensable to survival and humanitarian access-related issues in the following countries since 2020:

- Myanmar
- South Sudan
- Syria
- Yemen

Similar to GRC's Starvation [Jurisprudence Digest](#), this digest will be updated regularly and will aim to serve as a resource tool for practitioners interested in understanding and charting the use of sanctions relevant in the conflict and hunger, food-insecurity space.

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Sanctions Digest

Sanctioning Bodies: United Kingdom (UK) Secretary of State & Office of Financial Sanctions Implementation HM Treasury (OFSI)

Country	UK Office of Financial Sanctions Action ('OFSI)	References to Starvation and/or Humanitarian Access Issues	Impact of Action to Relieving Starvation and/or Humanitarian Access, and relevant Humanitarian-related Sanctions Exemptions, if any
Myanmar	<p>Designation of Commander-in-Chief Min Aung Hlaing (OFSI, 06/07/2020).</p> <p>Designation of Deputy Commander-in-Chief Soe Win (OFSI, 06/07/2020).</p>	<p>OFSI designated Commander-in-Chief Senior General of the Tatmadaw (Myanmar Armed Forces), Min Aung Hlaing, for his responsibility in the brutal security operation in Rakhine State in 2017 and 2019, resulting in over 500,000 people fleeing Bangladesh. During that time, members of ethnic minority groups were killed or injured by gunshot or by soldiers using large-bladed weapons; others were burned to death in their own houses. Commander-in-Chief Senior General Min Aung Hlaing was therefore involved in atrocities and serious human rights violations committed against the Rohingya population in Rakhine State by the Tatmadaw.</p> <p>Deputy Commander-in-Chief Soe Win, equally involved in this case, was also designated under the Global Human Rights Sanctions Regulations regime. He had responsibility for the Tatmadaw troops who carried out serious human rights violations against the Rohingya population in Rakhine State in 2017 and 2019 including unlawful killings, torture, forced labour, systematic rape and other forms of targeted sexual violence. He was also involved in the financing of the Tatmadaw military operations in Rakhine State during which these violations took place. He knew this would contribute to the commission of these violations.</p>	<p>Both Commander-in-Chief Min Aung Hlaing and Deputy Commander-in-Chief Soe Win are subject to an asset freeze and travel ban, which took effect immediately on 6 July 2020. This will prevent the designated persons from entering the UK, channelling money through UK banks, or profiting for the UK's economy.</p> <p>Commander-in-Chief Senior General Min Aung Hlaing's was responsible for military operations carried out in Rakhine State in 2017 and in 2019. His designation under the Global Human Rights Sanctions Regulations 2020 for his involvement in human rights violations and atrocities includes: (1) unlawful killings, including through systematic burning of Rohingya houses and buildings, (2) massacre, (3) torture, (4) forced labour, (5) systematic rape and (6) other forms of targeted sexual violence, and (7) forced labour.</p> <p>The UK statement of reasons for listing Commander-in-Chief Senior General Min Aung Hlaing makes explicit reference to the "systematic burning of Rohingya houses and buildings" which was found to be associated with starvation and humanitarian access-related issues. The targeted buildings and premises included livestock and several local markets. If not burnt, Rohingya were denied access to other markets, to their rice fields at harvest time by Myanmar security forces. This devastated Rohingya livelihoods and caused severe food shortages.</p>
Myanmar	Designation of Myanmar Economic Holdings Public Company Ltd (OFSI, 25/03/2021)	<p>Myanmar Economic Holdings Limited ('MEHL') is a major military conglomerate, owned by current and former Myanmar military personnel and was designated under the Global Human Rights Sanctions Regulations 2020.</p> <p>Commander-in-Chief Hlaing (see designation above) is the Chair of MEHL's 'patron group', in which several senior Tatmadaw officials are also involved or associated with. Given the close connections between the Tatmadaw involved in 'clearance operations' against the Rohingya, Commander-in-Chief Hlaing's involvement in the commission of atrocities and violations of human rights, and the MEHL, there are reasonable grounds to believe that the company</p>	<p>The MEHL is subject to an asset freeze and will hence prevent the company from channelling money through UK banks and engaging in business activities in the UK.</p> <p>The MEHL contributed to fundraising events that ultimately provided financial support to the Tatmadaw. There are "reasonable grounds to suspect that part or all of these funds contributed to operations that resulted in serious human rights violations, including mass unlawful killings, torture, systematic rape and other forms of targeted sexual violence by the Tatmadaw committed in Rakhine State in 2017. In view of the circumstances including the close connections between MEHL and senior members of the</p>

		knew or had reasonable cause to suspect that the financial support would contribute to serious human rights violations.	Tatmadaw, there are reasonable grounds to suspect that MEHL knew or had reasonable cause to suspect that the funds would or may contribute to the serious human rights violations committed. Further or alternatively, MEHL is associated with the Commander in Chief and Deputy Commander in Chief of the Tatmadaw in view of their connections to MEHL including their positions on the patron group".
Myanmar	<p>Designation of Brigadier General Than Oo (OFSI, 29/04/2021)</p> <p>Designation of Lieutenant General Aung Kyaw Zaw (OFSI, 29/04/2021)</p> <p>Designation of Brigadier General Khin Maung Soe (OFSI, 29/04/2021)</p> <p>Designation of Major General Maung Maung Soe (OFSI, 29/04/2021)</p> <p>Designation of Brigadier General Thant Zin Oo (OFSI, 29/04/2021)</p> <p>Designation of Brigadier General Aung Aung (OFSI, 29/04/2021)</p> <p>Designation of Major Aung Myo Thu (OFSI, 29/04/2021)</p> <p>Designation of Staff Sergeant Ba Kyaw (OFSI, 29/04/2021)</p> <p>Designation of Brigadier General Khin Hlaing (OFSI, 29/04/2021)</p>	<p>OFSI designated Brigadier General Than Oo, Commander of the 99th Light Infantry Division of the Myanmar Army, under the Myanmar (Sanctions) Regulations 2021 for his responsibility for serious human rights violations committed against the Rohingya population in Rakhine State, including unlawful killings and systematic burning of Rohingya houses and buildings.</p> <p>OFSI designated Lieutenant General Aung Kyaw Zaw, Commander of the Myanmar Army's Bureau of Special Operations, under the Myanmar (Sanctions) Regulations 2021. He oversaw the Myanmar Army's Western Command, which is responsible for serious human rights violations committed against the Rohingya population in Rakhine State, including unlawful killings and systematic burning of Rohingya houses and buildings.</p> <p>OFSI designated Brigadier General Khin Maung Soe, Commander of the Military Operation Command 15 ('MOC 15'), under the Myanmar (Sanctions) Regulations 2021. He oversaw the MOC 15 with 10 battalions operating in Northern Rakhine, responsible for serious human rights violations committed against the Rohingya population in Rakhine State, including extra judicial killings, sexual violence and systematic burning of Rohingya houses and buildings.</p> <p>OFSI designated Major General Maung Maung Soe, former chief of the Myanmar Army's Western Command, under the Myanmar (Sanctions) Regulations 2021, responsible for serious human rights violations committed against the Rohingya population in Rakhine State, including extra judicial killings, sexual violence and systematic burning of Rohingya houses and buildings.</p> <p>OFSI designated Brigadier General Thant Zin Oo, Commander of the paramilitary 8th Security Police Battalion of the Myanmar Army during August and September 2017, under the Myanmar (Sanctions) Regulations 2021, responsible for serious human rights violations committed against the Rohingya population in Rakhine State, including unlawful killings, repression of the civilian population and systematic burning of Rohingya houses and buildings.</p> <p>OFSI designated Brigadier General Aung Aung, Commander of the 33rd Light Infantry Division of the Myanmar Army, under the Myanmar (Sanctions) Regulations 2021, responsible for serious human rights violations committed against the Rohingya population in Rakhine State, including unlawful killings and systematic</p>	<p>All of the following are subject to an asset freeze and travel ban preventing the designated persons from entering the UK, channelling money through UK banks, or profiting for the UK's economy.</p> <p>The UK statement of reasons for these listings makes explicit reference to the "systematic burning of Rohingya houses and buildings" which was found to be associated with starvation and humanitarian access-related issues.</p>

		<p>burning of Rohingya houses and buildings.</p> <p>OFSI designated Major Aung Myo Thu, Field Unit Commander of the 33rd LID, under the Myanmar (Sanctions) Regulations 2021. He oversaw military operations carried out in Rakhine state in 2017 and is responsible for atrocities and serious human rights violations, including the systematic burning of villages.</p> <p>OFSI designated Sergeant Ba Kyaw, the 546th Light Infantry Brigade of the Tatmadaw, under the Myanmar (Sanctions) Regulations 2021, responsible for the commission of, and involvement in, serious human rights violations, including the systematic burning of Rohingya houses and buildings.</p> <p>OFSI designated Brigadier General Khin Hlaing, Commander of the Northeastern Command of the Myanmar Army, under the Myanmar (Sanctions) Regulations 2021. He oversaw the 99th Light Infantry Division, responsible for the commission of, and involvement in, serious human rights violations, including the systematic burning of Rohingya houses and buildings.</p>	
Myanmar	Designation of Major General Nyi Nyi Swe (OFSI, 29/04/2021)	<p>OFSI designated Major General Nyi Nyi Swe, former head of the Northern Command, who oversaw military operations carried out in Kachin State between May 2016 and April 2018, under the Myanmar (Sanctions) Regulations 2021, responsible for serious human rights violations committed against the Rohingya population in Kachin State by the Tatmadaw, including the systematic burning and clearing of civilian villages. Major General Nyi Nyi Swe is further responsible “for the obstruction of humanitarian relief to civilians in Kachin, in particular the blocking of food transports”.</p>	Major General Nyi Nyi Swe is subject to an asset freeze and travel ban preventing the designated persons from entering the UK, channelling money through UK banks, or profiting from the UK's economy.
Myanmar	Designation of U Tay Za (OFSI, 02/09/2021)	<p>OFSI designated Tay Za (Chairman of Htoo Group of Companies) under the Myanmar (Sanctions) Regulations 2021. Among the reasons for the designation, are Tay Za's role as an arms dealer; the provision of funds and economic resources, supply of goods and/or technology to the Myanmar authorities, which contributed to serious human rights violations. With the above Tay Za has supported activities of the Tatmadaw, including the commission of “serious human rights violations in Myanmar for decades, including the ethnic cleansing of the Rohingya in 2017, ongoing attacks on other ethnic groups and the 2021 coup and associated repression of the civilian population and serious human rights violations including killings, arbitrary detention and torture.”</p>	

Myanmar	Designation of Htoo Group of Companies (OFSI, 02/09/2021)	Htoo Group of Companies is owned and controlled by U Tay Za, designated under the Myanmar (Sanctions) Regulations 2021 . The Group has “contributed funds to the Tatmadaw in 2017, at a fundraising event for the Rakhine clearance operations held by Commander in Chief, Min Aung Hlaing. There are reasonable grounds to suspect that these funds contributed to serious human rights violations and ethnic cleansing against the Rohingya”.	The Htoo Group of Companies is subject to an asset freeze and will hence prevent the company from channelling money through UK banks and engaging in business activities in the UK.
South Sudan	Designation of Paul Malong Awan Anei (OFSI, 21/01/2021)	Paul Malong is Chief of General Staff of the Sudan People’s Liberation Army (‘SPLA’) and was designated under the South Sudan (Sanctions) (EU Exit) Regulations 2019 , including for ordering SPLA units to prevent the transport of humanitarian supplies and under his leadership the “SPLA attacked civilians, schools and hospitals, forced the displacement of civilians, carried out enforced disappearances, arbitrarily detained civilians, and conducted acts of torture, and rape”.	The sanctions designation subjects Malong to an asset freeze and travel ban. The additional information contained in the narrative summary accompanying the designation, includes Malong’s order to impede the transport of humanitarian supplies and his leadership of the SPLA, who attacked civilians, schools and hospitals, forced the displacement of civilians, carried out enforced disappearances, arbitrarily detained civilians, and conducted acts of torture, and rape.
Syria	Designation of Yasser Hussein Ibrahim (OFSI, 15/03/2021)	Yasser Hussein Ibrahim is a prominent and influential business-person and financier to President Assad and was designated under the Syria (Sanctions) (EU Exit) Regulations 2019 , for his association with the Assad regime and for his actions as “front for Bashar and Asma Assad’s personal hold on the Syrian economy, whilst millions of Syrians are food insecure.”	The sanctions designation subjects Yasser Hussein Ibrahim to an asset freeze and travel ban. The additional information contained in the narrative summary accompanying the designation, explicitly links Ibrahim’s role within the Syrian economy and the Assad regime to the food insecurity affecting the Syrian population.
Yemen	Designation of Muhammad Abd Al-Karim Al-Ghamari (OFSI, 09/11/2021)	Al-Ghamari is the Houthi Military Chief of General Staff and was designated on 9 November 2021, under the Yemen (Sanctions) (EU Exit) Regulations 2020 , for his involvement and leadership role in military campaigns that threaten the peace, security, and stability of Yemen, including by taking charge of the recent Houthi offensive in Marib governorate, which “is exacerbating Yemen’s humanitarian crisis, as it puts approximately one million vulnerable internally displaced people at risk of being displaced yet again, lead to the deaths of civilians, and is triggering broader escalation of the conflict.”	The sanctions designation subjects Al-Ghamari to an asset freeze and travel ban. The additional information contained in the narrative summary accompanying the designation of Al-Ghamari, explicitly links his involvement in the Houthi offensive on Marib and the consequent worsening of the humanitarian crisis in Yemen.
Yemen	Designation of Yusuf Al-Madani (OFSI, 09/11/2021)	Al-Madani is a prominent leader in the Houthi armed forces and is the commander of forces in Hudaydah, Hajjah, Al Mahwit, and Raymah, Yemen. He was designated on 9 November 2021 for his involvement in the Houthi offensive on Marib governorate, during which “[p]ersistent Houthi repositioning and other violations of the ceasefire provisions of the Hudaydah Agreement have destabilized a city that serves as a critical thoroughfare for humanitarian and essential commercial commodities. Additionally, there are regular reports of Houthi attacks impacting civilians and civilian infrastructure in and around Hudaydah, further exacerbating the situation for Yemenis facing some of the highest levels of humanitarian need in the country.”	The sanctions designation subjects Al-Madani to an asset freeze and travel ban. The additional information contained in the narrative summary accompanying the designation of Al-Madani links his activities as a commander to humanitarian access issues due to the Marib offensive and to Houthi attacks on civilians and civilian infrastructure in Hudaydah (he is identified as commander of Houthi forces in Hudaydah) and their detrimental effect on the civilian population therein.



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