



General Assembly

Distr.: General
16 July 2025

Original: English

Human Rights Council

Sixtieth session

8 September–3 October 2025

Agenda item 3

**Promotion and protection of all human rights, civil,
political, economic, social and cultural rights,
including the right to development**

Impact of unilateral coercive measures on economic, labour and social rights

Report of the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena F. Douhan

Summary

In the present report, the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena F. Douhan, provides an overview of the negative impact of unilateral coercive measures, the means of their enforcement and overcompliance on various aspects of economic, labour and social rights. She addresses the direct and indirect implications of such measures on States under sanctions, third States and sanctioning States. She reveals the impact of unilateral sanctions on the ability of States under sanctions to alleviate the negative consequences thereof, as well as their ability to provide humanitarian assistance to those in need. Special attention is paid to the adverse effects of unilateral sanctions on the economic, labour and social rights of vulnerable groups, including women, children, persons with disabilities, older persons and refugees.



I. Introduction

1. The present report is submitted pursuant to General Assembly resolutions 76/161 and 79/167 and Human Rights Council resolutions 27/21, 54/15 and 55/7, in which the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights was requested to, inter alia, gather all relevant information on the negative impact of unilateral coercive measures on the enjoyment of human rights; study trends, developments and challenges in this regard; draw attention to specific situations and cases requiring the attention of United Nations organs; and make recommendations on ways to prevent, minimize and redress the adverse impact of unilateral coercive measures on human rights.
2. Through activities including thematic research, country visits, case analysis and management, expert consultations and political and academic events, the Special Rapporteur has identified significant humanitarian implications of unilateral sanctions for the enjoyment of all economic, labour and social rights.
3. The Special Rapporteur notes that multiple sanctions regimes, alongside secondary sanctions and extensive overcompliance, produce cumulative effects and wider implications for the economy of and economic rights in targeted countries, third States and even sanctioning States themselves,¹ indiscriminately affecting the human rights of individuals and peoples, including freedom from poverty,² the right to health,³ the right to an adequate standard of living,⁴ the right to water and sanitation,⁵ the right to food⁶ and other economic, social and cultural rights.⁷ Unilateral sanctions also undermine the ability of targeted States to ensure relevant human rights within their territory due to economic hardships and other tangible impediments, even though it is their primary responsibility to take all possible measures to ensure the protection, promotion and fulfilment of human rights within the maximum resources available.
4. In the present report, the Special Rapporteur presents an assessment of the impact of unilateral sanctions, secondary sanctions and overcompliance on economic, labour and social rights, with a particular focus on the most vulnerable groups. She addresses the adverse impact of unilateral sanctions on the enjoyment of economic, labour and social rights in third countries and sanctioning States. Unless otherwise stated, the term “unilateral sanctions” in the report encompasses unilateral sanctions, means of their enforcement and overcompliance.
5. To collect information for the present report, the Special Rapporteur issued a call for submissions addressed to different stakeholders. Responses were received from the Governments of China, Cuba, Honduras, Iraq, Mexico, Uzbekistan and Venezuela (Bolivarian Republic of), some United Nations entities, civil society organizations and associations, lawyers and scholars.⁸ The Special Rapporteur expresses her gratitude to all respondents.

II. Activities of the Special Rapporteur

6. In order to raise awareness about the mandate, the negative impact of unilateral sanctions on human rights, situations in countries under sanctions, findings from country visits and problems in the application of humanitarian exemptions, the Special Rapporteur gave numerous interviews to news and other media outlets around the world.

¹ A/HRC/57/55, paras. 21 and 24.

² See communication USA 3/2024. All communications mentioned in the present report are available from <https://spcommreports.ohchr.org/Tmsearch/TMDocuments>.

³ See communications SWE 3/2023 and USA 23/2023.

⁴ Ibid.

⁵ See communication USA 6/2022.

⁶ See communications USA 3/2024 and USA 4/2024.

⁷ See communication USA 11/2024.

⁸ See <https://www.ohchr.org/en/calls-for-input/2025/call-input-2025-thematic-reports-un-human-rights-council-and-un-general>.

7. She participated in thematic conferences, webinars and online meetings, including an Arria-formula meeting on 25 November 2024 and met with representatives of permanent missions in Geneva and New York and representatives of the Movement of Non-Aligned Countries and the Group of Friends in Defense of the Charter of the United Nations to raise awareness about current challenges caused by the use of unilateral sanctions and overcompliance. She welcomes the organization of the conference on the impact of unilateral sanctions on access to justice, which was held in Tehran in May 2025.

8. She held meetings with representatives from the World Food Programme and the Food and Agriculture Organization of the United Nations (FAO), the International Labour Organization and other United Nations organs and institutions and sent official letters containing updates on her activities and to discuss the impact of unilateral coercive measures on different categories of human rights, and potential implications for the exercise of the mandate.

9. The Special Rapporteur held expert consultations in Geneva with academics, non-governmental organizations and lawyers on the development of guidance documents on unilateral sanctions and humanitarian action, and on unilateral coercive measures, responsibility, effective remedy and redress. She organized side events on monitoring and assessment of the impact of unilateral coercive measures on the enjoyment of human rights and on the impact of unilateral sanctions on access to justice and an effective remedy, which were held on the margins of the fifty-seventh and fifty-eighth sessions, respectively, of the Human Rights Council.⁹

10. On 20 September 2024, she officially launched a tool for monitoring and assessing the humanitarian impact of unilateral coercive measures, which allows for the collection and processing of data to effectively, timely, fully and systematically assess the negative effect of unilateral sanctions on the enjoyment of human rights.¹⁰

11. Over the past year, the Special Rapporteur sent numerous communications to various stakeholders to express concern about the devastating humanitarian impact of unilateral sanctions, corporate due diligence in the context of application of unilateral sanctions, the reported use of the rebuttable presumption of wrongdoing and de facto reversal of the burden of proof as a recurrent practice in sanctions-related cases; the designation and redesignation of certain States as sponsors of terrorism and the alarming humanitarian situation as a consequence of it; and the use of family ties as a ground for the imposition of unilateral coercive measures.¹¹

12. In the face of attempts by States and businesses to shift responsibility to each other for human rights violations occurring due to unilateral sanctions, the Special Rapporteur, upon consultations with different groups of stakeholders, developed the guiding principles on sanctions, business and human rights¹² and a commentary thereto.¹³ Drafts were discussed at the international conference on sanctions, business and human rights held on 21 and 22 November 2024. A complete list of her activities over the past year may be found on the mandate website.¹⁴

III. Negative impact on economic rights

13. Unilateral sanctions are usually aimed at targeting the economy of the sanctioned States. They take different forms and include measures taken against States, sectors of a State's economy (e.g. gold-mining sector in Zimbabwe; and mining, wood and energy sectors

⁹ See <https://www.ohchr.org/en/events/side-events/2024/monitoring-and-impact-assessment-ucms-and-overcompliance-enjoyment-human>; and <https://www.ohchr.org/en/events/events/2025/impact-unilateral-sanctions-access-justice-and-effective-remedy>.

¹⁰ See <https://ucmmonitoring.ohchr.org/>.

¹¹ See <https://spcommreports.ohchr.org/TmSearch/Mandates?m=263>.

¹² See <https://www.ohchr.org/sites/default/files/documents/issues/ucm/events/international-conf-sanctions-business-hr/gps-sanctions-business-hr.pdf>.

¹³ See <https://www.ohchr.org/sites/default/files/documents/issues/ucm/commentary-gpssbhr-2025.pdf>.

¹⁴ See <https://www.ohchr.org/en/special-procedures/sr-unilateral-coercive-measures/activities>.

in the Russian Federation) or a specific region of a country (e.g. cotton, textile, tomatoes and polycrystalline silicon industries in Xinjiang Uighur Autonomous Region, China),¹⁵ entities or individuals, including State officials ex officio.¹⁶ Such measures affect economic and social rights in different ways, both directly and indirectly.¹⁷

14. Trade embargoes and restrictions and financial, economic and sectoral sanctions directly target the economies of sanctioned States. Such measures affect the businesses of nationals and residents of sanctioned States and the activities of all those operating in such States. They also affect central and commercial banks' ability to transfer money to and from sanctioning States and the ability of sanctioned States to meet the basic needs of their citizens due to reduced revenue and ability to transfer, procure, ensure and deliver.

15. Targeted sanctions are directed at designated individuals or companies.¹⁸ The Special Rapporteur notes that European Union financial sanctions include several thousand individuals and companies;¹⁹ far more are listed by the United States of America.²⁰ The grounds for the listing of companies and individuals have expanded significantly beyond the authorization of the Security Council.²¹

16. Such measures produce negative effects not only on the individuals and entities that are directly targeted, but also an indiscriminate number of people, particularly with the imposition of sanctions on banks and other financial institutions leading to the closure of accounts and the freezing of deposits, impeding bank transfers and remittances.²²

17. The Special Rapporteur notes the discrepancy in the terminology used in relation to the adoption of restrictive measures. In particular, sanctions regulations refer to the freezing of economic resources, the freezing or immobilizing of funds,²³ the blocking of property²⁴ and interests in property²⁵ and financial sanctions.²⁶ In such cases, any property and interests in property of a sanctioned person "must be blocked (i.e., "frozen") – not seized – and may not be transferred, withdrawn or otherwise dealt in. Title to the blocked property remains with the blocked person, but the exercise of powers and privileges normally associated with ownership is prohibited".²⁷ Since February 2022, property of more than 1,500 Russian individuals or organizations has reportedly been blocked in this way. Russian gold and foreign exchange reserves amounting to \$300 billion have been frozen, and the profits of some of those assets have reportedly been used without the agreement of the Government of the Russian Federation.²⁸ The assets of Russian nationals blocked by the Group of Seven countries amount to \$30 billion.²⁹ Uncertain and ambiguous terminology, alongside the use

¹⁵ See A/HRC/57/55/Add.1.

¹⁶ Alena Douhan, "Understanding of unilateral coercive measures", in *Humanitarian Impact of Unilateral Sanctions and Over-Compliance: Theoretical Challenges and Practical Implications* (Paris, Académie de Géopolitique de Paris, 2025).

¹⁷ Aslan Abashidze, "The position of the Committee on Economic, Social and Cultural Rights on unilateral coercive measures", in *Humanitarian Impact of Unilateral Sanctions and Over-Compliance: Theoretical Challenges and Practical Implications* (Paris, Académie de Géopolitique de Paris, 2025).

¹⁸ Douhan, "Understanding of unilateral coercive measures".

¹⁹ See <https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions?locale=en>.

²⁰ See <https://ofac.treasury.gov/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>.

²¹ Douhan, "Understanding of unilateral coercive measures".

²² See communication GBR 5/2025.

²³ See <https://data.consilium.europa.eu/doc/document/ST-5664-2018-INIT/en/pdf>.

²⁴ See <https://www.govtrack.us/congress/bills/114/s284/text>.

²⁵ See <https://ofac.treasury.gov/recent-actions/20250430>.

²⁶ See <https://www.legislation.gov.uk/ukpga/2018/13/section/3>.

²⁷ See <https://ofac.treasury.gov/faqs/9>.

²⁸ See https://enlargement.ec.europa.eu/news/first-transfer-eu15-billion-proceeds-immobilised-russian-assets-made-available-support-ukraine-today-2024-07-26_en.

²⁹ See <https://russiancouncil.ru/analytics-and-comments/analytics/sanktsii-i-konfiskatsiya-rossiyskoy-sobstvennosti-pervyy-opyt/> (in Russian).

of severe means of enforcement, including criminalization, exacerbates overcompliance³⁰ and directly affects the right to property and other economic rights.

18. The Special Rapporteur notes with concern that newly adopted legislation in several countries³¹ legitimizing the confiscation of frozen State property violates international law, in particular, norms on State immunities, and the principle of the sovereign equality of States. Legislation providing a framework for the forfeiting of both sovereign and private property manifestly doesn't correspond with the right to property set forth in the Universal Declaration of Human Rights (art. 17) and regional instruments such as the Protocol to the Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights) (art.1).

19. Article 3i of Council Regulation (EU) No. 833/2014 of 31 July 2014 permits the confiscation of Russian private property falling within the list of prohibited goods contained in annex XXI of the regulation.³² Latvia and Lithuania passed legislation allowing for the confiscation of cars registered in Belarus.³³ The Special Rapporteur emphasizes that any confiscation of property is a measure of individual responsibility traditionally applied following criminal conviction. The confiscation of the property of nationals or residents of another State is a clear and gross violation of fundamental human rights, including the presumption of innocence, the right to a fair trial, the right to access justice, the right to freedom from discrimination, the right to equal protection of the law and, of course, the right to property.

20. Multiple reports indicate that private property is frequently seized for the alleged circumvention of primary unilateral sanctions. For example, seven milk tankers and 17 fire engines were confiscated in the Port of Klaipėda, Lithuania, in 2023 for the alleged circumvention of unilateral sanctions while they were being transferred from Belarus through Lithuania to Cuba and Zimbabwe.³⁴ Directive (EU) 2024/1260 of the European Parliament and of the Council, in its paragraphs 11, 15 and 39, provides for the possibility to confiscate private property for the circumvention of European Union sanctions, thus expanding the rules applicable to suppression of transboundary crimes. This practice clearly contradicts the right to property provided in article 17 of the Charter of Fundamental Rights of the European Union.

21. Sanction regulations and non-binding interpretative documents of sanctioning authorities are also used as a ground for seizure of goods by sanctioning States' customs authorities.³⁵ Since 2022, the United States Customs and Border Protection has reportedly seized thousands of shipments of imported Chinese goods, including high-tech items valued at more than \$2 billion, under the Xinjiang-related sanctions³⁶ and has been escalating seizures of Chinese automotive and aerospace shipments in 2025. Only 2 out of the total 2,790 automotive and aerospace shipments inspected by the Customs and Border Protection in January and February 2025, valued at about \$10 million, were released.³⁷ Such measures constitute a manifest violation of the right to property, as well as other rights such as the right to development, humanitarian assistance and international solidarity.

³⁰ A/HRC/51/33, para. 12.

³¹ See <https://laws-lois.justice.gc.ca/eng/acts/S-14.5/page-1.html>; and <https://www.congress.gov/bill/118th-congress/house-bill/8038>.

³² See <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02014R0833-20221204>; https://finance.ec.europa.eu/document/download/66e8fd7d-8057-4b9b-96c2-5e54bf573cd1_en?filename=faqs-sanctions-russia-consolidated_en.pdf; and <https://www.euractiv.com/section/global-europe/news/russians-can-no-longer-bring-their-car-to-the-eu>.

³³ See <https://minsk.belprofmash.1prof.by/news/xcdf-6/> (in Russian).

³⁴ See <https://www.sb.by/articles/litva-prodast-s-auktsiona-konfiskovannye-molokovozy-i-pozharnye-mashiny-iz-belarusi.html> (in Russian).

³⁵ Commentary to the guiding principles on sanctions, business and human rights, p. 12.

³⁶ A/HRC/57/55/Add.1, para. 36; see <https://www.reuters.com/world/china/exclusive-us-blocks-more-than-1000-solar-shipments-over-chinese-slave-labor-2022-11-11/>; and submission from China.

³⁷ <https://blog.aiag.org/u.s.-customs-escalates-seizures-of-chinese-automotive-and-aerospace-shipments-1>.

22. A broad interpretation of the restrictions imposed, alongside the application of a rebuttable presumption of wrongfulness, compounds and broadens the negative effects of targeted unilateral sanctions by affecting even those who are not the primary targets of unilateral sanctions. For example, section 321 of the Countering America's Adversaries Through Sanctions Act creates a rebuttable presumption that a number of goods, wares, merchandise and articles mined, produced or manufactured wholly or in part by nationals of the Democratic People's Republic of Korea or citizens of that country anywhere in the world are forced-labour goods that are prohibited from importation. If they enter United States territory, they may be subject to detention, seizure and forfeiture, with consequent civil penalties and criminal prosecution.³⁸

23. The Special Rapporteur regrets that overcompliance by banks and other financial actors includes charging higher rates or imposing unreasonable delays, freezing assets that are not targeted by sanctions and denying individuals the possibility to open or maintain bank accounts or to conduct transactions on the grounds that they are nationals or residents of or originate from a country under sanctions.³⁹ This can apply even to those who are nationals of the sanctioning State. Such measures indiscriminately affect the lives of the general population, with a disproportionate impact on groups and persons in vulnerable situations, which constitutes discrimination based on, inter alia, nationality and place of birth, and results in a violation of the right to property as well as other human rights (rights to health, food, education, an adequate standard of living and development).

24. The Special Rapporteur notes with concern that unilateral sanctions also have an indirect effect on certain sectors of the economy of third States, affecting their macroeconomic indicators (gross domestic product (GDP) growth, inflation, currency stability, foreign direct investment and international commerce).⁴⁰ This in turn affects their labour market, income levels and the broader socioeconomic situation, which leads to the rising cost of essential goods, decreased employment opportunities and limited access to financial resources for development projects.⁴¹

IV. Negative impact on the right to work

25. The right to work is a fundamental right enshrined in the Universal Declaration of Human Rights (art. 23), the International Covenant on Economic, Social and Cultural Rights (art. 6) and regional human rights instruments.

26. As the Committee on Economic, Social and Cultural Rights has emphasized, "the right to work is essential for realizing other human rights and forms an inseparable and inherent part of human dignity. ... The right to work contributes at the same time to the survival of the individual and to that of his/her family, and insofar as work is freely chosen or accepted, to his/her development and recognition within the community". The right to work encompasses all forms of work, whether independent work or dependent wage paid work. Thus, it implies the right to be involved in any economic activity, including self-employment and doing business, and encompasses the right to decent work.⁴²

27. Unilateral sanctions have tremendous effect on the enjoyment of all aspects of the right to work. Unemployment increased from 8.6 per cent of the total labour force in 2011 to 13.2 per cent in 2023 in the Syrian Arab Republic, from 9 per cent in 2003 to 15.4 per cent in 2023 in Iraq and from 8 per cent in 2001 to 14 per cent in 2023 in Afghanistan.⁴³ The Special Rapporteur is concerned that, as a result of, inter alia, unilateral sanctions and consequent hyperinflation, salaries in the public sector significantly dropped in many countries under sanctions. For example, the average public-sector salary in the Bolivarian Republic of Venezuela is estimated at \$2–\$10 per month, with the cost of the average food

³⁸ See communication USA 1/2025.

³⁹ A/HRC/51/33, para. 30; and see communication GBR 5/2025.

⁴⁰ Submission from Honduras.

⁴¹ Submission from Uzbekistan.

⁴² General comment No. 18 (2005) on the right to work.

⁴³ See <https://data.worldbank.org/indicator/SL.UEM.TOTL.ZS?locations=AF-SY-IQ>.

basket being many times higher (about \$200).⁴⁴ All of the above results in the deteriorating level of social security and labour conditions, the loss of professionals and economic migration.

28. Countries under sanctions also see an expansion of the shadow economy⁴⁵ (up to 40 per cent in the Islamic Republic of Iran),⁴⁶ with vacancy rates reaching 30–50 per cent and sometimes even higher for vital public-sector jobs such as doctors, nurses, teachers, university professors, State officials, police officers and judges⁴⁷ or those involved in tourist, restaurant, handicraft and other relevant sectors.⁴⁸ As a result, the poverty rate in the Bolivarian Republic of Venezuela, as assessed by humanitarian organizations, has reached 94 per cent, and 67 per cent of persons are living in extreme poverty.⁴⁹ Multiple reports have indicated that unilateral sanctions have exacerbated or induced poverty and pushed people to engage in illicit activities such as illegal oil refining and smuggling,⁵⁰ drug trafficking, robbery, illegal mining, prostitution, sexual exploitation and trafficking in persons.⁵¹

29. Unilateral sanctions often result not only in higher unemployment rates, but also in wage reductions, the deterioration of working conditions and a shift towards informal employment, affecting labour rights and standards. In the Syrian Arab Republic, sanctions have shattered the State's capability to respond to the needs of the population, particularly the most vulnerable, and 90 per cent of the population lives below the poverty line, as witnessed by the Special Rapporteur during her visit to the country. Since 2019, prices increased by more than 800 per cent and hundreds of thousands of jobs were lost due to the destruction of industries, the loss of external trade and the coronavirus disease (COVID-19) pandemic.⁵² This results in the manifest violation of the right to decent work, enshrined in the International Covenant on Economic, Social and Cultural Rights (arts. 6–8) and relevant International Labour Organization (ILO) conventions,⁵³ depriving people of essential opportunities to access decent and productive work in conditions that provide them freedom, equality, security and human dignity.

30. Unilateral sanctions also negatively affect State capacity to confront environmental challenges, including climate change.⁵⁴ The lack of access to advanced technologies, alongside the impossibility of procuring filters, equipment and spare parts⁵⁵ due to unilateral sanctions, undermines the right to green jobs and the transition towards a sustainable environment,⁵⁶ the achievement of Sustainable Development Goal 2 (End hunger, achieve food security and improved nutrition and promote sustainable agriculture)⁵⁷ and the right to

⁴⁴ A/HRC/48/59/Add.2, para. 96.

⁴⁵ A/HRC/48/59/Add.2, para. 32.

⁴⁶ Submission from the Network of Women's Non-governmental Organizations in the Islamic Republic of Iran.

⁴⁷ A/HRC/48/59/Add.2, para. 37; A/HRC/51/33/Add.2, paras. 41 and 46–48; and see <https://www.ohchr.org/sites/default/files/documents/issues/ucm/statements/SR-UCM-EOM-statement-syria-2023-en.docx>.

⁴⁸ A/HRC/48/59/Add.2, para. 67; and A/HRC/51/33/Add.1, para. 47.

⁴⁹ A/HRC/48/59/Add.2, para. 30.

⁵⁰ Submission from Maat for Peace, Development and Human Rights Association.

⁵¹ A/HRC/48/59/Add.2, para. 32; and A/HRC/51/33/Add.2, paras. 45 and 76.

⁵² See <https://www.ohchr.org/sites/default/files/documents/issues/ucm/statements/SR-UCM-EOM-statement-syria-2023-en.docx>.

⁵³ Employment Policy Convention, 1964 (No. 122), art. 1; Discrimination (Employment and Occupation) Convention, 1958 (No. 111), arts. 1–3; Occupational Safety and Health Convention, 1981 (No. 155), arts. 4 and 5; and Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187), art. 2.

⁵⁴ A/HRC/51/33/Add.2, para. 52.

⁵⁵ See A/HRC/48/59/Add.2, A/HRC/51/33/Add.2 and A/HRC/54/23/Add.1.

⁵⁶ See https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_emp/%40emp_ent/documents/publication/wcms_432859.pdf; and <https://iopscience.iop.org/article/10.1088/1748-9326/ad9d5d/pdf>.

⁵⁷ X.M. Liu and H.J. Qiu, “The impact of international sanctions on food security and Sustainable Development Goal 2 (SDG-2)”, *Public Health*, vol. 235 (October 2024).

decent work, by decreasing productivity and income, which severely undermines ILO standards on safe working conditions.⁵⁸

31. As noted by ILO, the embargo measures have a dissuasive effect on potential investors, affecting indirectly, and even directly, economic development perspectives and therefore job creation and decent work in Cuba.⁵⁹ Moreover, limitations on commerce and financial transactions still represent a serious bottleneck and an additional cost burden for business development and job creation in Cuba, as decent work largely depends on productive investment and access to financing. Limited access to technology transfer implies further difficulties for enterprises and for social and economic development; limited access to and delivery of essential goods, including food and medicine, represent a risk of humanitarian crisis.⁶⁰

32. Labour rights in third countries and even sanctioning States are also affected due to contract losses and company closures. For instance, the designation of the Xinjiang branch of a large textile group reportedly caused broad reputational damage to the whole group, with consequent financial implications, resulting in the closure of businesses and factories located in several countries in South and South-East Asia, thus affecting the employment situation in those countries.⁶¹ Unilateral sanctions have reportedly cost the United States between \$15 billion and \$19 billion in lost merchandise exports to targeted countries. This revenue loss has translated into over 200,000 job reductions in the export sector and a nearly \$1 billion decline in wage premiums, illustrating the far-reaching economic consequences of sanctions.⁶²

33. The reported negative effect of unilateral sanctions on education undermines future job opportunities. Although precise skilled migration figures are scattered or unavailable, brain drain surveys conducted in Zimbabwe and the southern African region have revealed that close to half a million qualified professionals were located in diasporas in third countries.⁶³ The crisis caused by unilateral sanctions has led to significant emigration, with 1 million to 7.7 million (the number varies depending on the source) Venezuelans leaving the country by 2021.⁶⁴ The restrictions on financial transactions and the difficulty of obtaining visas have made legal migration increasingly challenging in the Islamic Republic of Iran. As a result, many Iranians resort to irregular migration routes, often facing significant risks and exploitation. The number of Iranian asylum-seekers in 2022 more than doubled compared with 2012 and increased more than five times compared with 2002.⁶⁵

34. Unilateral sanctions are also reported to violate the labour rights not only of migrants from countries under sanctions abroad, as they often agree to work at lower salaries and without social guarantees, but also of the local population, due to the overfilling of labour markets. They may also affect foreign workers in countries under sanctions. In the international context, unilateral sanctions may limit cooperation between trade unions and foreign partners, hindering the exchange of experience and participation in global labour initiatives.⁶⁶

35. The Special Rapporteur is alarmed that unilateral coercive measures have become an important trigger in assessments of reputational risk by businesses, often resulting in excessive overcompliance due to the uncertainty of regulations and applications and the likelihood of high penalties,⁶⁷ which is often misinterpreted by sanctioning States as freedom of business decisions.

⁵⁸ E.g. Safety and Health in Agriculture Recommendation, 2001 (No. 192); Worst Forms of Child Labour Recommendation, 1999 (No. 190); Safety and Health in Mines Recommendation, 1995 (No. 183); and Prevention of Major Industrial Accidents Recommendation, 1993 (No. 181).

⁵⁹ A/73/85, sect. III.

⁶⁰ A/79/80, sect. III.

⁶¹ A/HRC/57/55/Add.1, paras. 35 and 38.

⁶² See <https://www.superstaff.com/blog/understanding-economic-sanctions/>.

⁶³ A/HRC/51/33/Add.2, para. 48.

⁶⁴ Submission from Amadeus.

⁶⁵ Submission from the Association of Citizens Civil Rights Protection “Manshour-e Parseh”.

⁶⁶ Submission from Uzbekistan.

⁶⁷ A/HRC/57/55/Add.1, para. 29.

36. The above reasons are compounded by possible reputational risks and also cause discrimination in labour. In the specific case of Xinjiang, due to the “rebuttable presumption of the use of forced labour” and the requirement to monitor the whole supply chain, not only foreign but also Chinese businesses hesitate to cooperate with businesses from Xinjiang or to recruit Uighurs.⁶⁸ The issue of forced labour has also been invoked to substantiate United States visa restrictions on third countries’ government officials on the basis of their alleged connection with the international medical mission programmes of Cuba.⁶⁹ Raising human rights issues with references to forced labour as grounds for introducing unilateral sanctions may constitute discrimination and a breach of the duty of a State to refrain from the exploitation and the distortion of human rights issues as a means of interference in the internal affairs of States and of exerting pressure on other States.⁷⁰

37. Multiple reports reflect that hyperinflation erodes the population’s purchasing power,⁷¹ shrinks markets, shuts down certain areas of economy and discourages entrepreneurship.⁷² Governments under sanctions have decreased possibilities to provide credit to small and medium-sized businesses, especially when direct foreign investments are blocked due to unilateral sanctions. Entry and visa restrictions also affect the hospitality and tourism sectors.⁷³

38. In particular, 81 per cent of Venezuelan private companies are negatively affected by United States trade and economic sanctions⁷⁴ as their accounts in the United States financial system and lines of credit were closed and suppliers of raw materials, spare parts, machinery and equipment withdrew, affecting even critical infrastructure such as electricity, water, gas, transportation and telecommunications.⁷⁵ In accordance with the United States Visa Waiver Program Improvement and Terrorist Travel Prevention Act of 2015, nationals of Visa Waiver Program countries who have visited Cuba on or after 12 January 2021 (the date of the unilateral designation by the United States of Cuba as a State sponsor of terrorism) may not obtain visa waivers through the Electronic System for Travel Authorization. The punitive effect of this provision significantly affects travel to and tourism in Cuba, which is one of the country’s primary sources of income. The inclusion of Cuba in the list has also raised the country risk, confirming the extremely disadvantageous conditions. This undermines the interest of foreign investors and discourages them from participating in the Cuban economy.⁷⁶

39. The Special Rapporteur aligns with the position of the Committee on Economic, Social and Cultural Rights that the right of everyone to the enjoyment of just and favourable conditions of work is an important component of other labour rights enshrined in the Covenant, including the right to fair remuneration providing for a decent living for workers and their families.⁷⁷ However, the preliminary results of the monitoring and impact assessment demonstrate a high level of working poverty in numerous States under unilateral sanctions. For 2024, the working poverty rate was 22 per cent in Mali, 23.2 per cent in the Bolivarian Republic of Venezuela, 24.7 per cent in the Syrian Arab Republic, 31.2 per cent in Haiti, 34.6 per cent in Zimbabwe, 42 per cent in the Niger, 48.2 per cent in Yemen, 65.7 per cent in the Central African Republic and 72.8 per cent in the Democratic Republic of the Congo.⁷⁸ As of July 2025, the minimum monthly wage is equivalent to \$1.35 in the

⁶⁸ Ibid., para. 28.

⁶⁹ See <https://www.state.gov/releases/office-of-the-spokesperson/2025/06/visa-restrictions-for-central-american-government-officials-exploiting-cuban-medical-professionals/>.

⁷⁰ Declaration on the Inadmissibility of Intervention and Interference in the Internal Affairs of States.

⁷¹ Submission from the Bolivarian Republic of Venezuela.

⁷² Submission from Sanctions Kill Campaign.

⁷³ Submission from the Association of Citizens Civil Rights Protection “Manshour-e Parseh”.

⁷⁴ See <https://www.nodal.am/2024/02/81-de-las-empresas-venezolanas-afectadas-por-las-sanciones-de-eeuu/> (in Spanish).

⁷⁵ See <https://www.swissinfo.ch/spa/el-peso-de-las-sanciones-a-venezuela-y-su-impacto-en-el-pa%C3%ADs/47579016> (in Spanish).

⁷⁶ See A/79/80.

⁷⁷ General comment No. 23 (2016), paras. 7 and 18.

⁷⁸ See <https://ilostat.ilo.org/data/snapshots/working-poverty-rate/>.

Bolivarian Republic of Venezuela,⁷⁹ \$12.4 in the Syrian Arab Republic,⁸⁰ \$24 in Eritrea⁸¹ and \$86.5 in Afghanistan.⁸² Harsh economic conditions provoked by the application of unilateral sanctions significantly affect States' ability to raise wages, therefore preventing them from fulfilling their obligation to ensure fair wages under article 7 of the Covenant.

40. Low salaries or non-payment of salaries to teachers in the Syrian Arab Republic for prolonged periods result in their frequent absences from schools, having a negative impact not only on the right to work, but also on other human rights, such as the right to education and the right to development.⁸³

41. The Special Rapporteur regrets that vulnerable groups are disproportionately affected by unilateral sanctions. In particular, women are reported to be the first to lose jobs, experience extended working hours, be deprived of protections in the informal sector, have limited access to business opportunities and be subjected to discrimination. Sanctions result in widespread unemployment and reduced incomes, particularly in sectors dominated by women, such as textiles and handicrafts. Economic hardships reduce the revenue available for States to ensure overall education for children and to create favourable working conditions for persons with disabilities; they may also result in an increase in child labour.⁸⁴

42. The Special Rapporteur notes with great concern that documents of international organizations might be interpreted by States as justifying or in a certain way legitimizing the use of unilateral sanctions. In particular, the decision of the ILO Governing Body with regard to the resolution of the General Conference concerning the measures recommended by the Governing Body under article 33 of the ILO Constitution on the subject of Belarus introduces a very broad interpretation of the list of measures that could be taken by member States, employers and workers as being "of an economic or other character". In the face of the expanding use of primary and secondary sanctions by States, such an approach has been interpreted by sanctioning States as providing for the authorization to impose unilateral sanctions. The Special Rapporteur has addressed her concerns to ILO, encouraging it to consider establishing processes to regularly monitor the negative humanitarian impact of unilateral sanctions on economic, labour and social rights.⁸⁵

V. Impact on the enjoyment of social rights

43. Social rights are those rights necessary to ensure an adequate standard of living. They include the rights to food, housing, health, social security and education. Under article 2 (1) of the Covenant, States Parties undertake to take steps, individually and through international assistance and cooperation, especially economic and technical, to the maximum of their available resources, with a view to achieving progressively the full realization of the rights recognized in the Covenant by all appropriate means.

44. The Special Rapporteur acknowledges that all States (including those under sanctions) bear the primary responsibility for ensuring the enjoyment of economic, social and labour rights within the maximum resources available and, as a result, are also obliged to take steps to prevent or minimize the humanitarian impact of unilateral coercive measures. Although such obligation may be conditioned by "the maximum of its available resources", a State must demonstrate that every effort has been made to use all resources that are at its disposal in an effort to satisfy, as a matter of priority, those minimum obligations.⁸⁶

⁷⁹ See <https://wageindicator.org/salary/minimum-wage/venezuela>.

⁸⁰ See <https://wageindicator.org/salary/minimum-wage/syria>.

⁸¹ See <https://wageindicator.org/salary/minimum-wage/eritrea>.

⁸² See <https://wageindicator.org/salary/minimum-wage/afghanistan>.

⁸³ Anna Cervi and Erice Moret, "After 14 Years of Conflict, Can Barriers to Education in Syria Be Overcome?" (Atlanta, United States of America, Carter Centre, 2025).

⁸⁴ Submission from the Maryam Educational Charity Institute.

⁸⁵ See communications OTH 29/2023 and OTH 64/2023. See also <https://www.ilo.org/sites/default/files/2025-04/GB353-INS-PV-%5BRELMEETINGS-250311-002%5D-Web-EN.pdf>

⁸⁶ Committee on Economic, Social and Cultural Rights, general comment No. 3 (1990), para. 10.

45. Unilateral sanctions reportedly result in declining State revenue and GDP, rising inflation rates, deteriorating currency stability, decreased foreign direct investment flows and donations from businesses, impediments, including disruptions, delays and high costs, to the delivery of humanitarian assistance⁸⁷ and a decrease in available resources⁸⁸ and governmental capacity to develop and maintain critical infrastructure⁸⁹ to ensure economic, labour and social rights.⁹⁰ States affected by unilateral coercive measures are reported to take various measures to alleviate the negative impacts thereof.⁹¹

46. If they have an insufficiency of resources, States prioritize the basic survival of the population (food and healthcare) at the expense of other sectors, including transportation, the treatment of solid and medical waste,⁹² culture, education, development and the maintenance of criminal justice infrastructure.⁹³ This disrupts State social programmes for those most in need.

47. In the Bolivarian Republic of Venezuela, a drastic reduction in foreign currency income, from \$39 billion in 2014 to \$743 million in 2020, compromised macroeconomic stability, generating a sustained decline in GDP during the period 2015–2020 and restricting the State’s ability to finance social investment and public infrastructure.⁹⁴ In the Sudan, the reduction in foreign direct investment flows of approximately 45 per cent had a negative impact on economic development.⁹⁵ Sanctions have strained the social services of the Islamic Republic of Iran, including childcare, welfare programmes and support for vulnerable families. For example, funding for orphanages and shelters for abused women was cut due to budget constraints. Women and children in need of social support face increased hardships and shelters for victims of domestic violence reported overcrowding and insufficient resources.⁹⁶

48. Financial blacklisting and greylisting initiated by different international regulatory bodies, often resulting from the impossibility of making direct and transparent payments due to unilateral sanctions, is also a challenge for Governments in their efforts to promote social rights.⁹⁷ The resulting reduced fiscal space limits Governments’ ability to invest in essential services such as healthcare, education and social protection. The reputational damage associated with blacklisting can also deter foreign investment, reduce capacities to cover insurance risks, including those related to the climate crisis, and disrupt banking relationships, further marginalizing vulnerable populations.

49. As a result of prolonged economic sanctions, the Government of the Islamic Republic of Iran has been compelled to adopt the doctrine of “resistance economy”, which has not only affected economic sectors but has also resulted in substantial sociocultural repercussions. Even non-governmental organizations supporting refugee populations and providing much-needed social services face significant operational constraints due to the challenging economic climate and the limitations imposed by sanctions.⁹⁸ This not only undermines the enjoyment of the right to social security, but also contributes to an increase in poverty rates⁹⁹ and social exclusion, while negatively affecting the right to education and the right to health.

50. The embargo reportedly affects the ability of Cuban programmes to ensure continued quality and universal public services such as health and education. Certain items, including

⁸⁷ A/HRC/51/33/Add.1, paras. 16 and 36.

⁸⁸ Submission from Maat for Peace, Development and Human Rights Association.

⁸⁹ A/HRC/51/33/Add.2, paras. 25 and 49–59; and A/HRC/54/23/Add.1, para. 23.

⁹⁰ A/HRC/48/59/Add.2, para. 25; A/HRC/51/33/Add.1, paras. 16 and 61; and A/HRC/54/23/Add.1, paras. 15, 23 and 27.

⁹¹ A/HRC/48/59/Add.2, paras. 24 and 25; A/HRC/51/33/Add.1, paras. 26, 27 and 40; and A/HRC/57/55/Add.1, para. 42; .

⁹² A/HRC/54/23, para. 57.

⁹³ Confidential submission.

⁹⁴ Submission from the Bolivarian Republic of Venezuela.

⁹⁵ Submission from Maat for Peace, Development and Human Rights Association.

⁹⁶ Submission from the Maryam Educational Charity Institute.

⁹⁷ Confidential submission.

⁹⁸ Submission from HAMI Iran.

⁹⁹ Submission from the Institute Peace.

technologies, that can save, prolong or increase the quality of people's lives, cannot be acquired as they are made in the United States or have United States components.¹⁰⁰ Moreover, extensive pressure on the internal economy and, as a result, on internal income, prevents Cuba from procuring those goods in other markets.¹⁰¹

51. Multiple reports indicate that unilateral sanctions are affecting all relevant social rights, including the rights to adequate food, clean water, sanitation, freedom of movement and a healthy environment.¹⁰² The Special Rapporteur regrets that, due to the word limit for the present report she is not able to address all elements. The main focus in the present part will be on the impact on the right to food and ability of States under sanctions to ensure freedom from hunger and malnutrition as a social right, especially due to the fact that the biennial panel discussion on the impact of unilateral coercive measures and overcompliance on the right to food and food security, which had been due to be held in September 2025 pursuant to Human Rights Council resolutions 55/7 and 58/3, was assessed by the Office of the United Nations High Commissioner for Human Rights as not deliverable owing to the liquidity and financial crisis affecting the United Nations.

52. The right to adequate food, including freedom from hunger, is reportedly severely affected by unilateral sanctions.¹⁰³ The former Special Rapporteur on the right to food acknowledged that "the continued imposition of crippling economic sanctions ... severely undermines ordinary citizens' fundamental right to sufficient and adequate food".¹⁰⁴ Other reports refer to challenges such as the interruption of bank correspondence relations and supply chains, Society for Worldwide Interbank Financial Telecommunication (SWIFT) bans, fear of secondary sanctions, physical blockades of transport routes and hindrances to the delivery of medicine and food by humanitarian organizations.¹⁰⁵ Countries under sanctions report high levels of food insecurity: up to 60 per cent in specific regions in the Islamic Republic of Iran,¹⁰⁶ up to 35 per cent in the Bolivarian Republic of Venezuela¹⁰⁷ and over 50 per cent in the Syrian Arab Republic.¹⁰⁸

53. Unfortunately, efforts to mitigate the negative impact of unilateral sanctions may be insufficient, especially in the long term. Although the World Food Programme acknowledges the results of Cuban social protection programmes for the eradication of hunger and poverty, it notes that access to basic goods, especially food, remains a major concern. Household purchasing power has been drastically reduced due to inflation.¹⁰⁹ The high cost of importing food, agricultural equipment and inputs, coupled with difficulties in conducting financial transactions with foreign partners and accessing external multilateral financing for development programmes in agriculture and rural development,¹¹⁰ overcompliance by companies participating in food supply chains and impediments in access to irrigation, diesel fuel, agricultural equipment, spare parts, seeds and fertilizers¹¹¹ are directly affecting the country's ability to ensure freedom from hunger and malnutrition.¹¹² For example, in February 2024, a Spanish company refused to sell chicken embryos to the Cuban company Labiofam as the United States supplier had noted that the final destination of the embryos was a country subject to sanctions by the Government of the United States.¹¹³

¹⁰⁰ See A/73/85.

¹⁰¹ Submission from Cuba.

¹⁰² Submission from Sanctions Kill Campaign.

¹⁰³ Alena Douhan, "Impact of unilateral sanctions and over-compliance on food security", *Eurasian Journal of International Law*, vol. 2, No. 10 (2024).

¹⁰⁴ See <https://www.ohchr.org/en/press-releases/2020/03/covid-19-economic-sanctions-should-be-lifted-prevent-hunger-crises-un-expert>.

¹⁰⁵ See A/HRC/54/23.

¹⁰⁶ A/HRC/51/33/Add.1, para. 43.

¹⁰⁷ A/HRC/48/59/Add.2, para. 35.

¹⁰⁸ See <https://www.ohchr.org/sites/default/files/documents/issues/ucm/statements/SR-UCM-EOM-statement-syria-2023-en.docx>.

¹⁰⁹ See A/79/80.

¹¹⁰ See A/78/84.

¹¹¹ A/HRC/48/59/Add.2, para. 99; and A/HRC/51/33/Add.1, para. 41.

¹¹² See A/79/80; and Douhan, "Impact of unilateral sanctions and over-compliance on food security".

¹¹³ See A/79/80.

54. Unilateral sanctions indirectly affect food security through their broader economic effects and the challenges that they pose to the agricultural sector in particular.¹¹⁴ In Cuba, the economic damage for cereal production as a result of the embargo was estimated at \$2,447,830 during the period 2016–2017.¹¹⁵ The Special Rapporteur notes that 90 per cent of children in the Syrian Arab Republic depend on humanitarian assistance for survival and that about 117,000 children in the Bolivarian Republic of Venezuela were at risk of acute malnutrition in 2022,¹¹⁶ with half of children under the age of 5 being at risk of acute malnutrition.¹¹⁷ In the Democratic People's Republic of Korea, the figure is about 140,000 children under 5 years old. Similar figures are also reported in other countries under sanctions.¹¹⁸

55. Sanctions-induced trade restrictions and foreign businesses' overcompliance prevent the procurement of the equipment and spare parts needed to repair, maintain and develop water supply networks. Contamination of irrigation water with sewage resulted in a cholera outbreak affecting more than 20,000 persons in the Syrian Arab Republic in 2022.¹¹⁹

56. Following his visit to the Bolivarian Republic of Venezuela, the Special Rapporteur on the right to food reflected on the constraints placed on the Government's fiscal ability to implement its social protection programmes and deliver basic public services due to unilateral sanctions. He highlighted the negative impact of unilateral sanctions and overcompliance by foreign banks and suppliers on the availability of raw materials, supplies for the food and agriculture sector and fuel, food production and distribution and the accessibility of food, disproportionately affecting those living in extreme poverty or vulnerable circumstances.¹²⁰ The financial blockade and the confiscation of assets exceeding \$30 billion has severely restricted the ability of the Bolivarian Republic of Venezuela to import essential goods, including food and medicine, affecting basic public services and essential rights such as access to food, healthcare, education, housing and transportation.¹²¹

57. Unilateral sanctions have both direct and indirect impacts on the right to food and other social rights in third countries as their economies or supply chains might depend on States under sanctions. For example, in 2024, in Uzbekistan, unemployment benefits increased by 15 per cent in response to job losses abroad. Similarly, the number of Uzbek families receiving targeted social assistance increased by 12 per cent due to inflationary pressure caused by disruptions in international supply chains as a result of the unilateral sanctions imposed on the Russian Federation.¹²²

58. Unilateral sanctions imposed on fertilizer producers and the consequent disruptions in fertilizer deliveries have resulted in an increase in their cost and a decrease in their availability. The Special Rapporteur noted in her communications to Lithuania and the European Union that imposing sanctions on Belarusian potash fertilizers and impeding financing and transportation of 20 per cent of the world's potash exacerbated the global shortage of fertilizers, with consequent price increases and risks for food security in many parts of the world.¹²³ Measures taken by Lithuania to prevent the transportation of potash from Belarus to Africa and Latin America resulted in a shortage of fertilizers and adversely affected food security in countries in those regions.¹²⁴

¹¹⁴ FAO, *Special Report: 2021 FAO Crop and Food Supply Assessment Mission to the Syrian Arab Republic – December 2021* (Rome, 2021).

¹¹⁵ See A/73/85.

¹¹⁶ Zoë Pelter, Camila Teixeira and Erica Moret, "Sanctions and their impact on children", Discussion paper (New York, United Nations Children's Fund, 2022).

¹¹⁷ A/HRC/48/59/Add.2, para. 33.

¹¹⁸ Pelter, Teixeira and Moret, "Sanctions and their impact on children".

¹¹⁹ See <https://www.unicef.org/mena/press-releases/cholera-outbreaks-threaten-childrens-survival-middle-east>.

¹²⁰ See <https://www.ohchr.org/sites/default/files/documents/issues/food/statements/20240214-eom-statement-venezuela-sr-food-en.pdf>.

¹²¹ Submission from the Bolivarian Republic of Venezuela.

¹²² Submission from Uzbekistan.

¹²³ See communications LTU 1/2022 and OTH 27/2022.

¹²⁴ E/C.12/LTU/CO/3, para. 20.

59. Despite claims that the United States sanctions allow for the import of food and fertilizers, the removal of Russian banks from SWIFT, the restrictions imposed on Russian air and shipping routes, high oil prices and other restrictions make it difficult for countries to pay for and procure Russian goods. They have increased the cost of importing Russian grains, fertilizers, pesticides and other agricultural inputs on which many countries of the global South rely.¹²⁵ This could result in less planting, lower yields and lower qualities, exposing the Russian agricultural sector and global food supplies in general to non-negligible risks.¹²⁶

60. The Special Rapporteur notes with regret that the negative impact of unilateral sanctions also manifests in relation to other social and economic rights. Social security, through its redistributive character, plays an important role in poverty reduction and alleviation, preventing social exclusion and promoting social inclusion. The right to social security encompasses the right to access and maintain benefits, whether in cash or in kind, without discrimination in order to secure protection from, *inter alia*: (a) lack of work-related income caused by sickness, disability, maternity, employment injury, unemployment, old age, or death of a family member; (b) unaffordable access to health care; and (c) insufficient family support, particularly for children and adult dependents.¹²⁷ Unilateral sanctions reportedly affect the ability of States under sanctions to promote and guarantee occupational health and safety in deteriorating labour conditions, including through social protection schemes, and pose challenges to the delivery of up-to-date specialized equipment, including for pollutant measurement and for monitoring and measuring other health-related incidents.¹²⁸

61. Health is a fundamental human right indispensable for the exercise of other human rights. Every human being is entitled to the enjoyment of the highest attainable standard of health conducive to living a life in dignity. The right to health is closely related to and dependent upon the realization of other human rights, including the rights to food, housing, work, education, human dignity, life, non-discrimination, equality, prohibition of torture, privacy and access to information.¹²⁹

62. The Special Rapporteur addressed the impact of unilateral sanctions on the right to health in her 2023 thematic report¹³⁰ and identified their negative impact on all aspects of the enjoyment of the right to health of all people in countries under sanctions, including on access to adequate medicine, healthcare facilities, medical equipment and qualified medical assistance; on disease prevention and control; on an adequate number of health professionals with access to training and up-to-date scientific knowledge, technologies and research; and on international scientific and medical cooperation. To her regret, the situation has not changed since the publication of that report. Submissions for the present report reflect the shortages of medicine resulting in delays in treatment and growing mortality rates for paediatric cancer patients in the Islamic Republic of Iran,¹³¹ infant mortality in Zimbabwe due to the withdrawal of external health facility development funding,¹³² the impossibility of procuring medicine due to the blocking of payments from Cuba¹³³ and the refusal of monopolist producers to sell life-saving medicines to the Islamic Republic of Iran.¹³⁴ In the Syrian Arab Republic, the Special Rapporteur was made aware of the unavailability of services and support for persons with physical impairments and with mental health conditions, including those suffering from war trauma and stress.¹³⁵ Sanctions in that country have affected the right of women to reproductive health, including access to contraceptives,

¹²⁵ Submission from Sanctions Kill Campaign.

¹²⁶ FAO, "Addressing food security challenges faced by Near East and North Africa region due to the Ukraine crisis" (Cairo, 2022).

¹²⁷ Committee on Economic, Social and Cultural Rights, general comment No. 19 (2007), paras. 2 and 3.

¹²⁸ A/HRC/54/23, para. 58.

¹²⁹ Committee on Economic, Social and Cultural Rights, general comment No. 14 (2000), paras. 1 and 3.

¹³⁰ A/HRC/54/23.

¹³¹ Submission from the Maryam Educational Charity Institute.

¹³² Submission from Zimbabwe Human Rights Commission.

¹³³ Submission from Cuba.

¹³⁴ Submission from the Institute of Sustainable Development.

¹³⁵ See <https://www.ohchr.org/sites/default/files/documents/issues/ucm/statements/SR-UCM-EOM-statement-syria-2023-en.docx>.

and prevention of sexually transmitted diseases, undermining State capacity in the prevention and treatment of severe diseases and in vaccine development due to challenges in accessing essential materials and in collaborating with international partners.¹³⁶

63. The human right to adequate housing, which is derived from the right to an adequate standard of living, is of central importance for the enjoyment of all economic, social and cultural rights.¹³⁷ Unilateral sanctions have an adverse impact on all aspects of this right by affecting the construction of social housing, the provision of housing subsidies and the availability of social housing programmes for vulnerable groups such as older persons, orphans, homeless people, migrants and refugees, especially in countries where the construction of social housing is funded or subsidized by the State budget. For example, unilateral sanctions substantially slowed down housing construction programmes in the Bolivarian Republic of Venezuela, including due to a fall in the capacity of key industries such as those responsible for the production of iron sheets and cement and the blockade on the import of machinery and spare parts.¹³⁸ Unilateral sanctions have prevented the rebuilding of housing and critical infrastructure in the Syrian Arab Republic.¹³⁹

VI. Conclusions and recommendations

A. Conclusions

64. Unilateral sanctions take many forms and are aimed at States, regions, specific sectors of the economy, companies and individuals. As such measures directly affect the economies of the targeted States, they produce a direct and indirect negative impact on the enjoyment of all economic, labour and social rights, with spillover effects for third States, sanctioning States and the world population, hampering States' ability to ensure economic, labour and social rights.

65. Targeted sanctions, such as the freezing of assets, directly affect the right to property. Although such measures do not automatically deprive designated persons of their property, they undermine the right to property as the exercise of the powers and privileges normally associated with ownership is prohibited. Confiscation of property and of traded items, including customs seizures for alleged sanctions circumvention or alleged violations of export controls, exacerbates the situation further.

66. Targeted sanctions produce a series of implications for all economic, labour and social rights, especially with respect to the most vulnerable groups, such as older persons, children, women, homeless people, persons with disabilities, migrants and refugees. Such rights are interconnected; even a single negative implication usually triggers a series of adverse effects for all such rights, resulting in massive spillover effects. Such measures manifestly violate the right to property as well as a series of civil rights, including but not limited to the right to fair trial, the presumption of innocence and the right to legal assistance. Moreover, such measures violate the right to development.

67. Unilateral sanctions significantly affect the right to development and the achievement of all the Sustainable Development Goals. The imposition of unilateral sanctions as such constitutes a manifest impediment of the achievement of Goal 17, on strengthening the means of implementation and revitalizing the Global Partnership for Sustainable Development, due to the broad, multidimensional and comprehensive negative impact on all economic, labour and social rights.

68. States under sanctions bear the primary responsibility to ensure the protection, promotion and fulfilment, within their territory or jurisdiction, of all economic, labour and social rights within the maximum resources available. Unilateral sanctions reduce sanctioned

¹³⁶ Submission from the Institute of Sustainable Development.

¹³⁷ Committee on Economic, Social and Cultural Rights, general comment No. 4 (1991).

¹³⁸ See <https://www.fundavivienda.org/impacto-negativo-de-lasmedidas-coercitivasunilateralesen-el-disfrute-del-derechoa-la-vivienda-en-venezuela/> (in Spanish).

¹³⁹ See communication USA 30/2020.

States' revenues, thus undermining their ability to progressively implement economic, labour and social rights, due to the reduction in available resources. However, such States are under the obligation to take all possible measures within available resources to mitigate the negative impact of unilateral sanctions on human rights and to assist people under their jurisdiction or control in the promotion and protection of human rights affected by unilateral sanctions, including by means of instruments of diplomatic protection, international adjudication and the provision of advisory and other services. The impact on human rights of unilateral sanctions, the means of their enforcement and overcompliance should be reported to and properly taken into account by relevant United Nations organs and institutions, as well as other organizations.

69. States are responsible for violations of economic, labour and social rights or retrogression in the implementation of such rights in targeted societies due to the reduction of national capacity resulting from the imposition or enforcement of unilateral sanctions by their organs and officials; and for violations of the obligation of due diligence and consequent violations of human rights caused by overcompliance by private actors under their jurisdiction and control.

70. Unilateral sanctions have extensive adverse implications on economic, labour and social rights in third States, especially countries of the global South, which may also depend on assistance, trade or supplies from the States under sanctions. Unilateral sanctions affect the labour market and rights of local workers due to migration, contract losses and company closures. They may also affect the availability and quality of certain social and development programmes and access to food, seeds and fertilizers, among others.

71. Unilateral sanctions, the means of their enforcement and overcompliance have tremendous effect on the enjoyment of all aspects of the right to work. Sanctions often result not only in higher unemployment rates, but also in wage reductions, the deterioration of working conditions, a shift towards informal employment, the weakening of labour rights, protections and standards and the shrinking of the space for entrepreneurship.

72. Any overbroad interpretation of the constituent treaties of international organizations invoked as a basis for illegal coercion against States already affected by unilateral sanctions and whose capacity to alleviate the negative effects on economic, labour and social rights is highly limited, constitutes a manifest violation of the principles set forth in the Charter of the United Nations, the law of such organizations, international human rights law and Sustainable Development Goal 17, while impeding the achievement of all the Sustainable Development Goals.

B. Recommendations

73. **Sanctioning States and regional organizations should:**

(a) Review measures taken without or beyond the authorization of the Security Council and lift those that do not meet the criteria for retortion or countermeasures, in full conformity with the standards and limitations of the law of international responsibility, as constituting unilateral coercive measures;

(b) Guarantee that delivery of humanitarian assistance to countries under sanctions by humanitarian actors is not viewed as a punishable action within their national jurisdiction;

(c) Ensure that the implementation of the humanitarian resolutions of the Security Council aimed at meeting the basic needs of the people is not impeded by any unilateral measures, including any impediments to transferring money or delivering or insuring humanitarian cargo;

(d) Take all legislative, institutional and administrative measures possible to avoid and minimize overcompliance and ensure that the activities of private businesses under their jurisdiction and/or control do not violate the right to property, work, social security, food, housing, health, education and other human rights extraterritorially, as

reflected in the guiding principles on sanctions, business and human rights¹⁴⁰ and the commentary thereto.¹⁴¹ Non-fulfilment of this obligation can be used as grounds for asserting the responsibility of the relevant States for violations of treaty obligations to protect relevant economic and social rights, alongside the responsibility of relevant businesses;

(e) Ensure access to justice in accordance with international standards for all those whose economic, labour and social rights are affected by unilateral sanctions and overcompliance.

74. Unilateral sanctions should never affect the functioning of critical infrastructure relevant to healthcare, food, agriculture, electricity, water supply, irrigation, sanitation, seeds and fertilizers, all of which are necessary for the survival and well-being of populations.

75. Businesses should avoid zero-risk policies and overcompliance, which are incompatible with their obligations, as set out in the guiding principles on sanctions, business and human rights.

76. International organizations should refrain from the practice of legitimizing or justifying unilateral coercive measures, which are clearly prohibited by international public law. Provisions of internal law of international organization cannot be invoked to avoid the responsibility of States under international law and/or liability for damages incurred. Shifting responsibility between international organizations, States and businesses does not provide any ground for excluding such responsibility or liability under international public law.¹⁴² All responsible actors bear separate international legal responsibility for internationally wrongful acts committed.

77. States under unilateral sanctions should:

(a) Take all steps within the maximum of available resources to mitigate the negative impact of unilateral sanctions;

(b) Report on all types of challenges arising from unilateral sanctions and overcompliance on economic, labour and social rights in their engagement with all relevant United Nations entities and mechanisms (including the World Health Organization, ILO, FAO, the United Nations Development Programme and the United Nations Educational, Scientific and Cultural Organization), the universal periodic review and the treaty bodies, within the scope of their mandates;

(c) Provide information for the monitoring and impact assessment tool in accordance with the methodology developed by the Special Rapporteur to ensure the accuracy, reliability and trustworthiness of the results;

(d) Inform non-governmental organizations and research institutions about the possibility of submitting information for the monitoring tool to encourage diverse engagement and provide for verification of the results.

78. United Nations entities and organs should:

(a) Monitor, within their mandates, the impact of unilateral sanctions and overcompliance on the ability of States under sanctions to fulfil their international obligations under the relevant human rights conventions on the right to adequate food, adequate housing, education, health, social security, water and sanitation;

(b) Monitor the impact of unilateral coercive measures on the ability of States under sanctions and third States to fulfil their international obligations under the relevant conventions, follow up on their respective recommendations and other relevant acts and take them into account while assessing the human rights situation in the country, based on factual evidence;

¹⁴⁰ See <https://www.ohchr.org/sites/default/files/documents/issues/ucm/events/international-conf-sanctions-business-hr/gps-sanctions-business-hr.pdf>.

¹⁴¹ See <https://www.ohchr.org/sites/default/files/documents/issues/ucm/commentary-gpssbhr-2025.pdf>.

¹⁴² Guiding principles on sanctions, business and human rights, principle 29.3.

(c) Provide their responses to the monitoring and impact assessment tool annually, both directly and through country teams;

(d) Undertake effective measures to ensure that their decisions are not used by member States for the legitimization or justification of the use of unilateral coercive measures.

79. The International Labour Organization should:

(a) Take the lead in monitoring the unhindered exercise of the right to work, the right to decent work, labour rights and social security in the face of unilateral sanctions, the means of their enforcement and overcompliance;

(b) Monitor, in line with its mandate, the impact of unilateral sanctions on the ability of States under sanctions to fulfil their international obligations under ILO conventions, recommendations and strategies on decent work, green jobs, social protection and occupational safety and health, and assess the policies of sanctioning States and instances of overcompliance by businesses and the financial sector.

80. The treaty bodies should:

(a) Include in their engagement with States Parties an assessment of the impact of unilateral sanctions on economic, labour and social rights within the scope of the relevant human rights treaties;

(b) Include their assessment of the impact of unilateral sanctions, the means of their enforcement and overcompliance in their general comments on relevant economic and social rights;

(c) Assess the impact of unilateral sanctions on the ability of States under sanctions to effectively respond to their obligations under the provisions of the treaties.

81. The adverse effects of unilateral sanctions on human rights should be included and assessed during the sessions of the universal periodic review and by other relevant United Nations mechanisms mandated to monitor, inter alia, progress in the realization of the Sustainable Development Goals.

82. States are invited to engage in international adjudication, including through competent international quasi-judicial and human rights bodies, to settle disputes, protect human rights and determine responsibility and redress in sanctions cases.

83. The Special Rapporteur notes the important role of international and local civil society organizations in providing humanitarian assistance and life-saving services, especially to all those in vulnerable situations in countries under sanctions. Any discussions about the humanitarian situations in countries under sanctions should be inclusive and allow for the participation of all stakeholders, including both international and local civil society actors.

84. International and national NGOs, States, scholars, research institutions and individuals from sanctioning and sanctioned countries and third countries are invited to contribute to the monitoring and impact assessment tool by submitting information on the impact of unilateral coercive measures, the means of their enforcement and overcompliance on the enjoyment of economic, labour and social rights.

85. All stakeholders, including States, United Nations entities, specialized agencies and other international and regional organizations, are invited to provide access to justice to protect relevant human rights and to contribute to the development of the guidance on humanitarian action and the guidance on responsibility, accountability and redress, both of which are under development by the Special Rapporteur.
