



European Union Increase Financial Pressure on the Fighting Parties in Sudan

By Anrike Visser

On April 15, 2023, fighting broke out in Sudan between the Rapid Support Forces (RSF) and the Sudanese Armed Forces (SAF), shattering the hopes for a transition to a civilian-led government.¹ Today, the hostilities continue to escalate: ethnic cleansing has been reported, the Sudanese now constitute the largest displaced population in the world, and the death of 2.5 million people due to mass starvation is looming large.^{2, 3, 4, 5, 6, 7, 8}

More than a year since the start of the civil war, the response of the international community has been insufficient to meet the crisis unfolding in Sudan.^{9, 10} In the midst of this crisis, the European Union (EU), with its considerable ties to Sudan via aid, trade, and migration,^{11, 12, 13, 14, 15} can help drive change by blocking the incentives of the conflict. Until now, the EU has lagged in its response to the conflict, especially compared to the United States (US) and, to a lesser extent, the United Kingdom (UK). Although the EU swiftly condemned the violence and has dedicated significant amounts of aid together with EU member states, it has not done enough to block the funding feeding the conflict, and it has not gone far enough in its drive to hold the individuals principally responsible for the fighting to account.^{16, 17}

While the US and UK imposed sanctions within two and three months, respectively, of the start of the fighting, the EU only imposed sanctions nine months after the start of the war. The US has also scaled up sanctions and increased pressure over six escalating rounds of sanctions, including on top leadership. The EU, on the other hand, has launched only two rounds of sanctions that steer clear of top national leadership and their families, leaving significant sanctions gaps.^{18, 19, 20, 21, 22, 23} The EU also falls short of the UK in the number of entities sanctioned, although the UK hasn't targeted any individuals.^{24, 25} The limited EU sanctions to date are a good starting point, but more needs to be done to create sufficient pressure on the warring parties to end the violence.

The use of a full range of more robust tools of financial pressure on RSF and SAF top leadership and their enablers would allow the EU to help create desperately needed leverage for the struggling mediation efforts. Additional sanctions should be enacted to target the domestic and international proxies, enablers, companies, and subsidiaries facilitating the ongoing human rights abuses, as well as the trade in arms and gold essential to sustaining the fighting. The EU—along with the Financial Action Task Force (FATF)—should add Sudan to its list of high-risk third countries that have strategic deficiencies in their anti-money laundering and countering the financing of terrorism (AML/CFT) regimes in order to help reduce the risk of illicit funds entering the EU financial system. It should also issue warnings to EU companies in the form of business and bank advisories.



The EU must take a strong and united stance against the leaders who put their personal and financial interests above the well-being of Sudan. It is time for the EU to ramp up the pressure and help end the conflict.

Economic Interests

As the war in Sudan rages on and the RSF and SAF continue hostilities despite attempts to facilitate negotiations, limiting access to the economic interests of the warring parties becomes a key pressure point for the EU and other governments invested in the country's return to peace.²⁶ Under former President Omar al-Bashir, both the RSF and SAF accumulated a wide range of economic interests, and both parties have repeatedly rejected civilian oversight of these interests, which range from gold mining to construction and hospitality.^{27, 28, 29, 30, 31, 32} The desire to maintain control of these is partly driving the conflict, while the money earned is funding it.^{33, 34}

The RSF, and especially the family of General Mohamed Hamdan Dagalo, or “Hemedti,” has accumulated a significant commercial empire, with interests in mining, construction, agriculture, real estate, and procurement.^{35, 36, 37, 38} The general's family owns or controls multiple prominent conglomerates in an “expanding empire” of revenue-generating companies.³⁹ This network is not contained within the borders of Sudan. It includes front companies and bank accounts in the United Arab Emirates (UAE).^{40, 41} Sudanese gold has been exported to Dubai since the beginning of the war, according to a report from the United Nations (UN) Panel of Experts on Sudan from January 2024.⁴² And RSF forces have reportedly acted as mercenaries in Yemen via a deal with the UAE on behalf of the Saudi-led coalition.⁴³

The SAF also operates or is involved in extensive commercial holdings stemming from the Bashir era.^{44, 45, 46} The SAF is associated with Defense Industries System (DIS), formerly known as the Military Industrial Corporation, which has been sanctioned by the US and the UK.^{47, 48} DIS generates “an estimated \$2 billion in revenue via hundreds of subsidiaries across various sectors,” according to the US Department of the Treasury,⁴⁹ and Africa Intelligence writes that its corporate structure is “an obscure maze in which public and private interests are intertwined.”⁵⁰ Other prominent SAF-linked interests include the Giad conglomerate, which consists of numerous subsidiaries across the construction, automotive, hospitality, and pharmaceutical sectors.^{51, 52, 53, 54}

Both the SAF and RSF have resisted ceding control of these lucrative companies in the past.⁵⁵ For instance, in 2020, the Sudanese government reportedly attempted to bring all military-owned companies not related to defense under the supervision of the Ministry of Finance. An anonymous cabinet advisor said that the SAF had “formally agreed to cooperate with the process but, in practice, is not sharing the relevant financial data.”⁵⁶

For the two military forces, protecting their significant economic interests is paramount, and so taking away these financial incentives—which may well help fund the fighting—is a crucial avenue to speed up the path towards peace and end the conflict.

EU Response

As the international community looks to create leverage that will influence the RSF and SAF to cease hostilities, the EU has an important role to play. And while the EU stepped up in the immediate aftermath of the conflict's outbreak by condemning the fighting and offering aid, its response in terms of financial pressure has been far slower than other international partners, like the US and UK.⁵⁷ After the fighting broke out in Sudan, the EU released a statement within days to “strongly condemn” the fighting.⁵⁸ Over the following months, the EU and its member states made significant financial commitments totaling almost 900 million euros to the humanitarian response—almost half of the total contributions.^{59, 60}



The EU has also been supportive of dialogue and criminal justice. In June 2023, for instance, the EU was a signatory on a statement by the Friends of Sudan Group members—including France, Germany, Norway, and Sweden—that called for the return to the Jeddah dialogue facilitated by Saudi Arabia and the US.⁶¹ Later, in November 2023, the EU expressed readiness to “facilitate dialogue” if needed.⁶²

Similarly, in July 2023, three days after the International Criminal Court announced its investigation into “fresh allegations of war crimes and crimes against humanity in the Darfur region,” the EU said it was “actively engaged in supporting international criminal justice” in Sudan.^{63, 64} This was later reiterated in November 2023, with the EU recommitting to “monitoring and documenting human rights’ violations and abuses.”⁶⁵

When it comes to financial pressure, however, the EU’s response has been slower and less pronounced. On October 9, 2023, the EU announced a new sanction regime for Sudan, but it wasn’t until January 2024 that the EU imposed sanctions, targeting entities only.⁶⁶ Another five months later, the EU designated six individuals, but it did not target some of the top leaders or involved family members that had been previously sanctioned by the US.^{67, 68, 69, 70, 71, 72, 73} Yet by going further with sanctions and other tools of financial pressure, the EU has the opportunity to make a significant impact.

Sanctions efforts

One of the key ways to target the financial interests of the RSF and SAF is through targeted network sanctions. The EU currently has several sanctions regimes that could be used to enact sanctions against the warring parties in Sudan, including the Global Human Rights Sanctions Regime, which was previously used to sanctioned Sudanese companies affiliated with the private military company Wagner Group—since reconfigured as the Africa Corps.^{74, 75} In addition, the EU announced a new sanctions regime for Sudan on October 9, 2023. The criteria for designation under this regime include threatening the peace, stability, or security of Sudan; undermining efforts to resume the political transition; impeding humanitarian assistance; and planning, directing, or committing serious human rights violations or abuses or violations of international humanitarian law.⁷⁶

However, the EU has been slower to apply sanctions than the US and UK, which imposed their first sanctions in June and July 2023, respectively. For instance, while the Sudan sanctions regime was rolled out in October 2023, it wasn’t until January 2024—more than nine months after the fighting broke out—that the EU imposed sanctions.⁷⁷ Even then, it didn’t entirely close the gap with the US, which had already targeted one more entity and six individuals, including senior RSF leaders and former senior Sudanese government officials.^{78, 79, 80, 81} The EU’s second round of sanctions, while including individuals, avoided top national leaders and their close associates and family, instead mainly targeting mid-level officials involved in airstrikes and the violence in Darfur.⁸² The EU did target two individuals facilitating the financial flows and economic interests on both sides, although it did not target several UAE-based companies currently blocked by the US pending investigation.⁸³



Sudan Sanctions by the EU, US, and UK in Response to the War Starting April 15, 2023

Name	EU	US	UK
Individuals			
Abdelrahim Hamdan Dagalo	-	September 6, 2023 ⁸⁴	-
Abdul Rahman Juma (aka Abdulrahman Juma Barakallah) ⁸⁵	June 24, 2024 ⁸⁶	September 6, 2023 ⁸⁷ (visa restriction only)	-
Ali Karti (aka Ali Ahmed Karti Mohamed)	June 24, 2024	September 28, 2023	-
Taha Osman Ahmed al-Hussein	-	December 4, 2023 ⁸⁸	-
Salah Abdallah Mohamed Salah	-	December 4, 2023	-
Mohamed Atta Emoula Abbas	-	December 4, 2023	-
Ali Yagoub Gibril (potentially deceased) ⁸⁹	-	May 15, 2024 ⁹⁰	-
Osman Mohamed Hamid Mohamed	-	May 15, 2024	-
Mirghani Idriss Suleiman	June 24, 2024	-	-
El Tahrir Mohamed El Awad El Amin	June 24, 2024	-	-
Mustafa Ibrahim Abdel Nabi Mohamed	June 24, 2024	-	-
Masar Abdurahman Aseel	June 24, 2024	-	-
Entities			
Al Junaid Multi Activities Co Ltd	January 22, 2024 ⁹¹	June 1, 2023 ⁹²	July 12, 2023 ⁹³
Tradive General Trading L.L.C.	January 22, 2024	June 1, 2023	July 12, 2023
Defense Industries System	January 22, 2024	June 1, 2023	July 12, 2023
Sudan Master Technology	January 22, 2024	June 1, 2023	July 12, 2023
GSK Advance Company Ltd	January 22, 2024	September 28, 2023 ⁹⁴	July 12, 2023
Aviatrade LLC	-	September 28, 2023	-
Alkhaleej Bank Co Ltd	-	January 31, 2024 ⁹⁵	April 14, 2024 ⁹⁶
Zadna International Co for Development Ltd	January 22, 2024	January 31, 2024	July 12, 2023
Al-Fakher Advanced Works Co Ltd	-	January 31, 2024	April 14, 2024
Red Rock Mining	-	-	April 14, 2024
Blocked pending investigation			
Al Jil Alqadem General Trading L.L.C.	-	June 6, 2024 ⁹⁷	-
Al Zumoroud and Al Yaqoot Gold and Jewellers Trading L.L.C.	-	June 6, 2024	-
Capital Tap General Trading L.L.C.	-	June 6, 2024	-
Capital Tap Holding L.L.C.	-	June 6, 2024	-
Capital Tap Management and Consultancies L.L.C.	-	June 6, 2024	-
Creative Python L.L.C.	-	June 6, 2024	-
Horizon Advanced Solutions General Trading – Sole Proprietorship L.L.C.	-	June 6, 2024	-



Existing RSF sanctions

US sanctions target top national leaders responsible for undermining the stability of Sudan, including the family of Hemedti, as well as those involved in human rights abuses. As a result, they send a strong signal to Hemedti to end the violence or risk further sanctions that could potentially target himself or his family members and business associates. For example, US sanctions target Abdelrahim Hamdan Dagalo, a high-ranking leader of the RSF and the brother of Hemedti, as well as former state minister Taha Osman Ahmed al-Hussein, who the US has determined played a “pivotal role” in the RSF’s engagement with regional actors.⁹⁸ RSF sector commander in West Darfur, Abdul Rahman Juma, faces visa restrictions for his involvement in kidnapping and killing the governor of West Darfur, Khamis Abbakar, and his brother.⁹⁹ Finally, Ali Yagoub Gibril, now-deceased Central Darfur commander,¹⁰⁰ and head of operations Osman Mohamed Hamid Mohamed were sanctioned for leading or supporting the RSF’s war campaign.¹⁰¹

The EU, on the other hand, has taken a different approach to accountability, mainly targeting those involved in human rights abuses in Darfur, as opposed to the top leaders on the national level responsible, to some extent, for the start of the fighting.¹⁰² This includes Abdul Rahman Juma, currently facing US visa restrictions, as well as Masar Abdurahman Aseel, a prominent tribal leader of the Mahamid clan in West Darfur who collaborated with the RSF in ethnically targeted attacks, according to the EU.¹⁰³

By avoiding members of the Dagalo family who control companies funding the RSF, as well as RSF top leadership outside of Darfur, the EU sanctions place less pressure directly on Hemedti to sincerely negotiate a return to peace.¹⁰⁴ The EU did, however, designate the Dubai-based financial advisor of the RSF, Mustafa Ibrahim Abdel Nabi Mohamed, who serves as the director of al-Khaleej Bank, which is 60% owned by companies associated with family members of Hemedti.¹⁰⁵ The EU did not sanction those family companies or the associated family members.

Existing SAF sanctions

When it comes to the SAF, the US targets those involved in destabilization efforts in an aim to increase pressure to more actively pursue a negotiated peace. Former high-ranking Sudanese government official Salah Abdallah Mohamed Salah, for example, was designated by the US for undertaking actions to destabilize Sudan, having even called for the SAF to overthrow the civilian government at one point.¹⁰⁶ Mohamed Atta Emoula Abbas, former Sudanese ambassador and former leader of Sudan’s National Intelligence and Security Service, and Ali Karti, the former minister of foreign affairs, were sanctioned for joining the Sudanese Islamic Movement, which was involved in actions derailing “Sudan’s progress toward a full democratic transition.”^{107, 108}

The EU, on the other hand, seems to be focused on targeting those responsible for airstrikes and violence and on stopping the flow of funds to the SAF. The EU did target US-sanctioned Karti, but not Salah or Abbas.^{109, 110} Instead, the EU designated the commander of the Air Force, El Tahrir Mohamed El Awad El Amin.¹¹¹ As with the RSF, the EU has targeted the SAF’s economic interests by sanctioning the general director of Defense Industries System, SAF officer Lieutenant General Mirghani Idriss Suleiman. Here again, the EU steers clear of several former high-ranking SAF officials on the national level and instead targets individuals responsible for civilian harm or for enhancing the SAF’s fighting capabilities.^{112, 113}

Sanctions gaps

By the time the EU imposed sanctions on individuals in Sudan, 14 months had passed since the start of the war and nine months since the US had sanctioned the first individuals. The EU could have come out strong by sanctioning all individu-



als and entities already sanctioned by other jurisdictions, including the US and UK. Instead, the EU selected lower-level officials and kept the European market open to business for several individuals sanctioned by the US.

Right now, there are various steps that the EU can take to close the gap and impose consequences for those national leaders involved in undermining peace or committing atrocities. These include more closely coordinating with partners in the US and other jurisdictions for future designations; targeting all the individuals involved in the violence, especially those that are already sanctioned by other jurisdictions; naming the subsidiaries of already sanctioned companies; and communicating clearly about the challenges and goals of the sanctions designations.

For sanctions to be effective, they should have clear objectives, be ramped up over time, and be imposed in lock step with other jurisdictions. Although the EU has taken some action condemning the violence and supporting monitoring efforts, the main national leaders responsible for the violence have not faced serious financial consequences from the EU, nor have their family members who are linked to companies funding the conflict.^{114, 115} This fractured international response leaves a loophole for US-sanctioned individuals to divert payments via European companies or to simply change transfers from US dollars to euros, as has been seen in other cases. Israeli businessmen Dan Gertler, for example, reportedly continued to receive “millions of euros” after being sanctioned by the US for corruption in the mining sector in the Democratic Republic of Congo.¹¹⁶ Synchronizing the targets and timing of future sanctions across jurisdictions will increase their impact. But for now, by failing to target the main individuals responsible for the violence, the EU offers a potential path for them to evade sanctions by the US and UK and continue business as usual.

To properly motivate the RSF and SAF to end the fighting and engage in peace negotiations, all the high-ranking national leaders need to experience the financial consequences of their actions.¹¹⁷ The EU should immediately impose targeted network sanctions on the as yet unsanctioned high-ranking RSF and SAF officials at the national level and on their corporate networks and enablers. In addition, the EU, US, and UK should significantly increase the pressure on the warring parties to return to negotiations by escalating the sanctions and targeting more current high-ranking national leaders on both sides.^{118, 119} Sanctions should also target more relevant individuals in close proximity to the main leaders of the RSF and SAF, as security and government officials involved in licit or illicit economic activities often use the names of family members or associates to obscure their own connection and circumvent oversight.¹²⁰ Identifying these enablers, including family members, and sanctioning them is thus crucial to increase the effectiveness of sanctions.

Governments should dedicate significant resources to identifying all those involved in destabilization efforts and human rights violations, in both the RSF and SAF. Increased sanctions should also target the full networks facilitating the supply of funding and arms to both parties, including key actors, close associates, enablers, involved family members, and any economic interests within Sudan and abroad. For example, on June 6, 2024, the US blocked seven UAE-based entities that are being investigated for possible involvement in undermining US sanctions on Sudanese individuals and entities;^{121, 122} the US-sanctioned Taha Osman Ahmed al-Hussein reportedly owns six properties in Dubai;¹²³ and on June 12, 2024, a UAE plane type used for “lethal aid transfers from the [UAE] to the RSF for flights to locations in Chad” was identified above El-Fasher in North Darfur.¹²⁴ The EU should consider similar sanctions targeting the enablers on both sides. Particular attention should be paid to those facilitating the illicit gold trade in the UAE and elsewhere; the mining sector is of the utmost importance, and investigative teams from relevant governmental agencies and financial institutions should devote significant time to identifying relevant companies for further sanctions.^{125, 126, 127, 128}

As sanctions on entities are often circumvented via the use of subsidiaries, the EU should explicitly mention in sanctions designations or listings the main relevant subsidiaries known to meet the so-called “ownership and control” threshold. For the EU, this threshold is ownership of 50% or more by a sanctioned entity or individual or joint ownership of more



than 50% by multiple sanctioned individuals or entities.^{129, 130} Regardless of the owned shares, the EU also includes entities controlled by a sanctioned person or entity, for example in the case of majority voting rights, the power to appoint or remove the majority of the management, administrative, or supervisory body or the right to use part or all of the assets of a legal person or entity.¹³¹

This threshold is designed to prohibit the flow of funds or economic resources to subsidiaries that meet the ownership and control criteria, but these subsidiaries often fall through the cracks at financial institutions due to the sheer number of sanctions designations.¹³² While the naming of subsidiaries by governments doesn't relieve financial institutions of the responsibility to conduct proper investigations, the EU can—and should—make this important contribution, as they likely have access to information that banks do not. For sanctioned Sudanese conglomerates and holding companies, the EU should add the names of known major subsidiaries to sanctions listings to prevent circumvention. In principle, these subsidiaries are considered to be providing funds to the related sanctioned entity unless it can be reasonably determined “that the funds or economic resources concerned will not be used by or be for the benefit” of that listed person or entity.¹³³

To ensure that sanctions on entities or their subsidiaries do not harm regular civilians, the EU has adopted exemptions, including for the provision of humanitarian aid and other activities that support basic human needs.^{134, 135, 136, 137} Nonetheless, disinformation campaigns often blame sanctions for the economic impact of civil war or economic mismanagement. To counter the possible emergence of disinformation from the RSF, SAF, and their enablers, the EU must adopt a proper communication strategy to accompany any sanctions.^{138, 139} Sanctions should be pegged to a viable, measurable political strategy with clear benchmarks and objectives, including an end to the violence and a commitment to transitioning to civilian rule.

Other tools of pressure

Beyond individual sanctions, the EU has other tools of financial pressure that can be utilized to increase the pressure on the warring parties, and some of these have already been deployed by other jurisdictions.

EU and FATF Greylists

The European Commission is mandated to assess high-risk third countries with deficiencies in their AML/CFT frameworks.¹⁴⁰ Considering the lack of oversight in the current violent climate, the EU should assess Sudan as soon as possible and should strongly consider adding the country to its list of high risk jurisdictions—the so-called “grey list.”¹⁴¹ If Sudan were to be listed, European banks would be obliged to conduct additional checks and balances on financial transactions stemming from the country in order to protect the European financial system from the risks of illicit finance.^{142, 143} The same should also apply to countries enabling the illicit arms and gold trade with the Sudanese parties to the conflict, including the UAE. For instance, the European Parliament recently voted to keep the UAE on the grey list partly because of its role in trading conflict gold from Sudan.¹⁴⁴

The EU should also call upon the FATF to assess Sudan's money laundering and terrorism financing risks and consider increasing scrutiny by adding the country to its own grey list of jurisdictions under increased monitoring.^{145, 146} Sudan was scheduled for an assessment in 2023, but no public statement has been made to date, meaning that its last published assessment is from 2015, when it was removed from the black list.^{147, 148} While European banks are not required to enforce FATF lists, unlike the EU grey list, the FATF's assessments are taken seriously by the international financial community, which adds an additional layer of control over any financial misconduct stemming from the violent capture of Sudanese institutions and banks.



Advisories

The EU and its member states should also consider issuing warnings similar to that shared by the US on Sudan after the fighting commenced in April 2023. On May 31, 2023, the US issued an updated interagency business advisory on Sudan, urging US companies to “conduct heightened due diligence related to human rights issues and the potential that their activities could contribute to conflict, corruption, or other activities that threaten Sudan’s stability.”¹⁴⁹ The advisory specifically identifies SAF and RSF affiliated companies, gold mining, dual-use goods, and defense products and services as being high risk. The UK has published similar advisories in the past, as well, specifically on South Sudan.¹⁵⁰ The EU should consider issuing a comparable advisory for businesses active in Sudan to warn them of the reputational risks of involvement with companies linked to the RSF and SAF.

Given the enhanced potential for illicit financial flows stemming from Sudan during times of increased conflict and limited civilian oversight, the EU should also issue an advisory for financial institutions highlighting the risks of money laundering by the SAF, the RSF, and their companies.¹⁵¹ The goal of the advisory would be to direct financial institutions to be alert to potential transactions related to illicit arms, dual-use goods, and the gold trade, as well as to the misappropriation of public financing, the offshoring of wealth by sanctioned entities, and the purchase of property and luxury goods abroad by the perpetrators of violence.

Closing the Gap

While the EU has made important contributions to peace efforts in Sudan by condemning the violence, committing significant amounts of aid, supporting peace dialogues, and monitoring human rights violations, it has not gone far enough in applying financial leverage to influence the considerations of the top leaders of the SAF and RSF and their enablers. Considering the economic drivers of the conflict and the EU’s significant leverage, this is a crucial oversight from Brussels.

It took the EU considerably longer to impose sanctions than the US and UK, and gaps remain between their respective designations. As a result, the EU risks partially undermining the financial pressure imposed by the US on top national leaders responsible for the fighting and exposing the European financial system to sanction circumvention efforts. Improved sanctions efforts targeting the main national leadership and the remaining gaps with entities sanctioned by the US and UK, better coordination, the issuance of advisories, and the assessment of the country in light of the EU and FATF grey lists would contribute to closing existing loopholes and helping bring the warring parties to the negotiation table.

These actions cannot wait, as the people of Sudan have suffered long enough, and circumstances are becoming increasingly dire with each passing day. In the face of horrific ethnic cleansing and unprecedented famine, sanctions and other tools of pressure need to be ramped up now.^{152, 153, 154, 155} The EU must take swift action to contribute to a durable and sustainable ceasefire and a transition to a civilian-led government with appropriate civilian oversight on all military and security forces.



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