Though most attention paid to using international sanctions properly fixates on their design and application, understanding how to remove sanctions is potentially more important. In essence, if sanctions are a psychological tool as much as an economic one, then their power lies in the ability of sanctioners to turn the spigot of “pain” on and off against their targets. Those sanctioned come to understand and expect that if they are willing to accommodate the interests of their tormentors, they will be free of that pain and able to resume business as usual. If, on the other hand, those against whom sanctions are applied come to realize that there is almost nothing that they can do which will satisfy the demands of sanctioners, or that sanctions are a permanent state of affairs once imposed, then the signals sent to the sanctioned and their responses will be far different, and in all likelihood less useful.

Governments know this, to be sure, including those that use sanctions as a primary instrument of state policy. Sanctions relief has figured prominently in U.S. policy over the past two decades, from the effort to relieve Iraq of Saddam-era sanctions after the 2003 invasion to the drive to get business back into Myanmar after its policy reversals. Perhaps nowhere was sanctions relief a more important element of diplomacy than in the case of the Joint Comprehensive Plan of Action (JCPOA) with Iran, where the agreement spelled out the terms and modalities of sanctions relief in exacting detail.

Yet in all of those cases, not to mention others like Cuba or Libya, sanctions relief has been controversial, complicated and halting. This has in turn generated resentments and frustrations in the countries once targeted with sanctions,
creating political problems and tensions that have even imperiled the agreements that permit relief to be granted. Donald Trump’s decision on May 8 to violate the JCPOA by withdrawing the United States from the agreement in the absence of Iranian material breach is a case in point as to the controversy that surrounds such agreements. None of this is helpful for the development of sanctions as a tool or in managing the specific situations affected.

For this reason, it is useful to consider carefully the common issues that lead to friction or complications in sanctions relief, as well as potential remedies. This article identifies three of each, to be addressed in turn.

Problems

The three problems identified are: unclear, confused or misaligned objectives; entrenched politics; and the complexity of pushing business interests.

Unclear Objectives

The decision to impose sanctions is, in many ways, the easy part of a sanctions campaign. In fact, it is so easy to decide to impose sanctions that, often, those responsible for designing sanctions measures learn about the intention to do so from an announcement by the senior echelons in their respective governments. It then falls upon the individuals who design them to figure out exactly what kinds of sanctions measures would be appropriate or effective, and how best to bring them into force.

Left usually until last is any conceptual work about why the sanctions are being imposed and precisely what it would take for sanctions to be removed. This is due in no small part to the usual presence of exigent circumstances: when a country has been invaded or a nuclear or humanitarian crisis is at risk, it is perhaps not the time for deep thinking as to when sanctions pressure may be alleviated. Indeed, some within a government may even argue that discussion of such concepts early on in a sanctions campaign can be deleterious to its execution, suggesting weak commitment to see sanctions through.

This is completely wrong-headed for many reasons, but particularly because the absence of concerted effort to decide when sanctions may be relieved is damaging to the kind of strategic messaging necessary to persuade the sanctions target to choose a different policy. Even worse, the delay in defining the objective of sanctions can also result in those imposing sanctions coming to radically different visions of what their final objectives may be. This can happen both within and between governments.

The obvious downside for such confusion is that it is much more difficult, then, for sanctioners to agree that they have met their objectives after their target takes
some kind of remedial action. But, it also affects the types of sanctions chosen and the severity of pressure to be applied. Consider the imposition of sanctions as the equivalent of a race: it matters considerably whether the participants in the race believe they are on a 5 K run or a 26.2-mile marathon. It changes the perception of the appropriate pace and the amount of energy that ought to be burned at any particular stage. And, of course, it means that there is a different perception as to how far the racers must go. For sanctions, this means that some might believe a modest change in policy is sufficient while others understand implicitly that only radical steps by the offending party would be acceptable to warrant a change in sanctions status.

Iran post-JCPOA offers the clearest example of the dislocation that can be created by misunderstood or confused objectives. Some in the United States thought that the objective being pursued was to transform Iranian government policy across a range of topics, and to make it impossible—physically—for Iran to ever develop nuclear weapons, requiring Iran’s abandonment of most of its nuclear program. Others understood that the objective was to reduce the possibility of a nuclear crisis in the near term, building confidence in the nature of Iran’s nuclear program over time so as to permit future negotiations across the range of problem areas. Some doubtless fell in between. This confusion in objectives led to political problems around the negotiation and implementation of the JCPOA both within the United States and between multiple governments, and arguably created the situation we have at present: an international agreement, spearheaded by U.S. negotiators, defended by most but not all of the international community, and now absent the United States after Trump’s decision to withdraw on May 8.

Beyond contributing to political issues, confusion regarding objectives is also damaging to sanctions relief, particularly when the imposing country is democratic with an open economy. It leads to uncertainty in the business community, which—as we will see—is a vital component of making sanctions relief work, and also generates anxiety on the part of the previously sanctioned, making them question whether an agreement potentially concluded after much sacrifice would remain in effect.

Objective confusion also limits the utility and attractiveness of sanctions relief in future agreements. If those being subjected to sanctions perceive the likelihood of goalpost movement after an agreement is reached, then they have little incentive to sign up in the first place. This is particularly concerning when sanctions target long-term adversaries.
Political Acrimony

Bilateral politics often interfere with realizing agreed sanctions relief. Here, bilateral politics refers to the complicated, intractable issues that are involved in any country’s ability to “forgive and forget” sufficiently to make national security-related agreements with adversaries. Yet, such agreements with adversaries are among the most important objectives of diplomacy. As President Obama noted when the JCPOA was concluded, you do not make arms control agreements with your friends, and the same can be said about the sorts of agreements that could involve sanctions relief.

Over the last 20 years, sanctions have been invoked by the United States more often against either 1) systemic ills such as weapons proliferation, terrorism or human rights violations pursued by individuals or entities; or, 2) countries, sometimes for the same crimes but often because of deeper competitions or disagreements about international situations. The Cuba sanctions are a case in point: though the United States imposed sanctions on Cuba for specific reasons, the overarching cause over much of the history of the embargo was Cuba’s realignment with the Soviet Union and export of revolution abroad.

Agreements with such adversaries have increasingly become complicated (particularly in the United States) due to an almost Manichean conviction on the part of U.S. political figures that adversaries are not merely opposed to the U.S. agenda, but are forces of evil with whom compromise is not merely unwise but immoral. President George W. Bush invoking the “axis of evil” with respect to Iraq, Iran and North Korea in 2002 is perhaps the most well-known example of this type of framing, but it is far from the only one. Advocates of a more aggressive U.S. posture with respect to terrorism, Iran, human rights violators and even internal political opponents have also taken on a lexicon that renders any compromise at risk of being compared to the 1938 Munich Agreement and appeasement of Hitler. But though U.S. politics have been the immediate focus, any number of other countries have their own adversaries with whom similar agreements might face similar complaints such as India-Pakistan, Japan-China, Israel-Iran, or Turkey and the Kurds.

If sanctions are increasingly a tool used to acquire leverage to address otherwise insurmountable diplomatic problems with adversaries, then increasingly sanctions relief will be linked to agreements with those very same adversaries. This raises the complexity of developing and sustaining domestic support for the underlying agreements, and grants politically persuasive arguments to those who stand in

Sanctions relief is linked to agreements with adversaries branded as forces of evil and immoral.
opposition to those agreements. It is reasonable to assert that overcoming opposition to the Iran nuclear agreement and its sanctions relief would have been manifestly easier if the country involved were Norway, Morocco, or Kazakhstan. But with Iran, there is both a recent unpleasant history as well as an entrenched adversarial relationship that even today could prompt military conflict for reasons completely removed from the nuclear issue. For this reason, even an agreement that was intended to address a serious security threat to the United States and its allies became immediately part of a broader conversation about the nature of the Iranian regime and the risks of accommodating it. Ambassador Nikki Haley’s September 2017 speech on Iran underscores the nature of the debate, particularly when she noted “Why did we need to prevent the Iranian regime from acquiring nuclear weapons in the first place? The answer has everything to do with the nature of the regime, and the IRGC’s determination to threaten Iran’s neighbors and advance its revolution.”

Importantly, this is not to argue that it is unreasonable to have the kind of detailed debate over the Iran agreement that took place in 2013-2015, or that it is unreasonable for fair-minded people to come to different conclusions about the nature of that agreement. Rather, it is to underscore that the terms of the debate have grown starker as sanctions have increasingly been used as a key element of policy and where agreements inherently might require their eventual relaxation.

Iran is not the only example of this tension. When sanctions were being relaxed against Libya, for example, there was widespread concern in the Bush administration that the former “mad dog of the Middle East” was being let off the hook. Some Bush officials wanted to retain sanctions on Libya in order to push the regime to make more changes at home and in its international policy, and succeeded to some degree by delaying for two years the removal of state sponsor of terrorism sanctions against Libya. But in the end, the United States relieved all of its Libya sanctions, including Libya’s designation as a state sponsor of terrorism, in deference to the broader objective of attempting to rehabilitate Libya and reintroduce it to the international community following its dismantlement of its WMD programs and end of support for terrorism.

Even now, there remains a debate about how to deal with Russia, and in what circumstances sanctions relief might be offered. The Minsk 2 Ceasefire (an agreement reached in 2015 between Ukraine, Russia, France and Germany that was intended to end the violence in eastern Ukraine and lead to a resolution of the conflict) gives some sense of the conditions under which sanctions relief might be conveyed, as did Obama administration policy statements that the Trump administration has continued to make. But the language of U.S. sanctions bills against Russia suggests that sanctions may not be terminated until a broader set of concerns about Russian behavior are addressed. Longstanding bilateral politics
continue to influence the debate surrounding sanctions and the willingness to agree on sanctions relief, which also contributes to objective confusion about the sanctions themselves.

Entrenched bilateral politics will undoubtedly affect any future agreement reached with North Korea over its nuclear and missile programs. Beyond the language of the sanctions statutes (which lump together human rights and terrorism issues in addition to nonproliferation), Trump administration policymakers have argued that the regime itself is so fundamentally untrustworthy that agreements with it would be moot. But at some point, if an agreement could be reached, it would require sanctions relief most likely in exchange for something less than the complete, irreversible, verifiable dismantlement (CVID) demanded by many. Making the internal U.S. political system comfortable with such an agreement would be very difficult. North Korea, of course, has done much to undermine confidence in previous agreements by willfully violating them over the past 30 years, but that speaks to the nature of the agreement, its verification and retaliatory provisions (if indeed sanctions are intended to be part of diplomacy). The more insurmountable problem may be the political conditions in the United States and in countries elsewhere that have sanctions on North Korea. All of this may mean that even if an agreement for sanctions relief is found to be necessary and potentially even advisable, it may still be politically difficult for the United States to negotiate and implement such an agreement.

Making It Rain

However, the difficulty of overcoming policy confusion and political disagreements pales in comparison to convincing economic actors to invest their money, time and attention in uncertain and risky markets. In many circumstances, the hardest part of delivering sanctions relief may be that market actors in liberal economies can say “no, thank you” to potential opportunities in post-sanctioned jurisdictions.

All of the recent examples of major sanctions relief have dealt with this problem, to one extent or another. Iran, for example, found its emergence into the post-sanctioned global economy to be far slower than it anticipated. Some of this may come down to overly optimistic projections and inflated expectations. It is certainly true that, as the U.S.-led sanctions regime was being put into storage in 2015-2016, the Iranian government over-promised and under-delivered to its own people and to the
broader international economy about the reforms Iran would be prepared to undertake. The heady days of 2016 were filled with a promise of rapid economic growth and reconnecting to the global banking system, not to mention rebalancing the Iranian economy away from smugglers and those who profited from the existence of sanctions. But by the end of 2016, positive statements from the Iranians were being replaced by accusations of U.S. duplicity.

Having served on the U.S. negotiating team, I can testify that the United States never promised that sanctions relief would be automatically embraced by the business sector. To the contrary, we consistently affirmed to the Iranian negotiators that the best that we could do is to permit restored business contacts. After that, it would be up to economic actors and the Iranians to negotiate mutually acceptable deals. This same posture was taken by the United States after the JCPOA was concluded, even as the United States went further than necessarily required under the JCPOA to advocate the restoration of normal banking ties, with the appropriate safeguards.

Still, the response from the business sector was halting and tentative. Even after Secretary of State John Kerry directly engaged European banks to support restored ties, major European and Asian banks refused to do so. The banks argued that the JCPOA was built on fragile ground, with uncertainty about its future given the political situations in both Iran and the United States. (Considering U.S. domestic political developments, they were not wrong and this learning may damage the ability of the United States to use the promise of delivering sanctions relief as a negotiating tactic long into the future.) They also noted that the U.S. sanctions system remained largely intact, with prejudicial penalties remaining possible for those who conduct transactions with Specially Designated Nations and Blocked Persons (also known as SDNs), the list of which serves as a compendium of all those with whom business is inadvisable (and illegal, for U.S. persons). And many noted that Iran itself is less than hospitable, with a business climate that has been consistently ranked one of the world’s worst. The overall context was such that, even for an economy as notionally attractive as Iran’s, the complexities and uncertainties around doing business with Iran left only those with the most explicit protections and guarantees, such as those specifically licensed by the U.S. government, or those most convinced of their ability to work around U.S. sanctions prepared to jump in. The consequence is that Iran’s economic restart has been less than what was desired by the Iranian government prior to the conclusion of the JCPOA, with market forces playing a substantial part. Obviously, this will only deteriorate further with the U.S. withdrawal.

A similar predicament emerged with Myanmar when sanctions were first eased in 2012. As former U.S. Treasury official Peter Kucik made clear in a paper written for the Center on Global Energy Policy, many non-U.S. countries were making substantial investments in 2011-2014, and as sanctions were being relieved in
2012, the economic case for investment in Myanmar was there. Residual sanctions on some individuals and complex guidance complicated the practical side of restarting such business, but the United States explicitly relieved many sanctions that would have strictly precluded doing business in Myanmar, legally clearing the way for a restart of business. Nevertheless, no major U.S. banks have reentered Myanmar and only a few major companies have taken the plunge. The climate has scarcely improved in the last two years, this time because of concerns about Myanmar’s treatment of the Rohingya population. Investors and companies have been concerned that they will be tarred with complicity in ethnic cleansing, calculating that their reputations are more important than what they would achieve by reentering Myanmar from a business standpoint. The threat of sanctions reimposition has also added to their sensitivity.

None of this is particularly surprising from the perspective of business-level, cost-benefit calculations. Most sanctions regimes over the past twenty years have been imposed against emerging markets, where there is substantial opportunity but also risk and complexity, particularly in countries where sanctions have contributed to warped economics and trapped potential. This risk and complexity is augmented not only when residual sanctions exist, as with Iran and Myanmar, but also as there are often unresolved political issues and broader problems, as with Cuba for example.

**Solutions**

If sanctions and their relief are going to remain key elements of foreign policy, then it is in the interest of sanctions professionals to find solutions to these sorts of difficulties. Certainly, it is more difficult to address issues of entrenched political opposition or even confused objectives once sanctions are in place. However, steps can be taken to clarify intent even after sanctions are imposed and to rationalize politics by articulating a clear vision of what sanctions relief will achieve.

Likewise, with respect to business risk, there are options available to reduce the fears and concerns around sanctions relief. For example, this can be done by finding ways of making the recipient particularly attractive or to insulate market actors from risk. In some cases, the latter can be provided by statements of political leaders or even through measures like specific or general licenses, effectively serving as legal guarantees that businesses operating in particular locales will not be harmed. Other tools—such as export guarantees—can also be useful in persuading businesses that their risks are no greater than operating in safer, more routine locales.

Making business opportunities in post-sanctioned jurisdictions more attractive through incentives has proven harder. Export credits exist and, in the case of Iran,
European governments have begun to use them to spur business on. Other options, such as direct subsidies or incentives, have not been a major part of the story thus far, though the involvement of national corporations and companies routinely benefiting from substantial government contracts—such as with Airbus and Boeing in Iran sanctions relief—could be seen as potential counterexamples. To date, the approach has been to open the door to market actors and to let them take matters forward from there.

Though the issues around convincing private actors to capitalize upon sanctions relief in problematic jurisdictions lack any single or simple solution, there are additional steps that governments could take to improve the degree to which sanctions relief is accessible and appropriately utilized. These solutions center on clarity: first in assigning objectives, and second in issuing guidance governing sanctions relief. But, the last and potentially most significant solution is also the trickiest to engineer or accept: how to grant time and space for performance on all sides.

Tell Me What You Want

Most fundamentally, sanctions relief will be easier to organize and to present conceptually if there is understanding and clarity in the objectives of sanctions—in the minds of both sanctioners and those sanctioned. As I have described at greater length separately, it is to the advantage of sanctioners in general to have clear objectives set out in advance of imposing sanctions. Such clarity can ensure that there is common understanding among the sanctioning community—domestically as well as internationally—about the intent of the measures and what it will take to remove them. There are also advantages to be gained in communicating to one's adversary that there are specific actions that can and should be taken to get out from under the lash of sanctions, not least to help create a sense within the sanctioned state that relief is achievable in general and positive behavior will be rewarded.

Not to be overlooked, however, is the benefit of clarity for third parties trying to conduct normal business with countries subject to sanctions. If the sanctions set up are relatively simple—for example, that there is only one instance of problematic behavior being subjected to sanctions pressure—then clarity can help the business community understand when the situation and the sanctions change. For example, in 2011, sanctions were imposed against Libya in response to Muammar Gaddhafi's belligerent activities within the country. It was relatively straightforward to communicate to the business sector that sanctions were intended to compel Gaddhafi...
to refrain from using violence against his population and, failing that, to prevent the reconstitution of the Gaddhafi regime in the future or the use of Libyan national resources by the Gaddhafi family in exile. Businesses could understand the dimensions of sanctions as well as the terms of their relief.

By contrast, the various explanations given for imposing sanctions against Libya, Russia, or Cuba—for example—have created real confusion within the business sector and beyond regarding the rationale for the sanctions, the scope of the relief provided in particular areas, and the overall direction of policy. A change in U.S. administrations—particularly but not only in this case from Barack Obama to Donald Trump—has added to the opacity concerning U.S. intentions. Sweeping changes in U.S. foreign policy as a result of political changes also create a new sense of political risk in negotiating agreements with the United States that will take a long time to dissipate, as events with the JCPOA bear out.

Perfect clarity and rigorous adherence to an established set of reasons for imposing sanctions (and therefore, the context for their removal) is probably too much to hope for in such complicated environments. Nor is it necessarily helpful in all circumstances to assign particular bad acts responsibility for particular sanctions, as this can induce an adversary to game sanctions imposition. For example, if a sanctioner implies that only little, modest sanctions are being used to deal with one bad act while very significant ones are being used for another, then this can suggest a difference in priorities or, worse, that the first set of bad acts are essentially irrelevant.

This is a charge that JCPOA critics have made with respect to the definition of nuclear sanctions used in the agreement, which were defined to include most of the economic measures adopted by the United States. By comparison, missile, terrorism and human rights sanctions were defined as those that are relatively narrow in application, targeting only identified individuals or entities. Though I support the JCPOA, concerns over the concept of separating types of sanctions, and even the assignment of key economic measures to the need to counter the enormous threat presented to the United States by an Iranian nuclear weapon, are valid and merit careful consideration in future sanctions cases. However, as valid as these concerns may be, it may still be necessary and prudent to consider similar such approaches in dealing with future problems, depending on the nature of the country or problem being subject to sanctions.

**Lead a Horse to Water**

As noted above, it may not be possible in all cases to provide absolute clarity regarding what types of actions will facilitate sanctions relief. Some cases will be sufficiently complicated as to undermine efforts at objective clarity or, in the
case of Iran, some sanctions regimes are old enough that—by now—they have ossified and become part of the broader policy framework. In still other cases, step-by-step removal may have been part of the negotiations that resulted in an agreement for sanctions removal and reciprocal steps on whatever problem led to sanctions in the first place. Step-by-step implementation may not be a problem for such agreements, but a core feature to ensure future compliance by the previously sanctioned state. For all of these problems, a central solution lies in providing clear guidance as to what is permitted, what is prohibited, and what to do about gray areas.

The United States has improved its sanctions guidance over the past ten years. There are now more than 500 “frequently asked questions” on the Treasury Department’s website with respect to sanctions, many of which clarify not only the scope of sanctions but also the scope of sanctions relief. Guidance documents are also increasingly used to provide actionable advice to all manner of market actors and governments as to the nature and extent of sanctions as well as their relief. Some of these documents include examples that can help put guidance in context and explore the gray edges of sanctions. None of these steps took place on their own: under the Obama administration, there was a concerted effort to provide specific, actionable guidance to businesses, banks, and individuals. Taken in combination with outreach activities, including participation in industry roundtables and conferences, the U.S. government has prioritized clarity in its communications and advice.

That said, much of the guidance still is complicated and trapped in legalese that—while precise—sometimes obscures more than it illuminates. For example, FAQ 315 regarding Iran on the Treasury Department’s website states:

…the extent that a shipping company transacts with port operators in Iran that have been identified as such under the [Iran Freedom and Counterproliferation Act] but not otherwise designated, and as long as such payments are limited strictly to routine fees including port dues, docking fees, or cargo handling fees, paid for the loading and unloading of non-sanctioned goods at Iranian ports, we anticipate that such transactions would not be considered significant transactions for the purposes of IFCA. Non-routine and/or large payments or fees that materially exceed standard industry rates could expose a person to sanctions. Furthermore, providing any port operator in Iran with any significant financial, material, technological, or other support could expose a person to sanctions.

This language is precise and specific, and offers maximum legal protection to the U.S. government in the event that the United States determined in the future that transactions with an Iranian port operator were problematic. But as far as offering clarity to those seeking to use Iranian ports, this language offers scant comfort and
significant wiggle room so that a reasonably careful corporate compliance officer could be reluctant to authorize any transactions whatsoever.

When actively sanctioning, this level of ambiguity can be helpful to impose sanctions, creating an incentive for over-compliance beyond the *de jure* legal obligations that may exist. But, for a post-sanctioned jurisdiction, this level of complexity offers little encouragement to market actors. The aforementioned sanctions on Myanmar is a potential case of the lack of clarity, with little guidance offered by the United States for years concerning how to treat companies owned by those not explicitly designated for sanctions but associated with those who were. By contrast to the Myanmar case in 2014 (and even the above FAQ), under the Joint Plan of Action that preceded the JCPOA with Iran, the United States published updated guidance on the implementation of sanctions relief. Though corporate compliance teams also had questions about this guidance, the language was markedly different, with the phrase “the USG will not impose …” frequently preceding specific provisions of sanctions relief. For sanctions relief cases, this is a model and template that ought to be followed in the future, as it provided a level of clarity that helped encourage market investment in the regime after sanctions had been lifted.

**Patience**

More than anything, however, sanctions relief requires patience, time, and space for implementation corrections to take place as problems are identified. Lacking the precision of a sanctions enforcement action—which has immediate, binding, and potentially global legal significance—a decision to provide relief from sanctions can be tentatively embraced. For this reason, it is necessary for all of those concerned with the implementation of sanctions relief to communicate frequently and openly about the challenges being identified in implementation so that solutions can be found.

More than anything, sanctions relief requires patience, time, and space.

For sanctioners, there are many dimensions of sanctions imposition and relief that are opaque, particularly if there are residual sanctions still in effect and negative feelings about previous enforcement decisions and fines. For this reason, they may not be aware of the complexities associated with relief or even some of the operational problems that could creep up as a result of individual market actor decisions. The only way in which they might become aware of such problems is through a complaint brought by the previously sanctioned, after which problem solving activities can be undertaken.
In the case of Iran in 2014, for example, there were myriad problems associated with the initial release of Iranian restricted assets that, though scheduled and covered with explicit letters of comfort to the associated financial institutions, did not take place as promised. It took months of concerted effort on the part of the U.S. government (and the Office of Foreign Assets Control, in particular), working with Iranian Central Bank authorities and foreign banks, to smooth out the various problems that emerged. Initially, Iranian authorities assumed that the United States was deliberately interfering with implementation as a means of damaging Iranian economic interests. However, as a result of concerted diplomatic work and the direct labor of U.S. officials, Iranian banking officials came to understand that the problems were less due to the guidance and instructions of the U.S. Treasury and more related to how those were received and interpreted by foreign banks.

Even though these problems persisted for months, over time, Iranian officials began to trust, if not the overall intent of the United States, at least the intent of those officials struggling to solve the problems that emerged. They did not take on faith that these problems were being solved, but instead saw the U.S. government in action, trying to solve them. This bought a modicum of patience and understanding, if not appreciation. But, it also pointed to the necessity of open communication and serious effort in managing these issues as they cropped up.

**Knowing How to Stop**

Sanctions will persist as a tool of foreign policy so long as economic forces can provide diplomatic leverage. Before sanctions are selected as an instrument for policy in a particular issue, they should be vetted to ensure that they are properly scoped and contained within a strategy that can prove successful. Sanctioners should anticipate the need for clear explication of objectives, notwithstanding the many points of concern that can exist in a relationship or poisonous political environment. Sanctioners should also anticipate that, having made business difficult or even impossible with a particular target, it may be difficult to undo such an action once taken. In other words, sanctioners should anticipate the problems of sanctions relief if they seek to use sanctions to achieve a policy goal.

It is not possible to make sanctions relief as seamless as those who barter for it would prefer, but just as sanctions enforcement can be better or worse depending on the clarity and effectiveness of implementation, so too can relief be made more or less efficient by the manner and operation of those tasked with it. For this reason, it is in the interest of sanctioners, as well as all those who operate in post-sanctioned jurisdictions, to improve the efficiency and effectiveness of sanctions relief through clarity, effort, and persistence.
Notes

13. Fararu News, “Economic Experts Reviewed Rouhani Statements,” August 12, 2015, http://fararu.com/fa/news/242178/DA%254A%259D%25B0%2582%2585-%25DA%258D%2599%25B0%258B-%25DA%2582%2583%2589%25B1%258C%2599%2585-%25DA%2586%2597-%25DA%258A%2587%25B3%258C%2582%2588%258A%258A%2580%2586%2589%2588%2589%2586%2588%258A%258F.