Grauvogel, Julia; Attia, Hana

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Julia Grauvogel and Hana Attia

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GIGA German Institute of Global and Area Studies
Leibniz-Institut für Globale und Regionale Studien
Neuer Jungfernstieg 21
20354 Hamburg
Germany
<info@giga-hamburg.de>
<www.giga-hamburg.de>

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Abstract

Research on sanctions has hitherto focused on their implementation and effectiveness, whereas the termination of such measures has received only little attention. The traditional model, which looks at sanctions and their removal in terms of rational, interstate bargaining, focuses on how cost–benefit calculations affect the duration and termination of such measures. Yet, this research insufficiently captures the back and forth between easing sanctions, stagnation, and renewed intensification. It also fails to account for the multifaceted social relations between senders, targets, and third actors that shape these termination processes, as well as for the signalling dimension of ending sanctions – not least because existing datasets tend to operationalise sanctions as a single event. To help fill these gaps, the paper proposes a process-oriented and relational understanding that also recognises how sanctions termination conveys the message of ending the visible disapproval of the target, which may be heavily contested. Case studies on Zimbabwe and Iran illustrate how such an approach sheds light on the different logics of action that shape processes of sanctions termination, and thereby contributes to a more holistic understanding of sanctions in general.

Keywords: Sanctions, termination, processes, signals, third state actors, Zimbabwe, Iran

Dr. Julia Grauvogel
is a senior research fellow at the GIGA Institute of African Affairs. She is also spokesperson for the GIGA Research Team "Interventions and Security" and Editor of *Africa Spectrum*. Currently, she heads the research project "The Termination of International Sanctions: Causes, Processes and Domestic Consequences" funded by the German Research Foundation (Deutsche Forschungsgemeinschaft, DFG).
<julia.grauvogel@giga-hamburg.de>
<www.giga-hamburg.de/en/team/grauvogel>

Hana Attia, M.A.
is a research fellow at the GIGA Institute of African Affairs. She is also a PhD candidate at the University of Konstanz (GSDS), and a member of the GIGA Doctoral Programme. Currently, she works within the research project "The Termination of International Sanctions: Causes, Processes and Domestic Consequences" funded by the German Research Foundation (DFG).
<hana.attia@giga-hamburg.de>
<www.giga-hamburg.de/en/team/attia>

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Julia Grauvogel and Hana Attia

Article Outline

1 Introduction[1]

In 2008, the European Union dropped its diplomatic sanctions[2] against Cuba despite internal disagreement and the United States' demands to maintain a tough stance against the Cuban government.[3] Six years later, the Barack Obama administration also started to progressively

1 We would like to thank Michael Brzoska, Hannah Smidt, and Annalena Rehkämper for their helpful comments on earlier drafts of this article. It is a product of the research project "The Termination of International Sanctions: Causes, Processes and Domestic Consequences" funded by the German Research Foundation (Grant number: GR 5141/1-1). The article originally appeared in the *Zeitschrift für Internationale Beziehungen* 26 (2). We thank the editors for making its publication as a GIGA Working Paper possible.

2 We define "sanctions" as government-led restrictions implemented by the so-called sender to promote political objectives vis-à-vis another country, as well as its leadership and any entities associated with it (i.e. the target). "Government-led" is understood in broad terms to capture also measures imposed by multiple governments under the auspices of (sub)regional or international organisations. In line with our definition, we do not address sanctions against non-state actors in this paper.

3 "Defying U.S., EU Scraps Cuba Sanctions" on Reuters, 20 June 2008, https://www.reuters.com/article/us-eu-cuba-sanctions/defying-u-s-eu-scraps-cuba-sanctions-idUSL1618178720080620 (accessed 28 March 2019).

lift[4] various financial and travel restrictions against Cuba (see, for example, Department of the Treasury 2015) previously described as "irrational,"[5] a move characterised as an important signal for the desired normalisation of bilateral relations (Obama 2016). Yet recently, Donald Trump has revealed new restrictions on travels to and business with Cuba (Department of the Treasury 2017).

This example underscores several crucial aspects which stand in contrast with the dominant view in the mainstream (quantitative) literature that ending such measures is a linear development – or even a single event – exclusively shaped by rational bargaining (Dorussen and Mo 2001; Krustev 2010). Instead, the process of ending sanctions is highly volatile and potentially inconclusive. In many cases, sanctions have been gradually removed (see, for example, Eriksson 2007 on Zimbabwe; Jones 2015 on Myanmar and Iraq). In addition, some sanctions – such as the United Nations measures against Libya – had become dormant before they were officially lifted (UN Security Council 1998, 2003) or were no longer applied in the absence of a formal decision to lift them (on China, see Hellquist 2012: 104). To complicate things even further, some sanctions – such as EU measures against Fiji and Togo – have also been reimposed "on identical grounds" (Portela 2010: 50) after their initial removal. The case of Cuba also suggests that the interplay of various actors' agendas may complicate sanctions termination, and that lifting them can convey significant and potentially controversial messages such as the intention to normalise sociopolitical relations.

To conceptualise these aspects, we propose a process-oriented and relational approach to sanctions termination that also takes the signalling dimension of ending sanctions seriously. Applying this understanding to the cases of Zimbabwe and Iran, our explorative analysis shows that contrary to media reports about the termination of sanctions against the two countries, it was in fact a very inconclusive process. The relations between different actors, which at times followed varying logics of action, shaped this process. The symbolic importance of lifting sanctions, for example, played an important role in the case of Iran, where the US resists a normalisation of relations despite potential economic and security benefits therefrom. While we contend that it is difficult to analyse such deliberations on sanctions termination solely in unitary and rationalist terms, we do not intend to discard the important insights generated by the rational interstate bargaining approach. Instead, our perspective – which should be seen as an attempt to establish a more holistic research agenda and not as a new theory of sanctions

4 We use the terms "ending" and "termination" of sanctions interchangeably to describe the abrogation of all measures by the respective sender against the target, whereas "lifting" and "removal" characterise the process of doing so; "suspension" refers to preliminary removal without a formal decision to lift. If only one particular sender lifts sanctions against a target while measures by another sender remain in place, we specify this accordingly.

5 "Lifting the Embargo Means Cuba Can No Longer Play Victim" in *Time*, 19 December 2014, http://time.com/3642109/us-cuba-embargo/ (accessed 28 March 2019).

termination – seeks to grasp sanctions' polymorphous character by accounting for the diversity in logics of action or in their purposes. Following March and Olsen (2011) as well as Biersteker et al. (2016: 226), we comprehend these as complementary and not as mutually exclusive.

Of the 119 imposed EU, UN, and US sanctions in the period from 1990 to 2014, almost three-quarters had been lifted as of 31 December 2014 (von Soest and Wahman 2015). Since then, other cases – such as Madagascar, Sri Lanka, and Vietnam – have also joined the ranks of formerly sanctioned countries. In other words, the termination of external pressure has become a common phenomenon since the end of the Cold War. Nonetheless, flourishing research on the implementation of sanctions and their effectiveness has not been matched by comparably detailed scholarship on sanctions termination. This is even more surprising given the issue's practical significance. Policymakers have long struggled with the fact that imposing sanctions is much easier than ending them (see Biersteker et al. 2016; Portela 2010: 157, 171), as they lack a proper framework for analysis and action.

Studying the end of sanctions also sheds light on the working of external pressure more generally. A more holistic understanding of sanctions termination calls into question assumptions of rationality and linearity that have guided previous (large-N) work on sanctions, and complements our knowledge of how they are not only lifted but also imposed – as both processes are inextricably linked. Features enshrined in a sanctions regime upon the measures' imposition, such as the specificity of the respective sender's goals or the (lack of) expiry dates and sunset clauses, potentially shape termination processes. However, they only become visible once policymakers and scholars explicitly examine the termination of sanctions.

In the next section, the paper shows that the traditional model of rational, sender–target bargaining has provided important insights guiding mainstream (large-N) research on sanctions termination, but has also restricted how these studies conceptualise – and consequently study – the issue. In the third section, we hence propose an alternative, process-oriented, relational, and signalling understanding that can contribute to filling these gaps in the current research. We then apply this understanding of sanctions termination to the cases of Zimbabwe and Iran, before discussing the implications for future work in line with this proposed research agenda in the conclusion.

2 The Traditional Interstate Bargaining Model of Sanctions Termination

The significant role of sanctions as a key foreign policy instrument has sparked considerable scholarly interest, and, over the past few decades, a large body of literature has consequently emerged on them. A traditional model that sees sanctions imposition and their eventual termination as the outcome of rational, sender–target bargaining has decisively influenced the

(predominantly quantitative) mainstream literature.[6] In the following, we first summarise the major insights of this research with regard to sanctions termination and then discuss its underlying assumptions and resulting limitations.

2.1 The "conventional" approach to sanctions termination

Research on sanctions initially focused on their implementation and effectiveness, not least because some of the famous "early" cases – such as the embargoes against Cuba, Iran, or South Africa – were still ongoing at that time. Scholars only started to look at sanctions termination with the (gradual) lifting of these sanctions and the creation of the first comprehensive dataset on sanctions (Hufbauer et al. 1990), which allowed them to fully capture the entire life cycle from imposition to termination. While research on the termination of sanctions remains scarce, studies seeking to understand the varying duration and effectiveness of the measures do implicitly touch upon termination. This research has, however, focused on identifying factors that explain why sanctions end while predominantly neglecting processes of actual sanctions termination. Overall, these accounts of sanctions termination can be divided into two strands: namely, sender- and target-related ones.

Sender-related accounts centre on a cost–benefit approach, which rests on the fundamental assumption that sanctions are costly for their senders (Baldwin 2000; Nooruddin 2002). Thus, senders have strong incentives to lift such measures as soon as their costs exceed the benefits derived from them (Smith 1996). Consequently, goal attainment constitutes the most straightforward path to sanctions termination because senders benefit from a policy change in the target while avoiding the costs of continued sanctions. Some senders also remove sanctions in the case of partial target compliance (Charron and Portela 2016). The costs of ending sanctions despite incomplete goal attainment is a function of how important the respective goals – such as non-proliferation, human rights protection, or democratisation – are for the sending state. Thus, the sender's resolve to see sanctions fully succeed increases with the issue's salience for that sender (Ang and Peksen 2007: 135). Accordingly, enduring sanctions have been often associated with a sender's failure to achieve the stated goals (Hufbauer et al. 2007). It follows that the duration of sanctions is related to the issues at stake, as well as to the size of the demanded concessions (Dorussen and Mo 2001).

However, there are also cases of sender capitulation – that is, when a sender decides to lift the measures despite not having achieved their desired goals. According to the Threat and Imposition of Sanctions dataset, only around 30 per cent of imposed sanctions (Morgan et al.

6 Another, mostly qualitative, strand of the literature has advanced a more holistic understanding of sanctions (imposition), on which we draw in our conceptual section below. However, we believe that it is reasonable to focus on the traditional model here as is constitutes a somewhat dominant paradigm that has also shaped qualitative work, as the references below show (while, conversely, non-rationalistic understandings of sanctioning have hardly informed the (quantitative) "mainstream").

2014) end with complete or partial goal attainment. Hence, senders regularly decide whether to hold on to unsuccessful sanctions measures or not. The literature has pointed to diverging rationales in this regard. On the one hand, senders appear more likely to maintain sanctions over time when they have already invested significant resources into imposing and maintaining them, which would be lost in the case of termination (Bonetti 1994). Relatedly, commitment strategies that senders may initially exercise to strengthen their bargaining position incur high costs upon termination (Dorussen and Mo 2001). Senders involve their constituencies in their decision-making to tie themselves to a policy stance in order to strengthen their bargaining position vis-à-vis the target. This creates audience costs (Dorussen and Mo 2001; Fearon 1994; Kaempfer and Lowenberg 1992) that make ending sanctions without obtaining target acquiescence costly. On the other hand, senders can experience "sanctions fatigue" (Elliott and Hufbauer 1999: 407) when the domestic costs of maintaining sanctions attract increased attention while the willingness to compromise economic opportunities for political motives wanes (Eaton and Engers 1999; Krustev and Morgan 2011).

Finally, domestic changes within a sender can affect its cost–benefit analyses. McGillivray and Stam (2004) empirically show how a change in non-democratic leadership in a sender country strongly increases the likelihood of sanctions being lifted (see, for example, Hufbauer et al. 1990 on Soviet sanctions against Yugoslavia). Similarly, sanctions duration may also depend on the identity of the sender – as senders differ in their willingness to terminate sanctions. The EU, on the one hand, has proven responsive to limited acquiescence, reciprocating modest concessions or even rewarding the anticipation of policy changes in many cases (Portela 2010: 110). On the other, it has sometimes imposed more comprehensive measures than the UN – and, furthermore, been more reluctant to ease them (Brzoska 2015).

For a long time now, research has adopted a sender-centric approach to study sanctions and their duration, thus producing models that exclude the target country's role in the process (Drezner 1999; Giumelli 2011; Hufbauer et al. 2007). More recently, sanctions research has increasingly addressed target states (inter alia, Escribà-Folch and Wright 2010; Peksen 2017). Mirroring the focus on senders' cost–benefit analyses, target-related explanations of sanctions duration and termination also revolve around the question of when sanctions become so costly that the target acquiesces to the sender's demands. The more economic pressure that target governments face, the harder it is for them to resist (for democracies, see Dashti-Gibson et al. 1997; Drury 1998; Lektzian and Souva 2007; on the diverging view that comprehensive sanctions rather increased targeted autocracies' stability as they may trigger a rally-round-the-flag effect, see Grauvogel and von Soest 2014). Target acquiescence, in turn, hinges on vulnerability to external pressure. Bolks and Al-Sowayel (2000) underline the significant role of target states' institutional structure for the duration of sanctions. They highlight specific attributes of targeted regimes that make sanctions more or less costly for different targets and thus increase sanctions duration, in particular the centralisation of political authority.

As a consequence, a target's reaction to sanctions – for example, the strategic redistribution of resources – plays a crucial role in explaining the duration and the outcome of a sanctions case (inter alia, Escribà-Folch and Wright 2010). Moreover, a target country's ability to mobilise countermeasures affects sanctions termination. Targets engage in sanctions-busting activities. Sanctions busters, also referred to as "black knights," shield targets from the sanctions' financial consequences, which in turn reduces their incentives to capitulate (Drury 1998; Early 2011; McLean and Whang 2010).

Table 1. Conventional Explanatory Factors for Sanctions Termination

Sender-specific	Economic factors	Economic costs (Nooruddin 2002; Smith 1996)
		Sunk costs (Bonetti 1994)
		Sanctions fatigue (Eaton and Engers 1999; Elliott and Hufbauer 1999; Krustev and Morgan 2011)
	Political factors	Audience costs (Dorussen and Mo 2001; Fearon 1994; Kaempfer and Lowenberg 1992)
		Issue salience (Ang and Peksen 2007)
		Leadership change (McGillivray and Stam 2004)
		Size of concessions (Dorussen and Mo 2001)
		Sender identity (Portela 2010)
Target-specific	Economic factors	Economic costs (Dashti-Gibson et al. 1997; Drury 1998; Hart 2000)
		Sanctions busting/black knights (Drury 1998; Early 2011; McLean and Whang 2010)
	Political factors	(Partial) acquiescence
		Vulnerability (Bolks and Al-Sowayel 2000)

Source: Authors' own compilation.

2.2 Underlying assumptions and limitations of the conventional approach

This research has provided important insights into how sanctions' intensity and costs, domestic institutions, third-party economic support for the target, and political concessions all affect termination. Yet, three underlying assumptions that have guided this work on sanctions termination have restricted research on the topic. First, existing studies model the decision to impose sanctions and to lift them as the outcome of rational cost–benefit analyses. While senders' potential benefits are mostly understood in political terms, namely compliance with their goals, costs for the sender are overwhelmingly conceptualised as being economic (see, for example, Dashti-Gibson et al. 1997; Krustev and Morgan 2011; McGillivray and Stam 2004). Accordingly, attempts to measure sanctions' financial impact have featured prominently in all widely used datasets. In other words, many studies on sanctions assume that senders and targets exclusively act and react in a rational manner – and thus they narrowly define rational behaviour in (politico-)economic terms.

Second and closely related, existing research focuses on senders' decision to maintain or lift sanctions. Targets choose to which degree they comply with the senders' demands, but

senders ultimately assess whether these concessions are sufficient for the termination of sanctions. In this vein, Dizaji and van Bergeijk (2013) argue that the economic leverage of a sender rather than the cost to a target is decisive for the outcome of sanctions. As a result, most mainstream (quantitative) studies ignore the multifaceted relations between senders and targets and beyond – despite them potentially influencing termination processes.

Third, sanctions research tends to operationalise sanctions as a singular event – especially in large-N analyses. The respective models usually assume that sanctions are implemented (and lifted) all at once (see, for example, Cox and Drury 2006; Wood 2008). Even the quantitative literature has started to acknowledge the "evolutionary and dynamic processes" of sanctioning however (Bolks and Al-Sowayel 2000: 243), and models sanctions as one factor in *repeated* international bargaining games (Krustev 2010; Whang et al. 2013). Nonetheless, the understanding of sanctions remains static insofar as the decision to implement or remove them is a binary outcome. Some case studies have depicted the volatile process of sanctioning. For example, Eriksson (2007) subdivides the EU sanctions regime against Zimbabwe into no less than eight episodes. This attempt to split enduring sanctions regimes into shorter episodes has recently been applied to larger data-collection efforts (Biersteker et al. 2016), but it is nevertheless still confined to disentangling the implementation stage.

Because of these assumptions, important gaps in the literature remain. Despite a recent focus on shorter episodes, the back and forth between easing pressure, stagnation, and sometimes even renewed intensification – which constitutes a distinguishing feature of many sanctions regimes – is insufficiently captured. While the gradual imposition and termination of sanctions was initially depicted as a practical problem because it would breed evasion (Hufbauer and Schott 1985), scholars have come to acknowledge that senders may purposefully use gradualism (Portela 2010). Yet, we still lack a more systematic analysis of such degrees of termination.

Moreover, sender- and target-related explanations as to why sanctions end are more often than not examined in isolation from each other. As described above, there is a tendency to focus on senders' decisions to end sanctions (see also, Portela 2010). Contrariwise, Bolks and Al-Sowayel (2000) find that attributes of the target – in particular its political structure – are important determinants of sanctions duration. Similarly, the qualitative study by Jones (2015) takes a target-centred perspective on sanctions termination. Yet, we need further theorising and empirical evidence on the intertwined nature of sender–target interactions and their embeddedness in a web of social, political, and economic relations that transcend this dyad.

Finally, many studies of sanctions (termination) fail to account for the signalling dimension of ending such measures – or at least assume a problematic distinction between the instrumental use of sanctions potentially yielding "tangible" results and their merely symbolic function (Lindsay 1986; Morgan and Schwebach 1997). The threat and imposition of sanctions are increasingly understood as highly visible symbolic acts (inter alia, Baldwin 1999; Giumelli 2011), which is more than cheap talk – as they actually shape political outcomes (Grauvogel et al.

2017). However, this research on the signalling dimension of sanctions focuses, as noted, only on the imposition stage. Looking at UN sanctions against Haiti, Biersteker et al. (2016) note in passing that their termination also served to signal support for the negotiated return to democracy. Hence, not only is it important whether senders lift sanctions but also how they justify the termination of external pressure.

3 Towards a Relational, Process-Oriented, and Signalling Understanding of Sanctions Termination

Our approach builds upon criticism of the mainstream (quantitative) approach to sanctions. Almost two decades ago, Tostensen and Bull already argued that the "cost-benefit rationale [is] questionable on theoretical, empirical, and ethical grounds" (2002: 235). Likewise, Jones (2015) underlines that sanctions research has been hampered by its focus on interstate interactions and the tendency to conceptualise states as unitary, rational, utility-maximizing actors. Yet, "an alternative paradigm has yet to replace the dominant understanding of sanctions heavily influenced by the behavioral change paradigm" (Giumelli 2016: 41). In response to this shortcoming, we propose a process-oriented and relational approach to the study of sanctions termination, one that also takes the signalling dimension of ending external pressure into account.

Two clarifications are in order in this regard. First, we do not intend to develop a new theory of sanctions and their termination. Instead, our aim is to highlight aspects neglected or at least marginalised in the mainstream model and to show how "alternative" conceptual approaches in sanctions research – but also in International Relations more generally – can help to make sense of them. Hence, our discussion of these aspects in the following section addresses both the conceptual dimension and the implications for empirical research. In our attempt to develop an understanding of sanctions (termination) that does justice to the phenomenon's polymorphous character, we first draw on existing research that conceptualises sanctions' inconclusiveness and volatility (see, for example, Biersteker et al. 2016; Eriksson 2007), their inherently social and relational nature (for instance, Hellquist 2017; Jones 2015; Portela 2011), and their signalling purpose (inter alia, Giumelli 2011). We also rely on conceptualisations of different notions of power in global governance (Barnett and Duvall 2005) and logics of action (March and Olsen 2011) that implicitly or explicitly[7] underpin research on sanctions beyond the mainstream paradigm. More specifically, we suggest that sanctioning goes beyond the exercise of compulsory power – which forces other actors to comply – to also entail the "production of subjectivity in systems of meaning and signification" (Barnett and Duvall 2005:

7 For example, Giumelli's (2016: 44) distinction into coercing, constraining, and signalling is explicitly derived from work on power in global governance, while his reference to different logics more indirectly speaks to the related literature mentioned above.

3). In that sense, sanctioning behaviour is not only driven by "calculated expected utility" (March and Olsen 2011: 490) but also serves to express normative beliefs (ibid.; Biersteker et al. 2016).

Second, we do not suggest that this understanding of sanctions and their termination should replace research focusing on actors' cost–benefit calculi. Rather, we agree with existing scholarship which highlights that sanctions, inter alia, combine normative communication and resource denial (Crawford and Klotz 1999), or – in the terminology of Giumelli (2011) – that sanctions coerce, constrain, and signal. While Giumelli (2011) initially conceptualised the purposes of sanctions as mutually exclusive, subsequent research has shown that senders usually pursue different purposes simultaneously (Biersteker et al. 2016: 48, 226). Understanding these different logics of action as complementary allows us to study their interplay, instead of asserting the primacy of one over another.[8]

3.1 Gradual, volatile, and inconclusive termination processes

It is conventional wisdom that sanctions can significantly change over time. This includes the partial lifting or temporal suspension of certain measures, the imposition of new restrictions, or the adaptation of goals – to name just a few examples. The increasingly common use of sanctions that target specifically designated individuals and firms has facilitated the incremental lifting of sanctions (Biersteker et al. 2016), as senders can selectively remove people and companies from so-called blacklists. Furthermore, we argue that it is important to pay more attention to the inconclusive nature of sanctions termination – including the fact that some restrictions may remain in place even when others have already been lifted.

Conceptually speaking, this highlights two important aspects. First, sanctions termination (or continuation) is not a binary decision, but a matter of degree. Existing frameworks can easily capture the gradual process of sanctions removal, for example by adding repetitions to bargaining games, but inconclusive outcomes are harder to conceptualise. This is further complicated by the fact that not all senders impose and lift sanctions at the same time (Brzoska 2011). Sanctions removal by one sender may thus significantly diverge from the ending of all restrictions imposed on the target. Thinking about the ambiguity of sanctioning could be helpful in this regard. While the ambiguity of sanctions threats or sender demands has often been depicted as a shortcoming in sanctions design (see, for example, Morgan et al. 2009), we argue that ambiguity in the threat, imposition, enforcement, and termination of sanctions should not be seen as an anomaly but as part of how senders exercise power. Second, we contend that the process of sanctions termination should be understood as non-linear, in line with the literature

8 In this, we follow the spirit of eclecticism that found its expression in the increasing overlap of positivist and more interpretative methods (Collier and Elman 2008: 780), as well as in attempts to question the explaining/understanding divide (Wight 2002).

that highlights such non-linearity in peacebuilding (Chandler 2013) or in international relations more generally (Bousquet and Curtis 2011). This notion of sanctions termination evidently complicates a clear-cut definition and identification thereof. Is, for example, the majority of people or companies no longer being subject to asset freezes and travel bans sufficient to speak of sanctions termination? Yet it nevertheless shows the value of understanding sanctions termination as a process, not as an outcome.

3.2 Multifaceted social relations

In their definition of sanctions, Hufbauer et al. (1990: 2) stressed that sanctions *modify the relationship* between sender and target by intervening in their "normal" or "customary" interactions. Rather than entirely undermining bi- or multilateral relations, most sanctions provide a specific framework for interaction and exchange (on Côte d'Ivoire, see Eriksson 2016: 89). The recent literature has aptly demanded "to widen the gaze beyond the conventional sender–target polarity" (Hellquist 2016: 997) and to take bargaining between different sanctions senders (Biersteker et al. 2016: 12), "bystanders" (meaning other states) (Hellquist 2016: 998), and "the larger audience" (Giumelli 2016: 54) seriously. While existing models can and indeed have incorporated some of these aspects – namely, (economic) interactions between different senders, and with third parties – a relational approach goes further still.

We understand sanctions as deeply social, in that they shape the relational status between senders and targets – and not just their balance of power in terms of material capacities and economic welfare (see also, Hellquist 2017). Going beyond the depiction of sanctions termination as a rational bargaining game that is only complicated by incomplete information (Drezner 2003; Eaton and Engers 1999; Whang et al. 2013), we propose to take senders' and targets' diverse logics of action into consideration when examining their deliberations over sanctions termination. In other words, negotiations over sanctions termination may not only concern questions of economic costs and political concessions but may amount rather to "a multi-relational battle over normative substance (what is good/bad, who merits punishment) and procedure (who should decide, who should lead)" (Hellquist 2016: 1015). With sanctions imposition, senders not only deny targets material benefits but also label them social outcasts (Hellquist 2018). Conversely, sanctions termination changes their relationship by ending a target's highly visible exclusion. We understand both target state concessions and sender state assessments of these concessions as the outcome of iterative deliberations. Hence, the termination of sanctions should in fact be perceived as a "negotiated" process (Portela 2010: 167).

Three implications for empirical analysis follow from such a perspective. Starting off, it appears important to account for sender–target relations beyond the economic realm (on the importance of social linkages, see Grauvogel and von Soest 2014). Furthermore, we suggest that a number of interactions among senders may complicate termination processes – not only with regard to technical aspects of cooperation (inter alia, Bapat and Morgan 2009; Drezner

2000), but also because uncoordinated sender behaviour transmits inconsistent signals. Lastly, third-party state actors can affect the termination process by intervening in the relations between senders and targets. They can exert pressure on senders to ease sanctions, or prevent them from lifting them – for instance, to prevent the international integration of targets (Nephew 2018). They can also disrupt or weaken the political message conveyed by senders to targets (Targeted Sanctions Consortium 2014), and they can (in)formally mediate in negotiations between the two parties as well.

3.3 The signalling dimension of sanctions termination

In conceptualising the signalling dimension of sanctions termination, we build upon the work of a number of authors who have highlighted the "symbolic" (Doxey 1980: 10), "signaling" (Baldwin 2000: 102), or "expressive" (Galtung 1967: 412) properties and purposes of sanctions imposition. Systematising these accounts, Giumelli (2011) developed a three-fold typology which, as noted, distinguishes between sanctions' coercing, constraining, and signalling functions. Signalling describes the process of "sending a message to one or more targets" both in the domestic and the international spheres (Giumelli 2011: 35). Based on these insights about sanctions imposition as a distinct form of international condemnation, we argue that, likewise, their termination not only offers the possibility to restore economic ties but also constitutes a visible symbol of ending a target's international isolation. In other words, the termination of sanctions sends signals of rapprochement and the normalisation of bi- or multilateral relations. Such an understanding of sanctions termination reveals the limits of a purely rationalist account hereof, as it highlights that sanctions also end "symbolic […] distance-taking from the target's wrongdoings" (Hellquist 2018: 7). Such a symbolic act may of course be controversial, especially when sanctions end without the target's compliance with all demands made.

Accordingly, it becomes essential to examine the discursive struggles related to sanctions termination. By this, we mean contestation over whether sanctions should be removed, or over whether they can even be considered terminated. This contestation may take place between different actors within the target state, between senders and targets, or among senders themselves. Thus, we need to account for the diverging narratives as well as potential within-country variation in the perceptions of sanctions termination, as this may matter for processes of ending such measures. One way to identify such discursive struggles is to examine public justifications for the (non-)termination of sanctions and how they are being contested.[9] Public justifications help to reconstruct the intersubjective reasoning of important actors, which makes them "a key piece in the explanatory puzzle of our socio-political universe" (Abulof and Kornprobst 2017: 4).

9 These justifications may (simultaneously) address different audiences at the international, regional, and (sub) national level. Rather than a priori stipulating "where" these discursive struggles unfold, we contend that it is important to reconstruct them and the respective audiences for each case.

4 The Examples of Zimbabwe and Iran

We examine the gradual removal of sanctions against Zimbabwe and Iran, which we perceive as "paradigmatic cases" (Flyvbjerg 2006: 232) for our understanding of sanctions termination introduced above. Paradigmatic cases serve as a "reference point" (Flyvbjerg 2006: 232) to develop new ways of thinking about specific phenomena. In that sense they are different from typical cases, as they do not (necessarily) represent a majority of all cases. Instead, paradigmatic cases are characterised by properties that serve as illustrations for the value added by our approach.

To identify paradigmatic cases, we assess all cases included in the GIGA sanctions dataset (Portela and von Soest 2012) according to the above-discussed characteristics of gradualism, multifaceted relations, and the signalling purposes of sanctions. As the dataset only offers information on the gradual imposition of measures, we rely on this because case studies pointing to highly contingent processes of imposition and termination (on Iraq and Myanmar, see Jones 2015) suggest that this should then also apply to the termination stage. With regards to the relational aspect, we capture whether sanctions cases involved more than one sender and whether third parties significantly affected the sanctions regime because they provided political, diplomatic, and/or economic support for the target based on exiting data (reference omitted for review). Concerning the signalling purpose of sanctions, the only dataset that provides systematic information is the Targeted Sanctions Consortium Database (Biersteker et al. 2016), which focuses on UN ones.[10] Based on these criteria, we identified cases in which sanctioning – and arguably sanctions termination – was likely shaped by aspects of gradualism, multifaceted relations, and/or signalling (see Appendix A).[11] From this universe of cases, we chose two – Zimbabwe and Iran – based on our specific regional expertise. These two cases are located in different world regions to ensure that we capture more than just intraregional specificities. The fact that we had to use rather crude measures of the three characteristics due to data constraints underlines that existing (large-N) research insufficiently captures them. As a result, the case selection also relied on intuition, as described in pointed terms by Flyvbjerg (2006).

In the following, we explore the process of lifting sanctions against these two countries based on interviews that we conducted in Zimbabwe in January and November 2014 – that is, at a time when the EU was gradually removing most of its restrictive measures imposed on the African state – as well as on additional primary and secondary material. More specifically, we analysed sender documents on the termination of sanctions against Zimbabwe and Iran. Moreover, we looked into domestic discourses on sanctions termination in targeted countries through an explorative analysis of articles in major newspapers and other local sources. This

10 However, this does not rule out that signalling purposes also play a major role in sanctions by other senders.

11 Due to data constraints, we chose a conservative threshold and included cases that – according to existing datasets – are characterised by only two of the three identified dimensions.

reconstruction of contestation over the signalling dimension of sanctions termination only offers, however, initial insights into the domestic debates, as comprehensive discourse analysis of local media was beyond the paper's scope.

4.1 The contested removal of sanctions against Zimbabwe

On 21 December 2001, the US Congress passed the Zimbabwe Democracy and Economic Recovery Act (ZIDERA) to halt the democratic and economic decline of the African country. It precluded the US government from approving new financial support to Zimbabwe from international financial institutions (US Congress 2001). Throughout 2002, the US State Department threatened additional measures,[12] which materialised with the implementation of travel restrictions and asset freezes in 2003 in response to widespread violence in the country (E.O. No. 13288 2003).

The EU meanwhile opened consultations with Zimbabwe in light of escalating human rights violations in 2001, and imposed sanctions in 2002. In addition to the suspension of development cooperation, the measures consisted of an arms embargo as well as visa bans and asset freezes for a number of high-ranking individuals (Council of the EU 2002). In the following, we reconstruct the process of removing these measures against the backdrop of the various involved actors' interactions and their contestation over the signalling dimension of lifting sanctions.

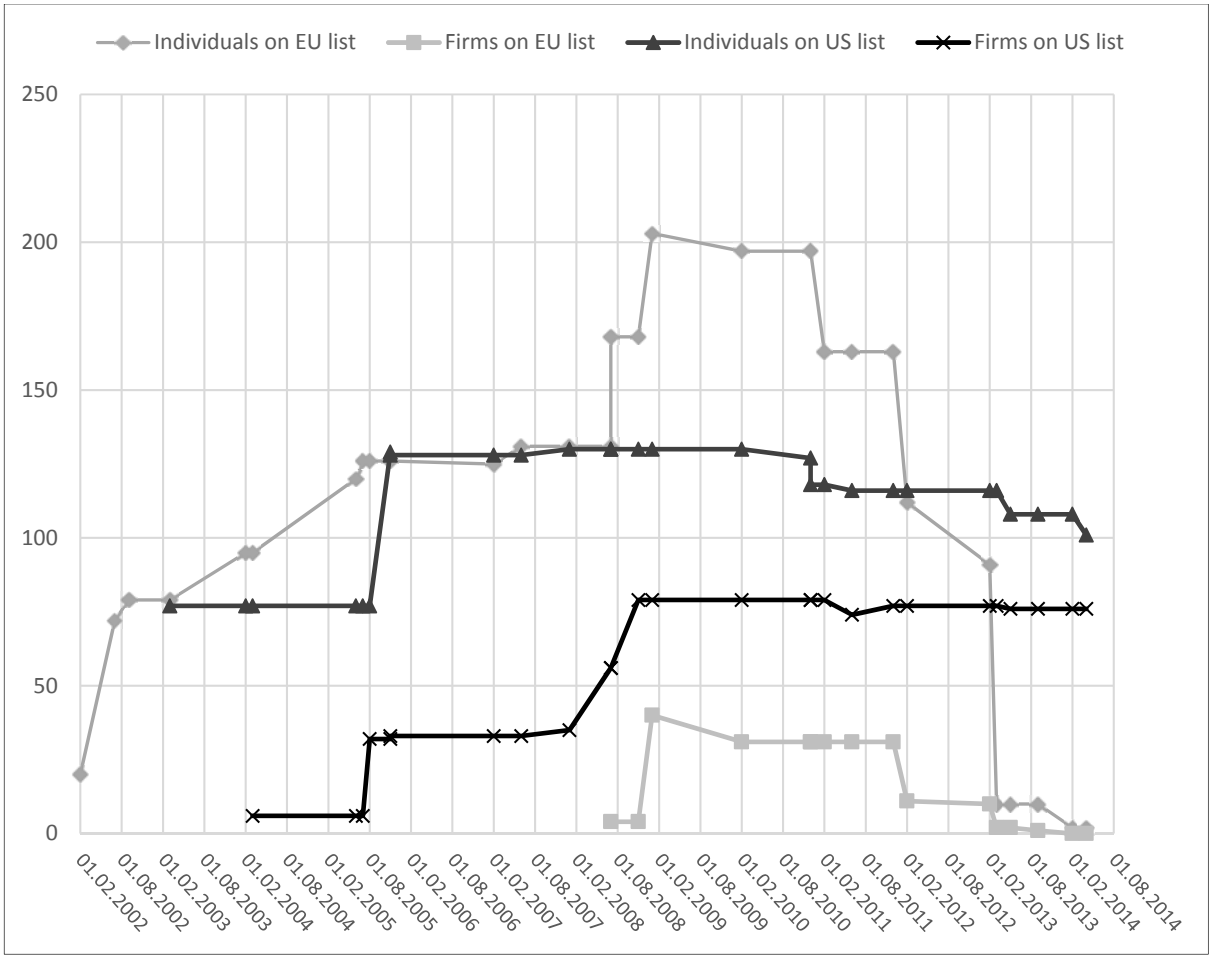
First, sanctions termination was a gradual and inconclusive process. Debates about a relaxation of EU measures started with the conclusion of the Global Political Agreement in 2009, which laid the basis for the so-called Government of National Unity (GNU) between the Robert Mugabe regime and Zimbabwe's major opposition parties. A year later, the EU eventually began to remove people and companies from its blacklist. In 2012, the EU also suspended its aid sanctions to demonstrate "continued commitment to the political process as part of the Global Political Agreement" (Council of the EU 2012b). With the adoption of a new Zimbabwean constitution, which paved the way for the 2013 elections, all remaining EU sanctions except for the measures targeting President Mugabe and his wife personally were suspended (Council of the EU 2013).

While it is possible to account for this step-by-step process within a traditional bargaining framework, as the EU responded to political developments in Zimbabwe, the process was also fairly inconclusive – which poses a challenge for models that rely on a binary outcome. The EU's decision to remove most sanctions was far more inconsistent than it appears at first sight, with the European Parliament questioning Zimbabwe's quest for further sanctions relief in early 2013 (European Parliament 2013) – namely, at a time when the Council was progressively easing the restrictive measures. Moreover, the EU and US also lifted sanctions at different

12 See, for example, "US, UK Threaten ZIM Sanctions" on News24, 16 January 2002, http://www.news24.com/xArchive/Archive/US-UK-threaten-Zim-sanctions-20020116 (accessed 28 March 2019).

paces (see Figure 1 below). EU concessions did not constitute a clear step towards sanctions termination in view of continued US sanctions, as people in Zimbabwe "tend[ed] to mix up"[13] both senders' measures and the regime could still denounce outside pressure so as to whip up domestic support. In this vein, sanctions termination cannot be properly understood as an outcome, only as a gradual and inconclusive process.

Figure 1. Zimbabwean Individuals and Firms on EU and US Sanctions Lists



Source: Author's own compilation, based on EU Common Positions, Council Decisions, and Resolutions, as well as on the US Office of Foreign Assets Control.

Second, multifaceted relations between different actors at the national, regional, and international levels shaped the termination process. To start with, the so-called target, Zimbabwe, did not take a uniform stance on the potential termination of sanctions. Instead, different political and societal actors disagreed on the desirability of sanctions removal. The GNU created a commission to work on the termination of sanctions. Even though it included members of all political parties, several high-ranking politicians of the (former) opposition – including party

13 Interview with a European diplomat, 15 January 2014.

leader Morgan Tsvangirai – still asked for the continuation of sanctions in private meetings with EU officials.[14] This divide also ran through civil society.[15]

Similarly, support for the lifting of sanctions varied significantly among EU members too.[16] Belgium pushed for the removal of diamond companies from the blacklist due to its own commercial interests. The Netherlands, among others, was in favour of rewarding political reforms in Zimbabwe as a step in the right direction, which also became the dominant narrative that guided subsequent EU decisions (see, for example, Council of the EU 2012a). In contrast, the United Kingdom insisted on keeping the measures in place as an important symbol for contesting the Mugabe regime's continuous human rights abuses.

The gradual removal of sanctions created frictions among different EU member states, as well as between the EU and the US.[17] Disagreement not only concerned strategic considerations regarding the political utility of lifting sanctions, but also the question of whether Western relations with Zimbabwe should change "from pariah to partner."[18] A rational choice approach cannot adequately account for these discursive struggles over normative substance, namely the legitimacy of sanctions removal.

Finally, Zimbabwe's relations with other countries influenced the termination process as well. Going beyond the well-documented activity of (economically motivated) sanctions busters such as China, South Africa's support for a swift removal of sanctions after the formation of the GNU was crucial for the EU's adopted stance (Hoekman 2013; Nyakudya 2013). While Zimbabwe's "Look East" policy introduced in 2003 (Chan and Patel 2006) was supposed to weaken the economic impact of sanctions, South Africa politically supported Zimbabwe in the international arena. At the same time, a significant number of countries helped sustain the Western sanctions policies; some 19 of them formally aligned themselves with at least one EU Council Decision on restrictive measures (Hellquist 2016: 1005). In addition to influencing the effectives of sanctions through their implementation or evasion, third parties also signalled disapproval of or support for the signal of ending the target's international isolation as conveyed by the removal of sanctions.

Third, the signalling dimension of sanctions termination became visible in the discursive struggle over the timing and desirability thereof. Vocal debates emerged questioning whether the lifting of all EU sanctions, except for the targeted measures against Mugabe and his wife

14 Interview with a European diplomat, 15 January 2015; interview with a European ambassador, 20 January 2014; interview with a Western ambassador, 21 January 2014.

15 Interview with the chief executive officer of a Zimbabwean non-governmental organisation, 17 November 2014; interview with a policy advisor, 17 January 2014.

16 Interview with the head of an international NGO, 14 January 2014; interview with a European diplomat, 15 January 2014; interview with a professor at the University of Zimbabwe, 12 November 2014.

17 Interview with a European diplomat, 15 January 2014; interview with a European ambassador, 20 January 2014; interview with a Western ambassador, 21 January 2014.

18 "Zim: From pariah to partner — series finale" in *The Herald*, 15 June 2018, https://www.herald.co.zw/zim-from-pariah-to-partner-series-finale/ (accessed 28 March 2019).

meant that sanctions were terminated. This demonstrated the salience of being subject to this visible form of international disapproval. The ruling party claimed that the whole country still faced sanctions as long as Mugabe was subject to a travel ban and asset freezes.[19] Others argued that the remaining measures against the president had no effect, so that the sanctions could be considered terminated.[20] Hence, it is not only difficult to assign a single date to the termination of sanctions but the assessment hereof is also subject to diverging interpretations that shape political perceptions and positions.

These controversies surrounding the lifting of sanctions in Zimbabwe at a time when the economic impact of the measures had arguably become negligible highlights its signalling dimension. Several interview partners explicitly referred to the "symbolic" importance of lifting sanctions,[21] which critics saw as a very visible "betrayal of human rights efforts" [22] in light of continued assaults on the freedom of speech and assembly in Zimbabwe. In that sense, the domestic debates about sanctions relief were part of a broader struggle over claims to legitimacy in the country, which included the important question of which domestic adversary "was proven right" by the (partial) removal of external pressure.

4.2 The cumbersome process of lifting the Iranian sanctions

The joint statement made by the High Representative of the EU and the Iranian foreign minister in October 2015, which disclosed a comprehensive solution to end all nuclear-related sanctions, marked a turning point in the relations between the EU and the Islamic Republic (EU External Action Service 2015). It was the result of 12 years of diplomacy between the EU3+3 and Iran.[23] EU sanctions on Iran, first imposed in 2007 due to concerns over the latter's nuclear programme[24] (Council of the EU 2007b), were initially limited to enforcing the UN's targeted sanctions (UNSC 2006). After 2010, however, the EU toughened its stance on Iran after several rounds of abortive negotiations (Patterson 2013), and imposed increasingly comprehensive sanctions that targeted Iran's energy, investment, and oil sectors, citing concerns over human rights, weapons of mass destruction, as well as nuclear proliferation (Council of the EU 2010,

19 See, for example, "EU Sanctions Review a Non-Event: Gumbo," on ZBC News Online Facebook Page, 26 March 2013, https://www.facebook.com/zimbabwebroadcastingcorporation/posts/eu-sanctions-review-a-non-event-gumbo-the-zanu-pf-secretary-for-information-and-/314512838676053/ (accessed 28 March 2019).

20 For example, interview with the programme coordinator of an international NGO, 23 January 2014; interview with the executive director of a non-governmental research organisation, 20 January 2014.

21 Interview with the executive director of a non-governmental research organisation, 20 January 2014; interview with a founding member of the major opposition party, 17 November 2014.

22 Interview with opposition member of parliament, 12 November 2014.

23 The EU3+3 includes France, Germany, and the UK as well as China, Russia, and the US, who joined the EU diplomatic efforts vis-à-vis Iran.

24 Restrictive measures were first announced by the EU in February 2007 (Council of the EU 2007a).

2012a, 2012b). In doing so, the EU also responded to US demands for more pressure to coerce Iran into coming to the negotiating table.

The lengthy process of lifting the nuclear-related sanctions saw numerous negotiations take place that initially failed to materialise into a substantive agreement (Patterson 2013). This culminated in a last round of EU sanctions that froze the assets of the Iranian Central Bank and banned Iranian crude oil imports to European countries (Council of the EU 2012b). The EU implemented these measures just before the Iranian presidential elections that put Hassan Rouhani, a former nuclear deal negotiator, in office on 3 August 2013. The negotiations started to take a different turn when Rouhani voiced his willingness to resume serious talks on the country's nuclear programme.[25] This paved the way for the Joint Plan of Action that was reached between the EU3+3 and Iran on 24 November 2013, and the subsequent EU announcement of a procedural agenda to ease sanctions in accordance with Iran's compliance.[26] Cheering crowds awaited the Iranian negotiators at home.[27] After Iran fulfilled its side of the bargain, the EU suspended the sanctions on petrochemical exports, gold, and precious metals. Following these steps, the EU would be characterised as a "responsive sanctioner" (Luengo-Cabrera and Portela 2015) who gradually lifts measures to incentivise targets to move towards the desired policy goal. The negotiations between the EU3+3 and Iran concluded with the Joint Comprehensive Plan of Action (JCPOA) in 2015. The EU formally lifted all nuclear-related sanctions on Iran on the day of implementation of the JCPOA.

The case of Iran highlights three important aspects. First, sanctions removal resulted from a complex process of back and forth negotiations that started in 2003 and included the imposition, strengthening, easing, and (partial) lifting of sanctions as described above. While a bargaining model can capture the successive removal of sanctions against Iran, with the EU rewarding Iran's initial concessions to incentivise future compliance, its inconclusive nature warrants further attention. The EU did not grant complete sanctions relief to Iran, but only terminated the nuclear-related ones – leaving restrictive measures over human rights and terrorism concerns in place. Furthermore, the US reimposed sanctions after all nuclear-related

25 "Six Takeaways from New Iranian President Rouhani's First News Conference" in *The Washington Post*, 6 August 2013, https://www.washingtonpost.com/news/worldviews/wp/2013/08/06/six-takeaways-from-new-iranian-president-rouhanis-first-press-conference/?noredirect=on&utm_term=.a9896a7ecf60 (accessed 28 March 2019).

26 The EU first justified the suspension of nuclear-related sanctions against Iran to "allow more time for the ongoing negotiations [between all parties]" (Council of the EU 2015a, 2015b). Later on, justifications given by the EU3+3 for the gradual removal of sanctions centred on Iran's compliance with the nuclear deal and the economic benefits a normalisation of relations would bring to both the senders and the Iranian people (E.O. 13716 2016; Council of the EU 2016).

27 "Iran's Leaders and Public Celebrate Geneva Nuclear Deal" in *The Guardian*, 24 November 2013, https://www.theguardian.com/world/2013/nov/24/iran-reaction-nuclear-deal-geneva (accessed 28 March 2019).

ones against Iran had been lifted by the other EU3+3 members (E.O. 13846 2018). Despite media reports about "Iran's sanctions lift,"[28] the reality of incomplete sanctions removal thus forces us to rethink it carefully as a process rather than a single outcome.

Second, disagreement among and between the different senders, and their relations with other actors, complicated negotiations over the removal of sanctions. Even though this is not incompatible with a rational choice bargaining framework, "sanctions have usually been analysed as a secluded affair between two parties" (Hellquist 2016: 997) – in other words, a target and a unitary sender. Instead, the case of Iran points to the importance of multiple relations that transcend the sender–target dyad. The firm unwillingness of the US to relax sanctions was a challenge for European attempts to lift sanctions in response to the gradual progressing of the negotiations. Furthermore, the Iranian case highlights how actors other than the sender and target decisively shaped the political context in which talks over the potential removal of sanctions took place. The EU decided to first impose sanctions on Iran when the threat of an Israeli attack on Iran loomed large on the horizon. According to the EU, this necessitated a more consequential response to prevent escalation into a military conflict (Patterson 2013; Tabrizi and Santini 2012).[29] Similarly, joint Israeli and Saudi pressure was particularly noteworthy when it came to intensifying the termination talks, with both countries pressing for Iran's continued isolation.[30] The termination process was further complicated with the election of Trump to office, who fulfilled his campaign promise[31] and withdrew the US from the JCPOA – thus creating frictions among the senders. His administration imposed the "highest level" of extraterritorial economic sanctions (White House 2018), which target foreign countries and entities doing business with Iran (E.O. No. 13846 2018) at a time when the EU had lifted all nuclear-related measures.

This asynchronous sanctions removal, third, has severely affected the signalling dimension thereof. The uncompromising US approach has undermined the credibility of the Europeans'

28 See, for example, "Iran's Sanctions Lift and the West Goes to Talk Business" in *The New York Times*, 25 January 2016, https://www.nytimes.com/2016/01/26/business/international/airbus-iran-aircraft-talks.html (accessed 28 March 2019).

29 "Israel Weighs Merits of Solo Attack on Iran" *in Wall Street Journal*, 21 April 2010, http://online.wsj.com/article/SB10001424052748703757504575194223689622084.html (accessed 28 March 2019).

30 "S. Arabia, Israel Admit Secret Talks on Iran" in *Tehran Times*, 6 June 2015, https://www.tehrantimes.com/news/247154/S-Arabia-Israel-admit-secret-talks-on-Iran; "مع تصاعد الأزمة بمن تضحي أمريكا...السعودية أم إيران" on Masr Alarabia, 5 January 2016, http://www.masralarabia.com/العرب-و-العالم/868810-بمن-تضحي-أمريكا-السعودية/; "حديث ابن سلمان عن حرب ضد إيران؛ حسابات غير دقيقة أم-إيران." on Alalam TV, 3 April 2018, www.alalamtv.net/news/3468181/حديث-ابن-سلمان-عن-حرب-ضد-إيران؛-حسابات-غير-دقيقة; "Israel Says Iran Lied on Nuclear Arms, Pressures U.S. to Scrap Deal" on Reuters, 30 April 2018, https://www.reuters.com/article/us-israel-iran-netanyahu/israel-says-iran-lied-on-nuclear-arms-pressures-u-s-to-scrap-deal-idUSKBN1I11CJ (all accessed 28 March 2019).

31 "Donald Trump's Big 10 Foreign Policy Pledges—Will He Stick to Them?" in *USA Today*, 18 November 2016, https://eu.usatoday.com/story/news/world/2016/11/17/trump-foreign-policy-campaign-promises/93802880/ (accessed 28 March 2019).

message of cooperation and rapprochement. Thus, following the US withdrawal from the deal, the EU openly condemned the US sanctions and strongly signalled its resolve to normalise its relationship with Iran (EU External Action Service 2018). The European commitment to keep the JCPOA intact thus clearly diverges from the US attempts to use the Plan for the implicit, yet thinly concealed, goal of regime change.[32]

The diverging EU and US stances on Iran have not only created practical problems, but also reconfigured sociopolitical relations between the three parties. On the one hand, the EU reactivated its blocking statue[33] – which obstructs the US-imposed restrictive measures, as a way to protect European companies doing business with Iran (European Commission 2018) and to respond to Iranian demands for "a compensation for the effects of US sanctions."[34] The blocking statute made manifest the Europeans' voiced commitment to the JCPOA. It also signalled to the international community that the nuclear deal is an international agreement between two parties that one side cannot breach unilaterally.[35] On the other hand, it created an Iranian narrative of "us" (Iran and the EU) against "them" (the US) and reinforced strong anti-US sentiment.[36]

In this regard, the Iranian case highlights how the different senders clashed over normative substance – as lifting sanctions was a symbol of Iran's reintegration into the global community after more than a decade of political and economic isolation. The reimposition of US sanctions on Iran despite its compliance highlights the shortcomings of the conventional rational choice approach. Remaining part of the JCPOA deal would have normalised relations with Iran and contributed to stability in the region by legally binding Iran to the maintenance of a peaceful nuclear programme – not to mention that a deal was in the "best interest of America's security, as well as the security of [America's] allies" (US Deputy Secretary Anthony Blinken 2015). However, the US administration did not perceive sanctions removal as a simple act of economic relief but also as a strong signal for the reintegration of adversaries "branded as forces of evil and immoral" (Nephew 2018: 66) – something which had to be prevented.

32 "Lamont: US sanctions aimed at regime change in Iran" on Sky's Ian King Live programme talking to Norman Lamont, 5 November 2018, https://news.sky.com/story/lamont-us-sanctions-aimed-at-regime-change-in-iran-11545757 (accessed 28 March 2019).

33 The blocking statute was first introduced by the EU in response to US-imposed extraterritorial sanctions on non-US companies investing in the Iranian oil and gas sector in 1996 (Council of the EU 1996).

34 "Zarif: Europe Must Protect Nuclear Deal for 'Its Own Sovereignty'" in *Tehran Times*, 21 September 2018, https://www.tehrantimes.com/news/427668/Zarif-Europe-must-protect-nuclear-deal-for-its-own-sovereignty (accessed 28 March 2019).

35 "JCPOA Is International Deal That Can't Be Breached by One Side: Iran" in *Tehran Times*, 6 December 2016, https://www.tehrantimes.com/news/408873/JCPOA-is-international-deal-that-can-t-be-breached-by-one-side (accessed 28 March 2019).

36 "Europeans United with Iran against U.S.: Nahavandian" in *Tehran Times*, 26 September 2016, https://www.tehrantimes.com/news/406733/Europeans-united-with-Iran-against-U-S-Nahavandian (accessed 28 March 2019).

In summary, the removal of measures against Zimbabwe and Iran represented inconclusive processes subject to diverging interpretations. The multifaceted relations between the different actors involved in these debates and their contestation over the potential lifting of restrictions decisively shaped these processes. In their deliberations, these actors sometimes followed different logics of action. Hence, the two cases highlight that the signalling dimension of sanctions termination is as important as the economic costs or benefits related to the continuation or removal of such measures.

5 Conclusion

Research on the end of international sanctions is still in its infancy. Explanations of the varying duration and termination of external pressure remain sparse, and are inherently limited because existing research has heavily relied on a rational, interstate bargaining framework that tends to model sanctions termination as a singular event based on the sender's cost–benefit calculations. To address these shortcomings, the paper has proposed a process-oriented, relational, and signalling approach to the study of sanctions termination. Previous research on sanctions termination has largely overlooked how some aspects, such as the volatile and gradual nature of termination processes and the importance of third-party actors situated outside of sender–target relations, can be accounted for within the traditional methodological framework. However, in addition to more complex and nuanced accounts of termination processes, we have suggested conceptualising the termination of sanctions as a signal ending the highly symbolic international disapproval of the target – something that affects social relations between multiple actors beyond the economic realm. In addition, we can only account for the inconclusive nature of sanctions termination if we understand it as a process and not a single outcome.

Such a signal can be heavily contested, as our illustrative case studies on Zimbabwe and Iran have shown. These two cases highlight that it is important to examine the social relations between the multiple actors involved, and how their – often inconsistent – interplay affects the signalling dimension of sanctions termination; in order to understand the protracted nature of the process. These insights into the "how" of sanctions termination also allow us to develop thoughts on the "why," which may complement – or partially contradict – purely cost-driven explanations. The case of Zimbabwe reveals that sanctions sometimes end because senders attempt to reward future norm-conforming behaviour, but also that such a move can be highly controversial. Moreover, it illustrates that contestation over whether the EU had actually removed its sanctions in view of an inconclusive status quo became central to such debates. In the case of Iran, meanwhile, several actors within the US made a case for the non-termination of sanctions despite the potential economic and security benefits that would result from a resumption of trade and increased regional stability, precisely because they did not want to send a signal of ending Iran's status as an international outcast.

To capture such processes as these, we need more diverse methodological approaches as well as more fine-grained data on sanctions termination with regard to both cross-national datasets and case studies. Recent large-N datasets have started to address issues of gradualism (Portela and von Soest 2012) and the signalling dimension of sanctions (Biersteker et al. 2018), but these variables have been confined only to disentangling the process of imposition. More information on aspects such as the gradual removal of measures, the adaptation of goals, and the language around termination requirements could help to fill some of the outstanding gaps. Yet, case-oriented research – to the extent that it has explicitly addressed the issue of termination at all – also faces the challenge of accounting for it as a heavily contested social process and not only as the outcome of interstate bargaining (for notable exceptions, see Hellquist 2012; Jones 2015). Discourse analyses of original documents to tease out political actors' justifications and the reconstruction of local narratives on sanctions termination in the targeted states are crucial in this respect.

Going forwards, research should also look into the economic and – above all – political after-effects of ending sanctions. Until now, "evaluations of sanctions typically tend to stop at the point of sanctions termination, with sanctions observers quickly turning their attention to other cases" (Andreas 2005: 339). As a result, researchers have mostly ignored the consequences of ending sanctions. If one does indeed take the signalling dimension seriously, it appears important to understand how the messages conveyed by ending this visible form of external pressure affect dynamics of contestation in both the sender and target states *after* the removal of sanctions.

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Appendix A: Universe of Potential Cases

#	Case	Gradualism	Multifaceted Relations	Signalling
1	UN vs. Afghanistan (1999–2002)	√		√
2	EU vs. Belarus (2000–ongoing)	√	√	
3	US vs. Belarus (2004–ongoing)	√	√	
4	US vs. Côte d'Ivoire (1999–2002)	√	√	
5	EU vs. Fiji (2006–ongoing)	√	√	
6	UN vs. Haiti (1993–1994)	√		√
7	US vs. Indonesia (1992–2005)	√	√	
8	US vs. Iran (1984–ongoing)	√	√	
9	UN vs. Iran (2006–ongoing)	√	√	√
10	UN vs. Libya (1992–2003)	√		√
11	EU vs. Myanmar (1996–ongoing)	√	√	
12	EU vs. Niger (1996–1999)	√	√	
13	US vs. Nigeria (1993–1998)	√	√	
14	EU vs. Nigeria (1993–1999)	√	√	
15	US vs. North Korea (1950–ongoing)	√	√	
16	US vs. North Korea (1993–ongoing)	√	√	
17	UN vs. North Korea (2006–ongoing)	√	√	√
18	UN vs. Sudan (1996–ongoing)	√		√
19	UN vs. Sudan (2005–ongoing)	√		√
20	US vs. Syria (1986–2003)	√	√	
21	US vs. Syria (2004–ongoing)	√	√	
22	EU vs. Zimbabwe (2002–ongoing)	√	√	
23	US vs. Zimbabwe (2002–ongoing)	√	√	

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Neuer Jungfernstieg 21 • 20354 Hamburg • Germany
E-mail: <info@giga-hamburg.de> • Website: <www.giga-hamburg.de>