

**Written Testimony Submitted
to the House Foreign Affairs Committee
Subcommittee on Africa, Global Health, and Global Human Rights
Hearing on US Sanctions in Africa
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Good afternoon, Chairwoman Bass, Ranking Member Smith, and members of the Subcommittee. Thank you for inviting me to speak with you today about US sanctions in Africa, an issue that directly affects the work of my organization and our partners on the continent.

My name is Bridget Moix, and I work with an international peacebuilding organization called Peace Direct. Peace Direct works with local people to stop violent conflict and build lasting peace. We partner with, accompany, support, and learn from partners in 13 countries, including Burundi, Central African Republic, Democratic Republic of Congo, Mali, Nigeria, Somalia, Sudan, and Zimbabwe. We also collaborate with a network of Local Peacebuilding Experts around the world, mapping local civil society peacebuilding work in 25 countries and amplifying the experiences and perspectives of local communities striving to overcome violence. We advocate with the United Nations, here in Washington, and in London, where we are headquartered, for policy change and improved foreign assistance to better support locally-led peacebuilding.

For those who may not be familiar with the field of peacebuilding, it includes the full spectrum of efforts to **prevent, respond, and recover** from violence in ways that **address the root causes of conflict and promote long-term, sustainable peace.**

Our partners are courageous local leaders who are helping to mitigate violence and build peace on the frontlines of some of the most complex conflict environments around the world. I am deeply honored to work with them and to do my best to speak with you on their behalf today.

Background: Locally-Led Peacebuilding in Africa

Before discussing how US sanctions can impact peacebuilding efforts, I want to provide some background on what we mean by locally-led peacebuilding and share a few examples of how local peacebuilders in Africa are working to advance justice, human rights, and long-term peace in countries where the US has imposed sanctions.

Peacebuilding requires a wide range of actors operating at all levels from community, provincial, and national, to regional and international. While recognizing the important role that local government, security sector and business play, Peace Direct's focus is on the role of civil society in building sustainable and just peace. Local civil society peacebuilders play essential roles in addressing conflict due to their lived experience with communities, deep contextual and cultural knowledge, trusted relationships and networks that bridge divided communities, and long-term presence. International actors have a key role to play in supporting locally-led peacebuilding, but international interventions rarely resolve conflicts for the long-term without the broad buy-in of local populations.

Arguments for what Peace Direct calls 'locally-led approaches' are based both on principle and pragmatism. Support for local peacebuilding aligns with our principles of inclusion, agency and challenging power structures. In addition, local approaches are often more effective because of actors' contextual knowledge, legitimacy and accountability; it also reinforces resilience and increases sustainability. Supporting locally-led approaches means acknowledging that local communities are never homogenous, often espouse divergent views, and are centrally involved in local politics. Although local approaches may have their limitations, they are too often dismissed or side-lined in favour of international (and predominantly White) responses due to factors such as risk aversion, concerns about scale and capacity, along with neo-colonialism, prejudice and racism.

While global peacefulness continues to decline, the international peacebuilding community is increasingly recognizing that locally-led activity is a key element to building sustainable peace.

Can locally-led peacebuilding end violence and build peace? Here are examples of how local peacebuilders in some of the African countries where the US imposes sanctions are working.

In Burundi and Democratic Republic of Congo, networks of local organizations have come together to establish locally-led early warning and response systems to monitor warning signs, respond directly to disputes or incidents of violence, and document human rights abuses. The INAMA network in Burundi included more than 180 citizen reports across all provinces of the country and reported and responded to hundreds of incidents or potential or immediate violence. The Beni Peace Forum in Eastern DRC has created an effective and entirely locally-led early warning and response system in the face of persistent failure by MONUSCO and the international community to prevent or respond to recent massacres.

Also in DRC, our long-time partner Centre Resolution des Conflits draws on deep connections with communities in North Kivu to rescue child soldiers and help reintegrate former combatants into communities, breaking cycles of recruitment by armed groups and strengthening social cohesion. Our partner FOCHI in South Kivu has helped nearly 40 communities without access to functioning justice systems to develop local peace courts. These community-run courts are preventing conflicts from escalating into violence, holding perpetrators accountable in ways the communities want, and creating space for reconciliation to break cycles of conflict. They include special women-led courts and two "super-courts" to address intercommunal violence as well.

In the Central African Republic (CAR) and Mali, youth-led organizations are working to recognize and empower the positive role that young people can play as peacebuilders in their communities, as a counter to the influence of armed groups and extremist ideology. In CAR, the organization Uru engages young people across all parts of the country to act as peacebuilders in their communities and advocates nationally for a voice in the peace process. In Mali, we recently supported 20 projects, many led by women and young people, involving 40 organizations that are bringing communities together to build trust and help reconcile differences in the face of growing intercommunal violence.

In Nigeria, the Peace Initiative Network works with young people to reduce recruitment to armed groups, tackle voter manipulation and help dispel suspicion and rivalry between different ethnic and religious groups. They support peace clubs in schools and engage young people through sports to provide a sense of belonging and positive alternative to the influence of armed groups. Every quarter they have multi-stakeholder meetings where they discuss what to do about community issues, to help prevent violence from flaring up. Civil defense,

police, vigilantes, youth leaders, and everyone in the community are all present at these meetings, creating lines of accountability downwards and upwards.

In Somalia, the Social-Life and Agricultural Development Organization works with youth in the country to provide them entrepreneurial skills necessary to gain jobs, so that they can provide for themselves and their families, while also teaching them peacebuilding and conflict resolution skills. In doing so, they provide young people much needed alternatives to joining Al-Shabab and other militia groups to earn a living.

In Somalia and Zimbabwe, women-led organizations are helping increase women's participation in peacebuilding and local decision-making. The Somali Women's Solidarity Organization (SWSO) has built community centers in every state that provide women a safe space to come together and work to address the violence plaguing their communities. Research by SWSO showed that women often play key roles – both negative and positive - in conflict and peacebuilding. Their influence on family members can be a critical factor in mobilizing violence and fueling armed groups, or in preventing recruitment and promoting peace. In Zimbabwe, Envision Women's Trust provides training in conflict transformation to traditional leaders, police, women, and youth.

Finally, in Sudan, it was a nonviolent civil society movement led by young people and women – not decades of US sanctions or other international intervention - that finally brought down a 30-year dictatorship. Local peacebuilding groups spent years creating peace committees that continue to respond to early warnings of violence by mediating tension and disputes at the community level. This work became all-the-more critical in the political upheaval surrounding the April uprising, and volunteers working with the organization adapted their roles to also act as whistleblowers on issues of corruption and promoters of human rights in their communities.

I share these examples to underline the need to ensure that any sanctions imposed by the US support – or at least do not harm – the locally-led solutions that civil society movements are already advancing in their own countries.

US Sanctions and Local Peacebuilding

Given the extensive use of sanctions by Congress and the Administration over many years, and the lack of understanding or consensus regarding their impacts, we welcome the Biden Administration's decision to undertake a review of US sanctions policy. According to OFAC, the US currently has 414 sanctions in place against entities and individuals in Africa. These include 198 sanctions against individuals and 216 against entities (states, corporations). What are the impacts of these sanctions? Are they effective? Are they advancing US national interests, promoting democracy, human rights, and peace? Are the Administration and Congress tracking these 414 sanctions regularly to understand and continually assess their impacts? When, how, and under what circumstances would each of these sanctions end, and how will we know if the purpose of imposing them has been served?

These are all questions we hope will be considered within the Administration's review. I am also here to urge Congress to ensure the review thoroughly considers the peacebuilding and humanitarian implications of US sanctions. Based on the findings of the review, Congress should work with the Administration to establish or

correct US sanctions policy in ways that will protect civilians from harm and support locally-led efforts to advance peace and human rights.

I want to thank Rep. Omar, Chair Bass, Rep. Cicilline, and all the Members of Congress who recently sent a letter to the Administration requesting a broader analysis of the humanitarian impacts of sanctions, including addressing sanctions that are impeding more rapid and equitable COVID relief. Ensuring US sanctions are not impeding the global distribution of COVID-19 vaccines as quickly and equitably as possible is not only the ethical thing to do; it is crucial for our own safety and security as well.

In preparing for this hearing, I reached out to some of our partners to ask their thoughts on the impacts of US sanctions on peacebuilding efforts in their countries. Sanctions are a complex issue, and there is no “black or white” position among local peacebuilders on them. Some common themes emerged though.

Local peacebuilders oppose broad economic sanctions that harm civilian populations. This is perhaps the clearest position across global civil society. Broad economic sanctions against a state or sector – unless called for by legitimate civil society movements – only had further harm to the suffering of civilian populations. They lay structural economic violence on top of the direct violence and abuse of authoritarian regimes, who will respond to sanctions by protecting their own wealth and well-being at greater expense to the population.

As Quscondy Abdulshafi, a long-time Sudanese peacebuilder and member of Peace Direct’s Global Advisory Council, explains, “Sanctions against the state collectively punish the citizens of the sanctioned state and provide a pretext for warlords to consolidate power further and legitimize violence and oppression.”

Many local peacebuilders do see the potential of international sanctions, particularly focused sanctions against individual human rights abusers, as an important tool that may help pressure abusive regimes and restrain human rights abusers. Sanctions are recognized, and sometimes called for, by nonviolent civil resistance movements as part of their strategies to overcome authoritarian regimes. Local peacebuilders believe in justice and accountability, and they want the international community to help hold perpetrators accountable. However, they also want their communities – those most impacted by the violence and abuse – to have a greater voice in determining if, when, and how international sanctions are used in their countries.

Unfortunately, the local peacebuilders with whom I consulted have not seen many positive impacts from US sanctions, and, in many cases, they saw greater harm than good from them. They described US sanctions as “biased”, “inconsistent”, “a manipulative tool to pursue US interests”, “causing harm to ordinary people,” “adding to the suffering of communities,” and simply “ineffective.” They questioned why the US continues to send military aid to many countries where war crimes and human rights abuses are underway and refuses to join international mechanisms for justice and accountability like the International Criminal Court.

They pointed out that sanctions imposed by the US without international coordination and a clear strategy often embolden authoritarian regimes, fuel dangerous alliances, and add to the already rising threats against civil society by authoritarian regimes. They noted that many travel bans or asset freezes are ineffective against individuals who maintain their wealth beyond the reach of the US or do not care about traveling here. They feel that sanctions are not applied consistently in all regions of the world and explained it often appears that the US uses them simply as a punitive tool to help policymakers feel they have “done something” in certain cases.

Moreover, the application of even targeted sanctions on a country has a disproportionate impact on any money transfers to that country due to the de-risking of the financial sector and its fear of breaking sanctions rules. This directly affects the operations and funding flows of both international and local peacebuilding and humanitarian organizations. The US needs to consider carefully the unintended consequences of sanctions on civil society more generally, and other vitally important flows of income into the country which are disrupted as soon as the US places any sanctions on a country.

Local peacebuilders urge that the US utilize any sanctions within a comprehensive strategy that **aims to reduce violence and suffering and strengthen locally-led movements for peace, justice, and democracy.**

Material Support Laws Undermine Peacebuilding and Humanitarian Efforts

Of particular concern to peacebuilders are the impacts of the current material support laws that restrict any engagement by humanitarian, development, and peacebuilding groups with US designated terrorist groups. While these laws may sound like a reasonable approach to ensuring US assistance does not end up in the hands of violent movements, their ultimate effect has been to hinder vital humanitarian and peacebuilding work that often requires reaching civilian populations in areas controlled by armed groups and engaging all sides of a conflict in dialogue, counter-recruitment, trust-building, and reconciliation efforts.

Current restrictions under the material support laws threaten the legitimate work of humanitarian and peacebuilding organizations working in conflict environments and impact the ability to help meet basic needs of populations and engage key actors in peacebuilding and reconciliation efforts. Even if their operations are not directly restricted, without a clearly articulated exception to the laws, peacebuilding and humanitarian organizations are left uncertain about the specific limits and are still exposed to risks of criminal prosecution. This leads many to curtail their efforts to reach the populations most in need or engage in the most critical work to prevent violence and build peace. The laws are also impractical.

As my colleague Michael Femi Sodipo, founder of Peace Initiatives Network in Nigeria, once told me, “Who is Boko Haram? People sometimes have to move in and out of armed groups to survive, or because they may want to leave but aren’t sure how to get out. We need to be able to reach everyone in our work – those most at risk and those already engaged in violence. That’s what peacebuilding means.”

Archbishop Desmond Tutu and former US Secretary of State James Baker have both summed up the importance of being able to engage even the worst perpetrators by explaining: **to build peace you don’t talk to your friends, you talk to your enemies.**

Earlier this year, the Biden Administration rightly reversed a decision to designate the Houthis in Yemen as a terrorist organization, partly in response to concerns raised by humanitarian and peacebuilding organizations of the impact this would have on their operations. However, the material support laws themselves need to be changed or humanitarian and peacebuilding efforts in places like Somalia, Nigeria, and DRC will continue to be constrained.

The Charity and Security Network, a coalition of humanitarian and peacebuilding organizations in which Peace Direct participates, has raised this issue repeatedly and called for clear safeguards and exceptions for peacebuilding and humanitarian efforts under the material support laws. Ending violent conflict and building peace requires engaging with enemies and creating pathways out of violence for those involved with armed groups. Humanitarian aid should flow uninhibited to communities in need.

We urge Congress to update the material support laws to ensure that terrorist designations do not undermine the life-saving work of humanitarian and peacebuilding organizations. When imposing sanctions, the US should include formal, a priori safeguards such as exceptions for peacebuilding activities. We ask Congress to press the Administration to restore the humanitarian exceptions that have been routinely cancelled under previous executive orders, and to request that the Department of Justice issue a written assurance that it will not bring criminal charges against legitimate aid and peacebuilding organizations operating with a Treasury license.

6 Key Questions to Ask

Drawing on the perspectives of our local peacebuilding partners, I would like to use the final portion of my testimony to propose 6 key questions that Congress and the Administration should consider during the current sanctions review and when considering any future sanctions policy.

1. Will sanctions harm civilian populations?

There is growing consensus that broad economic sanctions against a state often harm ordinary people far more than the individuals or institutions who are sanctioned. Congress should ensure that US sanctions do not add to the suffering of civilian populations. Congress should consult with legitimate local civil society actors regarding the impacts of sanctions and help ensure the basic needs of populations are not harmed by US policy. Sanctions should not be applied – and should be lifted – if they harm civilian populations. This should be a core guiding principle for US sanctions policy.

2. Will sanctions help or hinder locally-led peacebuilding, justice, and reconciliation efforts?

Locally-led efforts to prevent violence, bridge divisions, and restore broken relationships requires deep local knowledge and relationships, the ability to work across lines of conflict, a willingness to hold the tensions of justice and reconciliation together, and the space to engage with all those involved in the conflict – including perpetrators. Congress should assess the impact sanctions have on locally-led peacebuilding efforts and the ability of civil society to mobilize and organize. While our instincts may insist on punitive forms of justice and accountability, US policy should respect the desires of local communities who are impacted by violence to determine what justice looks like for them and how they want to reconcile their communities.

3. Will sanctions support nonviolent civil resistance movements?

Research has shown that nonviolent civil resistance movements are twice as effective as armed movements in overthrowing authoritarian regimes and lead to more democratic outcomes over the long-term. Nonviolent civil society resistance movements draw on a wide range of tactics to advance strategies for change in their societies

and undermine the power of authoritarian regimes. Sanctions may be a tool they seek to employ, and they may actively request support from the international community, as was the case in South Africa. These requests usually come as part of a broader strategy they are employing and with recognition of potential impacts. Congress should respond to the requests of nonviolent civil society movements if international sanctions are a part of their strategy and will help strengthen their resistance efforts. This includes both consideration of imposing any sanctions, as well as the process for lifting sanctions after a regime changes or a movement adjusts its strategy.

4. Are sanctions part of a comprehensive, coordinated strategy to reduce fragility?

One lesson of effectiveness of sanctions is the need for coordinated international support for implementation and accountability. Individual financial, travel, or other sanctions may be more effective against specific perpetrators of abuse or atrocities, but only if applied within a clear overarching strategy, with the support of legitimate local actors and civil society movements, and if coordinated with other international actors. Importantly, the end goal for applying sanctions, as well as the steps for how and under what conditions sanctions would be lifted, should be clearly aligned with a comprehensive strategy to help end violence, advance accountability and justice for the population, protect human rights, and support locally-led peace and reconciliation processes.

The Global Fragility Act now requires “all relevant Federal departments and agencies coordinate to achieve coherent, long-term goals for programs designed to stabilize conflict-affected areas and prevent violence and fragility globally, including when implementing the Global Fragility Strategy.” The comprehensive strategy must be coordinated with international and local actors to expand and enhance the effectiveness of United States foreign assistance programs and activities to stabilize conflict-affected areas and prevent violence and fragility globally. The use of sanctions should be incorporated into the comprehensive strategy laid out by the Global Fragility Strategy. Without such coordinated decision-making across US government, the use of sanctions will not be effective and could negatively impact the Global Fragility Strategy as mandated by Congress to address violence and global fragility.

5. What is the role of US military assistance in the conflict?

The US is the largest supplier of weapons in the world and continues to send arms and military aid, directly and indirectly, to active conflict areas, often with limited congressional oversight and without strong accountability for how US weapons may end up in the hands of abusive regimes or nonstate groups. The primary relationship between the US and many African countries continues to be through military aid and militarized approaches which fail to address the root causes of violence and conflict. Economic, financial, travel and other non-military sanctions are often considered entirely separately from the role of military aid, or through separate congressional committees, agencies, and decision-making processes. Imposing arms embargoes or cutting off military aid may be much more difficult politically, even though the impacts of continuing to pour weapons into conflict areas can be devastating for civilian populations.

Congress should ensure that the Administration’s sanctions review includes a thorough assessment of military assistance and improved policies and accountability to guarantee US weapons do not contribute to violence or end up in the hands of armed groups or authoritarian regimes.

6. Do sanctions perpetuate or help undo systemic racism in US foreign policy?

Structural racism and a sense of US exceptionalism have shaped US foreign policy since the creation of our country, particularly toward Africa. Even today foreign policy decisions, including on issues like sanctions, are often informed by the analysis of think tanks or foreign policy experts in Washington who generate their own analysis with limited or no real connection to the countries in question and from within agencies that too often lack diversity. Decisions are made based on the supposed “experts” often without the voices of those with lived experience at the table. [I confess my own complicity in this phenomenon as a speaker on this panel, which does not include people from Africa, as an immediate example.] The imposition of sanctions can also be shrouded in a sense of saviorism – a desire to do something to demonstrate our power to impose change on the world, even if what we are doing has little, or potentially harmful, effects and has not been requested by those with experience of the realities. Finally, policies toward Africa can also assume the ability of people on the continent to endure more hardship – more poverty, more authoritarianism, more violence – than other parts of the world, leaving situations like ongoing massacres in Eastern DRC to persist because they are assumed to be inevitable.

We welcome the growing commitment that we are seeing across the US government and the foreign policy establishment to root out systemic racism in all aspects of US policy, and we encourage you to apply an anti-racism lens to reviewing US sanctions toward Africa as well.

Closing

I would like to close with a story of a remarkable Somali peacebuilder and friend, whom I will call Mohamad, who helped me understand why US policy can be so problematic for peacebuilding. Mohamad worked for many years as a humanitarian and peacebuilder in Somalia. He used to tell me that for the price of one US drone strike, he could help 1000 young people get jobs, stay out of armed groups, and become positive change agents in their communities. He also explained to me how negotiating with armed groups – to travel, to implement his projects, to reach the people he needed to reach – was just a daily reality in humanitarian and peacebuilding work in Somalia that he had to navigate.

Mohamad had a vision of a peaceful future for his country that was inspiring. He understood the vital role that Somali civil society – women, youth, traditional elders, business, peacebuilders - all play, and he knew that there would never be a military solution to the conflict in his country. Instead, Mohamad believed that more peacebuilding efforts and a political process were ultimately the only way out. He believed that a dialogue process between the government, armed groups, and with civil society engaged could - one day – end decades of violence and bring a new future for his country. Does US policy help, or hinder, Mohamad’s vision?

Peace Direct believes deeply in the power of locally-led peacebuilding - in the vision, leadership, and courage of people like him. We know that local civil society – those most impacted by violence and injustice – understand their problems best and can lead the solutions their communities need. We know that locally-led solutions to international problems are more effective, less costly, and more durable than international interventions.

We urge Congress to undertake a thorough review of the impacts of US sanctions policy on locally-led peacebuilding and humanitarian efforts, and to advance policies that support – or at least do no harm to – the work of courageous local peacebuilders and their communities.