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The European Union's External Action Walks a Tightrope: The Challenge of Balancing Dynamics Between Humanitarian Aid and Counter-Terrorism Policies

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Abstract

This working paper examines the links and dynamics between the European Union (EU) counter-terrorism and humanitarian aid policies. These policies often share the same ground and are subject to sensitive interactions as one is very political and the other, by principle, is not. Thus, it is interesting to see how these dynamics can influence their effectiveness in achieving their objectives and in ensuring the overall coherence of the EU's external action, in accordance with Article 21(3) of the Treaty on EU. For this purpose, this working paper will explore the following questions: To what extent do the dynamics between humanitarian aid and counter-terrorism contribute to the effective achievement of their respective objectives? What is the impact of these dynamics on the overall coherence of the EU foreign policy?

This paper finds that some of the objectives inherent to the two policies may overlap but differ in the way in which these are achieved. Indeed, a certain complementarity could exist in the prevention of violent extremism and terrorism, field expertise and the capacity of humanitarians to cooperate with local actors. However, contradictions through sanctions and criminalisation of aid, as well as the antagonism materialised by the humanitarian principles, impede effective or coherent dynamics between these policies. A case study on the Sahel and Syria illustrates these policy interactions where the EU has decided to fight terrorism through different means, such as sanctions and CSDP missions. These cases demonstrate that policies are forced to coexist on the ground and that the EU has, to some extent, been able to meet the challenge of contradictions but didn't reach coherence.

Keywords

European Union's External Action, Counter-terrorism, Humanitarian aid, Coherence, Effectiveness, Syria, Sahel

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List of Abbreviations

AFSJ: Area of Freedom, Security and Justice

AQIM: Al-Qaida in the Islamic Maghreb

CFSP: Common Foreign and Security Policy

CSDP: Common Security and Defense Policy

CTC: Counter-Terrorism Coordinator

ECHO: Directorate-General for Civil Protection and European Humanitarian Aid Operations

EEAS: European External Action Service

EU: European Union

EUGS: Global Strategy for the European Union's Foreign and Security Policy

FISMA: Directorate-General for Financial Stability

GSIM: Group for the Support of Islam and Muslims

HOME: Directorate-General for Migration and Home Affairs

HR/HRVP: High Representatives and Vice-Presidents of the European Commission

ICRC: International Committee of the Red Cross

ISGS: Islamic State in the Great Sahara

ISIL/ISIS: State of Iraq and the Levant/Islamic State of Iraq and Syria (Da'esh)

IHL: International humanitarian law

MS: Member States

MUJWA: Movement for Unity and Jihad in West Africa

NATO: North Atlantic Treaty Organisation

NGO: Non-governmental organisations

PFCA: Political Framework for Crisis Approach

TEU: Treaty on European Union

TFEU: Treaty on the Functioning of the European Union

UN: United Nations

UNICEF: United Nations Children's Fund

UNSC: UN Security Council

WFP: World Food Programme

1. Introduction

“To prevent more recruitment by Da’esh, as well as future violence in and between displaced populations and host communities (...) humanitarian efforts must be linked with the affected person’s longer-term development needs as a means to (...) counter potential extremism amongst refugee populations and host communities.”¹

European Commission, 2015.

In its 2015 Joint Communication on the Regional Strategy against Da’esh, the European Commission put forward for the first time a link between humanitarian aid and counter-terrorism. With these words, the Commission introduced in an official document the idea that humanitarian aid, which is supposed to be independent and neutral, could help in the fight against extremism. While this strategy, subsequently adopted by the Council, does state that humanitarian aid is not subordinate to the European Union’s (EU) external action,² such statements have created a debate within the humanitarian community.

Several observations can be drawn from these Conclusions, and they highlight the importance of studying the dynamics between counter-terrorism and humanitarian aid policies. Firstly, these Conclusions reflect the duality of the issue of interactions between humanitarian aid and counter-terrorism, as this text illustrates a desire to respect the specificity of humanitarian aid policy and its principles of humanity, neutrality, impartiality and independence,³ while at the same time politicising it by mentioning that humanitarian efforts can be “a means to (...) to counter potential extremism”.⁴ Secondly, these findings also highlight that humanitarian aid ground is often shared with conflict actors who may be, as in Syria and Iraq, characterised as terrorist groups. Finally, these findings illustrate the EU’s increasingly comprehensive and integrated approach to conflicts and crises, which seeks to address them in the short, medium, and long term, using all the tools at its disposal. This approach, which allows for the activation and use of several policies at the same time, raises questions about the dynamics between these policies.

This paper will, therefore, focus on the case of the dynamics between counter-terrorism and humanitarian aid policies. Humanitarian aid, in its modern sense, has been understood as “the impartial, independent and neutral provision of aid to those in immediate danger”,⁵ whether handmade or manmade. The EU also defines humanitarian aid as such:

“Providing needs-based humanitarian assistance to the people hit by man-made and natural disasters with particular attention to the most vulnerable victims. Aid is channelled impartially to the affected populations, regardless of their race, ethnic group, religion, gender, age, nationality or political affiliation”.⁶

Terrorism, on the other hand, is a more complex concept to define as it can encompass a wide variety of acts. This paper will be based on Richard’s definition of terrorism as “the use of violence or the threat of violence with the primary purpose of generating a psychological impact beyond the immediate victims or object of attack for a political motive”.⁷ It should be stressed that the EU has not clearly defined terrorism, but often labels acts as terrorists. Indeed, the notion of terrorism is very political, as opposed to the definition of humanitarian aid.⁸

1 European Commission, Elements for an EU regional strategy for Syria and Iraq as well as the Da’esh threat, Join Communication to the European Parliament and the Council (JOIN/2015/0002), Brussels, 6 February 2015, p13.

2 Council of the European Union, “Press release: Council conclusions on the EU regional strategy for Syria and Iraq as well as the ISIL/Da’esh threat”, Brussels, 16 March 2015.

3 European Commission, Elements for an EU regional strategy for Syria and Iraq as well as the Da’esh threat, op. cit., p7.

4 Ibid., p13.

5 Ibid., p5.

6 European Commission, “Factsheet: Humanitarian Aid”, retrieved 13 April 2022, https://ec.europa.eu/echo/what/humanitarian-aid_en.

7 Andrew Richards, “Defining terrorism” in Andrew Silke (ed.), Routledge Handbook of Terrorism and Counterterrorism, London, Routledge, (2019), p13.

8 Bruce Gregor, “Definition of Terrorism: Social and Political Effects”, Journal of Military and Veterans’ Health, vol. 21, no. 2, (2013), p26.

While the EU is one of the largest donors of humanitarian aid in the world⁹ and while the EU intends to become an important player in global governance in the fight against terrorism,¹⁰ it seems relevant to analyse these policies. Moreover, since policies often share the same ground and because of the EU's ambition to have an integrated and comprehensive approach,¹¹ they are led to growing interactions. Thus, the issue of the dynamics that link them is a major issue for European ambitions as a global external player.¹² This choice is also made because of the lack of academic literature on the topic at the European level. Therefore, this paper aims to contribute to the academic discussion.

As the study focuses on the dynamics of two policies, the question of coherence arises. Coherence can be understood as “the absence of contradiction between policies”¹³ and has been enshrined in the Treaty on European Union (TEU) in Article 21(3), which states that: “The Union shall ensure consistency between the different areas of its external action and between these and its other policies”.¹⁴ This paper will therefore seek to answer the following questions: To what extent do the dynamics between humanitarian aid and counter-terrorism contribute to the effective achievement of their respective objectives? What is the impact of these dynamics on the overall coherence of EU foreign policy?

This paper will attempt to argue that the dynamics between EU humanitarian aid and counter-terrorism policies are partially effective and coherent for counter-terrorism policy objectives and not effective and coherent for humanitarian aid objectives but necessary for coherent external action. Coexistence is therefore mandatory and humanitarian aid must adapt to this new trend. In order to answer this research question and to prove or disprove the hypothesis, a research method has been established. Since academic resources are scarce on this particular topic, this study will rely on EU official documents and declarations, a dozen interviews and research reports from think tanks and NGOs. Finally, the paper will be based on an analytical framework and will be completed with two case studies to anchor the paper in facts and recent events relevant to the EU.

2. Humanitarian Aid and Counter-Terrorism Effectiveness Theoretical Framework

2.1 Humanitarian aid and counter-terrorism policies at the EU level

Humanitarian aid and counter-terrorism are distinct European policies that are subject to interplay. Humanitarian aid is an area of the Union's external action which aims to provide rapid assistance in areas outside the EU affected by the occurrence of natural or man-made disasters.¹⁵ Like development aid, humanitarian aid falls within the scope of parallel competence, meaning that the EU can exercise its competences without prejudice to the competences of other Member States (MS).¹⁶ The EU therefore has a duty of coordination and complementarity when carrying out its actions with MS. Article 214 of the Treaty on the Functioning of the European Union (TFEU) provides the legal basis for humanitarian aid and Article 21 of TEU, defining the EU's external actions, specifies the presence of humanitarian aid in it¹⁷.

The rules governing the delivery of humanitarian aid are defined in Council Regulation of 20 June 1996¹⁸ and the strategic

9 European Commission, “Factsheet: Humanitarian Aid”, op. cit.

10 Erik Brattberg, and Mark Rhinard, “The EU as a global counter-terrorism actor in the making”, *European Security* 21.4 (2012), p557.

11 European External Action Service, *Shared Vision, Common Action: A Stronger Europe – A Global Strategy for the European Union's Foreign and Security Policy*, Brussels, 2 June 2016, p21.

12 European External Action Service, “Making the EU a global player”, Brussels, 4 February 2021.

13 Clara Portela and Kolja Raube, “(In-)Coherence in EU Foreign Policy: Exploring Sources and Remedies”, Paper presented at the European Studies Association Bi-annual Convention, Los Angeles, April 2009, p3.

14 European Union, “Consolidated Version of the Treaty on European Union and the Treaty on the Functioning of the European Union”, *Official Journal of the European Union*, C326/13, 26 October 2012, article 21(3) TEU. (hereafter, “Lisbon”).

15 European Union, “Lisbon”, op. cit., article 214 TFEU.

16 European Union, “Lisbon”, op. cit., article 4(4) TFEU.

17 Ibid., article 21 TFEU.

18 Council of the European Union, “Council Regulation (EC) n° 1257/96 concerning humanitarian aid”, *Official Journal of the European Union*, L163/1, Brussels, 20 June 1996.

objectives and principles of humanitarian aid are defined in the 2008 European Consensus on Humanitarian Aid,¹⁹ which include saving lives, alleviating suffering and preserving human dignity. This consensus recalls the four humanitarian principles: humanity, by acting with respect for the dignity of all victims; neutrality, by not favouring any side in the conflict; impartiality, by giving aid on the basis of needs without discrimination; and independence, by acting independently of political, economic, military, or other objectives.²⁰ The EU is an important provider of humanitarian aid in the world, but it only acts through its partners, which are non-governmental organisations (NGOs), United Nations (UN) agencies and international organisations.²¹

The EU's legal basis for counter-terrorism is more complex, as it is the external expression of an internal EU policy. One of the main legal underpinnings is Article 83 TFEU which states that terrorism is a form of crime which may therefore require common rules²². It is important to remember, however, that Article 4(2) TEU states that "national security remains the sole responsibility of each Member State".²³ Counter-terrorism policy and its external aspect are not only the responsibility of the Area of Freedom, Security and Justice (AFSJ) but also of the Common Security and Defence Policy (CSDP), particularly regarding sanctions, as stated in Article 215 TFEU.²⁴

The EU has developed its counter-terrorism commitments and presence in line with terrorist attacks in Europe, acting as a policy entrepreneur. This evolution clearly distinguishes counter-terrorism from humanitarian aid, as the former is a recent policy, whereas the latter has a long history.²⁵ We can also see that these two policies are quite distinct and have their own particularities in the development of their competences, in their legal bases and in the actors involved, raising the question of consistency and effectiveness when used in parallel.

2.2 A framework for analysing policy coherence and effectiveness

Coherence is often defined in the EU as consistency. Indeed, Article 21(3) of the TEU states that: "The Union shall ensure consistency between the different areas of its external action and between these and its other policies".²⁶ However, a nuance can be made, since consistency is defined as the absence of contradiction, whereas coherence seeks to reach the synergy of policies.²⁷ Moreover, the link between effectiveness and coherence is clear, since without coherence, ineffectiveness increases considerably. Coherence can have three different dimensions: internal, vertical, and horizontal.²⁸ Coherence and consistency can be internal, which means that "within the Common Foreign and Security Policy (CFSP) and the External Action (...) the procedures and the internal dimensions of the policy follow the same direction."²⁹ Coherence can be vertical, such as speaking with one voice on behalf of the all MS.³⁰ Finally, coherence can be horizontal and corresponds to the extent to which two policies "do not contradict each other",³¹ which is the direct object of this study. Thus, to analyse the horizontal coherence of the EU's external action, we will seek to explore the significance of the dynamics of two policies, humanitarian aid, and counter-terrorism, in their effectiveness in meeting their objectives.

19 European Commission, "European Consensus on Humanitarian Aid." Official Journal of the European Union, 2008/C 25/01, 30 January 2008.

20 Ibid., paragraph 11, 12, 13, 14.

21 European Commission, "DG EHO Partner's", retrieved 11 April 2022, .

22 European Union, "Lisbon", op. cit., article 83 TFEU.

23 Ibid., article 4(2) TEU.

24 Ibid., article 215 TFEU.

25 Ivica Stehlíková, "The development of the European Union counter-terrorism framework", Security and Defence Quarterly 1.2 (2013), p41.

26 European Union, "Lisbon", op.cit., article 21(3) TEU.

27 Clara Portela, "Conceptualizing coherence in EU external action", in *The External Action of the European Union: Concepts, Approaches, Theories*, eds. Gstöhl Sieglinde, and Simon Schunz. The European Union Series. (London: Macmillan Education, 2021), p88.

28 Marina Tovar Velasco, "Coherence in the Union's External Action", Institute for a Greater Europe, 19 September 2021.

29 Ibid.

30 Ibid.

31 Ibid.

Effectiveness, according to Arne Niemann and Charlotte Bretherton, can be understood “in terms of ‘goal attainment’ and in terms of ‘problem-solving’”.³² While the problem-solving dimension is interesting, the literature has been more in favour of the first view of effectiveness by emphasising the achievement of given objectives. Jørgensen, in the same spirit, stresses the importance of focusing on the performance of clearly defined objectives to analyse the effectiveness of policies and becomes one of the first to systematise the conceptualisation of effectiveness at the European level, as the EU starts to use the term in its own foreign policies.³³

Simon Schunz has operationalised the analysis of effectiveness through a process and a framework. The latter seeks first “to identify the objectives of the EU in the given policy, (then) to match objectives with output and outcomes, to trace EU’s external action (and) to determine the degree of EU’s external effectiveness.”³⁴ Inspired by this analysis combining the institutional with the practical, this paper will create its own analytical framework. Thus, we will seek to define the objectives in the official EU texts of these two policies and their interactions (part 2). The implementation of these policies and different dynamics will be analysed (part 3). The role of these dynamics in specific contexts, the cases of Syria and the Sahel, will be assessed (part 4).

3. Institutional and Policy Analysis of the Convergences and Divergences of Humanitarian Aid and Counterterrorism Policies: Conflicting or Common Interests?

3.1 Differences and intersections between policy objectives

The two policies would appear, at first sight, to be opposed in every respect. However, if an analysis of the final objectives of these two policies is carried out, then forms of intersections may appear. Indeed, with regard to their objectives as listed in the 2017 Directive on combating terrorism³⁵, the 2020 Council Conclusions on EU external action concerning the prevention and combating terrorism and violent extremism³⁶, the 1996 Council Regulation³⁷ as well as the 2008 European Consensus on Humanitarian Aid,³⁸ there are several elements that link these two policies.

The main point of convergence lies in the return to peace and stabilisation. Indeed, the 2020 Council Conclusions on Preventing and Countering Terrorism and Violent Extremism discuss their cooperation with humanitarian aid as one of the tools for stabilisation:

“3. Together with broader diplomatic, development, security and humanitarian efforts, working as a stabilizing actor in the EU’s neighbourhood and beyond, the EU and Member States external action represents an essential instrument for promoting the EU’s interests and values on the global stage and for safeguarding the way of life of its citizens.”³⁹

The first words, “together with”, suggest that not only does the fight against terrorism intend to work alongside stabilising actors, including humanitarian aid, but also that, by extension, it intends to be fully involved in the idea of becoming a stabiliser in the EU’s external action. While the Consensus on Humanitarian Aid also reflects this idea of humanitarian aid as a stabiliser,⁴⁰ it does not directly mention other policies, other than development, with which it desires to work. It only specifies that it should

32 Arne Niemann and Charlotte Bretherton, “EU external policy at the crossroads: The challenge of actorness and effectiveness”, *International relations* 27.3 (2013), p267.

33 Knud Erik Jørgensen, Sebastian Oberthür, and Jamal Shahin, “Introduction: assessing the EU’s performance in international institutions—conceptual framework and core findings”, *Journal of European integration* 33.6 (2011), p603.

34 Simon Schunz, “Analysing the effectiveness of European Union external action”, *The external action of the European Union: Concepts, approaches, theories* (2021), p139-140.

35 Council of the European Union, “Directive (EU) n° 2017/541 on combating terrorism”, *Official Journal of the European Union* L88/6, Brussels, 31 March 2017.

36 Council of the European Union, *Council Conclusions on EU External Action on Preventing and Countering Terrorism and Violent Extremism* (8868/20), Brussels, 16 June 2020.

37 Council of the European Union, “Council Regulation (EC) n° 1257/96 concerning humanitarian aid”, *op. cit.*

38 European Commission, “European Consensus on Humanitarian Aid”, *op.cit.*

39 Council of the European Union, *Council Conclusions on EU External Action on Preventing and Countering Terrorism and Violent Extremism*, *op. cit.*, p2.

40 European Commission, “European Consensus on Humanitarian Aid”, *op. cit.*, p4.

cooperate as much as possible with other instruments to stabilise a fragile situation, of which the fight against terrorism is an indirect part. However, while the 2020 Conclusions include counter-terrorism as a stabilising tool, the Consensus was drafted in 2008, well before the 2020 Council Conclusions included the idea that counter-terrorism could be part of these stabilising instruments.

A second key point of convergence is human rights and international humanitarian law, as both policies place their reinforcement at the heart of their action, and both attempt to address human gravities at different levels.⁴¹ While the European Consensus states that it advocates “strongly and consistently for the respect of International Law, including International Humanitarian Law (IHL), Human Rights Law and Refugee Law”,⁴² the Council Conclusions stress “the importance of a criminal justice approach to terrorism and the need to strengthen the human rights (...) in compliance with the relevant international law, including international human rights law, international refugee law and international humanitarian law.”⁴³ Furthermore, they both act in favour of the protection of the civilian population as IHL prohibits acts of terrorism, and humanitarian aid seeks to reduce suffering.⁴⁴ While the aim of the fight against terrorism is to respond to the crises that cause it but also to prevent them, this also means reducing human suffering and protecting civilians.

Although several objectives would appear to be compatible between humanitarian aid and counter-terrorism, there are many divergent perspectives. Indeed, the first point is the objectives attributed to each policy. While both seek stabilisation of fragile areas and respect for rights, humanitarian aid seeks to “provide needs-based emergency assistance to save lives, prevent and alleviate human suffering, and preserve human dignity”⁴⁵ while counter-terrorism seeks to “protect EU citizens against terrorism and violent extremism in all their forms and irrespective of their origin.”⁴⁶

The second, and not the least important, difference resides in the very nature of humanitarian aid, which respects four principles of impartiality, independence, neutrality, and humanity which make it fully-fledged.⁴⁷ It clearly distinguishes this policy from crisis management, and it must not be politicised. Humanitarian aid should also be autonomous “from political, economic, or military objectives”,⁴⁸ and therefore from a policy that is a security tool with political objectives. Indeed, the fight against terrorism is not only about fighting a designated enemy, distinguishing it from humanitarian aid that does not discriminate when providing aid, but is also eminently political by placing the EU in the chessboard of a conflict and taking sides. This distinction in the objectives and principles surrounding the implementation of these policies is fundamental to understanding the existing dissension in the dynamics of these two policies.

Other distinctions can be made, such as the internal and external aspects of the fight against terrorism, while humanitarian aid, by definition, only acts outside European borders⁴⁹. Furthermore, the way in which these objectives are achieved is quite different as the EU works exclusively through its partners to deliver humanitarian aid,⁵⁰ whereas the fight against terrorism is conducted mainly by European actors through civilian and military operations or sanctions and MS actions,⁵¹ for example. However, there are similarities, such as the actors with whom both policies work, namely the United Nations, and the willingness of both policies

41 Interview 2, video conference, 04/03/2022.

42 European Commission, “European Consensus on Humanitarian Aid”, op. cit. p2.

43 Council of the European Union, Council Conclusions on EU External Action on Preventing and Countering Terrorism and Violent Extremism, op. cit., p7.

44 Interview 2, video conference, 04/03/2022.

45 European Commission, “European Consensus on Humanitarian Aid”, op. cit. p2.

46 European Commission, Communication from the Commission on the EU Security Union Strategy (COM/2020/605), Brussels, 27 July 2020, p37.

47 European Commission, “European Consensus on Humanitarian Aid”, op. cit. p2.

48 Ibid.

49 European Commission, “European Consensus on Humanitarian Aid”, op. cit. p4.

50 European Commission, “DG EHO Partner’s”, op. cit.

51 Council of the European Union, “The EU’s response to terrorism”, op. cit.

to engage at the local and multilateral levels.⁵² In addition, within the EU's humanitarian aid objectives, morality and solidarity are essential elements,⁵³ whereas solidarity in the fight against terrorism is quite different. Indeed, for the latter, it is essentially a question of solidarity between MS at the internal level, particularly when a terrorist act takes place on European territory.⁵⁴ Finally, one of the major distinctions is also that while the EU chooses the areas of intervention in the fight against terrorism when it comes to humanitarian aid, the EU acts out of needs rather than interests.⁵⁵

3.2 Interaction of these two policies in the EU's foreign policy strategies

There are currently two main EU external strategies, the 2003 Security Strategy⁵⁶ and its successor, the 2016 Global Strategy for the European Union's Foreign and Security Policy (EUGS).⁵⁷ Through a comparative analysis of those two policies in the CFSP strategies, it is possible to examine the evolution of the perception of foreign threats, the EU's priorities, the strategic objectives, and the political implications for the EU. In 2003, the main threats identified were terrorism, proliferation of weapons of mass destruction, regional conflicts, state failure, and organised crimes.⁵⁸ The strategic objectives are to address these threats by building security in the neighbourhood and promoting multilateralism.⁵⁹ To this end, the Strategy recommended developing European capabilities and establishing strategic partnerships but did not provide clear indications on how to achieve them.⁶⁰ In 2016, the threats are more numerous and include "terrorism, hybrid threats, economic crises, climate change, energy insecurity, violent conflict, cyber security, disinformation, fragile states, cross-border crime and weapons of mass destruction".⁶¹ As the threats evolve, so do the strategic priorities, with five focuses: "the security of the Union, the resilience of states and societies in the East and South, the integrated approach to conflicts and crises, the cooperative regional orders (and) the global governance for the 21st century".⁶²

It is interesting to note that from 2003 to 2016 the actions are more concrete, but also that there is more cooperation between the different instruments. Indeed, there is an increasing introduction of the idea of coherence and effectiveness through greater cooperation from 2003 until the idea of the integrated approach, reached by the Global Strategy in 2016.⁶³ In 2003, the approach was more sequential and less integrated. However, in 2003, the importance of adapting to each situation through a coherent use of external action instruments was already being stressed:⁶⁴

With the Lisbon Treaty of 2009, the idea of coherence of external action becomes more prominent⁶⁵ and is embodied by the creation of the concept of a comprehensive approach in 2013.⁶⁶ This global approach aims to make common and shared use of the tools and instruments available to the EU in the short, medium, and long term, but also in prevention. In 2016,

⁵² European Council, "The European Union Counter-Terrorism Strategy", op. cit., p4.

⁵³ European Commission, "European Consensus on Humanitarian Aid", op. cit., p1.

⁵⁴ European Union, "Lisbon", op. cit., article 222(3).

⁵⁵ European Commission, "European Consensus on Humanitarian Aid", op. cit., p1.

⁵⁶ Council of the European Union, European Security Strategy, A secure Europe in a better world, Brussels, 2003.

⁵⁷ European External Action Service, A Global Strategy for the European Union's Foreign and Security Policy, Brussels, 2016.

⁵⁸ Council of the European Union, European Security Strategy, op. cit., p30-32.

⁵⁹ Ibid., p34.

⁶⁰ Ibid., p22.

⁶¹ European External Action Service, A Global Strategy for the European Union's Foreign and Security Policy, op. cit., p20.

⁶² Ibid., p9-10.

⁶³ Ibid., p28.

⁶⁴ Council of the European Union, European Security Strategy, op. cit., p41.

⁶⁵ European Union, "Lisbon", op.cit., article 21(3) TEU.

⁶⁶ European Commission, The EU's comprehensive approach to external conflict and crises, Join Communication to the European Parliament and the Council (JOIN/2013/30), Brussels, 11 December 2013.

the increasingly complex and long-lasting nature of crises is pushing the EU to address them in a more coordinated way at ‘multidimensional’, ‘multiphase’, ‘multi-level’, and ‘multilateral stages’.⁶⁷ The ambition of this approach is to promote coherence and complementarity between the different areas of the EU’s external action, including humanitarian aid.

A quantitative method makes it possible to compare the presence of humanitarian aid and counter-terrorist policies in the EU’s strategies. The presence of humanitarian aid and terrorism are similar, although terrorism is no longer one of the three most repeated words in the 2016 global strategy compared to the 2003 security strategy. However, one element stands out and is absolutely new in the 2016 strategy: it is the notion of an integrated approach, previously analysed.

Figure 1. Analytical table of the recurrence of selected terms in the security strategy (2003) and the global strategy (2016) of the European Union

	Security Strategy – 2003	Global Strategy - 2016
Security	84	149
Terrorism	21	32
Peace	19	60
Trade	15	27
Defence	12	57
Humanitarian	8	12
Migration	4	26
Resilience	0	36
Diplomacy	0	31
Human Rights	0	31
Integrated approach	0	15

Source: Compiled by the author, 2022

Looking more qualitatively at the references to humanitarian aid and counter-terrorism in these two strategies, in 2016, humanitarian aid was repeatedly addressed through or with several other policies compared to 2003, particularly with regard to resilience.⁶⁸ This can be explained by the rise of the comprehensive and then integrated approach. In the case of terrorism, in 2003, the term appeared as an amplifier of pre-existing threats such as failed states but remained a security issue and was often reduced to justice and home affairs.⁶⁹ In 2016, terrorism appeared on numerous occasions in policies, notably neighbourhood but also stabilisation policies, reflecting the evolution of counter-terrorism policy towards an anticipatory logic and where the prevention component introduces more connections with other policies.⁷⁰ Therefore, the evolution of strategies suggests that the dynamics and interactions between these policies are bound to increase in practice. However, neither in 2003 nor in 2016 were humanitarian aid and counter-terrorism policies mentioned together or with a common objective.

⁶⁷ European External Action Service, A Global Strategy for the European Union’s Foreign and Security Policy, op. cit., p28.

⁶⁸ Ibid., p30.

⁶⁹ Council of the European Union, European Security Strategy, op. cit., p13.

⁷⁰ European External Action Service, A Global Strategy for the European Union’s Foreign and Security Policy, op. cit., p24.

4. Analysis of the Implementation of the Dynamics Between Humanitarian Aid and Counter-Terrorism: Complementarity or Contradictions?

In the implementation of their objectives, policies come together through dynamics challenging the coherence of the EU's external action and the effectiveness of these in meeting their objectives. The analysis of daily dynamics and the influence of one policy on the other is a complex matter and has not been analysed at the EU level. In order to explain them, this part is mainly based on interviews with EU officials and aid workers.

4.1 Complementarity: The positive effect of humanitarian aid in preventing and responding to extreme violence and terrorism

Prevention of violent extremism and terrorism

Firstly, one of the elements of complementarity between the two policies is that of prevention. While instability and misery are aggravating and favourable factors for violent extremism, humanitarian aid, through its action, makes it possible to minimise the effects of an environment favourable to extremism.⁷¹ Indeed, an environment of strong political and social destabilisation is conducive⁷² although the causes of terrorism can also be “rational optimising behaviour, as a political existential good, or as a legacy of history”.⁷³ A report by the International Committee of the Red Cross (ICRC) in 2017 emphasises that the promotion of international humanitarian law and its values, as well as education-related activities, can contribute to the fight against extremism.⁷⁴ Thus, the promotion of values and humanitarian law offers a different approach to that of terrorist groups and is, therefore, a preventer of extremism.⁷⁵

However, the Norwegian Refugee Council points out that the activities related to indiscriminate violence and the promotion of IHL, particularly in prisons, can provoke a problem of perception of humanitarian aid work and generate confusion about the very principles of aid: “programmes developed on the assumption that certain communities are more likely to support violent extremism based on their religion, geographical location or other factors clearly contradict the principle of impartiality”.⁷⁶ Humanitarian aid can then engage in such activities, but a distinction remains essential to preserve the principles of aid. However, it is worth pointing out that there is a difference between donors, such as the EU, and actors, such as the ICRC, with respect to these humanitarian principles. Aid workers act in strict compliance with the principles for security, access, and reputation reasons.⁷⁷ Donors can commit to these principles, such as the EU, by refraining from acting contrary to the principles and tending to be neutral, even if it is on a voluntary basis.⁷⁸

It is also necessary to define the role of aid in this prevention since the issue of excessive Western aid could draw criticism by terrorists and may thus lead to radicalisation. In addition, humanitarian aid can substitute for the damage caused by the terrorist groups' policies and heal the social wounds created by the terrorist groups, thus indirectly removing the responsibility

⁷¹ Interview 2, video conference, 04/03/2022.

⁷² Eelco Kessels and Christina Nemr, “Countering violent extremism and development assistance”, Policy Brief, Washington, DC, Global Center on Cooperative Security, 2016, p4-5.

⁷³ Juliet Elu and Gregory N. Price, “The causes and consequences of terrorism in Africa”, The Oxford handbook of Africa and economics, (2015), p13. <https://doi.org/10.1093/oxfordhb/9780199687114.013.16>.

⁷⁴ International Committee of the Red Cross, “Preventing and countering violent extremism”, Background note and guidance for national Red Cross and Red Crescent Societies, Geneva, June 2017, p5.

⁷⁵ Luke Kelly, “Evidence on the Indirect Contribution of Humanitarian Activities to Deradicalisation and Countering Violent Extremism (CVE) and the Risks in Linking such Objectives or Activities”, K4D Helpdesk Report 625 Institute of Development Studies, Brighton, 13 June 2019, p4-5.

⁷⁶ The Norwegian Refugee Council, “Principles Under”, op.cit., p18-19.

⁷⁷ Interview 7, video conference, 06/04/2022.

⁷⁸ Ibid.

for their alleged role.⁷⁹ Finally, the idea of long-term reintegration remains essential, as short-term or insufficient help can lead to radicalisation.⁸⁰

Humanitarian field expertise

Furthermore, humanitarian aid's field expertise is an element that can be seen as complementary to counter-terrorism policy and to the EU's external action in general. With 5 regional offices, more than 48 field offices in over 40 countries, 155 international experts, and 298 national staff members, DG ECHO benefits from strong field expertise.⁸¹ Indeed, humanitarian aid expertise significantly improves the work of counter-terrorism officials by analysing situations on the ground or by monitoring the consequences of counter-terrorism policies in the humanitarian field⁸² but also by having access to areas that other actors cannot enter.⁸³ Not only does this provide downstream analysis, but ECHO's and its partners' expertise contributes to the drafting of the EU's external policy and its counter-terrorism policy strategies, which are consulted upstream.⁸⁴ The European Commission and the European External Action Service (EEAS) also benefit from the detailed assessment of ECHO experts in the programming phase of their Conflict Analysis Screening and create coherence through early warning.⁸⁵

Cooperation with local actors

Not only can humanitarian aid improve counter-terrorism policy through its field expertise, but also through its ability to engage with local actors. Whether in the domain of counter-terrorism or humanitarian aid or even in the global vision of the integrated approach, the interviews conducted have highlighted the need for cooperation with local actors. Indeed, it has become necessary not only to view European policies from a Eurocentric perspective but also to integrate the local perception of needs.^{86,87} This perception, which stems from the post-colonial theory of decentralisation, aims to shift the focus in order to adapt to the EU's actions.⁸⁸ In this respect, DG ECHO provides real expertise as it essentially works with partners to carry out its actions. Although its partners are usually the same and are the most well-known Western NGOs or organisations, humanitarian aid has a local and field-based culture and follows the principle of impartiality. This ability to engage with non-state and non-traditional actors could be one of the future options in the fight against terrorism.⁸⁹ Indeed, engaging with religious elites would be fundamental in the fight against extremism, since in failed states, the credible actor is often not the state but the religious referent.⁹⁰ For example, the EU has already been able to cooperate on humanitarian aid with Caritas Internationalis of the Catholic Church or the Aga Kahn Development Network of the Shiite Ismaili Islam.⁹¹

However, these complementarities seem to be more in the interest of counter-terrorism policies, taking advantage of the indirect and involuntary benefits of humanitarian aid policy, which may act in favour of its objectives. These complementarities seem to

79 Ibid.

80 Luke Kelly, *op. cit.*, p4.

81 European Commission, "Field network", *op. cit.*

82 Interview 3, Staff member of the CTC Office, Brussels, 29/03/2022.

83 Ibid.

84 Interview 6, EU Official, video conference, 31/03/2022.

85 Interview 8, EEAS Official, video conference, 11/04/2022.

86 Interview 6, EU Official, video conference, 31/03/2022.

87 Interview 8, EEAS Official, video conference, 11/04/2022.

88 Stephan Keukeleire and Sharon Lecocq, "Operationalizing the Decentring Agenda: Analysing European Foreign Policy in a Non-European and Post-Western World", *Cooperation and Conflict* 53, no. 2 (2018): 277-295.

89 Interview 4, Advisor to the EU CTC, Brussels, 29/03/2022.

90 Ibid.

91 European Parliament, "EU and faith-based organizations – development and humanitarian aid", Briefing EU policies insight, Brussels, 8 November 2017.

improve the effectiveness of the objectives of the fight against terrorism, but also the coherence of the EU's external action. They allow it to benefit from expertise and reflection on the improvement of its policies, particularly in the fight against terrorism.

4.2 Contradictions: The limiting aspects of counter-terrorism on effective humanitarian action between sanctions and criminalisation

The interaction of these two policies can create complementarities but also contradictions with regard to the consequences of counter-terrorism policies on humanitarian aid in particular. While many tools are used to tackle terrorism⁹² sanctions are the most problematic regarding humanitarian aid. Since they come in different forms, they each have direct and indirect impacts on the proper functioning and effectiveness of humanitarian aid, despite the possibility of exceptions.

Types of sanctions

First, several types of sanctions exist as an instrument of the CFSP. These sanctions can be targeted at governments, entities, groups or organisations, terrorists or persons who support or take part in terrorist activities. These sanctions are regulated by Articles 25, 29 and 31 of the TEU.⁹³ In its broadest sense, sanctions include arms embargoes, restrictions on admission to the EU territory, freezing of assets and prohibition of making funds available to entities, or economic sanctions related to specific sectors of activity.⁹⁴ Counter-terrorism is one of the least represented types of sanctions, representing only 5% of the types of crises triggered by EU sanctions in 2021.⁹⁵ However, asset freezes and arms embargoes account for more than half of the measures represented⁹⁶ and since the fight against terrorism also requires a stable environment and the control of the flow of arms, almost all sanctions can indirectly address the fight against terrorism.

There are two specific sanctions aimed at counter-terrorism: the restrictive measures against ISIL (Da'esh) and Al-Qaida adopted by the UN and the EU and the specific measures adopted by the EU. In the first case, the UN adopted restrictive measures against the Taliban through Resolution 1267 and against Al-Qaida and other individuals, groups, undertakings, and entities associated with them by resolution 1390.⁹⁷ These sanctions were subsequently amended in 2011 and 2015, to distinguish between sanctions against Al-Qaida and those against the Taliban, specifically targeting Afghanistan,⁹⁸ but also extending sanctions to all companies and entities associated with the Islamic State of Iraq and the Levant.⁹⁹ Finally, since 2016, the EU can apply other restrictive measures against entities linked to Da'esh and Al-Qaida.¹⁰⁰ In the second case, it is a Council Common Position that allows for the freezing of assets and a prohibition on making funds or resources available to persons involved in terrorist activities on an autonomous basis and this decision is reviewed every 6 months.¹⁰¹

Finally, while multilateral organisations such as the EU and the UN, which are relevant to our study, can implement sanctions, other types of actors such as host country governments and other states can institute their own policies, the former by

⁹² See Part 1: Humanitarian aid and counterterrorism effectiveness theoretical framework, Section 1.1: Humanitarian aid and counter-terrorism policies at the European level.

⁹³ European Union, "Lisbon", op. cit., article 25, 29 and 31 TEU.

⁹⁴ Council of the European Union, "Different types of sanctions", retrieved 22 April 2022. <https://www.consilium.europa.eu/en/policies/sanctions/different-types/>.

⁹⁵ Francesco Giumelli, Fabian Hoffmann, and Anna Książczaková, "The when, what, where and why of European Union sanctions", *European Security* 30, no. 1 (2021): 12-13.

⁹⁶ Ibid.

⁹⁷ Security Council Committee, "Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) concerning ISIL (Da'esh) Al-Qaida and associated individuals groups undertakings and entities", S/RES1390, 16 January 2002.

⁹⁸ Security Council Committee, "Resolution S/RES1267", op. cit.

⁹⁹ Ibid.

¹⁰⁰ Council of the European Union, "Different types of sanctions", op. cit.

¹⁰¹ Council of the European Union, "Council Implementing Regulation (EU) n° 2022/147 implementing Article 2(3) of Regulation (EC) n° 2580/2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism, and repealing Implementing Regulation (EU) n° 2021/1188", *Official Journal of the European Union*, L25/1, Brussels, 3 February 2022.

restricting access and the latter by implementing executive and judicial legislation.¹⁰² The role of banks and donors is also important, as they enable the delivery of aid and can also be affected by sanctions.¹⁰³

Impact of sanctions

Sanctions, of various types, have direct and indirect consequences on effective humanitarian aid action such as legal, operational, financial, reputational and security impacts. The consequences are, first and foremost, legal and judicial, as humanitarian staff of organisations may face a violation of restrictive measures against terrorism as they might be suspected of supporting terrorist groups, whether financially, materially, or for medical assistance.¹⁰⁴ For instance, in Mali, Syria or Somalia, actors may be affiliated with Al-Qaida and may be threatened with sanctions by certain states, such as the United States.¹⁰⁵ Yet, according to IHL, organisations working on humanitarian grounds should not be subject to such pressure or sanctions, but some states use pressure to discourage humanitarians.¹⁰⁶

This legal aspect has operational and financial consequences, as to avoid being sanctioned, NGOs must take more precautions to ensure their backsides, such as having compliance departments.¹⁰⁷ Not only does this discourage some organisations from going to certain areas of conflict, but it also privileges only the well-known and big organisations. This leads to a tendency for overcompliance and fear of the restrictive environment and potential liabilities, the so-called chilling effect.¹⁰⁸ This chilling effect was seen in Somalia, where UNSC resolution 1844 imposed sanctions against al-Shabaab, which controlled Somali territory at the time and included criminalising the provision of resources and material support.¹⁰⁹ In addition, it can have an impact on the quality and effectiveness of aid through donor conditionality, resulting in additional staff to draft monitoring reports, for example, or limiting access to certain areas through “no-go zones”.¹¹⁰ For example, in the case of Syria and Iraq, organisations have turned down \$14 million and \$3.3 million, respectively, because the donor’s demands were too high.¹¹¹ But it may also prevent humanitarian work as members of key companies may be under sanctions, such as Cham Wings Airlines and the mobile group SyriaTel in Syria.¹¹² It creates additional unexpected costs on programmes and operations but also a decrease in grants as donors themselves may become reluctant and impose due diligence mechanisms.¹¹³ The limitations are, therefore, administrative, bureaucratic, financial and staffing, but it is also time-consuming.

More indirectly, the issue of security and the reputation of humanitarian organisations is questioned since such accusations could compromise the relations of humanitarian actors with the parties involved in the conflict and impact their image for future donors or sponsors.¹¹⁴ Indeed, “Al-Shabaab expelled the World Food Programme (WFP), the United Nations Children’s Fund

102 Interview 7, video conference, 06/04/2022.

103 Ibid.

104 Interview 5, video conference, 31/03/2022.

105 Alice Debarre, “Countering Terrorism and Violent Extremism: The Risks for Humanitarian Action”, in *Extremisms in Africa 2* (Byanston: Jonathan Ball Publishers, (2019): p202.

106 Ibid.

107 Interview 5, video conference, 31/03/2022.

108 Interview 7, video conference, 06/04/2022.

109 Mark Bradbury, “State-building, Counterterrorism, and licensing Humanitarianism in Somalia”, Feinstein International Center Briefing Paper, September 2010, p13.

110 Interview 5, video conference, 31/03/2022.

111 Emma O’Leary, “Politics and principles: The impact of counterterrorism measures and sanctions on principled humanitarian action”, *International Review of the Red Cross*, 2021, p466.

112 Interview 9, DG ECHO, video conference, 28/04/2022.

113 Jessica Burniske, and al, “Counter-terrorism laws and regulations: What aid agencies need to know”, *Humanitarian Practice Network - Network Paper no. 79*, November 2014, p4.

114 Ibid., p6.

(UNICEF) and other humanitarian aid agencies from their territory in 2009 due to alleged concerns about their neutrality.¹¹⁵ It also affects the perception of humanitarianism by civilians themselves and, therefore, directly impacts their security.¹¹⁶ Indeed, it blurs the boundaries of humanitarian activities, which are dictated by politicised states. Lastly, it can have a psychological impact on staff, who oscillate between the threat of sanctions from certain states, as occurred to ICRC members at the beginning of the American operations in Afghanistan in 2001, and pressure from non-state armed actors.¹¹⁷

Finally, as persons in need increasingly find themselves in territories controlled by armed groups that may be under sanctions, such as “Afghanistan, Colombia, Gaza, Iraq, Mali, Nigeria, Somalia, Syria, and Yemen”, the demand for exceptions for humanitarian workers is growing. Indeed, in times of armed conflict, IHL is supposed to be applied, but with the rise of terrorism, the line between armed conflict and terrorism is becoming more and more blurred. Thus, the question of the legal obligation to allow or guarantee humanitarian aid in situations where IHL does not apply, i.e. in situations not characterised as armed conflict, also arises. Indeed, the Council’s conclusions on humanitarian aid always refer to IHL without addressing the issue of situations outside IHL.¹¹⁸ However, regardless of a legal obligation, the EU and MS have practices ‘as a matter of policy’ in the name of moral obligations not to hinder aid.¹¹⁹ Lastly, sanctions are also intended to provide an incentive for actors not to violate IHL, and while a distinction must be made between humanitarian assistance and IHL,¹²⁰ this helps to nuance the contradiction.

Humanitarian aid exceptions

While point 15 of the EU Counter-Terrorism Directive indicates the various punishable acts such as material support or assistance, point 38 clearly recalls that humanitarian activities “do not fall within (this) scope”.¹²¹ However, the preamble of the Directive is not legally binding, and MS may not transpose this part of the text. In order to legally guarantee the facilitation of humanitarian work in sanction regimes, exceptions exist. Two types of exceptions are available, namely derogations, which must be requested and will be examined subsequently, and exemptions, which are automatic and apply to all recognised humanitarian workers.¹²² Several questions arise: firstly, for derogations, the question of the time taken to ask countries for derogation is a problem since, by definition, these are humanitarian emergencies where time is of the essence, and exemptions are therefore preferred by humanitarian actors. In the case of exemptions, the issue is the selection of humanitarian organisations. One solution could be the EU or UN-funded programmes, however, this would mean reinforcing traditional NGOs and leaving little room for local NGOs but would also lead to greater control of humanitarian activities.¹²³

Compared to other actors, the EU seems to be a rather poor performer in the application of these exceptions. Indeed, both the UN and North Atlantic Treaty Organisation (NATO) include the importance of respecting the specificity of humanitarian activities and IHL.¹²⁴ While the UN has already introduced two exemption regimes for Somalia and Afghanistan, and the US has also introduced exemptions, called licenses, in its own sanction regimes, the EU remains much more restrictive.¹²⁵ It applies 7 derogations in North Korea, Congo, Libya, Myanmar, Nicaragua, Syria, and on horizontal sanctions related to human rights violations.¹²⁶ Two exemptions exist at the EU level but are due to the transposition of UN sanctions, namely Somalia and

115 Alice Debarre, “Countering Terrorism and Violent Extremism”, op. cit., p206.

116 Interview 5, video conference, 31/03/2022.

117 Ibid.

118 Council of the European Union, Council Conclusions on EU External Action on Preventing and Countering Terrorism and Violent Extremism, op. cit.

119 Interview 3, Staff member of the CTC Office, Brussels, 29/03/2022.

120 Interview 7, video conference, 06/04/2022.

121 Council of the European Union, “Directive (EU) 2017/541 on combating terrorism”, op.cit., point 15 and 38.

122 Council of the European Union, “Different types of sanctions”, op. cit.

123 Dustin Lewis, “Humanitarian Exemptions from Counter-terrorism Measures”, op. cit., p150.

124 Interview 1, EU ECHO Official, video conference, 03/03/2022.

125 Interview 7, video conference, 06/04/2022.

126 ECHO, “Working with DG ECHO Sanctions 2021-2027”, retrieved 22 April 2022. <https://www.dgecho-partners-helpdesk.eu/sanctions/humanitarian-exceptions>.

Afghanistan.¹²⁷ A case of both derogation and exemption exists in Syria, as exemption has been applied only for the fuel sector.¹²⁸ If there are few exemptions in the EU, it is mainly due to the MS.¹²⁹ Indeed, despite advocacy by actors such as the ICRC, DGs such as DG ECHO which follows the same line,¹³⁰ as well as the position of the European Commission in general,¹³¹ MS ultimately implement and vote the sanctions.¹³²

Moreover, even if the EU were to include exemptions in a systematic way, this would not remove the issue of banks' de-risking.¹³³ Indeed, banks are over-compliant for fear of sanctions, and the cost/benefit ratio for banks of making transfers to countries where certain entities are under sanctions is not significant; they prefer to stop their activities.¹³⁴ This problem has been notable in occupied Palestinian territory, Somalia, Syria and Yemen.¹³⁵ Not only is coherence not insured, but consistency is not guaranteed because of the contradictions between both policies. In this way, counter-terrorism undermines the effectiveness of humanitarian aid and directly impacts its action.

This could be solved by automating exemptions to make it easier for banks to understand the regulations and restore their confidence. However, the EU is not the only actor with a sanctions regime, and this does not remove the anti-money laundering and anti-terrorist financing regime that applies to banks anyway.¹³⁶ Furthermore, banks are not the only ones involved in over-compliance, as some companies are refusing to sell and send certain essential equipment, such as water systems, because of the sanctions.¹³⁷ The European Commission is working in coordination with the Directorate-General for Financial Stability (FISMA), the EEAS and the Counter-Terrorism Coordinator (CTC) to dialogue on these issues and to find solutions, but also to carry out roundtables with banks to raise awareness.¹³⁸ In addition, the Commission writes letters to the banks for the NGOs it funds to explain the humanitarian nature of the transfers, but this is not very effective.¹³⁹ One of the solutions could be inspired by the recent events in Ukraine. Indeed, exemptions have been put in place by the EU, making it the third case of exemptions.¹⁴⁰ In addition, an interesting French initiative to use diplomatic bank accounts to compensate for the lack of international markets in the case of the war in Ukraine may be an innovative solution that should be explored in the future.¹⁴¹

4.3 Mutual antagonisms: Humanitarian principles as a catalyst for opposing humanitarian aid and counter-terrorism policies

Humanitarian aid opposed to counter-terrorism through its principles of humanity and impartiality

While there are complementarities and contradictions in some areas of the practical implementation of the interactions between the two policies, humanitarian principles lead to the emergence of opposed activities. Indeed, humanitarian aid operates in opposition to the objectives of counter-terrorism policies since it can support terrorism or legitimise terrorist rhetoric through

127 Ibid.

128 Ibid.

129 Interview 1, EU ECHO Official, video conference, 03/03/2022.

130 Interview 5, video conference, 31/03/2022.

131 Interview 7, video conference, 06/04/2022.

132 Interview 9, DG ECHO, video conference, 28/04/2022.

133 Stuart Gordon, and Sherine El Taraboulsi-McCarthy, "Counter-Terrorism, Bank de-Risking and Humanitarian Response: A Path Forward", Humanitarian policy group Policy Brief 72, August 2018, p1.

134 Ibid.

135 Ibid., p2.

136 Interview 3, Staff member of the CTC Office, Brussels, 29/03/2022.

137 Interview 9, DG ECHO, video conference, 28/04/2022.

138 Interview 7, video conference, 06/04/2022.

139 Interview 9, DG ECHO, video conference, 28/04/2022.

140 Council of the European Union, "EU introduces exceptions to restrictive measures to facilitate humanitarian activities in Ukraine", Brussels, 13 April 2022.

141 Ibid.

its principles of impartiality and humanity. Even if it does not attempt to achieve such objectives, by definition and according to its principles, humanitarian aid distributes its aid impartially, without looking at the individuals, and this can be done through medical care and equipment, for example.¹⁴² Indeed, humanitarian aid has the duty to treat all injured persons according to IHL¹⁴³ and therefore, it can directly help terrorist groups.

Moreover, the way humanitarian aid operates can nourish the rhetoric of terrorists who are seeking to win the hearts and minds of the population.¹⁴⁴ When certain terrorists control territories, we have to wonder why they accept aid and what it can bring them in return. This issue has been raised in the case of the Gaza Strip. Terrorists have used the gravity of human need and suffering to catalyse their rhetoric and to justify the legitimisation of their power.¹⁴⁵ Also, some critics, notably from the United States in the case of the Hamas group, point out that IHL awareness-raising missions can enable terrorists to better understand the law and, thus, better circumvent possible sanctions, limiting the condemnation of terrorists.¹⁴⁶ Thus, humanitarian aid may act in opposition to the fight against terrorism by its activities as well as by its objectives and principles. However, it is essential to nuance this since the work of humanitarian aid goes a long way to reducing the risk of radicalisation. For example, it has been demonstrated that too much time spent in refugee camps without adequate assistance leads to radicalisation and marginalisation of people.¹⁴⁷ A lack of aid would, therefore, also be a factor of radicalisation.

Counter-terrorism opposed to humanitarian aid due to the principles of independence and neutrality

Counter-terrorism also operates in opposition to humanitarian aid with regard to its principles of independence and neutrality. Indeed, while the principle of neutrality requires humanitarian aid not to take part in the conflict, certain restrictions imposed by governments for political reasons lead to a form of indirect politicisation of aid and increase the risk of the various actors feeling that they are taking part in the conflict. This could explain the increase in attacks on humanitarian workers.¹⁴⁸ For example, an attack on six French aid workers in Niger in August 2020 was claimed by the Islamic State in West Africa.¹⁴⁹ This opposition is also relevant to the principle of independence, according to which humanitarian objectives must be detached from all other objectives. Indeed, some EU officials share very different views of these principles, and of humanitarian action globally.¹⁵⁰ While this does not indicate a voluntary instrumentalisation of aid, it does raise questions about the knowledge of security, defence and foreign affairs actors in understanding and protecting the particularities of humanitarian aid. Finally, the principle of humanity can be hampered by counter-terrorism since sanctions imposed by states can create humanitarian needs, like in Somalia, before the implementation of exemptions.¹⁵¹

Thus, this leads to a politicisation of aid. Charlotte Dany has identified three types of politicisation: instrumentalisation, militarisation and developmentalisation.¹⁵² Instrumentalisation refers to the idea that humanitarian aid can serve interests different from its own, “compromising the principle of impartiality”.¹⁵³ Militarisation means that the line between the military and the humanitarian can become obscured, “compromising the principles of neutrality and independence”.¹⁵⁴ Finally, the idea of

¹⁴² Interview 5, video conference, 31/03/2022.

¹⁴³ European Commission, “European Consensus on humanitarian help”, op. cit., point 13.

¹⁴⁴ Interview 4, Advisor to the EU CTC, Brussels, 29/03/2022.

¹⁴⁵ Interview 6, EU Official, video conference, 31/03/2022.

¹⁴⁶ Interview 7, video conference, 06/04/2022.

¹⁴⁷ Luke Kelly, op. cit., p9.

¹⁴⁸ Kunle Adebajo, “‘Islamic State’ Accuses Aid Workers Of Espionage, Spreading ‘Blasphemous Beliefs’”, HumAngle, 20 August 2020.

¹⁴⁹ Nadia Massih, “Islamic State claims killing of French aid workers in Niger”, France 24, 18 September 2020.

¹⁵⁰ Interview 7, video conference, 06/04/2022.

¹⁵¹ Chatham House, “Recommendations for Reducing Tensions in the Interplay Between Sanctions, Counterterrorism Measures and Humanitarian Action”, 23 August 2017, p7.

¹⁵² Charlotte Dany, “Beyond Principles vs Politics, Humanitarian Aid in the European Union”, Arena Working Paper II, Arena Centre for European Studies, University of Oslo, November 2014, p7.

¹⁵³ Ibid.

¹⁵⁴ Ibid.

developmentarisation implies a narrowing of the differences between humanitarian and development aid policies, “compromising the principles of neutrality, impartiality and independence”¹⁵⁵ In the case of the effect of counter-terrorism on humanitarian aid, instrumentalisation seems to be the most appropriate form of politicisation.

It is interesting to note that this instrumentalisation can be carried out by external actors other than the EU. Indeed, in a context of hyper-politicisation and polarisation of conflicts at the international level, the humanitarian space can be increasingly constrained, making it difficult for the EU, despite its efforts, to access aid beneficiaries such as in Libya, Venezuela, Ukraine, Yemen, or Syria.¹⁵⁶ Indeed, humanitarian aid is sometimes the ultimate diplomatic link between actors and is therefore subject to other objectives and therefore to instrumentalisation.

While the negative aspects of this politicisation have been developed, the internal politicisation of aid can help to push for more funds for humanitarian aid. In this respect, the integrated approach through the Political Framework for Crisis Approach (PFCA) allows humanitarian aid to be presented within a political framework which facilitates its presentation to the MS.¹⁵⁷ It could thus be a form of positive or supportive politicisation. Finally, donating funds for humanitarian aid is always a political act, and only its implementation should be excluded from any politicisation. However, if humanitarian aid has a place in the integrated approach, it must be reasonable and must remain independent and impartial since humanitarian work cannot be at the service of other political decisions.¹⁵⁸

Need for adaptations by humanitarian actors and the EU

These fundamental oppositions have had to be considered by the various humanitarian actors, particularly at the level we are interested in, namely the EU. A study conducted by the Harvard Law School Program on International Law and Armed Conflict in 2017 reveals some interesting elements regarding the necessary adaptation of humanitarian organisations.¹⁵⁹ Based on a quantitative analysis of “participants from 14 major international NGOs (...), 96 key informants, and an online survey of 398 humanitarian practitioners”¹⁶⁰ the study shows that no less than 60% of respondents said that the fight against terrorism is affecting humanitarian principles,¹⁶¹ while 89% felt that they would need more information about counter-terrorism measures.¹⁶² To overcome this deficiency, organisations have had to invest more time in negotiating with banks and have had to develop banking and commercial knowledge and staff as well as specialist lawyers.¹⁶³ They have had to develop expertise, staff, and knowledge in completely different areas. This is time-consuming, requires a higher budget and discriminates against organisations that cannot afford such expertise. Thus, changes should be made not only on the humanitarian organisations’ side but also on the donors’ and political actors’ side, such as the EU.¹⁶⁴

The EU has taken several initiatives since 2020 to support humanitarian aid in the context of counter-terrorism measures. For example, the European Commission and its DG ECHO state in a grant agreement that humanitarian aid and persons in need should not be affected by restrictive measures, even if they have to respect them.¹⁶⁵ Its guidance note on the fight against COVID-19 stressed that humanitarian aid and its delivery take precedence over restrictive measures and also specifies that

¹⁵⁵ Ibid.

¹⁵⁶ Interview 1, EU ECHO Official, video conference, 03/03/2022.

¹⁵⁷ Interview 8, EEAS Official, video conference, 11/04/2022.

¹⁵⁸ Interview 5, video conference, 31/03/2022.

¹⁵⁹ Jessica S. Burniske, and Naz K. Modirzadeh, “Pilot Empirical Survey Study on the Impact of Counterterrorism Measures on Humanitarian Action”, Master’s Thesis (Cambridge: Harvard Law School Program on International Law and Armed Conflict, 2017).

¹⁶⁰ Ibid., p5.

¹⁶¹ Ibid., p23.

¹⁶² Ibid., p22.

¹⁶³ Chatham House, op. cit., p26.

¹⁶⁴ Sara Pantuliano, and al, “Counter-terrorism and humanitarian action”, Humanitarian Policy Group, October 2011, p11.

¹⁶⁵ European Commission, Commission Decision amending Commission Decision C(2018)5120 on the Internal rules on the implementation of the general budget of the European Union as regards the model grant agreement for use as from 2021 (C(2020)3759), Brussels, 12 June 2020.

banks should not over-comply.¹⁶⁶ While this effort should be emphasised, it is not legally binding and will not replace exemptions. This shows the discrepancy between the will of DG ECHO and its partners and that of the MS. In 2021, the EC has also created an information point for humanitarian organisations to facilitate the application of derogations.¹⁶⁷ Again, if it remains weak in comparison to the benefits of the exemptions, it is a way for the Commission to meet the needs of NGOs by circumventing the necessary unanimity of the Council. Finally, in the first European Humanitarian Forum, the issue of bank de-risking, and the issue of barriers to counter-terrorism measures and sanctions were addressed, showing the ambition of DG ECHO and the EU to discuss these problems.¹⁶⁸ Thus, despite obvious antagonisms in both ways linked to the principles that characterise humanitarian aid, solutions are emerging, and the EU's consideration is increasing. However, a significant burden remains on humanitarian organisations to deliver aid in the context of counter-terrorism measures.

5. Field Comparison Between the Syrian and Sahelian Cases: Is Coexistence Possible on The Ground?

5.1 Humanitarian crises, armed terrorist groups and violent extremism: cases conducive of humanitarian aid and counter-terrorism policy interactions

While there are complementarities and contradictions, the two policies are forced to coexist on the ground. Thus, it seems necessary to analyse this coexistence in concrete and important case studies for the EU. Syria, the Dae'sh sanctuary, has generated modern international terrorism, whose repercussions for the EU have been manifold, both in terms of the number of radicalised Europeans and of the attacks perpetrated on the continent. The second case study is the Sahel as Africa and the Sahel-Saharan band appear to be the new land of jihadism and extremism, which seems to increasingly preoccupy the EU and its MS.¹⁶⁹ Both the Sahel and Syria showcase humanitarian crises where terrorism has been added to pre-existing conflicts.¹⁷⁰ While there are many similarities between these two cases, their needs, and challenges inherent in their situations are quite different. At the humanitarian level, Syria is set in the context of a war that began a decade ago and counts no less than 6.9 million internally displaced persons and 5.6 million refugees.¹⁷¹ These humanitarian needs are due in part to the war coupled with the severe economic crisis, food shortages, but also a major drought in 2021 and Covid-19.¹⁷² The principal areas requiring assistance are in the north of the country. For the EU and its MS, more than 25 billion euros have been provided to support Syria and its neighbouring countries such as Turkey.¹⁷³ In 2022, 14.6 million people needed aid, according to the UN Special Envoy for Syria,¹⁷⁴ while access to lands, attacks on hospitals and civilians, and non-compliance with IHL are increasingly making the work of humanitarians difficult.¹⁷⁵

In the Sahel, the humanitarian issue is quite different since it is primarily related to the climatic consequences and food insecurity, which internal conflicts and poverty are fuelling.¹⁷⁶ Needs are clearly on the increase, with 32.4 million people in

¹⁶⁶ European Commission, Commission guidance note on the provision of humanitarian aid to fight the Covid-19 pandemic in certain environments subject to EU restrictive measures (C(2021) 5944), Brussels, 13 August 2021.

¹⁶⁷ European Commission, "EU-level contact point for humanitarian aid in environments subject to EU sanctions", retrieved 22 April 2022, https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions/eu-level-contact-point-humanitarian-aid-environments-subject-eu-sanctions_en.

¹⁶⁸ European Humanitarian Forum, "Programme 2022", retrieved 27 April 2022, https://humanitarian.forum.europa.eu/programme_en.

¹⁶⁹ Ibid.

¹⁷⁰ See Annex 2: Map of the Syrian Conflict representing controlled areas and humanitarian needs in 2021.

¹⁷¹ See Annex 3: Map of the Sahel Conflict and International and European Responses in 2020.

¹⁷² ECHO, "Factsheet: Syria", op. cit.

¹⁷³ Ibid.

¹⁷⁴ Ibid.

¹⁷⁵ United Nations, "Warning 'Future Looks Bleak' for Syrians Living through Twelfth Year of Crisis, Top United Nations Officials Urge More Resources, Focus on Conflict", 26 April 2022.

¹⁷⁶ ECHO, "Factsheet: Syria", op. cit.

¹⁷⁷ United Nations Office for the Coordination of Humanitarian Affairs, "Overview of humanitarian and financial needs: Sahel Crisis 2021", Humanitarian Programme Cycle, April 2021.

need in Burkina Faso, Cameroon, Chad, Mali, Mauritania and Niger in 2021, compared to 26.4 million in 2020.¹⁷⁸ The Sahel has also resulted in 7.7 million people being forcibly displaced, with particular concern for children.¹⁷⁹ Climate and food issues are worrying, making the Sahel an area of great concern for the future, with 23.4 million people at risk of food insecurity in 2021, a situation amplified by the COVID-19 crisis.¹⁸⁰ The EU, just like in Syria, is one of the main donors with its MS. Indeed, in 2021, 237 million euros, compared to 190 million in 2020, have been allocated to the Sahel, representing an increase of 47 million euros.¹⁸¹ However, humanitarian aid often finds itself on the same ground as terrorist groups where needs are greatest. Needs are fertile ground for the growth of terrorism, as a destabilised state can be seen as an easy target, and the population is more receptive to radical discourses.¹⁸² Indeed, the goal of most Islamist terrorist groups is to establish a Caliphate and a land to set up is sought. In fact, the difference between Al-Qaida and Da'esh is that the former seeks first to export terrorism and then to create its Caliphate, whereas the latter seeks to establish its caliphate in order to export its terrorism.¹⁸³

From a social explosion to a religious and civil war, the Syrian conflict has been conducive to the rise of contemporary international terrorism. The civil war has given rise to a significant number of radical Islamist groups such as ISIL, al-Nusra and other groups affiliated with Al-Qaida.¹⁸⁴ Several strategies have been set up by the EU to fight terrorism in the region with the EU regional strategy for Syria and Iraq as well as the ISIL/Da'esh threat in 2015,¹⁸⁵ the Council conclusions on the EU Regional Strategy for Syria and Iraq as well as the Da'esh threat in 2016¹⁸⁶ and the EU Strategy for Syria in 2017.¹⁸⁷ The EU has implemented a series of sanctions, the latest of which were imposed on 15 November 2021 and will be valid until 1 June 2022.¹⁸⁸ These restrictive measures affect 292 individuals and 70 entities who are prohibited from entering the EU and have their assets frozen.¹⁸⁹ As mentioned above, the EU can also, since 2016, carry out its own sanctions and has therefore renewed the sanctions against Da'esh and Al-Qaida on 18 October 2021.¹⁹⁰ Other sanctions concern investments, oil, Syrian central banks' assets on European territory and exports that could be used to repress the population.¹⁹¹

With porous borders and an arid environment, the Sahel is a classic trading and trafficking area. The Sahel has become a breeding ground for terrorism due to climate change, inter-tribal conflicts, weak governance and neighbouring civil wars.¹⁹² Indeed, the Sahelo-Sahelian band has been gripped by jihadism that is divided between supporters of Da'esh and Al-Qaida, with Al-Qaida in the Islamic Maghreb (AQIM) and the Movement for Unity and Jihad in West Africa (MUJWA) taking control of the area in 2012.¹⁹³ Since 2015, the Islamic State has been increasingly present in the Sahel with, in particular, allegiance to the Islamic

178 ECHO, "Factsheet: Sahel", op. cit.

179 Ibid.

180 Ibid.

181 Ibid.

182 Edward Newman, "Weak states, state failure, and terrorism", *Terrorism and political violence* 19.4 (2007), p466.

183 Mohamed Berkani, "Al-Qaida versus Daech : les differences et similitudes", *France Info*, 05 March 2015.

184 International Crisis Group, "Exploiting Disorder: al-Qaeda and the Islamic State", *Crisis Group Special Report*, 14 March 2016, p17.

185 Council of the European Union, *Council Conclusions on the EU Regional Strategy for Syria and Iraq as well as the ISIL/Da'esh threat (7267/15)*, Brussels, 16 March 2015.

186 Council of the European Union, *Council Conclusions on the EU Regional Strategy for Syria and Iraq as well as the Da'esh threat (9105/16)*, Brussels, 23 May 2016.

187 Council of the European Union, "Press release: EU Strategy for Syria", Brussels, 3 April 2017.

188 Council of the European Union, "Syria: EU response to the crisis", retrieved 22 April 2022, <https://www.consilium.europa.eu/fr/policies/syria/>.

189 Ibid.

190 Ibid.

191 Ibid.

192 Kyle Murphy, "Security Fragmentation Hinders Humanitarian Response in the Sahel", *Center for Strategic and International Studies (CSIS)*, 17 November 2020, p1.

193 Wolfram Lacher, "Organized crime and conflict in the sahel-sahara region Middle East", *The Carnegie Papers*, September 2012, p13.

State of Boko Haram, which became the Province of the Islamic State of West Africa.¹⁹⁴ On the Al-Qaida side, in the West of the Sahel, we also find the Group for the Support of Islam and Muslims (GSIM), which stems from AQIM and is very present with its affiliated group Ansaroul Islam, mainly located in Burkina Faso.¹⁹⁵ On the Da'esh side, in the East of the Sahel, the Islamic State in the Great Sahara (ISGS) and the Katiba Macina¹⁹⁶ are important actors.¹⁹⁷ In the Sahel, the EU's fight against terrorism is primarily conducted through cooperation and CSDP missions and operations such as EUCAP Mali, EUCAP Niger, EUTM Mali and the new EUMPM Niger mission. Another initiative is Task Force Takuba, which can be seen as a way for the French to Europeanise their operations.¹⁹⁸ The EU intends to fight terrorism in the region in the long term and with an integrated approach¹⁹⁹ while at the same time strengthening its partnership with West Africa, notably through the G5.²⁰⁰ The case of terrorism in the Sahel is particular because terrorists exploit the rivalries between sedentary and nomadic populations, but also because terrorism and its Salafist ideas are becoming institutionalised.²⁰¹ Thus, it is more difficult for European actors to qualify certain actors as terrorists. This raises questions about the ways in which the EU can combat this form of terrorism, of which the integrated approach is one.

5.2 The two policies constrained to exist side-by-side on the ground: dangerous liaisons or possible collaborations?

Syria is "one of the most challenging operational environments in the world for the delivery of humanitarian assistance and provision of services."²⁰² Indeed, Syria combines a large number of sanctions on its territory, making humanitarian work on the ground more difficult. In addition, UN, US, and EU sanctions²⁰³ are compounded by the increased politicisation of aid by state actors such as Russia.²⁰⁴ Despite the exceptions made by the US and the EU, Syria provides a good example of how restrictive measures have had a prominent impact on the effectiveness of humanitarian aid.

The most problematic aspect of the Syrian case is the difficulty in transferring funds without violating restrictive measures. While banks practice significant overcompliance,²⁰⁵ "almost a third of all money destined for Syria was held in an almost permanent limbo"²⁰⁶ due to banks blocking these same funds. Thus, without banking channels, which are dependent on the US financial system, humanitarians are forced to turn to informal transfers.²⁰⁷ Since, for example, access to certain areas of northern Syria is conditional on the escorting of humanitarians by armed terrorist groups in exchange for cash,²⁰⁸ the risk for humanitarian staff is increased. They are exposed to an increasing security risk, but also to extortion and, therefore, to the risk

194 Héli Nsaibia, and Caleb Weiss, "The End of the Sahelian Anomaly: How the Global Conflict between the Islamic State and al-Qaida Finally Came to West Africa", CTC Sentinel 13.7, July 2020, p2-3.

195 Andrew Lebovitch, "Mapping Armed Groups in Mali and the Sahel", European Council on Foreign Relations, May 2019.

196 Edoardo Baldaro, and Yida Seydou Diall, "The End of the Sahelian Exception: Al-Qaeda and Islamic State Clash in Central Mali", The International Spectator 55.4 (2020), p69.

197 France Info, "Les principaux groupes jihadistes présents au Mali", 29 November 2019.

198 Friedrich Plank and Julian Bergmann, "The European Union as a Security Actor in the Sahel: Policy Entrapment in EU Foreign Policy", European Review of International Studies 8.3 (2021), p389.

199 Katherine Pye, "A Means to an End or an End in Itself? The EU Integrated Approach to Conflict in Mali", EU Diplomacy Papers College of Europe, May 2019.

200 Friedrich Plank and Julian Bergmann, op. cit., p405.

201 Interview 4, Advisor to the EU CTC, Brussels, 29/03/2022.

202 Justine Wlaker, "Risk Management Principles Guide for Sending Humanitarian Funds into Syria and Similar High-Risk Jurisdictions", Association of Certified Anti-Money Laundering Specialists, May 2020, p4.

203 Diakonia International Humanitarian Law Centre, "Counterterrorism and humanitarian action in Syria", 7 September 2021, p7-10.

204 Interview 2, video conference, 04/03/2022.

205 The Carter Center, "Navigating Humanitarian Exceptions to Sanctions Against Syria Challenges and Recommendations", October 2020, p10.

206 Stuart Gordon, "The risk of de-risking: the impact of counterproductive financial measures on the humanitarian response to the Syrian crisis", Conflict Research Programme Blog, 2019, p4

207 Joseph Daher, and Erica Moret, "Invisible Sanctions: How over-compliance limits humanitarian work on Syria: Challenges of Fund Transfer for Non-Profit Organizations Working on Syria", Impact Civil Society and Development, 2020, p20.

208 Interview 3, Staff member of the CTC Office, Brussels, 29/03/2022.

of financial loss.²⁰⁹ Indeed, while organisations working in Syria need to rent vehicles, offices or equipment, organisations face a significant risk of embezzlement.²¹⁰ All of these constraints have led to the withdrawal of some NGOs and a decrease in funding proposals from donors.²¹¹ Finally, we can also contrast this situation because the expertise in counter-terrorism has also enabled the humanitarian sector to redirect its aid towards populations in need. In fact, while aid was concentrated in the north of Syria, needs identified by counter-terrorism teams in the rest of the country enabled humanitarians to improve the targeting of their assistance.²¹²

The EU has been able to adapt and take steps to decrease the strong contradictions in the Syrian case. The freezing of assets has been one of the main obstacles to aid in Syria, as well as the oil ban, which has been widely violated by humanitarians.²¹³ Regarding the oil ban, the EU was able to agree to a change in the 2012 regulation so that humanitarian organisations receiving EU funds could be exempted.²¹⁴ While this change shows a positive consideration of the need to respect the consistency of the EU's external action, it has been shown that these exemptions can lead to more blockages. Indeed, in Somalia, a large number of actors were included in the exemptions, but in Syria, the actors are limited to the EU's partners, creating tensions between organisations.²¹⁵ Moreover, as this exemption is only sectoral, it does not allow for the circumvention of other sanctions that have a strong impact on aid.²¹⁶ Although it can be criticised, this inclusion marks a step forward in the coherence of counter-terrorism policies. Regarding the freezing of assets and other sanctions, a guide was drawn up in 2020 to raise awareness of risk management in Syria in order to inform not only humanitarians but also banks and donors on EU, UN and US sanctions.²¹⁷ This initiative should be generalised and seems to be a good way to help actors, although it does not replace the benefits of generalising exemptions.

The Sahel is a different case where the EU focuses its action against terrorism not through sanctions but through its CSDP²¹⁸ missions and is a perfect illustration of the impact of the politicisation of aid. Firstly, the politicisation of aid arises from the reconsideration of the reasons for fighting terrorism in the region. In the Sahel, terrorism has taken hold in a historically unstable region of transit and trafficking, with rivalries between traditional tribes and a long-standing colonial past.²¹⁹ Indeed, while the French counter-terrorism military operation Serval, at the request of the Malian government, has had remarkable achievements, the pursuit of its operations by Barkhane has highlighted the fatigue of Sahelians with the French presence through mistakes and misinformation.²²⁰ Not only is this fatigue directed against the French, but also against European military and civilian operations as they are seen as the uploading of the French and a post-colonial dominance.²²¹ Moreover, taking advantage of local tribal claims and the colonial past, terrorist groups act less and less violently against civilians but offer a counter-discourse.²²² This allows for the institutionalisation of Salafism but challenges the definition of terrorism in the region. Thus, the definition of terrorist acts is questioned, as well as the legitimacy of Western and European action: "in the past 10 years, the promise to

209 Alice Debarre, "Making sanctions smarter: safeguarding humanitarian action", International Peace Institute, 2019, p3.

210 Justine Wlaker, *op. cit.*, p15.

211 The Carter Center, *op. cit.*, p10.

212 Interview 4, Advisor to the EU CTC, Brussels, 29/03/2022.

213 Council of the European Union, "Council Regulation (EU) n° 36/2012 concerning restrictive measures in view of the situation in Syria and repealing Regulation (EU) n° 442/2011 Art 6(b)", Official Journal of the European Union, L 16/1, Brussels, 18 January 2012.

214 Council of the European Union, "Council Regulation (EU) n° 2016/2137 amending Regulation (EU) n° 36/2012 concerning restrictive measures in view of the situation in Syria", Official Journal of the European Union, L 332/3, Brussels, 6 December 2016.

215 Emanuela-Chiara Gillard, "Recommendations for Reducing Tensions in the Interplay Between Sanctions, Counterterrorism Measures and Humanitarian Action", Chatham House, August 2017, p11.

216 *Ibid.*

217 ECHO, "Working with DG ECHO Sanctions 2021-2027", *op. cit.*

218 Council of the European Union, Council Conclusions European Union Integrated Strategy for the Sahel (7723/12), *op. cit.*, p10.

219 Franklin Charles Graham, "Abductions, kidnappings and killings in the Sahel and Sahara", *Review of African Political Economy*, 38:130, (2011), p589.

220 Charles Soucy, "La Françafrique est-elle chose du passé? La joute française au Sahel: implications et désillusions", *Federalism-E* 22.1 (2021), p86.

221 Friedrich Plank and Julian Bergmann, *op. cit.*, p389.

222 Interview 4, Advisor to the EU CTC, Brussels, 29/03/2022.

remove the threat of terrorism, these [the Western powers] actors perpetuate the established foreign domination over local populations.”²²³

The reconsideration of the motivations for counter-terrorism in the region in light of the evolution of these terrorist groups in society raises doubts about the place of Western actors. While the EU is accused of its colonial past and criticised for its agenda based on migration and security issues in its neighbourhood, the European presence, whether counter-terrorism or humanitarian, appears as an additional means of domination.²²⁴ Thus, humanitarian aid is confused with other European policies in the region and can, therefore, appear instrumentalised, but is also trapped by the past of some MS.

Secondly, while the *raison d'être* of the European fight against terrorism in the Sahel is questioned and politicises aid, the military failure in this fight raises concerns about European capabilities in the area. Not only does this question the results of these operations, but it also questions the need for an alternative to fight terrorism. Indeed, the securitisation and militarisation of the Sahel issue, rather than engagement with the local population, would have aggravated insecurity and was assessed as an inadequate response by the EU.²²⁵ The EU has conducted several CSDP operations with EUCAP Sahel Niger since 2012, which aims to train the police and strengthen the rule of law, EUTM Mali in 2013, which seeks to train the armed forces and then EUCAP Sahel Mali, with the same missions as EUCAP Niger, since 2014.²²⁶ These missions had fairly limited success and have been considered failures by many actors. They also raised issues of legitimacy and effectiveness in the fight against terrorism in the region.²²⁷ More than a reconsideration of the effectiveness, these missions would have increased military and humanitarian interactions on the ground, constituting a risk of militarisation of aid.²²⁸

Yet, while some actors believe that violence prevents stabilisation, Sahelian states consider that the military responses of France and the EU have not been sufficient or tough enough, and have recently turned to the Russian Wagner mercenaries.²²⁹ This has also prompted the EU to suspend its missions in the region, in view of the abuses committed.²³⁰ Thus, while the question of more stabilisation is raised, the question of the EU's executive power in military matters in the fight against terrorism is also highlighted. The dilemma of security before aid or aid before security arises in a general context of increasing rejection of the West.

Finally, as military means are being questioned, the EU wishes to resolve the Sahelian case through an integrated approach.²³¹ One of the problems with this approach is that it sometimes combines contradictory agendas that everyone tries to fulfil.²³² Humanitarians are, therefore, increasingly confused with other Western actors, and violence against humanitarian staff in the Sahel is very high. In 2020, seven members of the NGO Acted died in an attack in Niger, and four aid workers from Action Against Hunger and the International Rescue Committee were also murdered in Nigeria.²³³ This led to the end of Acted's activities in Niger and shows the deadly consequences of the politicisation of aid, but also the repulsive effect on aid NGOs.²³⁴ Furthermore, in order to compensate for the inefficiency of military activities, some actors are asking for more stabilisation

223 Franklin Charles Graham, “Abductions, kidnappings and killings in the Sahel and Sahara”, *op.cit.*, p596.

224 *Ibid.*

225 Isaac Kfir, “Organized Criminal-Terrorist Groups in the Sahel: How Counterterrorism and Counterinsurgency Approaches Ignore the Roots of the Problem”, *International Studies Perspectives* 19.4 (2018), p344.

226 European External Action Service, “EU relations with Sahel countries - Burkina Faso, Chad, Mali, Mauritania, Niger”, Brussels, 17 June 2016, p2-3.

227 Interview 6, EU Official, video conference, 31/03/2022.

228 Isaac Kfir, “Organized Criminal-Terrorist Groups in the Sahel”, *op.cit.* p356.

229 Interview 6, EU Official, video conference, 31/03/2022.

230 Marie-Madeleine Courtial, “L'Union européenne met fin à la mission EUTM Mali”, *À l'Avant-garde*, 13 April 2022.

231 Council of the European Union, Council Conclusions European Union Integrated Strategy for the Sahel, *op. cit.*

232 Signe Marie Cold-Ravnkilde, and Christine Nissen, “Schizophrenic agendas in the EU's external actions in Mali”, *International Affairs*, Volume 96, Issue 4, (2020), p952.

233 Raoul Mbog, “Périr ou laisser périr : l'impossible dilemme des humanitaires au Sahel”, *Le Monde*, 7 September 2020.

234 *Ibid.*

through development aid and are pushing for a stronger nexus between humanitarian and development aid, constituting a form of developmentarisation of aid.²³⁵ In the Sahelian case, we, therefore, find the three forms of politicisation highlighted by Charlotte Dany as discussed earlier, which constitute obstacles to humanitarian principles, namely instrumentalisation, because humanitarian aid is confused with other policies, militarisation, because aid increasingly needs the support of the military to secure its operations, and finally developmentalisation, because there is a push for greater development of aid.²³⁶

Thus, the Syrian and Sahelian cases confirm the contradictions and antagonisms previously identified. Sanctions act in a contradictory way on many points in Syria and the politicisation of aid in the Sahel demonstrates the danger of challenging humanitarian principles and the possible consequences of the integrated approach. However, the importance of history and actors in the different cases does not allow for a generalisation but highlights new perspectives.

5.3 Assessing policy effectiveness in Syria and the Sahel: positive or negative impact of policy interactions on the achievement of their objectives?

After providing a non-exhaustive description of the cases, it is now possible to assess the effectiveness of humanitarian aid and counter-terrorism policies in achieving their objectives and to define their dynamics. This analysis also makes it possible to assess the coherence of the EU's external action.

Regarding counter-terrorism policies, two distinct strategies and commitments have been made by the EU, acting through a strong restrictive measures framework in the case of Syria and CSDP missions and an integrated approach in the case of the Sahel. Both methods have had limited success and have had consequences for humanitarian aid. However, the main difference is that in the case of Syria, despite many limitations, some efforts have been made by the EU to mitigate the negative effects of its counter-terrorism policy, such as the guide or the sectoral exemption.²³⁷ Although insufficient on certain points, particularly with regard to the exemption which should be complete, the EU, and more particularly the Commission, has made real efforts to facilitate the work of humanitarians at its level.²³⁸ Indeed, it is up to the States to implement sanction regimes and to agree on them. While Syria remains a challenge for aid access, the EU has sought to move closer to consistency, in the sense that it seeks to limit the contradiction between the two policies. Moreover, its action to combat terrorism remains positive as terrorism in the region has been reduced, and the fall of Baghuz marked the end of the territorial grip in March 2019,²³⁹ even if some recent resurgences have been identified.²⁴⁰ This is not due solely to the EU but rather to the Global Coalition,²⁴¹ but the EU has been part of other efforts to combat terrorism.

The Sahel presents more significant problems, particularly with regard to the ineffectiveness of the EU's action on counter-terrorism and on the reduction of the politicisation of aid. This ineffectiveness is crowned by the possible recruitment of soldiers trained by EUTM Mali by the Wagner mercenaries²⁴² and the cessation of the EU operation in Mali.²⁴³ In this respect, the counter-terrorism policy is rather ineffective, and neither coherence nor consistency has been concretely implemented. However, there is real monitoring of the situation by both ECHO and EEAS, and the situation is being taken seriously by the EEAS.²⁴⁴

235 Interview 5, video conference, 31/03/2022.

236 Charlotte Dany, *op. cit.*, p7.

237 ECHO, "Working with DG ECHO Sanctions 2021-2027", *op. cit.*

238 Interview 9, DG ECHO, video conference, 28/04/2022.

239 French Ministry of European and Foreign Affairs, "Global Coalition Against Daesh: high-level experts meeting at the Ministry for Europe and Foreign Affairs", Paris, 25 June 2019.

240 RTBF, "Depuis la chute de Baghuz, on peut constater que Daech reprend des forces en Syrie", 10 January 2021.

241 French Ministry of European and Foreign Affairs, *op. cit.*

242 Interview 4, Advisor to the EU CTC, Brussels, 29/03/2022.

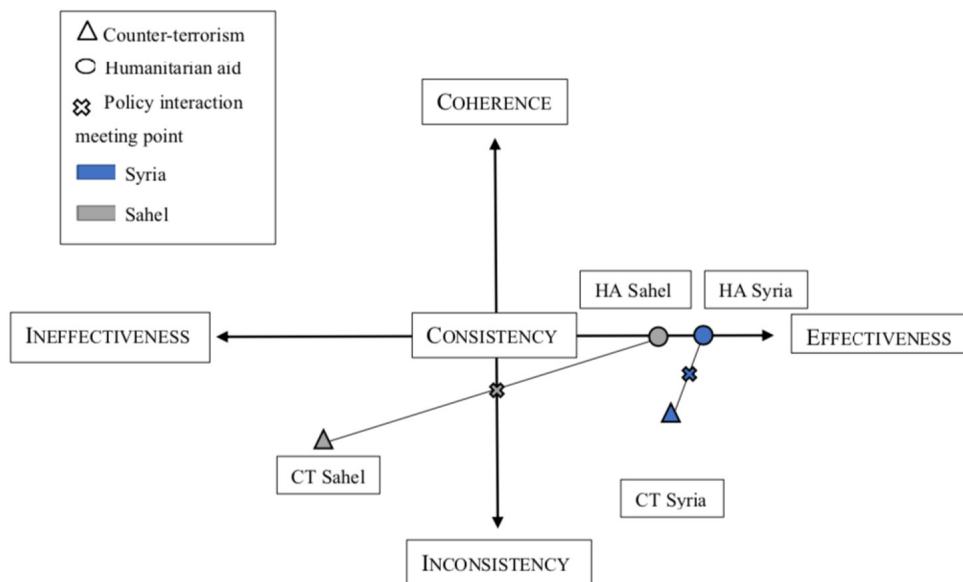
243 Marie-Madeleine Courtial, *op.cit.*

244 Interview 8, EEAS Official, video conference, 11/04/2022.

On the humanitarian aid side, in both cases, there may have been elements favouring terrorism, but these are considerably less compared to the aid allocated with 237 million euros for the Sahel²⁴⁵ and 141 million euros for Syria in 2021,²⁴⁶ which, as demonstrated, can prevent extremism. In this sense, there is a certain consistency as humanitarian aid does not stand in contradiction to the counter-terrorism policy.

These cases also highlight the future challenges of the dynamics between counter-terrorism and humanitarian aid. Since the integrated approach seems to be a format that is destined to grow, the Sahelian case warns against the politicisation of aid and its consequences. Indeed, the dynamics of the two policies have tended to focus on the case of sanctions, but recent developments in the Sahel demonstrate that the increasing politicisation of aid also merits further study. Finally, a form of complementarity has been found in Syria regarding the information sharing on the needs in the country between actors,²⁴⁷ even if these cases show that contradictions and antagonisms predominate over complementarities.

Figure 2. Assessment of the coherence and effectiveness of humanitarian aid and counter-terrorism policy dynamics in Syria and the Sahel



Source: Compiled by the author, 2022

Thus, once the two policies have been analysed, the synthesis of their dynamics in Syria shows a certain consistency despite contradictions and effectiveness in the Commission's recent actions. However, external action in the Sahel seems to be close to inconsistency and oscillates between the effectiveness of aid and the ineffectiveness of the fight against terrorism. Moreover, these cases demonstrate that contradictions and antagonisms are more important than complementarities, but that coexistence remains mandatory and must be taken into account by the EU.

²⁴⁵ ECHO, "Factsheet: Sahel", op. cit.

²⁴⁶ ECHO, "Factsheet: Syria", op. cit.

²⁴⁷ Interview 4, Advisor to the EU CTC, Brussels, 29/03/2022.

6. Conclusion

The analysis of the theoretical framework of the research provided a valuable distinction regarding the difference between coherence and consistency. Indeed, while consistency, which is found in Article 21(3) of the TEU, aims at ensuring that two policies are not contradictory, horizontal consistency aims at ensuring that two policies can benefit from their interactions. Finally, effectiveness has been defined as the achievement of policy objectives.

An analysis of the institutional objectives through official documents of the humanitarian aid and counter-terrorism policies then demonstrated that some objectives may overlap, such as stabilisation and the reduction of human suffering, but also the respect of international humanitarian law. However, the two policies have very different ways of achieving them. Indeed, the humanitarian principles of neutrality, impartiality, humanity and independence represent a real difference between humanitarian aid and counter-terrorism. Furthermore, this institutional analysis has highlighted the possibility of a rapprochement of the two policies in the EU's external strategy, in particular in its integrated approach, and thus poses an additional challenge for increasing their interaction.

Furthermore, the analysis of the implementation of the dynamics themselves, through interviews, showed that the dynamics between the policies could be partly complementary and thus improve the coherence of the policies regarding the prevention of violent extremism and terrorism, field expertise and the capacity of humanitarians to cooperate with local actors. It is important to note that the focus was more on how humanitarian aid could contribute to counter-terrorism than the other way around. However, there are contradictions that make policies not only incoherent but inconsistent with respect to restrictive measures and their direct and indirect impacts on funding, security, administrative burden, and aid effectiveness on the ground. Moreover, humanitarian principles have emerged as the main catalyst for antagonism, since humanitarian aid can indirectly help terrorists through its principles, but counter-terrorism policy can hinder humanitarian principles. It appears that the impact of counter-terrorism policies on humanitarian aid is far more significant than the other way around.

Finally, the case studies on Syria and the Sahel have revealed that a certain consistency can exist when the EU adapts to the consequences of its actions, as in Syria, but also reveals that the hindrance to aid can come from other actors than the EU such as the US, the UN, its own MS or private actors. This may have highlighted the limit of the Commission's ability to respond to the consequences of its policies but may also have shown a willingness to do so in the Syrian case. The case of the Sahel highlighted an issue that had not been explored in sufficient depth until then, namely the politicisation of aid and the consequences of other actors, such as terrorist groups or locals, questioning the motives of counter-terrorism policy. Thus, the question of the legitimacy of acting in the fight against terrorism impacts the legitimacy of the presence of humanitarian actors. The Sahel case also demonstrates the failure of military means in the fight against terrorism and the possible value of an integrated approach to effectively combat extremism and terrorism, of which humanitarian aid is a part.

Thus, these different analytical steps allow us to readjust the initial hypothesis. The dynamics between the EU's humanitarian aid and counter-terrorism policies are partially consistent for counter-terrorism policy objectives and inconsistent for humanitarian aid objectives. However, neither policy makes the other more effective, on the contrary. Rather, the effectiveness of humanitarian aid is hampered by counter-terrorism policy. While some complementarities, particularly in favour of the counter-terrorism policy, exist on profound objectives, the significant contradictions of the counter-terrorism policy on humanitarian aid constrain the effectiveness of this dynamic. Finally, the policies are forced to coexist, and it would be possible to define their interactions as a challenged coexistence. Indeed, a measure taken to make one policy more effective will not necessarily be effective for the other. These dynamics show certain inconsistencies of the EU in its external action. Indeed, the catalytic antagonisms formed by humanitarian principles seem to make it impossible to achieve full coherence.

The analysis of this paper and the recommendations derived from it are nevertheless limited to the data available to the author and the elements that the interviewees were willing to transmit. Moreover, while the military approach to the fight against terrorism seems to have its limits and while sanctions are additional elements to other military actions, it would seem that the EU may see the integrated approach as a new way to fight terrorism.²⁴⁸ Thus, it would be interesting for future research to analyse the role of the integrated approach in the politicisation of humanitarian aid in the context of the fight against terrorism.

²⁴⁸ Quinty de Nobel, and Federica Mogherini, "Addressing Contemporary Terrorism: The Eu's Integrated Approach to Conflict and Crises As an Alternative to the War on Terror", Master's Thesis (Bruges: College of Europe, 2020).

References

Institutional Sources

- Council of the European Union. Basic Principles on the use of restrictive measures (10198/1/04). Brussels, 7 June 2004. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST-10198-2004-REV-1/en/pdf>.
- Council of the European Union. "Council Common Position of 27 December 2001 on the application of specific measures to combat terrorism." Official Journal of the European Union, L 344, 2001/931/CFSP, Brussels, 27 December 2001. Retrieved 30 April 2022, <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2001:344:0093:0096:EN:PDF>.
- Council of the European Union. Council Conclusions European Union Integrated Strategy for the Sahel (7723/12). Brussels, 16 April 2021. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST-7723-2021-INIT/en/pdf>.
- Council of the European Union. Council Conclusions Integrated strategy of the European Union in the Sahel (7723/21). Brussels, 16 April 2021. Retrieved 27 April 2022, <https://data.consilium.europa.eu/doc/document/ST-7723-2021-INIT/en/pdf>.
- Council of the European Union. Council Conclusions on EU External Action on Preventing and Countering Terrorism and Violent Extremism (8868/20). Brussels, 16 June 2020. Retrieved 30 April 2022, <https://www.consilium.europa.eu/media/44446/st08868-en20.pdf>.
- Council of the European Union. Council Conclusions on Syria (7956/18). Luxembourg, 16 April 2018. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST-7956-2018-INIT/en/pdf>.
- Council of the European Union. Council Conclusions on the EU Regional Strategy for Syria and Iraq as well as the Da'esh threat (9105/16). Brussels, 23 May 2016. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST-9105-2016-INIT/en/pdf>.
- Council of the European Union. Council Conclusions on the EU Regional Strategy for Syria and Iraq as well as the ISIL/Da'esh threat (7267/15). Brussels, 16 March 2015. Retrieved 30 April 2022, <https://www.consilium.europa.eu/media/21843/st07267en15.pdf>.
- Council of the European Union. Council Conclusions on the Integrated Approach to External Conflicts and Crises (5413/18). Brussels, 22 January 2018. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST-5413-2018-INIT/en/pdf>.
- Council of the European Union. "Council Implementing Regulation (EU) n° 2022/147 implementing Article 2(3) of Regulation (EC) n° 2580/2001 on specific restrictive measures directed against certain persons and entities with a view to combating terrorism, and repealing Implementing Regulation (EU) n° 2021/1188." Official Journal of the European Union, L25/1, Brussels, 3 February 2022. Retrieved 30 April 2022, <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32022R0147>.
- Council of the European Union. "Council Regulation (EC) n° 1257/96 concerning humanitarian aid." Official Journal of the European Union, L163/1, Brussels, 20 June 1996. Retrieved 30 April 2022, https://www2.coleurope.eu/system/files/uploads/intranet-page/2.5_reglement_1257_96.pdf.
- Council of the European Union. "Council Regulation (EU) n° 36/2012 concerning restrictive measures in view of the situation in Syria and repealing Regulation (EU) n° 442/2011 Art 6(b)." Official Journal of the European Union, L 16/1, Brussels, 18 January 2012. Retrieved 30 April 2022, <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32016R2137>.
- Council of the European Union. "Council Regulation (EU) n° 2016/2137 amending Regulation (EU) n° 36/2012 concerning restrictive measures in view of the situation in Syria." Official Journal of the European Union, L 332/3, Brussels, 6 December 2016. Retrieved 30 April 2022, <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32016R2137>.
- Council of the European Union. "Curriculum Vitae – Ikka Salmi." Retrieved 16 April 2022, <https://www.consilium.europa.eu/media/52164/ilkkasalmicvshort.pdf>.
- Council of the European Union. "Different types of sanctions." Retrieved 22 April 2022, <https://www.consilium.europa.eu/en/policies/sanctions/different-types/>.
- Council of the European Union. "Directive (EU) n° 2017/541 on combating terrorism." Official Journal of the European Union L88/6, Brussels, 31 March 2017. Retrieved 27 April 2022, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32017L0541>.
- Council of the European Union. "EU introduces exceptions to restrictive measures to facilitate humanitarian activities in Ukraine." Brussels, 13 April 2022. Retrieved 27 April 2022, <https://www.consilium.europa.eu/en/press/press-releases/2022/04/13/eu-introduces-exceptions-to-restrictive-measures-to-facilitate-humanitarian-activities-in-ukraine/>.
- Council of the European Union. European Security Strategy, A secure Europe in a better world. Brussels, 2003. Retrieved 30 April 2022, <https://www.consilium.europa.eu/media/30823/qc7809568enc.pdf>.

Council of the European Union. "Foreign Affairs Council Configuration." Retrieved 23 April 2022, <https://www.consilium.europa.eu/en/council-eu/configurations/fac/>.

Council of the European Union. Outline of the counter-terrorism strategy for Syria and Iraq, with particular focus on foreign fighters (5369/15). Brussels, 16 January 2015. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST-5369-2015-INIT/en/pdf>.

Council of the European Union. "Press release: EU Strategy for Syria." Brussels, 3 April 2017. Retrieved 30 April 2022, <https://www.consilium.europa.eu/en/press/press-releases/2017/04/03/fac-conclusions-syria/>.

Council of the European Union. Restrictive measures (Sanctions) - Update of the EU Best Practices for the effective implementation of restrictive measures (8519/18). Brussels, 4 May 2018. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST-8519-2018-INIT/en/pdf>.

Council of the European Union. Sanctions Guidelines – Update (5664/18). Brussels, 4 May 2018. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST-5664-2018-INIT/en/pdf>.

Council of the European Union. "Syria: EU response to the crisis." Retrieved 22 April 2022. <https://www.consilium.europa.eu/fr/policies/syria/>.

Council of the European Union. "The EU's responses to terrorism." Retrieved 23 April 2022, <https://www.consilium.europa.eu/en/policies/fight-against-terrorism/>.

ECHO. "Factsheet: Sahel." Retrieved 26 April 2022, https://ec.europa.eu/echo/where/africa/sahel_en.

ECHO. "Factsheet: Syria." Retrieved 26 April 2022, https://ec.europa.eu/echo/where/middle-east/syria_en.

ECHO. "Working with DG ECHO Sanctions 2021-2027." Retrieved 22 April 2022. <https://www.dgecho-partners-helpdesk.eu/sanctions/humanitarian-exceptions>.

European Commission. Commission Decision amending Commission Decision C(2018)5120 on the Internal rules on the implementation of the general budget of the European Union as regards the model grant agreement for use as from 2021 (C(2020)3759). Brussels, 12 June 2020. Retrieved 27 April 2022, [https://ec.europa.eu/transparency/documents-register/api/files/C\(2020\)3759_0/de00000000052575?rendition=false](https://ec.europa.eu/transparency/documents-register/api/files/C(2020)3759_0/de00000000052575?rendition=false).

European Commission. Commission guidance note on the provision of humanitarian aid to fight the Covid-19 pandemic in certain environments subject to EU restrictive measures (C(2021) 5944). Brussels, 13 August 2021. Retrieved 30 April 2022, <https://www.medbox.org/pdf/5f0556c253933c5b516da6b2>.

European Commission. Communication from the Commission on the EU Security Union Strategy (COM/2020/605). Brussels, 27 July 2020. Retrieved 30 April 2022, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0605>.

European Commission. "DG EHO Partner's website." Retrieved 11 April 2022, <https://www.dgecho-partners-helpdesk.eu>.

European Commission. Elements for an EU regional strategy for Syria and Iraq as well as the Da'esh threat, Join Communication to the European Parliament and the Council (JOIN/2015/0002). Brussels, 6 February 2015. Retrieved 30 April 2022, <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=celex:52015JC0002>.

European Commission. "EU-level contact point for humanitarian aid in environments subject to EU sanctions." Retrieved 22 April 2022, https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions/eu-level-contact-point-humanitarian-aid-environments-subject-eu-sanctions_en.

European Commission. "European Consensus on Humanitarian Aid." Official Journal of the European Union, 2008/C 25/01, 30 January 2008. Retrieved 30 April 2022, <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1431445468547&uri=CELEX%3A42008X0130%2801%29>.

European Commission. "Factsheet: Humanitarian Aid." Retrieved 13 April 2022, https://ec.europa.eu/echo/what/humanitarian-aid_en.

European Commission. "Field network." Retrieved 11 April 2022, https://ec.europa.eu/echo/who/about-echo/field-network_en.

European Commission. "Press release - Security Union: A counter-terrorism Agenda and stronger Europol to boost the EU's resilience." Brussels, 9 December 2020. Retrieved 30 April 2022, <https://www.statewatch.org/media/1638/eu-com-security-agenda-pr-9-12-20.pdf>.

European Commission. The EU's comprehensive approach to external conflict and crises, Join Communication to the European Parliament and the Council (JOIN/2013/30). Brussels, 11 December 2013. Retrieved 30 April 2022, <https://op.europa.eu/en/publication-detail/-/publication/31aeff51-6312-11e3-ab0f-01aa75ed71a1>.

European Council. The European Union Counter-Terrorism Strategy (14469/4/05). Brussels, 30 November 2005. Retrieved 30 April 2022, <https://data.consilium.europa.eu/doc/document/ST%2014469%202005%20REV%204/EN/pdf>.

European External Action Service. A strategic compass for security and defense - For a European Union that protects its citizens, values and interests, and contributes to international peace and security (7371/22). Brussels, 21 March 2022. Retrieved 27 April 2022, <https://data.consilium.europa.eu/doc/document/ST-7371-2022-INIT/en/pdf>.

- European External Action Service. "Draft Agenda: Virtual Informal EU Consultations for the 2020 UN Peacebuilding Architecture Review." Brussels, 27 April 2020. Retrieved 30 April 2022, https://www.un.org/peacebuilding/sites/www.un.org.peacebuilding/files/draft_agenda_eu_consultations_un_pba_review_virtual_v23_april_2020.pdf.
- European External Action Service. "Making the EU a global player." Brussels, 4 February 2021. Retrieved 13 April 2022, https://www.eeas.europa.eu/eeas/making-eu-global-player_en.
- European External Action Service. "Organigram." Retrieved 23 April 2022, <https://www.eeas.europa.eu/node/5392>.
- European External Action Service. Shared Vision, Common Action: A Stronger Europe – A Global Strategy for the European Union's Foreign and Security Policy. Brussels, 2 June 2016. Retrieved 30 April 2022, https://eeas.europa.eu/archives/docs/top_stories/pdf/eugs_review_web.pdf.
- European Parliament. "EU and faith-based organizations – development and humanitarian aid." Briefing EU policies insight, Brussels, 8 November 2017. Retrieved 30 April 2022, [https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI\(2017\)608800](https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2017)608800).
- European parliament. "Factsheet: Humanitarian Aid." Brussels, September 2021. Retrieved 11 April 2022, <https://www.europarl.europa.eu/factsheets/en/sheet/164/humanitarian-aid>.
- European Parliament. "Understanding EU counterterrorism policy." Briefing EU policies insight, Brussels, 2021. Retrieved 11 April 2022, [https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/659446/EPRS_BRI\(2021\)659446_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2021/659446/EPRS_BRI(2021)659446_EN.pdf).
- European Union. "Consolidated Version of the Treaty on European Union and the Treaty on the Functioning of the European Union." Official Journal of the European Union, C326/13, 26 October 2012. Retrieved 30 April 2022, https://eur-lex.europa.eu/resource.html?uri=cellar:2bf140bf-a3f8-4ab2-b506-fd71826e6da6.0023.02/DOC_1&format=PDF.
- European Union. "EU Body: European External Action Service (EEAS)." Retrieved 11 April 2022, https://european-union.europa.eu/institutions-law-budget/institutions-and-bodies/institutions-and-bodies-profiles/eeas_en.
- French Ministry of European and Foreign Affairs. "Global Coalition Against Daesh: high-level experts meeting at the Ministry for Europe and Foreign Affairs." Paris, 25 June 2019. Retrieved 30 April 2022, <https://www.diplomatie.gouv.fr/en/french-foreign-policy/security-disarmament-and-non-proliferation/news/2019/article/global-coalition-against-daesh-high-level-experts-meeting-at-the-ministry-for>.
- Security Council Committee. "Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) concerning ISIL (Da'esh) Al-Qaida and associated individuals groups undertakings and entities." S/RES1267, 15 October 1999. Retrieved 30 April 2022, <https://www.un.org/securitycouncil/sanctions/1267>.
- Security Council Committee. "Resolutions 1267 (1999) 1989 (2011) and 2253 (2015) concerning ISIL (Da'esh) Al-Qaida and associated individuals groups undertakings and entities." S/RES1390, 16 January 2002. Retrieved 30 April 2022, <https://www.un.org/securitycouncil/s/res/1390-%282002%29>.
- United Nations Office for the Coordination of Humanitarian Affairs. "Overview of humanitarian and financial needs: Sahel Crisis 2021." Humanitarian Programme Cycle, April 2021. Retrieved 30 April 2022, <https://reliefweb.int/sites/reliefweb.int/files/resources/2021%20Sahel%20Crisis%20HNRO%20EN.pdf>.
- United Nations. "Warning 'Future Looks Bleak' for Syrians Living through Twelfth Year of Crisis, Top United Nations Officials Urge More Resources, Focus on Conflict." 26 April 2022. Retrieved 30 April 2022, <https://www.un.org/press/en/2022/sc14870.doc.htm>.

Interviews

- Interview 1, EU ECHO Official, video conference, 03/03/2022.
- Interview 2, video conference, 04/03/2022.
- Interview 3, Staff member of the CTC Office, Brussels, 29/03/2022.
- Interview 4, Advisor to the EU CTC, Brussels, 29/03/2022.
- Interview 5, video conference, 31/03/2022.
- Interview 6, EU Official, video conference, 31/03/2022.
- Interview 7, video conference, 06/04/2022.
- Interview 8, EEAS Official, video conference, 11/04/2022.
- Interview 9, DG ECHO, video conference, 28/04/2022.

Books and Book Chapters

- Bergamaschi, Isaline. "The Political Economy of Aid in the Sahel." *The Oxford Handbook of the African Sahel* (Oxford: Oxford University Press, 2021): 347.
- Debarre, Alice. "Countering Terrorism and Violent Extremism: The Risks for Humanitarian Action." In *Extremisms in Africa 2* (Byanston: Jonathan Ball Publishers, 2019): 201-222.
- Portela, Clara. "Conceptualizing coherence in EU external action." In *The External Action of the European Union : Concepts, Approaches, Theories* eds. Gstöhl

Sieglinde, and Simon Schunz. *The European Union Series*. (London: Macmillan Education, 2021): 87-102.

Richards, Anthony. "Defining terrorism." In *Routledge Handbook of Terrorism and Counterterrorism*. (London: Routledge, 2019): 13-21.

Schunz, Simon. "Analysing the effectiveness of European Union external action." In *The External Action of the European Union : Concepts, Approaches, Theories* eds. Gstöhl Sieglinde, and Simon Schunz. *The European Union Series*. (London: Macmillan Education, 2021): 126-142.

Tuček, Filip, and Richard Warnes. "The European Union against Terrorism: Challenges and Future Opportunities." In *The Palgrave Handbook of Global Counterterrorism Policy*. (London: Palgrave Macmillan, 2017): 315-336.

Van Elsuwege, Peter, and Jan Orbie. "The EU's Humanitarian Aid Policy after Lisbon: Implications of a New Treaty Basis." In *EU Management of Global Emergencies*. (Lyde: Brill Nijhoff, 2014): 21-46.

Academic articles

Baker-Beall, Christopher, and Gareth Mott. "The new EU counter-terrorism Agenda: preemptive security through the anticipation of terrorist events." *Global Affairs* no. 7:5 (2021): 1-22.

Baldaro, Edoardo, and Yida Seydou Diall. "The End of the Sahelian Exception: Al-Qaeda and Islamic State Clash in Central Mali." *The International Spectator* 55.4 (2020): 69-83.

Berg, Eugène. "L'intervention de la Russie dans le conflit syrien." *Revue Defense Nationale* 7 (2017): 30-35.

Bøås, Morten. "EU migration management in the Sahel: unintended consequences on the ground in Niger?." *Third World Quarterly* 42.1 (2021): 52-67.

Brattberg, Erik and Mark Rhinard. "The EU as a global counter-terrorism actor in the making." *European Security*, vol. 21, no. 4, (2012): 557-577.

Brattberg, Erik, and Mark Rhinard. "The EU as a global counter-terrorism actor in the making." *European Security* 21.4 (2012): 557-577.

Broberg, Morten. "The Humanitarian Law Principle of Independence Versus the European Union's Missionary Principle." *Yearbook of European Law*, Volume 36, (2017): 810-828.

Brubaker, Rebecca, and Sophie Huvé. "Conflict-related UN sanctions regimes and humanitarian action: A policy research overview." *International Review of the Red Cross* (2021): 1-18.

Bruce, Gregor. "Definition of terrorism social and political effects." *Journal of Military and Veterans Health* 21.2 (2013): 26-30.

D'Amato, Silvia and Andrea Terlizzi. "Strategic European counterterrorism? An empirical analysis." *European Security* (2022): 1-18.

Dany, Charlotte. "Politicization of Humanitarian Aid in the European Union." *European Foreign Affairs Review*, Issue 3, no. 20 (2015): 419-437.

Davis Cross, Mai'a K. "Counter-terrorism in the EU's external relations." *Journal of European Integration*, vol. 39, no. 5, (2017): 609-624.

Erforth, Benedikt. "Multilateralism as a tool: Exploring French military cooperation in the Sahel." *Journal of Strategic Studies* 43.4 (2020): 127-153.

Faleg, Giovanni. "The EU: from comprehensive to integrated approach." *Global Affairs*, vol. 4, nos. 2-3, (2018): 171-183.

George, Justin. "State Failure and Transnational Terrorism: An Empirical Analysis." *The Journal of Conflict Resolution* 62, no. 3 (2018): 471-95.

Giumelli, Francesco, and Fabian Hoffmann, and Anna Książczaková. "The when, what, where and why of European Union sanctions." *European Security* 30, no. 1 (2021): 1-23.

Graham, Franklin Charles. "Abductions, kidnappings and killings in the Sahel and Sahara." *Review of African Political Economy*, 38:130, (2011): 587-604.

Gregor, Bruce. "Definition of Terrorism: Social and Political Effects." *Journal of Military and Veterans' Health*, vol. 21, no. 2, (2013): 26-30.

Griffin, Christopher. "Operation Barkhane and Boko Haram: French Counterterrorism and Military Cooperation in the Sahel." *Small Wars & Insurgencies*, 27:5, (2016): 896-913.

Idahosa, Stephen Osaherumwen, Denis Andreevich Degterev, and Rasheed Olasunkanmi Abidoye. "Strategic fight against terrorism: A narrative of its implication in the Sahel region." *International Journal of Engineering & Technology* 7.4.38 (2018): 727-731.

Jørgensen, Knud Erik, Sebastian Oberthür, and Jamal Shahin. "Assessing the EU's performance in international institutions—conceptual framework and core

findings." *Journal of European integration* 33.6 (2011): 599-620.

Kaválek, Tomáš. "From al-Qaeda in Iraq to Islamic State: The Story of Insurgency in Iraq and Syria in 2003-2015." *Turkish Journal of International Relations*, vol. 15, no. 1, (2015): 1-33.

Keukeleire, Stephan and Sharon Lecocq. "Operationalizing the Decentring Agenda: Analysing European Foreign Policy in a Non-European and Post-Western World." *Cooperation and Conflict* 53, no. 2 (2018): 277-295.

Kfir, Isaac. "Organized Criminal-Terrorist Groups in the Sahel: How Counterterrorism and Counterinsurgency Approaches Ignore the Roots of the Problem." *International Studies Perspectives* 19.4 (2018): 344-359.

Lugna, Lauri. "Institutional framework of the European Union counter-terrorism policy setting." *Baltic Security & Defence Review* 8.1 (2006): 101-128.

MacKenzie, Alex and Christian Kaunert. "Still the absent friend? The European Union's global counter-terrorism role after twenty years." *Global Affairs*, no. 7:5, (2021): 615-630.

Martins, Bruno O. and Laura Ferreira-Pereira. "Stepping inside? CSDP missions and EU counter- terrorism." *European Security*, vol. 21, no. 4, (2012): 537-556.

McKeever, David. "International Humanitarian Law and Counter-Terrorism: Fundamental Values, Conflicting Obligations." *International & Comparative Law Quarterly* 69.1 (2020): 43-78.

Monar, Jörg. "Common threat and common response? The European Union's counter-terrorism strategy and its problems." *Government and opposition* 42.3 (2007): 292-313.

Monar, Jörg. "The EU's approach post-September 11: global terrorism as a multidimensional law enforcement challenge." *Cambridge Review of International Affairs*, vol. 20, no. 2, (2007): 267-283.

Newman, Edward. "Weak states, state failure, and terrorism." *Terrorism and political violence* 19.4 (2007): 463-488.

Niemann, Arne, and Charlotte Bretherton. "EU external policy at the crossroads: The challenge of actorness and effectiveness." *International relations* 27.3 (2013): 261-275.

O'Leary, Emma. "Politics and principles: The impact of counterterrorism measures and sanctions on principled humanitarian action." *International Review of the Red Cross*, (2021): 459-477.

Orbie, Jan, Peter Van Elsuwege and Fabienne Bossuyt. "Humanitarian Aid as an Integral Part of the European Union's External Action: The Challenge of Reconciling Coherence and Independence." *Journal of Contingencies and Crisis Management* 22, no. 3 (2014): 158-165.

Osland, Kari and Henriette Erstad. "The Fragility Dilemma and Divergent Security Complexes in the Sahel." *The International Spectator*, 55:4, (2020): 18-36.

Plank, Friedrich, and Julian Bergmann. "The European Union as a Security Actor in the Sahel: Policy Entrapment in EU Foreign Policy." *European Review of International Studies* 8.3 (2021): 382-412.

Rasheed, Adil. "Why Terrorist Groups Form International Alliances." *Strategic Analysis*, 43:4, (2019): 349-351.

Roy, Allison. "Russia and Syria: explaining alignment with a regime in crisis." *International Affairs* 89, no. 4 (2013): 795-823.

Rygiel, Kim, Feyzi Baban, and Suzan Ilcan. "The Syrian refugee crisis: The EU-Turkey 'deal' and temporary protection." *Global Social Policy* 16.3 (2016): 315-320.

Rysaback-Smith, Heather. "History and principles of humanitarian action." *Turkish journal of emergency medicine* 15 (2015): 5-7.

Schlanser, Célia. "La coopération franco-américaine en Afrique." *Revue Defense Nationale* 3 (2015): 99-104.

Signe, Marie Cold-Ravnkilde, and Christine Nissen. "Schizophrenic agendas in the EU's external actions in Mali." *International Affairs*, Volume 96, Issue 4, (2020): 935-953.

Stehlíková, Ivica. "The development of the European Union counter-terrorism framework." *Security and Defence Quarterly* 1.2 (2013): 38-57.

Stent, Angela. "Putin's power play in Syria: How to respond to Russia's intervention." *Foreign Aff.* 95 (2016): 106-113.

Yurtsever, Serdar, and Abubaker Almailes. "Syrian crisis in scope of the US-Russian competition in Middle East." *International Journal of Entrepreneurship and Management Inquiries* 2.3 (2018): 33-48.

Zenn, Jacob. "Rebel rivals: reinterrogating the movement for Unity and Jihad in West Africa and the roots of Al-Qaeda-Islamic State Infighting in the Sahel." *The*

Journal of North African Studies (2021): 1-25.

Master's Thesis

Burniske, Jessica S., and Naz K. Modirzadeh. "Pilot Empirical Survey Study on the Impact of Counterterrorism Measures on Humanitarian Action." Master's Thesis (Cambridge: Harvard Law School Program on International Law and Armed Conflict, 2017).

Nobel, Quinty de, and Federica Mogherini. "Addressing Contemporary Terrorism: The Eu's Integrated Approach to Conflict and Crises As an Alternative to the War on Terror." Master's Thesis (Bruges: College of Europe, 2020).

Research Papers and Reports

Adebajo, Kunle. "'Islamic State' Accuses Aid Workers Of Espionage, Spreading 'Blasphemous Beliefs.'" HumAngle, 20 August 2020. Retrieved 1 May 2022, <https://humanglemedia.com/islamic-state-accuses-aid-workers-of-espionage-spreading-blasphemous-beliefs/>.

Bradbury, Mark. "State-building, Counterterrorism, and licensing Humanitarianism in Somalia." Feinstein International Center Briefing Paper, September 2010. Retrieved 1 May 2022, <https://fic.tufts.edu/assets/state-building-somalia.pdf>.

Burniske, Jessica, and al. "Counter-terrorism laws and regulations: What aid agencies need to know." Humanitarian Practice Network, no. 79, November 2014. Retrieved 1 May 2022, https://odihpn.org/wp-content/uploads/2014/11/NP_79_crc_string_FINAL.pdf.

Counterterrorism and Humanitarian Engagement Project. "Enterprise Risk Management: A New Approach to Managing the Risks Posed by Counterterrorism Regulations." Project's Research and Policy Paper series, March 2013. Retrieved 1 May 2022, <http://blogs.harvard.edu/cheproject/files/2012/10/CHE-Project-ERM1.pdf>.

Courtial, Marie-Madeleine. "L'Union européenne met fin à la mission EUTM Mali." À l'Avant-garde, 13 April 2022. Retrieved 22 April 2022, <https://defencebelgium.com/2022/04/13/lunion-europeenne-met-fin-a-la-mission-eutm-mali/>.

Dany, Charlotte. "Beyond Principles vs Politics, Humanitarian Aid in the European Union." Arena Working Paper II, Arena Centre for European Studies, University of Oslo, November 2014. Retrieved 1 May 2022, <https://www.sv.uio.no/arena/english/research/publications/arena-working-papers/2014/wp11-14.pdf>.

Debarre, Alice. "Making Sanctions Smarter: Safeguarding Humanitarian Action." International Peace Institute, December 2019. Retrieved 1 May 2022, https://www.ipinst.org/wp-content/uploads/2019/12/1912_Making-Sanctions-Smarter.pdf.

Diakonia International Humanitarian Law Centre. "Counterterrorism and humanitarian action in Syria." 7 September 2021. Retrieved 1 May 2022, https://apidiaioniase.cdn.triggerfish.cloud/uploads/sites/2/2021/08/Diakonia_FactSheets_Counterterrorism.pdf.

Gillard, Emanuela-Chiara. "Recommendations for Reducing Tensions in the Interplay Between Sanctions, Counterterrorism Measures and Humanitarian Action." Chatham House, 23 August 2017. Retrieved 1 May 2022, https://www.chathamhouse.org/sites/default/files/publications/research/CHHJ5596_NSAG_iv_research_paper_1708_WEB.pdf.

Gordon, Stuart and Sherine El Taraboulsi-McCarthy. "Counter-Terrorism, Bank de-Risking and Humanitarian Response: A Path Forward." Humanitarian policy group Policy Brief 72. August 2018. Retrieved 1 May 2022, <https://cdn.odi.org/media/documents/12368.pdf>.

Gordon, Stuart, and al. "The impact of bank de-risking on the humanitarian response to the Syrian crisis." Humanitarian Policy Group Working Paper, 2018. Retrieved 1 May 2022, <https://cdn.odi.org/media/documents/12376.pdf>.

Herlin-Karnell, Ester and Claudio Matera. "External dimension of the EU counterterrorism policy." Centre for the law of EU external relations, Cleer working paper 2014/2, 2012. Retrieved 1 May 2022, https://www.researchgate.net/profile/Claudio_Matera/publication/276410755_The_External_Dimension_of_EU_Counter-Terrorism_Policy_An_Overview_of_Existing_Agreements_and_Initiatives/links/555cc0f608ae86c06b5d3fb5/The-External-Dimension-of-EU-Counter-Terrorism-Policy-An-Overview-of-Existing-Agreements-and-Initiatives.pdf.

International Committee of the Red Cross. "Preventing and countering violent extremism." Background note and guidance for national Red Cross and Red Crescent Societies, Geneva, June 2017. Retrieved 1 May 2022, <https://www.icrc.org/en/document/guidance-note-national-societies-preventing-and-countering-violent-extremism-approach>.

International Crisis Group. "Exploiting Disorder: al-Qaeda and the Islamic State." Crisis Group Special Report, 14 March 2016. Retrieved 1 May 2022, https://d2071andvip0wj.cloudfront.net/exploiting-disorder-al-qaeda-and-the-islamic-state_0.pdf.

International federation for human rights. "In Central Mali, Civilian Populations Are Caught Between Terrorism and Counterterrorism Fact-finding." Mission Report n° 727a, November 2018. Retrieved 1 May 2022, https://www.fidh.org/IMG/pdf/fidh_centre-of-mali_population-sized-between-terrorism-and-counter-terrorism_727_en_november2018.pdf.

Kelly, Luke. "Evidence on the Indirect Contribution of Humanitarian Activities to Deradicalisation and Countering Violent Extremism (CVE); and the Risks in Linking

such Objectives or Activities.” K4D Helpdesk Report 625 Institute of Development Studies, Brighton, 13 June 2019. Retrieved 1 May 2022, https://opendocs.ids.ac.uk/opendocs/bitstream/handle/20.500.12413/14643/625_Evidence_on_the_Indirect_Contribution_Humanitarian_Activities_Deradicalisation_and_Countering_Violent_Extremism_%28CVE%29.pdf?sequence=4&isAllowed=y.

Kessels, Eelco, and Christina Nemr. “Countering violent extremism and development assistance.” Policy Brief, Washington, DC, Global Center on Cooperative Security, 2016. Retrieved 1 May 2022, <https://www.globalcenter.org/wp-content/uploads/2016/01/Feb-2016-CVE-and-Development-policy-brief.pdf>.

Lacher, Wolfram. “Organized crime and conflict in the sahel-sahara region Middle East.” The Carnegie Papers, September 2012. Retrieved 1 May 2022, https://carnegieendowment.org/files/sahel_sahara.pdf.

Lebovitch, Andrew. “Mapping Armed Groups in Mali and the Sahel.” European Council on Foreign Relations, May 2019. Retrieved 27 April 2022, https://ecfr.eu/special/sahel_mapping/.

Lewis, Dustin. “Humanitarian Exemptions from Counter-terrorism Measures: A Brief Introduction, in 47 Proc.” Bruges Colloquium 141. 2017. Retrieved 1 May 2022, https://dash.harvard.edu/bitstream/handle/1/40268420/Lewis_colloquium_47_v7.pdf?sequence=1&isAllowed=y.

Murphy, Kyle. “Security Fragmentation Hinders Humanitarian Response in the Sahel.” Center for Strategic & International Studies (CSIS), 2020. Retrieved 1 May 2022, https://csis-website-prod.s3.amazonaws.com/s3fs-public/publication/201117_Murphy_Security_Fragmentation_Humanitarian_Response_Sahel-2.pdf.

Nsaibia, Héni, and Caleb Weiss. “The End of the Sahelian Anomaly: How the Global Conflict between the Islamic State and al-Qaida Finally Came to West Africa.” CTC Sentinel 13.7, July 2020. Retrieved 1 May 2022, <https://ctc.westpoint.edu/wp-content/uploads/2020/07/CTC-SENTINEL-072020.pdf>.

Osiewicz, Przemysław. “The EU and the Syrian conflict: A decade on, what comes next?.” Middle East Institute, 30 July 2021. Retrieved 1 May 2022, <https://www.mei.edu/publications/eu-and-syrian-conflict-decade-what-comes-next>.

Pantuliano, Sara, et al. “Counter-terrorism and humanitarian action.” Humanitarian Policy Group. October 2011. Retrieved 1 May 2022, <https://cdn.odi.org/media/documents/7347.pdf>.

Portela, Clara and Kolja Raube. “(In-)Coherence in EU Foreign Policy: Exploring Sources and Remedies.” Paper presented at the European Studies Association Bi-annual Convention, Los Angeles, April 2009. Retrieved 1 May 2022, [https://aei.pitt.edu/33122/1/portela_clara_\(2\).pdf](https://aei.pitt.edu/33122/1/portela_clara_(2).pdf).

Pye, Katherine. “A Means to an End or an End in Itself? The EU Integrated Approach to Conflict in Mali.” EU Diplomacy Papers College of Europe, May 2019. Retrieved 1 May 2022, https://www.coleurope.eu/sites/default/files/research-paper/edp-5-2019_pye_0.pdf.

Soucy, Charles. “La Françafrique est-elle chose du passé? La joute française au Sahel: implications et désillusions.” Federalism-E 22.1, 2021. Retrieved 1 May 2022, <https://ojs.library.queensu.ca/index.php/fede/article/view/14737/9675>.

Stoddard, Abby and al. “NGOs and Risk How international humanitarian actors manage uncertainty.” Humanitarian Outcomes. February 2016. Retrieved 1 May 2022, https://www.humanitarianoutcomes.org/sites/default/files/publications/ngo-risk_report_web.pdf.

The Norwegian Refugee Council. “Principles Under Pressure The impact of CT measures and preventing/countering violent extremism on principled humanitarian action.” The Norwegian Refugee Council Reports, 12 June 2018. Retrieved 1 May 2022, https://www.nrc.no/globalassets/pdf/reports/principles-under-pressure/nrc-principles_under_pressure-report-2018-screen.pdf.

Tovar Velasco, Marina. “Coherence in the Union’s External Action.” Institute for a Greater Europe, 19 September 2021. Retrieved 1 May 2022, <https://www.institutegreatereurope.com/single-post/coherence-in-the-union-s-external-action>.

Venturi, Bernardo. “The EU and the Sahel: A Laboratory of Experimentation for the Security Migration Development Nexus.” Istituto Affari Internazionali, 2017. Retrieved 1 May 2022, <https://www.iai.it/sites/default/files/iaiw1738.pdf>.

Wlaker, Justine. “Risk Management Principles Guide for Sending Humanitarian Funds into Syria and Similar High-Risk Jurisdictions.” Association of Certified Anti-Money Laundering Specialists, May 2020. Retrieved 1 May 2022, https://ec.europa.eu/info/sites/default/files/business_economy_euro/banking_and_finance/documents/200526-risk-management-guide_en_0.pdf.

Newspaper Articles

Berkani, Mohamed. “Al-Qaïda versus Daech : les differences et similitudes.” France Info, 5 March 2015. Retrieved 22 April 2022, https://www.francetvinfo.fr/monde/al-qaïda-versus-daech-les-differences-et-les-similitudes_3066525.html.

France Info. “Les principaux groupes jihadistes présents au Mali. ” 29 November 2019. Retrieved 22 April 2022, https://www.francetvinfo.fr/monde/afrique/mali/les-principaux-groupes-jihadistes-en-presence-au-mali_3720945.html.

Massih, Nadia. “Islamic State claims killing of French aid workers in Niger.” France 24, 18 Spetember 2020. Retrieved 22 April 2022, https://www.youtube.com/watch?v=TK3u7ON_ohg.

Mbog, Raoul. "Périr ou laisser périr : l'impossible dilemme des humanitaires au Sahel." *Le Monde*, 7 September 2020. Retrieved 22 April 2022, https://www.lemonde.fr/afrique/article/2020/09/07/perir-ou-laisser-perir-l-impossible-dilemme-des-humanitaires-au-sahel_6051330_3212.html.

RTBF. "Depuis la chute de Baghouz, on peut constater que Daech reprend des forces en Syrie." 10 January 2021. Retrieved 27 April 2022, <https://www.rtb.be/article/depus-la-chute-de-baghouz-on-peut-constater-que-daech-reprend-des-forces-en-syrie-affirme-la-ministre-francaise-des-armees-10670106>.

The New Humanitarian. "Balancing Act: Anti-Terror Efforts and Humanitarian Principles." 26 November 2019. Retrieved 2 January 2022, <https://www.thenewhumanitarian.org/feature/2019/11/26/balancing-act-anti-terror-efforts-and-humanitarian-principles>.

Other Resources

European Humanitarian Forum. "Programme 2022." Retrieved 27 April 2022, https://humanitarian.forum.europa.eu/programme_en.

Sanctions map. <https://www.sanctionsmap.eu/#/main>. Retrieved 22 April 2022.

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