

The Return of the Junta

The European sanction policy: an uncontested paradigm?

Master's Thesis

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Abstract

This thesis puts the EU sanction policy under scrutiny. In the European Global Strategy (2016), its commitment of being a hard power on the international stage is clearly displayed. It could be expected that this also gets translated into other EU foreign policies. An example of this would be that African states get less sanctions imposed on them, because it is beneficial for the EU to keep up good relations with these governments. Russia has been gaining influence in strategic important regions, such as the Sahel. Given the war in Ukraine and Europe's new geopolitical resolution, it is a strong incentive for European officials to not drive these states into Russian hands because of European sanctions. Nevertheless, most of the time, the EU quite easily opts for sanctions anyway, such as in Mali. Why is this the case? Literature that covers European sanctions has tried to explain discrepancies in the policy, but is at a standstill. This thesis applies a new theory to explain European choices: policy paradigm theory, which explains why policies stay the way they are. This strand of literature could use further operationalization in cases of international relations, as it is mostly theoretically developed or applied to national policies. This research will apply it to the cases of Myanmar, which knows a long history of European sanctions, and Mali, which has been sanctioned more recently. In the case of Myanmar, economic downsides of sanctions raise doubts about whether or not to implement them, but not enough to bring about policy change. Regarding Mali, it is shown that the Council and Commission opt for sanctions without hesitation, regardless of growing Russian influence and a worsening situation for the Malian people. The paradigm structures reality and thus imposing sanctions is seen as the legitimate policy. Despite noted disadvantages, such as economic considerations or a deterioration of relations with sanctioned governments and consequently their turn to Russia, policy paradigm theory is found to indeed be a helpful and innovative way to understand the ongoing EU sanction policy.

Keywords: EU sanctions, policy paradigms, Myanmar, Mali, China, Russia, European Union Foreign Policy

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List of abbreviations and acronyms

ASEAN	Association of Southeast Asian Nations
CFSP	Common Foreign and Security Policy
EBA	Everything but Arms
ECOWAS	Economic Community of West African States
EEAS	European External Action Service
EU	European Union
EUSR	European Union Special Representative
HR/VP	High Representative / Vice President
MEP(s)	Member(s) of the European Parliament
MOGE	Myanmar Oil and Gas Enterprise
NGO(s)	Nongovernmental organization(s)
NLD	National League for Democracy
NPE	Normative Power Europe
RELEX	Working Party of Foreign Relations Counsellors Working Party
UN	United Nations
U.S.A.	United States of America

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1. Introduction

All European eyes are tensely pointed to Russia nowadays. Due to the war in Ukraine, sanctions have been all over the news as a point of discussion. For the European Union (EU), it is a very important instrument to punish states that do not adhere to international norms (European Parliamentary Research Service, 2018), and accordingly the main way to make Russia answer for its crimes. Naturally, the war is not only played out on the battlefield: Europe also calls on China and African actors such as South Africa to raise their voices against Russia (Brzozowski & Fox, 2023). The importance of getting these actors on their side dawned once more due to the current geopolitical landscape (Murphy, 2022). Russia itself has been trying to influence these actors over the past years and has become aware of the growing importance of its close ties in the African continent during the war. Meanwhile, Europe has been struggling with a response to these disturbed international relations (ibid.). In Ethiopia, engagement with Russia led European leaders to argue for more financial aid, despite serious accusations of war crimes (Gridneff, 2022). Then how to act on countries such as Mali, which is building connections with Russia and its Wagner Group, and at the same time is ruled by a military junta that violates human rights? In line with its values, the EU adopted sanctions after the coup. However, to what extent does this drive Mali's military leaders only further into Russian hands, which is detrimental to the Malian population and European objectives?

The EU sanction policy has more often been a point of discussion. As an example: just this week, two articles appeared in the Dutch newspaper *de Volkskrant*. One points to the humanitarian disaster in Afghanistan, which is partly a consequence of economic sanctions imposed on the country (Vos, 2023). Secondly, the counterproductive effect of measures on Uganda is outlined, as they have instigated anger towards Europe among the population because they are perceived as hypocritical (Titeca, 2023). Overall, the use of European sanctions has only increased over the past three decades (Giumelli, 2013; Hörbelt, 2017; Giumelli, Hoffmann, & Książczaková, 2021), and it has become an important instrument for the EU and actors such as the United States of America (U.S.A.) and United Nations (UN) to vocalize their stance on international affairs. If the UN fails to implement sanctions, the EU plays an important role in imposing restrictive measures instead (Vines, 2012). In many parts of the world, the EU is a trade partner or aid provider. If this gets halted because of sanctions, it has a severe impact and European sanctions are thus very effective in this way (ibid.). However, the literature until now has not been able to discern a pattern in which countries are sanctioned or in the triggers to do so (Brunner, 2009). At the same time, the European Union is ever more aware of the changing geopolitical landscape around them. At conferences and in EU documents, the growing importance of facing security challenges is addressed, and investments in development and humanitarian aid are pointed to as a 'selfish investment in our security' by former High Representative / Vice President (HR/VP) Mogherini (European External Action Service, 2017). It dawned that a more strategic and geopolitical approach to its foreign policy is needed (Nitoiu & Sus, 2019). The EU wants to be a stronger, harder power (EEAS, 2022). But how come in this case, this realization is not translated into the sanctions policy of the EU? Until now, the EU has used sanctions as a soft power instrument and has had difficulties in dealing with countries like the U.S.A. that use them as hard power measures (Helwig, Jokela, & Portela, 2020). It seems like the sanction policy lags behind other international policies in which the EU has tried to adhere to its new decisive geopolitical role. This raises the point of how the EU sanction policy will fit into its new geopolitical objectives. This thus leads to the following research question:

Why does the European Union stick to its sanction policy, despite its growing awareness of security and geopolitical considerations?

The interplay between norms and interests has been an important discussion around the implementation of sanctions. Because there might not be a clear pattern in the triggers (Brummer, 2009), the reasoning of the EU behind its sanctions is debated. On the one hand, the European Union is seen as a Normative Power (Manners, 2002), that acts according to its democratic values. On the other hand, according to some, the economic and security interests of the EU in the African region cannot be overlooked, as well as the historical ties the EU has with some of the states (Brummer, 2009; Mitta, 2021). Rationalist authors lay emphasis on the ‘securitization’ of development policies, and argue that whenever the EU has to choose between security or democracy and peacebuilding, the EU will most likely choose security (Del Biondo, 2011; Del Biondo & Orbie, 2014). Security interests also account for the fight against terrorism and the managing of migration flows. Another important consideration seems to be the historical colonial ties, for instance between France and multiple African states (Del Biondo, 2015). Altogether, this rationalist group of scientists concludes that the EU will not impose sanctions on political or economic allies, while unstable political systems or economies get sanctioned more easily (Fürrutter, 2021). Other scholars still hang on to the idea of Normative Power Europe (NPE) and refer to the importance of norms such as democratization for the identity of the EU. Authors such as Saltnes (2017) build on this, and point to the importance of weighing different norms as regards to policy decisions. Value- and norm-based considerations have only become more important foundations for the EU’s external policies, according to them (Portela, 2005). At this point in time, this debate seems to be at a standstill, with few new contributions or insights. Furthermore, geopolitical considerations regarding Russia, as illustrated in the discrepancy between Ethiopia and Mali, are not reflected in the literature around EU sanction policies. In order to make a new contribution to the debate, and include new geopolitical stances of the EU, this thesis will use insights from the policy paradigm literature. The inherent stability of policy paradigms may offer a convincing answer to the presented puzzle of an unchanged sanction policy. Which factors account for the stability of the policy, and is there any sign of a process of slow destabilization?

This thesis has theoretical and societal relevance in multiple ways. First, the above discussion between rationalists and idealists will be supplemented with geopolitical considerations, in this case about the rising presence of the People’s Republic of China and the Russian Federation (hereafter shortly China and Russia). Especially in light of the recently started war, the influence of this trend cannot be missed in the analysis of the European sanctions. Second, the debate around the EU’s motivation behind its sanction policy seems to be at an impasse. This thesis will try to give new insight into the subject, by taking a new theoretical angle upon the matter that had not yet been done: policy paradigms. Next to the deadlock between sanction scholars, the paradigm literature also lacks case studies in which the concepts are operationalized (Daigneault, 2014). On top of this, new critical insights in the paradigm literature will be combined with classical notions. Thus third, this thesis will come up with new understandings of the paradigm literature. By combining the until now distinct discussions around sanctions and paradigm literature, this thesis hopes to contribute to both a better understanding of the EU sanction policy, and the practicality of the policy paradigm literature. In this research, the outcome will be about sanctions, but insights into the functioning of the EU and possible altering policies can be generalized over multiple policies. The multiple theoretical insights the paradigm literature can provide, are likely to become more and more relevant given the increasing policy openness of the EU (Alons, 2020). Also, this research is placed in a time where Europe is not only thinking about its role in Africa relative to China and Russia, but also about getting rid of any colonial associations. This plays a role in almost every bilateral or multilateral relation between Europe and Africa, and the sanction policy of the EU is a part of this. Mostly, the war in Ukraine has set international relations at sharp again, and especially Russia’s intentions in Africa are being questioned once more (Murphy, 2022). Dependent on European reactions, which sanctions are a part of, Africa can in this way become a new proxy battlefield. This is something the EU should be cautious of. Sanctions are important ways of international communication,

and can alter relations negatively or positively. Moreover, these policies can have direct consequences for people suffering from conflict. Understanding and with that optimization of international policies that affect these conflicts is thus in their best interest.

The theory of policy paradigms will be used to answer the research question. Firstly, the existing literature around sanctions will be set out, in the broader framework of realism and constructivism. It will be shown that these are insufficient to answer the research question, thus policy paradigms are introduced. These insights will be applied to the case studies of Myanmar and Mali. Myanmar and the EU have known a long history of sanctions and different stages of engagement (Dosch & Sidhu, 2015). In the last decade, Myanmar had to deal with a democratic transition, a genocide, and a military coup (Poletti & Sicurelli, 2022). This case gives the possibility to look in depth into the reactions of the EU to these happenings, but also to compare it to earlier sanctioning of misconducts in Myanmar. It will thus compare European policies from around 2000 with recent ones. In this way, any changes or alternations in the EU's thinking on sanctions are likely to be detected. Furthermore, it is interesting to see if China's influence is an important factor in European policy decisions regarding Myanmar. Mali is a case in which Russian presence has clearly expanded, which is mentioned by African and European actors (Janes-Lucas & Fofana, 2023). Sanctions followed after two coups took place in 2020 and 2021 (Dietz, 2022), and this gives the possibility to look into considerations regarding Russia's new presence. The Sahel is of strategic importance for the EU, which has adopted multiple strategies since 2010 (Pichon, 2020b). The development of these different policies is interesting to research, with the influence of Russia's increasing presence in mind. The expectation is that policy paradigms will be able to provide more insight into why the EU opts for sanctions, although these might deteriorate crucial relations with African or Asian states. And indeed, as shown below, these downsides of implementing sanctions get filtered out by the paradigm. Because of how the paradigm structures reality, imposing sanctions is the legitimate and obvious choice for policymakers.

The next chapter will give more background about the rationalist and idealist notions of the EU sanctions policy, and will outline the theory of policy paradigms, including the importance of ideas and possibilities for paradigm change. Subsequently, the methods will be discussed, with more information about the case studies, operationalization and expectations. The empirical chapter will start with a look into the EU Foreign Policy and its quest for a new decisive geopolitical role. After this, the cases will be described, and the insights of paradigm literature will be applied to relevant actors and their ideas. The conclusion will address the limitations of the study and provide recommendations for further research.

2. Theoretical framework

This chapter will begin reviewing sanctions as a foreign policy instrument, and will show that it is a popular instrument among EU policymakers. Subsequently, the existing debate between EU sanction scholars will be scrutinized. Lastly, the theoretical angle of this thesis, policy paradigm theory, will be explained, in order to investigate EU sanctions policy in two case studies.

2.1 A brief overview of the sanction policy of the European Union

The definition of sanctions is quite contested, as shown by multiple discussions between scholars over the past decades (Gibbs, 1966; Portela, 2005). A general definition would be that of Eaton and Engers (1992, p.1): ‘measures that one party (the sender) takes to influence the actions of another (the target)’. A somewhat narrower description would add that they involve the withdrawal of trade or benefits or the interference of normal relations, in order to acquire political goals (Portela, 2005). Most academic literature until now has discussed the effectiveness of sanctions (Nossal, 1989; Blanchard & Ripsman, 1999; Drezner, 2011). Around the sixties, scholars asked whether sanctions as foreign policy tools actually ‘work’ (Taylor, 2009). Authors such as Galtung (1967) claim that sanctions are a misjudgment of policymakers, and that their consequences are only negative. As an answer, Hufbauer, Schott and Elliot (1990) showed that sanctions can work if implemented properly. In the past decades, influential scholars such as Balwin and Pape (1998), have built their discussions over sanctions on these notions.

Since the concept of sanctions is under scrutiny, the EU uses the term ‘restrictive measures’¹ (Portela, 2005). These are laid down in the Common Foreign and Security Policy (CFSP), which came to force in 1993 with the Maastricht Treaty (Giumelli et al., 2021). Sanctions mainly consist of arms embargoes, travel bans, diplomatic constraints or economic restrictions, such as asset freezes or trade restrictions (ibid.). Three main documents guide the implementation of sanctions by the EU. The ‘Basic Principles’ were adopted in 2004, preceded by the ‘Guidelines on the implementation and evaluation of restrictive measures in the framework of the EU Common Foreign and Security Policy’, which was introduced in 2003 and updated in 2017 (Council of the European Union, 2018). Since this guideline has introduced targeted sanctions to individuals, the third document ‘Best Practices’ accounts for the uniform application (Portela, 2005). Important players for the implementation are the High Representative of the Union for Foreign Affairs and Security Policy, who proposes restrictive measures, and the relevant bodies of the European Council. These can consist of several working groups, such as the Working Party of Foreign Relations Counsellors Working Party (RELEX) (European Council & Council of the European Union, 2022). The sanctioning trend of the EU is, as earlier mentioned, steadily increasing. After the fall of the Soviet Union, sanctions had a stellar rise in the 90s. The first peak in the amount of imposed sanctions signals the start of the sanction policy. The second at the beginning of the century resembles the reaction to the terrorist attacks. The third steep rise is because of the Arab Spring (Giumelli et al., 2021). As for the regions to which sanctions are pointed, research shows that the EU is still focused on its nearby states, however at the same time the sanctions imposed on ‘far away’ states significantly increased (Hörbel, 2017). No international happening or crises has led to a decrease in the use of sanctions, but has always been answered by more sanctions. This is why this thesis will speak of a paradigm in the EU sanction policy. Of course, the European policy sometimes knows some discrepancies, for instance when human rights violating states do not get sanctioned. This is however not a refutation of the argument of the sanction trend, because in these decisions the EU is also quite constant: important states get sanctioned less (Fürrutter, 2021). Dataset EUSANCT shows in its graphs once more the stability of ongoing EU sanctions, especially when compared to the U.S.A..

¹ Academic literature adheres to the term ‘sanctions’, as will this research.

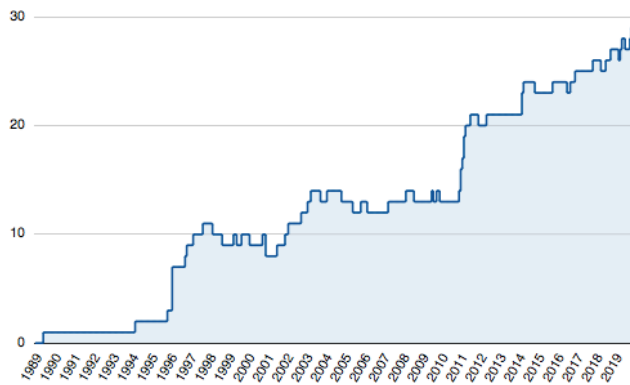


Figure 1. EU sanctions 1990-2019. (Giumelli et al., 2021).

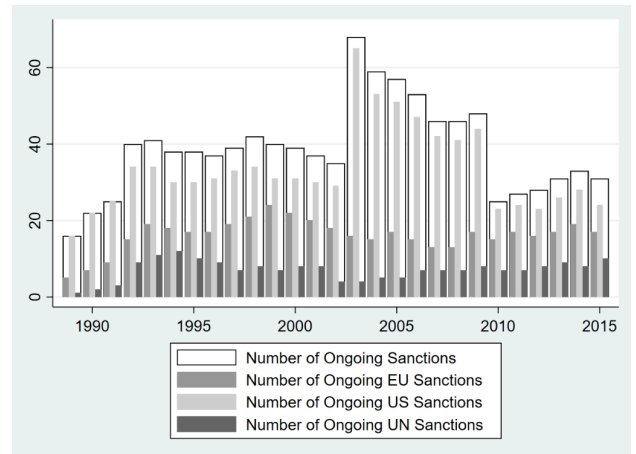


Figure 2. Number of ongoing sanctions 1990-2015. (Weber & Schneider, 2022).

2.2 Motivations behind the EU's sanction policy

Concerning the reasoning of the EU behind the sanctioning, the literature is divided. Giumelli et al. (2021) show a considerable variation in the trigger to sanction, based on different regions: sanctions in Europe have mostly been imposed because of (post-)crisis management, while democracy promotion is on average the cause to impose sanctions in Asia and Africa. But as mentioned in the introduction, other authors conclude that there is no clear pattern in the triggers for the EU to sanction (Brunner, 2009). More generally, the literature on the EU's sanction policy knows a lively, ongoing debate about the reasoning and motivation of whether or not to sanction. The authors can roughly be divided into two sections: rationalists² and idealists (Saltnes, 2017). In this discipline, rationalists point to the economic and security interests of the EU, which guide their decisions and actions. On the other hand, idealists adhere to Manner's concept of Normative Power Europe (NPE) (2002). Norms are the foundation of the European Union, and thus its identity and actions are shaped by values such as peace, liberty, democracy, rule of law and respect for human rights and fundamental freedoms (Mitta, 2018). The following paragraphs will take a closer look at the two streams in order to understand their arguments.

Half of the countries that score high on the Political Terror Scale, and can thus be accused of the violation of international norms, have not been sanctioned (Fürrutter, 2021). Rationalist arguments build on notions like that, as they point to the never-ending tension between these core norms and the inclination to improve European security (Pänke, 2018). Normative considerations are present in the decisionmaking of the EU, but these still first and foremost serve their own security and economic interests. Sanctions are more easily imposed on states who are of no severe economic or security interest to the EU (Del Biondo, 2011). Important energy suppliers or partners in the War on Terror are hardly bothered. Also in its vicinity, rationalists see the EU as more interested in stability than in democracy promotion. Another important factor is the colonial history between Europe and Africa. Former colonizers hope to keep their influence in their former colonies, of which France is the most prominent example (ibid.; Saltnes, 2017).

Nevertheless, authors also keep emphasizing the importance of norms and the interplay between norms and interests, since the focus on interests solely might be a superficial or one-sided explanation of the behavior of the EU (Sjursen, 2003; Saltnes, 2017). As earlier mentioned, the founder of the normative stream is Manners (2002), who emphasizes the ideational impact of the EU on others, instead

² Some of the literature labels this group of authors realists, because their explanations are interest based. However, this thesis will use the term 'rationalists', as this group of thinkers exists of realists and liberal institutionalists.

of focusing solely on the distinction between a civilian or military power (which was the debate at the time). This is because the choices made in those policy areas, automatically reflect the (international) identity of the EU. For Manners, the discussion should be about the power over opinions and ideas, common principles and the ability to refute conventions (ibid.). With this, the conception of what is normal is shaped, or in other words 'norms'. Saltnes (2017) considers the option that the decision to not impose sanctions might be because of a contestation between norms, instead of a conflict between norms and interests. Following norms is as rational as following interests. Different norms are considered and weighted, and eventually one is considered the most valid. Discrepancies can be explained by conflicting norms, since in different situations, other norms take the upper hand (ibid.). More idealist scholars show that norms are an essential feature in explaining EU foreign policies.

Sjursen (2003) argues that a rationalist explanation of the decisions of the EU alone lets important aspects unexplored. Longer term changes within the CFSP cannot be explained or examined by the rationalist perspective alone, since self-interested actors are by definition short term. There is thus need for another perspective, to supplement the realist one, which she labels the 'deliberate perspective' (ibid., p. 2). Analysis of the European policies should not be limited to either one of the perspectives, since both use different concepts which can shed light on different dimensions of EU foreign policy. Yet these perspectives should not be seen as descriptions of reality, but they both 'tell stories' (ibid.). Del Sarto (2016) also points to the interplay between interests and values and tries to explain the European policies through a synthesis of these. Throughout history, empires have always tried to impose their normative self-image on surrounding states, stabilize them and take economic advantage. The EU also follows this pattern. However, because of its normative construction and specific history, the EU is inclined to act as a normative power. Transferring these normative rules serves the European interests by stabilizing its surroundings (ibid.).

Although most of the above authors do not name it as such, their ideas and convictions are grounded in classical theories: realism and constructivism (Del Sarto, 2016). According to classical realism, the international political arena is all about power: more powerful states have more influence and are always on the look for more power (Mearsheimer, 2013). Notably, relative power is more important than absolute power, since politics are a zero-sum game. National interests are thus primary, and for the survival of the state, national security is key. This all is placed above international norms and values. Cooperation between states is only possible if interests align (ibid.). Sjursen (2003) shows with the help of multiple examples, that European states actually are very much interested in each other's views and interests. Multiple times, member states have voted in line with the general frameworks of the EU or abandoned some particular traits of their own (foreign) policies, while this was unbeneficial for themselves (ibid.). She thus concludes that classical realism cannot make any sense of common European policies such as the CFSP, and turns to neo-realism and neo-liberalism. These streams make equal assumptions about driving forces in the international arena, namely rational states that pursue their own self-interest (ibid.). But they differ from classical realism in their actor approach: whereas the classical theory focuses on the power resources of actors, the 'neo' perspectives focus on calculations and negotiation strategies of actors. Of course, neo-realism and -liberalism differ in their accounts of cooperation, but their views on self-interest and their denial of the ideational factors are very alike (ibid.). In the sanctions literature, the rationalist stream explains the EU's actions as a consequence of their economic and security self-interest. States can work together and sometimes give in to other states, if this is in the end beneficial for themselves. Normative considerations are not taken seriously. It follows that the rationalist scholars arguing against NPE fit in neo-realism.

In contrast, constructivists emphasize the ideational characteristics of politics, instead of the material. Norms are the social basis of the international arena, and are defined as 'the intersubjective beliefs about the social and natural worlds' (Sjursen, 2003, p. 12). Constructivists focus on the constitutive characteristic of norms and shared understandings, next to the relationship between agency

and structure (Fierke, 2013). Subjects of politics are not static, but change in accordance with their surroundings. Their distinct identities are shaped by cultural and material factors and contexts in which they are embedded. Interests of these actors are created in a ‘world of social meaning’ and are tied to their identity (ibid.). Where rationalists follow a ‘logic of consequences’ and turn to structures to explain states’ behavior, constructivists focus on how structures influence the identity of actors and are thereby guided by a ‘logic of appropriateness’. The international arena consists of shared understandings of legitimate behavior, which is defined by norms and values (ibid.). According to Sjørnsen (2003), cooperation of European states is more easily explained on the basis of ‘appropriateness’, since coordination is practiced like a habit instead of like a rational consideration. Unlike realism, it can explain irrational behavior. Idealists in the NPE debate closely follow the above logic. Norms shaped the identity of the EU (Mitta, 2021), and states are sanctioned because they violate international norms, such as human rights or democratic standards (Fürrutter, 2021). The decision to sanction is based on values instead of triggered by own interests.

Given the intent of the EU to be a hard power on the international stage (EEAS, 2022), rationalists and idealists can no longer provide a satisfactory explanation of the ongoing sanction policy. Rationalists would expect the sanction policy to change, because of its quest of countering Russian influence. But why then does the sanction policy not adapt to this intent to balance power and continues to be the way it was? Idealists would argue that this shows that the EU acts according to its values, and continues to impose sanctions because of promoting democracy and human rights. Nevertheless, the EU is clear in its intent to act more realist, thus an adjusted sanction policy (with less idealist commitments) would be a logical consequence. As shown, this is not the case, as the policy continues to be the way it was. It is thus useful to look at the debate around the sanction policy of the EU from another theoretical angle. Policy paradigms can be a suitable way to further investigate the EU sanctions policy, in order to explain the choice to sanction, whilst it sometimes seems irrational or counterproductive. The following part, in that regard, looks into the useful concepts in what a policy is constituted of, how policies are influenced, and in the end might change or why they do not. The characteristics of policies are looked into, in order to specify it onto the EU sanction policy in coming chapters.

2.3 Policy paradigms and ideas

This thesis looks at the sanctions policy of the EU from a new theoretical point of view: policy paradigm literature. The next paragraphs will shed light on the importance of ideas for eventual policy alteration, so that subsequently it can be investigated how ideas play a role in the EU sanctions policy. Insights given by these paragraphs make it possible to operationalize ideas in the following methods chapter, and thus eventually draw conclusions about the steady EU sanction policy.

The nature of policies, their content and their alteration are studied in the policy paradigm literature. O’Sullivan (1993) describes policy paradigms as frameworks that embody linguistic, normative and epistemic dimensions. Policy scholars have known an ideational turn: more and more policy changes have been explained with the help of ideas, instead of the ‘usual suspects’ such as interests, institutions and socioeconomic conditions (Swinkels, 2020; Daigneault, 2015). It is no longer the question if ideas matter for political science, but *how* (Daigneault, 2014). Manners (2002) already pointed to the importance of ideas and conceptions, and the ability to build and refute them. Béland and Cox (2010) give an explanation of what ideas are and how they work. Actors are motivated by innumerable ideas, which can contain their interests, but also their values, ideals, fears and so on. Shared ideas give substance to what action is deemed legitimate. The authors define ideas as causal beliefs, as they propose connections between things and provide guidance for action (ibid.).

The policy paradigm literature owes much to Peter Hall, who is positioned within the broader theoretical framework of historical institutionalism, and laid important foundations for the ideational turn with his insights (Wood, 2015). In his definition, a policy paradigm is ‘a framework of ideas and

standards that specifies not only the goals of policy and kind of instruments that can be used to attain them, but also the very nature of the problems they are meant to be addressing' (Hall, 1993, p. 279). Through ideas, paradigms can legitimize or challenge existing policies and institutions (Béland, 2009). So policies are guided by sets of beliefs, and these in their turn identify the relevant problems and their solutions (Princen & Van Esch, 2015). A central concept is the social learning process, by which actors interact and share information, which may lead to the emergence of new policy paradigms. Social learning can thus be seen as a driver of change, according to classical paradigm literature (Hall, 1993). The paradigms guide the learning processes, through which existing policies are evaluated (Béland, 2009). In periods of crisis or uncertainty, actors might look for or turn to other ideas in order to solve the puzzles they are confronted with (ibid.). From the above concepts, it becomes clear that policy paradigm theory is based on the paradigm change theory of Kuhn. He distinguishes periods of 'normal science', which get interrupted by 'revolutions' when the prevailing paradigm cannot solve all the puzzles anymore (Kuhn, 1996).

Kingdon looks at the content of the policy agenda and why some ideas are included while others are not (in Béland, 2009). Also, ideas can constitute a public discourse, which together with framing processes may influence relevant actors, such as policymakers, interest groups, or the general population. Cox describes this as 'the social construction of the need to reform' (2001, p. 464). Political leaders can mobilize a public debate and gain support through framing. This is often an important instrument for policymakers, also in the case of implementing sanctions. Cox names this process 'path shaping' (ibid.). Taking a closer look at Kingdon, in his book he investigates why government actors attend to some subjects and not to others. In this regard, he takes a close look at the agenda (the problems policymakers pay attention to) and the alternatives (the potential solutions to the problems) (Béland, 2016). Kingdon distinguishes three independent streams, namely the problem stream, policy entrepreneurs and policy windows. Ideas are a very important component of the problem stream, as they construct things as a problem when they mismatch with desired expectations. As regards for the policy entrepreneurs, they might be guided by self-interest, but their own values are also factors in the policymaking. Lastly, the policy windows are unique opportunities for reform (ibid.).

The notion of the importance of ideas for policymaking is labeled as 'discursive institutionalism', which is rather similar to designations as ideational institutionalism, constructivist institutionalism or strategic institutionalism (Schmidt, 2008). Schmidt also categorizes the ways in which political scientists use ideas, namely at three levels of generality: policy, programmatic and philosophical ideas (ibid.). Carstensen and Schmidt (2016) made an effort to provide tools to analyze ideational power. They argue that ideational power is comparable to other sources of power, and for this notion they lean on scholars such as Foucault and Gramsci, who all adhere to the central role of ideas in relations of power (ibid.). In order to give a theoretical framework of ideational power, the authors come up with three different types. Firstly, 'power through ideas' is the capacity of actors to convince others of their course of action, through ideational elements. 'Power over ideas' relates to the capacity of agents to reject new ideas in policy-making, because some actors have the power to control the meaning of ideas. 'Power in ideas' is about the institutional constraints to new ideas (ibid.). Ideational power is defined 'as the capacity of actors (whether individual or collective) to influence other actors' normative and cognitive beliefs through the use of ideational elements' (ibid., p. 321). This can happen directly, but also due to the ideational context that influences the possible solutions or options. With this definition, the authors attempt to grasp the arguments about the importance of ideas together: ideas justify actions because the world is interpreted through ideational elements. Ideational elements provide among other things discourse, narratives, frames, norms and identities (ibid.).

The above paragraphs clarify the relation between policymakers and their institutions, shaped by the power of ideas. Ideas have the capacity to alter the debate or keep the policy as it is. Through ideas, actors are able to influence the normative notions of other actors. In order to know more about

the sanctioning policy of the EU, it is important to know the actors, their ideas and ideas imposed on them, and the institutional constraints and possibilities they get. This can give an explanation for why the EU sanction policy is shaped and conducted the way it is. Ideas have structured our thinking about the need to sanction and their effectiveness; due to them, the sanctions paradigm can be either entrenched or challenged. Next, it will be investigated how policy paradigms get contested.

2.4 The viability and demise of policy paradigms

The following paragraphs will discuss shifts in policy paradigms, which can be applied to the missing fluctuation in the EU sanctions policy. Hall has shed light on the instances in which policy changes occur, namely at three levels: the settings of the basic instruments of a policy, the instruments themselves and the hierarchy of goals behind the goals of the policy (Hall, 1993). These align with Schmidt's levels of generality (policy, programmatic and philosophical ideas) (Delputte & Orbie, 2020). Changes in the settings of the instruments or in the instruments themselves, can be seen as 'normal policymaking' (this corresponds to the periods of 'normal science' in Kuhn's theory). However, Hall's third category entails radical changes in the policy discourse and is associated with a paradigm shift. These 'big ideas' in the background will hardly be contested, except for moments of deep crisis (ibid.).

Certain circumstances are needed for a paradigm shift, for it is such a radical shift. First, policy failures are important triggers, since it leads to dissatisfaction with the policies in place. Major crises will be attributed to the existing paradigm, and thus policy actors start looking for alternatives. The accumulation of anomalies will first lead to a stretch of the paradigm, but this undermines the coherence of the paradigm and will thus end in a shift (Hall, 1993). A second trigger might be ascribed to policy actors or 'experts', who challenge the current paradigm by suggesting alternative ideas. Due to the policy failures, relevant actors will start searching for a new paradigm (Delputte & Orbie, 2020). Notably, this process of weighing new alternatives is more sociological than scientific. The diverse views of the experts on new paradigm options cannot be made on scientific views alone. The choice will thus be based on 'a set of judgments', which are of a more political nature (Hall, 1993). The eventual outcome is also influenced by the position of the actors in the institution and external factors that give advantage to the actors who back a paradigm, to impose its paradigm over other paradigms. Third, power shifts are a likely precedent of paradigm shifts. Experts can have conflicting views on the matters, and politicians will have to decide which set of actors they grant the authority over the affairs (Hall, 1993; Delputte & Orbie, 2020). Furthermore, policy paradigms are incommensurable, another concept Hall (1993) lends from Kuhn (1996). Facts cannot be relevant in two paradigms at once and paradigms cannot be combined. They are thus *internally coherent* and *mutually exclusive* (Carstensen, 2015).

A further assumption about policy paradigms, which closely follows Kuhn's logic, is that policymakers can only observe problems through a particular lens, which structures reality at that point in time (Princen & Van Esch, 2015). In this paradigm, not every evidence or fact is as convincing as others. A paradigm is thus not a neutral set of beliefs, but filters possible reactions to problems over other ideas. Importantly, policy paradigms are relatively stable, since they do not mirror reality, but structure it. Facts that cannot be rhymed with the paradigm will be ignored or reinterpreted. Consequently, policy changes normally take place within an existing paradigm and lead to changes in details, but not in an underlying philosophical change (ibid.). Like Hall, Princen and Van Esch argue that paradigm change is more likely to happen when there is a change of actors, instead of in an established political community. In a 'closed policy community', the social pressure to adhere to a dominant paradigm is higher (ibid.). Alternatives have a harder time entering the debate, and thus a dominant paradigm is more likely to be established. When actors have a clear shared interest, they will probably adhere to one set of policies, in line with the paradigm. The number of veto players in policymaking has a negative influence on the establishment of a dominant policy paradigm (ibid.). Importantly, Princen and Van Esch depart from Hall's incommensurability claim, as they state that

multiple 'ideal typical' policy paradigms can co-exist in policymaking, without undermining the coherency of an argument or working of the paradigm (ibid., p. 372). Mixes between policy paradigms can exist, with varying emphasis. This does not automatically lead to paradigm change, as it does not necessarily cause inconsistencies.

Cianciara (2017), like Hall, points to the consequences of crises. For her, shifts are the result of actors' concerns about legitimacy, which in its turn has come up because of insecurity and uncertainty. Also, she uses 'shift' instead of 'change', because she does not expect the European policy to change abruptly (ibid.). Cianciara uses the concept of a 'narrative', however her definition of this is equal enough to the definition of the paradigm concept to use her insights in this framework, as she states that narratives are cognitive resources, which can be strategically used by actors. They are thus especially helpful in times of uncertainty and insecurity (ibid.). Narratives do not reflect reality, they rather shape it, just like paradigms. Due to this shaping function, they can also be used by actors to persuade other actors. In this process, narratives are used to legitimize policies (ibid.). However, Cianciara lays much emphasis on structure, since actors are not free to choose their narrative, but are guided by the available discourses. Discourses are embedded in historical and cultural contexts and structure narratives. At their turn, specific policy narratives are founded by more overarching narratives. These different 'narrative levels' need to be consistent, in order for the EU or any institution to be legitimate and conceivable (ibid.). Policies should not be seen as targeted solutions, but as legitimizing narratives. According to the author, this should end the debate between realists and idealists or interests and values (ibid.).

Wood (2015) discusses the earlier named concept of 'social learning' as the main driver of paradigm change. Actors deliberate the successes and failures of policies, and supplemented with an external struggle for institutional resources ('puzzling' and 'powering'), this leads to a paradigm change (Hall, 1993). However, social learning cannot explain the counterintuitive decision to continue with failed policy paradigms, or to discard functioning policies and their paradigms. This policy change cannot be driven by the rational learning process, but can rather be ascribed to emotional or normative factors and legitimizing narratives (Wood, 2015). He uses the concept of politicization and depoliticization: politicization takes place when issues turn into subjects of human agency, such as deliberation and further decision-making, when earlier they were not. Affairs that are taken for granted, or perceived as inevitable, become exposed and questioned. Depoliticization, on the contrary, points to a process in which issues are deliberated less and less, and in the end are seen as inescapable. Contingency is removed, while permanence and necessity are created (ibid.). These concepts align with Hall's third order change, since politicization implicates questioning underlying assumptions that structure society and depoliticization is about entrenching such guiding assumptions. In these processes, policy paradigms become either challenged or indisputable. In the end, Wood prefers this rhetorical explanation for policy paradigm change over the rational social learning, because there is no specific or clear reliance on evidence of policy failure in case of a shift. The formulation of ideas that construct an argument by giving people the belief that 'there is no alternative' are more convincing than empirical evidence, and the same goes for deconstructing assumptions by showing attractive alternatives (ibid.). Thus Wood defines (de)politicization as 'deliberate attempts to alter policy through the rhetorical recognition or denial of the capacity to alter collective practices, institutions and social conditions' (ibid., p. 14).

According to the social learning process, actors are able to develop their beliefs in a complex fashion, based on experiences and new insights. Opposite of this, other scholars adhere to the conception that actors only change their beliefs when anomalies are accumulated to undeniable proportions. Until that point, actors will try to avoid and deny inconsistencies. Due to this high level of normative and moral declarations, this process is more in line with Hall's third order change, according to Wood (2015). The inherent rightness of a policy is justified by constructed binary distinctions. Actors evaluate policies in black and white terms, such as good versus evil, efficient versus inefficient, alternatives

versus no alternatives, etc. Debates about successes and failures will have relatively simple arguments instead of detailed, nuanced analyses. This construction of simple narratives can be labeled as ‘political storytelling’ (Bevir, 2011). Actors will ensemble around political cleavages and simple policy statements, in order to provide coherence (Wood, 2015).

Daigneault (2014a) has made an effort to enlighten scholars about easy and often made misinterpretations of Hall. When studying paradigms, the ideas of policymakers should get as much attention as the policies eventually adopted, but they should also be clearly distinguished. Derived from the notions of Hall, Daigneault states that policy paradigms are necessary but not sufficient for third order policy change. Paradigms are the means through which policy change can take place. However, another motivation is needed, namely a crisis or at least a severe policy problem. Next to this, a catalyst is required: the political actors (ibid.). This is in accordance with Kingdon’s three streams of problems, policy and politics. Daigneault sees a lot of validity problems in the paradigm study field, and thus provides a couple of propositions for his colleagues. Policy paradigms are normative ideas, subjectively and jointly held by policy actors. They consist of four ‘dimensions’: values and assumptions about reality, social justice and the correct role of the governing institution; an interpretation of the problem; a conception of which objectives and policy ends should be strived for; and which policy instruments would be suitable for the desired outcome. A shift will only take place after a change in all these four dimensions. The operationalization of ideas in the methods chapter will build on this. Like the other authors, Daigneault stresses the importance of internal coherence of a policy paradigm in order for it to survive.

Baumgartner (2014) at his turn discusses Daigneault’s insights on paradigms. Coming back to Hall’s definition of policy paradigms, Baumgartner again stresses the power of ideas. Ideas can be more or less powerful and influential: not all ideas are or become paradigms. He suggests to identify the ideas linked to policies and subsequently determining their power or salience. After having measured ideas, actors should be identified, and lastly, policies can be measured (all separately). Summarized, policy change can take place when an ideational change has occurred at all levels. Shifts in ideas can lead to shifts in policies, since relevant actors use their ideas to pursue their preferred policies. Coherent policy communities need to have a consistent set of policy ideas in order for this transformation to happen, which is thus rarely. However, in areas where ideas are in constant struggle, change is more likely to happen (ibid.). This thus again points to the need of identifying the ideas of relevant decision makers regarding European sanctions.

The above literature clarifies what would be needed to severely change the sanctioning policy of the European Union. These are crises described to policy failures, anomalies leading to alternative ideas, power shifts and challenging actors. All these factors rely on the ideas of relevant policy actors. In order to get insight into why the EU keeps making the same choices in its sanctions policy, the above elements can be taken into account and further investigated, namely the important actors and how significant ideas structure the reality around the sanctions policy. It is important to know how policy paradigms work and which factors influence them, so more can be said about the ‘status’ of the EU sanction policy: unchanged, destabilizing, contested or changed. Whereas most of the paradigm literature adheres to the idea of ‘fast fundamental change’, as laid down in historical institutionalism (Peters, Pierre & King, 2005), this thesis distances from that claim. Instead of a sudden crisis that causes change in the policy outcome, this research will look at the *process* in which the paradigm might get contested. The above discussed causes of change do not have to lead to a sudden switch of paradigm. The expectation of Hall (1993) that contestation will definitely end in policy instability and change, is more and more questioned in recent research (Alons, 2020). Rather, it might be interesting to look into anomalies that get noted by policy actors or alternative ideas that come to the fore. How are things in this possible opening for change? Is it possible to open the black box that is positioned moments before change takes place? Paradigm theory, and its emphasis on ideas, might be a good tool to do this. Notions

of incremental change are for instance found in literature of Vivian Schmidt (2002; 2011), but also in the work of Carstensten (2011), who is often seen as a critic of the policy paradigm approach (Wood, 2015). He claims that although ideas might be important during times of crises, ideas in times of ‘normal policymaking’ should not be neglected and thus transformative, incremental policy change should be further extensively theorized (Carstensten, 2011). Conflicts over ideas, although below the surface, can be drivers of incremental change (Peters et al., 2005). Furthermore, crises are factors external of the theoretical model. How does change happen within an institution and among policy actors? Most ‘classical’ paradigm scholars, such as Blyth (2002), see ideas as stable factors during normal policymaking. Might it not be more interesting for ideational research to look at the process of developing ideas? A shift in ideas over time can account for influential policy change, as it unnotably alters the conception of actors (Carstensen, 2011). This reflection will be further scrutinized in this research.

Daugbjerg, Farsund and Langhelle (2017) have convincingly argued that contestation can be present in a policy domain, along with instruments that might adhere to different paradigms. Nevertheless, a policy can still be resilient and stable according to them. Alons (2020) builds on notions like this when she shows that actors might have more strategies at their disposal when a paradigm moves away from being entrenched or, in her termination, dominant. It grants policy actors more room for maneuver in legitimizing their policies. During these incremental changes, the core of the policy stays unaffected. Furthermore, the above authors question the concept of incommensurability, with comments also brought up by Princen and Van Esch (2016). Alons (2020) proposes a distinction of ideas between the epistemological and the political level, in order to preserve incommensurability at the epistemological level. Multiple research shows that paradigms in reality can be a bit fuzzy. They can overlap and actually be commensurable. It is thus proposed that ideas can be considered as abstract ideal types on an epistemological level, whilst being perceived as ‘actionable’ ideas at the political level (Wilder, 2015; Alons, 2020). In practice, policy actors are engaged in deliberation, discussion and compromises, which might undermine the apparent coherence or ‘purity’ of a paradigm. Concluding, the coherency of a paradigm is a social construct. It cannot be established as a fact, but is grafted by how relevant actors perceive it. It follows that the analysis of this research will adhere to this notion. Incremental change is thus a new field of interest, which points to a further contribution of this thesis: classical paradigm literature is combined with some of its criticisms that point to the need to look into the process of change. That said, the following stages of a policy paradigm in this process are proposed: entrenched, contested, destabilized or changed. The operationalization of these stages will follow in the methods chapter.



Figure 3. Stages of a policy paradigm.

2.5 Summarizing remarks

Since the paradigm literature is so intertwined with ideas and policy actors, it makes sense to look into their thoughts about realist versus idealist actors and tie the discussed theories a bit together. According to Kingdon, political scientists look at policy actors as self-interested, however this is because the influence of ideas is not considered (Kingdon 1993, in Béland 2016). In order to know motivations and goals of actors, their ideas are needed. These motivations can serve self-interest, but also other ends. Self-interest alone cannot explain actors’ behavior, only a wide variety of motivations can. Notably, Kingdon does not deny the role of interests altogether, however he thinks it is impossible to draw a clear

line between interests and ideas. They are ‘different but inseparable’. This is because ideas give meaning to self-interests (ibid.).

Some authors criticize the ideational turn in the policy literature, since it is difficult to ‘model’ ideas. For instance, Jabko and Schmidt (2021) argue that the literature overstates the ideational coherence in policies. Rather, policies are crafted in processes and practice, and linking ideas to these practicalities bypasses the distinctiveness of policy paradigms. Because of this fuzziness, paradigms lose their meaning. These authors state that change is an ongoing process, and the paradigm literature conceals this. However, ideas are one of the ways to look at policy change, and authors like Daigneault (2014a) have also put emphasis on the political context (crises) and the policy actors. Hall states that ‘policy paradigms can be seen as one feature of the overall terms of political discourse’ (1993, p. 290). The policymaking process is crafted by multiple factors, it can be structured by a set of ideas as well as a set of institutions. These two augment each other, since the day to day practices of policymaking are based on ideas about what should be done in the policy sphere (ibid.). This thesis has aligned with the policy paradigm literature and the importance of ideas, in order to give new insights of the unaltered EU sanction policy. Despite listed uncertainties, a paradigm within the European policies can be found, as well as ideas that matter for this paradigm or that destabilize it. The above distinction of Alons (2020) between theoretical and actional ideas is also helpful in this regard, and diminishes the above criticism on ideas and paradigms. Recent literature indeed wants to grasp the process of policymaking, which diminishes the criticism of Jabko and Schmidt (2021).

Summarized, the above authors provide some cohering insights. Starting with Hall’s foundations, paradigm change occurs due to experts and because of policy failures. Anomalies have accumulated and the paradigm can no longer legitimize the policy. According to Cianciara, actors search for legitimizing narratives because policy crises have led to insecurity and uncertainty. Wood adheres to legitimizing narratives and adds emotional and normative factors as a cause for policy change. Anomalies will force actors to *rhetorically* weigh off other narratives. Daigneault once again points to the importance of ideas, and concludes that paradigm change, together with a crisis and actors as catalysator, leads to Hall’s third order policy change. Baumgartner suggests weighing the differences in power of ideas. With the notions of recent authors, the importance to look into incremental change is outlined. All in all, ideas and the legitimizing stories that stem from this, are important factors to measure in the coming chapters in order to give insight into the research question of this thesis.

3. Methods

This chapter will focus on the methodology used to research the sanction policy of the EU through the lens of policy paradigms. It will describe the case study approach, choices of the case and used material will be defended, and the concepts given in the theoretical framework will be operationalized.

3.1 Case selection

As pointed to in the former chapters, this thesis tries to apply the insights of policy paradigms to EU sanction policy. In search for explaining mechanisms behind the EU's decisions around sanctioning, it is useful to look into a situation in detail and thus conduct a case study. As pointed out by Gerring (2004), a case study especially lends itself to descriptive and illustrative inferences. This is also the goal of this thesis, as a new theoretical angle is applied to sanctions, rather than testing specific hypotheses or theories against each other (Gerring, 2017). The case study in this research illustrates how policy paradigm concepts can be adjusted and shed new light on the EU sanction policy. It is stated that the EU has a steady trend of sanctioning and the objective is to get a better understanding of the unaltered policy. This thesis has thus opted for including typical cases, as it wants to study a common pattern (*ibid.*) This method provides a way to look within the case (Seawright & Gerring, 2008). In this thesis, the details of the case are examined, to illustrate a broader theoretical argument (Levy, 2008). This also points to the added value of a second case: plausibility of the paradigm argument is probed twice and thus representativeness is enhanced. This is useful because specific concepts of the paradigm literature can be studied and applied in depth, such as whether or not a change is visible. In order to see if the paradigm lens gives a new explanation for EU sanction decision-making, a detailed examination of a case is needed. An often named problem when doing case study research is representativeness. In societal studies, there is often much variation between cases and it is thus difficult to make broader inferences (Gerring, 2017). However, by taking a typical case, this problem can partly be overcome, as it is more clear which broader phenomenon the selected case is a case of. By taking a case that can be seen as a 'mean' or 'median' case, the highest representativeness is obtained. Also, case studies give the opportunity to look into complex situations and phenomena and historical context. Internal validity can be preserved in this way. As Gerring (2017) states, at the end of a case study, researchers are so well-informed about and familiar with the case that they are very unlikely to be fooled by any threats to the research.

In search of overcoming the problem of representativeness, this thesis has made the effort of looking into two cases: Myanmar and Mali. The case of Myanmar is chosen because it knows a turbulent history, on which the EU had multiple reactions. In this way, earlier policy statements and choices can be compared to current ones, in order to track any change in the (thinking behind) EU sanction policy. As said, Myanmar can be seen as a typical case, because the EU reacted with sanctions to undemocratic changes in the country, as is in line with expected EU behavior. The newest sanctions are quite recent, which makes it interesting to conduct conclusions about. In this way, the case of Myanmar is somewhat generalizable to other cases, since the EU stands for the same choices: how does it act upon undemocratic developments, while it also wants to ensure a certain geopolitical role? It wants to stay close to important countries and organizations, counter Russian and Chinese influence and come across as being a hard power. Insight into these conflicting incentives is also interesting for other cases and the EU behavior in general.

Mali is chosen because of the vocalized strategic interest of the country and its region for the EU (EEAS, 2021a), which pushes the EU to conduct the best suiting policies and adapt them to geopolitical and regional changes. The EU is ever more aware that the happenings there affect our continent, and has thus been employing strategies since 2010. These can be compared to current policies,

to see whether new considerations have been translated into them. As goes for Myanmar, this case again has interesting regional actors such as Economic Community of West African States (ECOWAS) and human rights groups that are invested in the humanitarian troubles. Also, Mali is seen as one of the main examples of Russia's growing influence in Africa, at the expense of Europe (Jourdain & Tuma, 2022). It is interesting to see whether and to what extent this will alter policies. Furthermore, the case is thus quite representative for the other countries in the region, as the strategies are sometimes regionwide, but also because Mali is seen as a typical example of Russia's spreading influence, which is expected to happen more and more in Africa from now on.

The outcome of the two cases is the same: the EU continues to opt for restrictive measures. The aim of this thesis is to investigate whether policy paradigms can deliver a new answer to the ongoing sanction policy of the EU. By giving two cases as example, the explaining power of paradigm literature for unchanged sanction policy is hopefully enlarged. The two cases are illustrative of how policy paradigms can explain the absence of change in sanctions policy. The added value of including two cases, is that the contexts of the cases are quite differential, whereas at the same time, underlying considerations of the EU might be the same. What is meant by this, is that the upgraded Global Strategy of the EU might be translated into both the Mali and Myanmar strategies: downgrading the influence of in the one place Russia and in the other China fall under this same new commitment. However, the cases also lend themselves for diverse considerations: the historical context of the cases is different, the trade relations know a different value, the relations with ECOWAS and ASEAN might play a different role, Mali lies more in Europe's geographical vicinity, and so on. When investigating two cases, the theoretical contribution of this thesis is increased by heightened representativeness.

This thesis will use three types of sources. Firstly it will conduct a document analysis, as important sources are the written strategies of the EU. These documents enable longer term observations and show the intended strategy of the EU. In this way, the foreign policy as well as views upon international relations can be determined. Secondly, insights are gained from speeches and discussions in meetings of EU actors, obtained through video and audio recordings. Thirdly, these will be triangulated with written sources of journalists and human rights groups. The sources are found on sites of the EU, newspapers, opinion blogs or policy briefs. Downsides of document analysis again lie in the selection: there can be a bias in favor of a desired outcome, which can be overcome by relying on a wide range of EU strategies and different secondary sources.

Next to the case and sources, choices have also been made about which actors are looked into. Debates within the European Parliament are analyzed, and the opinions of EU officials are collected, as well as the stances of member states in the European Council (hereafter shortly Parliament and Council). The Council is an important institution regarding sanctions, as it eventually decides whether or not to sanction (Helwig, Jokela, & Portela, 2020). The opinion of the HR/VP is an important step in the decision-making process, influences the debates in the EU, takes on the views of member-states and citizens, is influential in the international sphere and represents a common stance of the EU. The Parliament is included because it tries to influence the Council by its resolutions, and discusses up- and downsides of sanctions. The debates are openly available and have another point of view than solely a technocratic one. This thesis tries to establish a general view of the discussion around EU sanctions, and therefore has not made distinctions between party affiliated stances in the Parliament. Stances of the European Commission are not elaborated on in great depth, since this institution discusses the legal and technical aspects of sanctions, while this research looks into ideational factors such as views, beliefs, values and so on. As stated in the theoretical framework, contextual actors around the EU may have the ability to influence the debate. In this regard, the opinion of regional organizations, human rights groups and experts are analyzed. Their positive or negative view upon sanctioning might eventually alter the debate within the EU and is thus essential to interpret. Stances of relevant economic sectors such as the textile sector are included via discussions within EU institutions and social platforms or organizations.

3.2 Operationalization

European actors will be investigated on different aspects of policy paradigms. These aspects are mostly based on literature from Daigneault (2014a and 2014b), for he has made the effort to conduct a measurement of the ideas of policy actors. As stated before, most research on policy paradigms thus far were of a theoretical nature, and therefore research like this in which the concepts are put into practice is hardly needed. In his own research, Daigneault (2014b) comes up with four dimensions of a paradigm. These will form the basis for the operationalization in this research, however they will be partly adjusted in line with other theoretical insights from the previous chapter. This is in order to give the most comprehensive view of the elements of a paradigm and to make a typology unique for this thesis. Accordingly, the relevant European actors will be investigated upon the following four dimensions:

- i. Lens: values and assumptions about reality and self-perception;
- ii. Interpretation of the problem: perception of crisis or policy failure;
- iii. Goals: which (policy) ends should be strived for;
- iv. Means: suitable instruments.

Through this typology, the thesis hopes to organize the ideas of relevant actors. The above elements are abstracted from Hall's definition of a policy paradigm: 'a framework of ideas and standards that specifies not only the goals of policy and kind of instruments that can be used to attain them, but also the very nature of the problems they are meant to be addressing' (Hall, 1993, p. 279). So perceptions about reality can point to the set of beliefs of actors, which can in turn identify the problems, goals and instruments (Princen & Van Esch, 2015). The process of the emergence of a new paradigm is more sociological than scientific (Hall, 1993). It is thus very relevant to obtain beliefs of relevant actors: if crises are perceived, there are new openings for alternative views. Their lens upon the matter structures their reality and clarifies what is open for debate or what policy is inevitable; accordingly it paves the way for possible change (Wood, 2015). Ideas give guidance in which aims the policies should achieve, because ideas make sense of the world around them (Swinkels, 2020). The last element of the typology is relevant because in the end, the question is about the use of sanctions. Are sanctions the appropriate means for goals that are shaped by the actor's ideas? This typology will be supplemented with concepts explained in the theoretical framework. If too many anomalies add up, this could lead to an alteration of the paradigm. This is related to the struggle over ideas, which points to contestation of the reality presented by the paradigm. Some actors might have more ideational power over decision makers than others. These are all instances that might be present in the cases, or can be totally absent in case the paradigm is very entrenched.

Likewise, with insights from the paradigm literature in mind, some expectations on the status of the EU sanction paradigm can be outlined. If the sanction paradigm is very strong, little discussion will be found. No alternative ideas are brought to the table, also not by influential actors outside of the EU: the paradigm stays *entrenched*. Because it is argued that the EU sanction policy is unaltered, this is not an unlikely scenario. It is quite unlikely to find a situation in which the sanctions policy is criticized in every EU institution and among policy actors, although this would be an interesting finding. The paradigm would be *destabilized*. In this case, it would be likely that a 'crisis' around the sanction policy is found as well. Thirdly, a possible situation is that the EU sanction policy is somewhat disputed or debated under policy actors inside the EU: the paradigm is *contested*. Possibly, alternative ideas are present among experts or local institutions, and these slowly have their influence on ideas inside the EU. However, these alternatives will only have reached some individuals, and the EU Commission or officials will not be penetrated with new ideas. Among them, the choice to sanction is relatively easy and legitimate. Next to this, it is expected that the influence and attendance of Russia and China in the

cases will have some effect on the decision whether or not to sanction. This is because of the updated Foreign Policy of the EU, but also because international relations are increasingly on edge since the start of the war in Ukraine. The following chapter will look into these expectations.

Status paradigm	Empirics found	Expectation
Changed	Policy altered because of fundamental change in philosophical ideas behind the policy	Highly unlikely
Destabilized	Policy highly criticized in multiple EU institutions, alternative ideas likely to take the upper hand	Unlikely
Contested	Policy is under scrutiny and discussed among some policymakers, some alternative ideas come to the fore	Likely
Entrenched	No anomalies are discussed, no alternative ideas are brought up, policy only legitimate choice	Likely

Table 1. Empirical findings on the status of a policy paradigm.

4. Empirics

This chapter will look into the cases of Myanmar and Mali, in order to get insight into the EU sanctions paradigm. First, the foreign policy of the EU will be outlined. It will be argued that these policy documents characterize a realist hard power turn of the EU, and in what way it might be logical that this would also translate in a different European look on sanctions. Furthermore, this chapter will show that the embeddedness of policy paradigms may answer the question of why the EU sanction policy is unaltered. Regarding the Myanmar case, it will be demonstrated that economic sanctions are partly deliberated, however beliefs by EU actors about the sanction policy, including the perceived reality and goals, are not affected. Although some anomalies have occurred around economic sanctioning, they have not led to a major change. The paradigm structures reality for the actors in a way that sanctions are the legitimate policy. The same goes for Mali, where the encroaching Wagner Group could have been an incentive for Europe to soften its tone against the military junta. Nevertheless, EU officials opted for continuing sanctions. The cases will show this mechanism more in depth, after the change in the overall European Foreign Policy has been outlined.

4.1 European Foreign Policy

The perception of the role of the EU in international politics has and still is severely changing (Nitoiu & Sus, 2019). Not only scholars, but also European diplomats and policymakers have taken on the notion that the EU must take a more strategic and geopolitical stance in its foreign policy. The Arab Spring and the War on Terror already triggered this way of thinking, and certainly the crisis in Ukraine further incited it. Although the EU's foreign policy has been different than that of powerful nation states in the way that it wanted to overcome Realpolitik, its goal still is to have a strong presence in the international affairs (ibid.). Geographical vicinity has been an important factor in foreign policy, which becomes clear when looking at the European Sahel Strategy or other strategies for its Southern Neighborhood. Next to this, the EU has of course also followed the pivot to Asia and wants to leave its mark there, since the European values are seen as universal and essential to promote everywhere (ibid.). But focusing solely on values and economic integration does not seem to be an option anymore in the changed political landscape. In the past decade, the power of the United States declined, and authoritarian regimes have gotten into office in diverse countries (Lehne, 2020). The self-perception of the EU is thus up for a shift, as Europe has noticed.

That the EU is striving for a more traditional role for itself in the geopolitical arena, is also displayed in the narratives of the European External Action Service and EU officials, and reflected in the EU Global Strategy. It is now openly acknowledged that the EU should put its own interests first (Nitoiu & Sus, 2019). According to EU officials, this was already going on before the Ukrainian crisis, but it is important to now secure the 'European awakening' and make it permanent and consequent (EEAS, 2022). On the EEAS site, multiple stances underline the need for a hard power identity of the EU, such as the following words of HR/VP Borrell: 'Making Europe also a hard power. I am convinced that the EU must be more than a soft power: we need hard power too. However, we need to realize that the concept of hard power cannot be reduced to military means: it is about using the full range of our instruments to achieve our goals. It is about thinking and acting in terms of power.' (EEAS, 2022). Dialogue is favored over confrontation, but in order to establish a dialogue, power and resources are needed. Europeans need to learn to speak the language of power. In relation to China, this means Europe needs to be less naïve and better anticipate to their less open policies. The relations to the Indo-Pacific regions are also seen as a competitive field (ibid.). During her time as HR/VP, Federica Mogherini also opts for a hybrid approach between soft and hard power, and sees it as the only way to answer the security challenges the EU faces. Investing in other countries in the form of humanitarian aid or

development is not charity, but a selfish investment in our security in her words (EEAS, 2017). Also the European Commission admitted that own interests have not been fully served (Pänke, 2019).

These insights are not only spoken, but also written down in the EU Global Strategy. The interests of the European citizens are put on the forefront and the sense of a threat and crisis is depicted. The EU needs to think and act strategically, to deal with the evermore instable surroundings. The first words of the Strategy, written in the foreword of Mogherini, are the following: ‘The purpose, even existence, of our Union is being questioned. Yet, our citizens and the world need a strong European Union like never before. Our wider region has become more unstable and more insecure. The crises within and beyond our borders are affecting directly our citizens’ lives. In challenging times, a strong Union is one that thinks strategically, shares a vision and acts together.’ (European Union, 2016, p. 3). Furthermore, the Strategy itself begins with: ‘We need a stronger Europe. This is what our citizens deserve, this is what the wider world expects. We live in times of existential crisis, within and beyond the European Union. Our Union is under threat. Our European project, which has brought unprecedented peace, prosperity and democracy, is being questioned.’ (European Union, 2016, p. 7). According to Pänke (2019), the shift in the narrative of EU policy documents points to the need of reconsidering Manner’s Normative Power Europe.

Zooming in on sanctions again, scholars have also noted the challenges for these European restrictive measures. The way the EU presented them until now, sanctions were mostly a way to pursue compliance with international norms (Helwig, Jokela, & Portela, 2020). The EU has difficulties with answering actors that use sanctions as a hard power instrument, such as the United States. There were already calls for a more flexible EU sanctions policy framework, but the above described revealing awareness of a new geopolitical arena, set the need for a more extensive discussion about sanctions as foreign policy instrument of the European Union (ibid.). The shift in thinking about EU Foreign Policy and its place in international relations is clear. The rest of the chapter will investigate why this change has not been profoundly translated into the EU’s sanctions policy.

4.2 Myanmar

4.2.1 Context and European engagements

Myanmar knows a long infamous and violent history, in which the EU has actively tried to bolster human rights and democracy already since the 1990s, partly through sanctions (Poletti & Sicurelli, 2022). In 1996, the military junta (known as Tatmadaw) was accused of imposing forced labor to the population, which led to the European decision to impose harsh economic sanctions. The Generalized System of Preferences offers developing countries unilateral advantageous entry to the European market, and was in this case halted for Myanmar. This is interesting, because it was the first time this happened in the history of EU foreign policy, and in the last round of the recent sanctions the EU refrained from this measure (ibid.). Importantly, this points to the paradigm getting somewhat contested. Further analysis below will show that this is because of the ideational power of economic actors. After the sanctions in 1996, the European-Myanmar relations came at a low for multiple years (Dosch & Sidhu, 2015). In contrast with the current affairs, the EU dropped its effort for a ‘critical dialogue’ and diplomatic relations became impaired. Remaining interaction solely focused on humanitarian aid, an aspect the EU wanted to adhere to more next to its sanctions from 2007 onwards (ibid.). The extent to which the EU should still provide financial assistance to sanctioned states is often a point of discussion, which will also be shown in the case of Mali. The EU-Myanmar relationship began to grow after the quasi civilian government of U Thein Sein took the first steps towards democratization in 2011 (EEAS, 2018; Staunton & Ralph, 2019). Improvements in press freedom, peace with ethnic armed groups and socio-economic recovery led to the suspension and later lifting of sanctions by the international

community, with the exception of the arms embargo (ibid.; ibid.). The Everything But Arms (EBA) agreement, which grants Myanmar important trade preferences, was restored. Notably, human rights groups disapproved of this decision, as in their view promises by Myanmar remained unfulfilled and progress was halted (Human Rights Watch, 2013). Democratic efforts were thus enough to quite fast lift the sanctions. This is in line with the paradigm, as the goals of the policy are obtained, after which sanctions can be eased or removed. At this point in time, the paradigm is entrenched.

The most important reason to lift the sanctions, was to support the initiated democratic process, instigated by the first democratic elections that brought Aung San Suu Kyi and her party National League for Democracy (NLD) into office in 2015 (EEAS, 2018). Importantly, the EU was open about its strategic interests in a peaceful Myanmar. The country has a key position in the region, and good relations between the EU and Myanmar could also further strengthen the EU-ASEAN connections (European Commission and High Representative of the Union for Foreign Affairs and Security Policy, 2016). Of course, economic advantages were also noticed, since Myanmar could provide cheap labor, a new market and natural resources. Regarding to the EU itself, they played a ‘crucial role’ in this democratic shift and economic recovering, because of the removal of sanctions (ibid.). The EU tried its best to build the idea of a mutually beneficial and special relation, by assisting the military and government in numerous projects, and provided multiple millions for state capacity building and development (ibid.).-Here it is visible how the paradigm structures the legitimacy of the sanction policy. In the created reality, the reason behind imposing or lifting sanctions becomes justified by highlighting its importance.

However, the democratic efforts were not enough to prevent history from happening, as in the years after the elections a genocide took place, as well as a coup by the junta. Inhumane actions by the Tatmadaw against the Rohingya caused a humanitarian crisis, with thousands of people displaced or killed. The international community considers the happenings as ethnic cleansing with genocidal intent (BBC, 2020; Naing & Van den Berg, 2019). Naturally, this deteriorated the relations between Myanmar and the EU, which installed sanctions once more (EU Sanctions Map, 2023). Poletti and Sicurelli (2022) analyzed why sanctions have not been tougher after the genocide. They look into the possible domestic winners and losers of the EU’s sanction policy. On the one hand, EU policy actors have always focused on economic actors, who lobby for beneficial trade policies, such as market liberalization. On the other hand, humanitarian organizations became more and more important for EU policymakers (ibid.). The authors conclude that in 2017, the region was too interesting for investors and retailers to withdraw their businesses after the genocide. Instead, they actively mobilized for a softer economic sanction approach. Policymakers admitted that they were responsive to these lobbies, regardless of the global humanitarian attention to the humanitarian violations. It seems to be that economic actors had enough ideational power to influence the EU policymakers. Economic incentives have thus contributed to the softened EU approach to Myanmar (ibid.). This already hints at the importance of economic actors for the EU policymakers, and how their ideas can be a contestation of the paradigm.

The EU reacted with multiple rounds of sanctions to the coup by the junta in 2021, which entail for instance travel bans, asset freezes, arms embargoes, export restrictions and freezing of financial assistance to the government (EU Sanctions Map, 2023). Furthermore, the EU has decided to sanction MOGE, Myanmar Oil and Gas Enterprise. This state-owned company was under military control since the coup. The U.S.A. and UN have so far failed to install this sanction (Human Rights Council, 2023). Notably, the European Council decided to also implement a derogation clause in the sanction, which means that European oil and gas enterprises that are still located in Myanmar may pursue financial interactions with MOGE (International Federation for Human Rights, 2022). Moreover, Myanmar is still granted with the EBA agreement, although it could have been suspended because of the grave violation of human rights. Importantly, these decisions thus mark a change when compared to economic restrictions in the 90s. As already said, this could be seen as a contestation of the paradigm. The 2021

coup did lead to a suspension of humanitarian and development aid, in order to prevent the military would benefit from the money (Blenkinsop, 2021).

Concluding, the earliest EU sanctions on Myanmar were quite harsh, reflected in its economic as well as diplomatic exclusion. After approximately the first decade, along with the sanctions came humanitarian assistance, and under pressure some diplomatic engagement. However, after the elections the EU was very positive and made efforts for a mutually beneficial relationship. The promotion of democracy became the highest priority and covered the signs of the genocide. This came at a halt with the humanitarian disaster in 2017, but mostly with the coup in 2021. However, the EU this time did not opt for total isolation. Myanmar stayed under the EBA regulation, and also after the genocide, the EU met Myanmar at the annual Human Rights Dialogue (EEAS, 2021c). Economic considerations were thus more present in the recent decisionmaking around sanctions than at the beginning of the century. Economic sanctions are more up for debate than earlier: they are not easily taken as natural, but are subject to deliberation. The next paragraph will study the relevant actors and their judgments on the sanctions after the genocide and coup.

4.2.2 Actors and their ideas

Important actors in the above described history of Myanmar and Europe, have been European institutions and officials, human rights groups, and experts such as journalists or scholars. In order to know more about the sanction policy of the EU, it is important to know their views upon it. Building on the policy paradigm literature, this goes further than opinions, but it is also about the constructed reality around the sanction policy. Which ideas were important for the policymakers, and which ideas might have been ignored or reinterpreted? And are these realities contested by one of the above actors?

The decision-making power regarding sanctions is mostly in the hands of the Council. Although the Parliament has little say in the final conclusion, it is interesting to see what kind of influence they try to impose on the Council. In the case of Myanmar, the Parliament is on average a strong advocator of human rights, and often calls for stricter punitive measures (see for instance European Parliament, 2017). After the genocide, the Parliament called on the Myanmar government to legalize the citizenship of the Rohingya and other Muslim communities (European Parliament, 2018). It urged the Commission and the HR/VP to adopt sanctions and trade restrictions (European Parliament, 2017; Meissner, 2021). When it comes to economic restrictive measures, the Parliament usually opts for lifting trade preferences (Poletti & Sicurelli, 2021). It suggested that state enterprise MOGE should be sanctioned, and when the company was under restrictive measures, the Parliament disagreed with the exemption clause which still allowed some European enterprises to conduct business (International Federation for Human Rights, 2022). It also asks critical questions about whether the junta does not benefit from the EBA, and some Members of the European Parliament (MEPs) even suggested suspension (Meissner, 2021). The Commission is asked to start an investigation about whether the trade preferences should be halted, because of the incompliance with international conventions and respect for human rights after the execution of the four protesters (European Parliament, 2022). For example, British MEP Bashir said in 2017: "The time has come for sympathetic words to translate into firm action and that action must mean sanctions... I am all for trade and commerce, but we must put lives and people first. Where there is no fairness and dignity there can be no trade. Commerce cannot turn a blind eye to violence and cruelty." (Banks, 2017). The Parliament thus sees itself as an important representative of human rights.

Nevertheless, also in the Parliament some have brought unintended consequences of sanctions under consideration, especially concerning the most vulnerable (European Parliament, 2021). HR/VP Borrell calls attention to this, pointing out that 500 thousand workers would be at risk, mostly women. Caspary of the European's People Party mentions the importance of the timing of sanctions, and that just blindly taking action would only be beneficial for China. The people of Myanmar should be the center of their attention (ibid.). Newspaper Asia Times talked to high ranked officials about the possible

halt of the EBA for Myanmar (Hutt, 2022). According to them, some sources say the suspension did not take place because it would be more detrimental to the workers than to the junta. However, other sources also point to the European worry that local businesses will be taken over by the junta or Chinese companies. Another factor the EU keeps in mind, is that sanctions that badly affect the public could also further instigate resentment towards the Rohingya population (ibid.). The well-being of Myanmar's population is thus a valuable part of the decision-making in the Parliament, but geopolitical economic disadvantages also play a role. The implementation of economic sanctions is thus a point of discussion, for these could hurt the workers, but also because it could enhance China's influence. Here we see a slight contestation of the paradigm because of some anomalies with regard to the improvement of the humanitarian situation. Taken together, the *lens* for the European Parliament is mostly dominated by human rights and its role in advocating for them. Since their desired *policy outcome* is peace for the people of Myanmar, there was a minor notion of unintended consequences of economic sanctions, and also of China gaining authority in Myanmar. Regarding the best *instrument* to implement, there was thus slight doubt whether economic sanctions were the best tool to secure their *goal*. However, within the Parliament there seems to be less of a struggle over different ideas, as the main focus is on human rights and the improvement of the situation of Myanmar's people. The need to act upon human rights abuses is clear, and overall (economic) sanctions are a legitimate foreign policy tool. Doubts about Chinese influence are not a big enough anomaly to really contest or even destabilize the current sanction approach.

In the other EU institutions, the struggle over ideas seems to be more present. After the genocide in 2017, European officials were not immediately on the same page regarding economic sanctions. The at the time EU Trade Chief Malmström was quite positive about implementing trade restrictions, while Mogherini again pointed to the risk of hurting normal citizens (Emmott & Blenkinsop, 2018). The officials did not want to interrupt economic development, because the growth has positive democratic consequences and abates China's influence. European officials are aware of the benefits textile manufacturers like H&M, Adidas, C&A and Primark have in Myanmar because of the low labor costs. A deterioration of trade relations would of course be disadvantageous for them. With this in mind, an EU official mentioned that 'removing this duty-free access is a measure of last resort, but we must act if other measures are not delivering' (ibid.). Regarding targeted sanctions after the genocide, the European member-states took a variety of stances. The effectiveness was deliberated, but the members were also aware of their lost interests if some sanctions would be implemented (Staunton & Ralph, 2019). States such as United Kingdom, France, Denmark, Sweden, the Netherlands and Finland were in favor of sanctions, while others were more reluctant. The lack of consensus made it difficult to take action, and this analysis points to practical and political considerations taking the upper hand of normative factors (ibid.). Here, the benefits of the European textile sector and national interests raised doubts about whether or not to sanction economically. The derogation clause in the sanctions on enterprise MOGE also points to a reduced working of the paradigm. If the paradigm would be totally entrenched, economic sanctions would be less of a discussion, and they would be as harsh as seen in earlier years. A process of politicization (Wood, 2015) is taking place: the economic sanctions become the subject of deliberation. This cannot yet be labeled as third order policy change, as the underlying beliefs in the goals of the policy are not affected. There is no crisis or complete policy failure detectable. It might however be the beginning of changes in the setting of the instrument. Nevertheless, despite the downsides, MOGE is still sanctioned and the goals of the policy are unaltered. The above happenings cannot be seen as more than a contestation and third order change is out of question. As Daugbjerg, Farsund and Langhelle (2017) and Alons (2020) show, the core of a policy paradigm does not have to be affected by discussions as above displayed.

When looking at the paradigm dimensions inside the EU Council and EU officials, it becomes clear that multiple factors are at stake. Economic development of Myanmar as well as economic interests

of the EU itself are taken into consideration before making decisions about sanctions. The influence of the European textile sector cannot be denied, and also national interests play a role within the Council. Not to be forgotten, the institution seeks to minimize China's influence and take-over of European trade in Myanmar. In its *lens* upon the matter, the interests of European actors thus play a big role and the economic discourse seems to be dominant. This is also seen in the *problems* the Council pays attention to: the national economy should not be a victim of sanctions, and European businesses should not be taken over by China. However, the horrible human rights situation in Myanmar is naturally seen as the problem the EU should deal with. In this regard, the problems the Council wants to deal with are multi-faceted. This also applies to the *goals* the Council wants to accomplish: economic development in Myanmar should be upheld, the member-states should not be disadvantaged, the textile sector should be heard and the sanctions must be effective in the sense that they alter the behavior of the junta and do not hurt ordinary citizens. As pointed to by Hall (1993), a change of hierarchy in goals is important for instigating a shift. As it seems from the discussed material, the Council seems to struggle somewhat with this hierarchy in problems around sanctioning Myanmar. Naturally, this is displayed in a discussion about which *instruments* (thus sanctions) to implement. Since many goals are desirable to obtain, it is difficult which sanctions to implement, as shown in the dialogues between EU actors. The structured reality of the paradigm is a bit fuzzy, which could lead to a contestation of the paradigm. The next paragraphs will look into the stances of actors that might influence the ideas of EU actors.

Human rights have become an important aspect of the identity of the EU, especially as normative power. Therefore, insights from human rights organizations might be an important force to alter the debate around sanctions. Rights groups note that the European sanctions have thus far not caused any positive shifts in the junta government (Emmott & Blenkinsop, 2018). Some groups thus suggest stronger sanctions, while others adhere to the negative consequences this might have for vulnerable workers. But the legitimacy of this last argument which was also brought up by some EU officials is questioned, because the working conditions already are horrific. The Industrial Workers Federation of Myanmar even compares it to modern slavery (IndustriALL, 2021). The industry remains a very important source of income for the junta and European brands are therefore asked to cease production. Their presence is not seen as help for the workers, but as self-interested behavior. European and Myanmar trade unions are clear in their stance: suspend Myanmar from the EBA (Hutt, 2022). It appears that this argument is not picked up by the EU. Another example of human rights groups calling for tougher action can be found in the sanctions around state enterprise MOGE. The decision to cease financial interaction with MOGE could have been a critical step, but the included derogation clause undermines the sanction and fails to meet the intended goal (International Federation for Human Rights, 2022). 21 civil society organizations, located both in and outside of Myanmar, urged the EU to take more decisive measures, and to take on their role as human rights advocates. In the eyes of the organizations, the EU did not live up to this expectation (Marchi, 2020). The legitimacy of sanctions thus seems to be strong among rights groups. It is not in line with the expectations around paradigms that this strong opinion in favor of sanctions is not picked up by the EU. The ideational power of economic actors, which is more in line with the interests of European member states, was more influential. Nevertheless, economic sanctions were imposed: the paradigm is still in place, but some other ideas have emerged as well.

The discussion on trade sanctions is also present between experts. Some note that these restrictive measures will not drive the junta toward a democratic transition and indeed will crush the financial independence of young female garment workers (Hutt, 2022). Next to this, the effectiveness of economic sanctions is put into question for two reasons (International Crisis Group, 2021). First, the junta gets an extensive share of its incomes via China, and European sanctions are unlikely to alter or affect this. Second, the military does not seem to be driven by profits, but by personal endeavors. Targeted personal sanctions might be a safer option, since it will not hurt the population, however it will

again have little leverage. In any way, Myanmar should not be isolated, international actors must continue to search for dialogue with the junta (ibid.). Next to this, experts share the opinion that Europe's reactions have not been in line with the complex realities in the country, and instead are based on misunderstandings and oversimplification (Boisseau du Rocher & Heiduk, 2021). The importance of Myanmar's democratic process for Europe is a consequence of its search to be a great power (ibid.). In focusing on its values such as democracy, the EU displayed its identity and imposed them on countries like Myanmar. In this way, restrictive measures of the EU are mostly a reaction and are in reality nothing new or unexpected. Sanctions will be unlikely to influence the Tatmadaw, apart from harshening its nationalism. The EU must thus question itself in what way it could have an impact on the junta. In the current situation, European values should not be enforced in Myanmar (ibid.). Targeted sanctions on officials and businesses can work, but the EU should also listen closely to the opposition and coordinate their action with ASEAN (Sifton, 2022). These experts adhere to earlier named downsides of sanctions: the Tatmadaw is not impressed by them, it hurts the population and China will fill the vacuum left by the EU (Frittin & Swanström, 2010; Boisseau du Rocher & Heiduk, 2021). If Europe wants to fulfill its strong geopolitical ambition, it should do so in new innovative ways, namely in engagement with the democratic opposition. The domestic actors will have more influence on the outcome than European sanctions (Boisseau du Rocher & Heiduk, 2021). Among experts, there is thus contestation of the sanctions policy. Alternative ideas come to the fore and sanctions are no longer the best or legitimate policy answer. The same notions are not echoed in the EU decision-making actors, where the paradigm seems to be quite embedded, as it is still seen as the right instrument to reach the goal of influencing the junta.

The above ideas seem to influence the EU decision-makers only to a certain extent, but from their different views, a number of insights regarding the sanctions paradigm can be taken. If the earlier EU-Myanmar strategy at the beginning of the century is compared to the current one, it becomes clear that the EU's reaction is more fluid. Where earlier Myanmar was isolated and under harsh economic sanctions, over the years the EU sent more money and even aimed for partnership. This can most likely be described to new ideas of geopolitical links and economic importance. Currently, not only human rights but also economic incentives legitimize policies. However these two ideas can cause discrepancy, and this slight anomaly has led to discussion about economic sanctions at the instrument level. Furthermore, the relatively new discourse in the European Foreign Policy about a secure Europe in the world is partly reflected in the ideological concerns of growing Chinese influence. However, this awareness of China is also strongly tied to the economic discourse, and not just to the different power positions in geopolitics. Taken together, economic ideas contest the paradigm somewhat, but the beliefs behind it are not affected. As explained in the theoretical framework, third order change is not something that happens every instant. It is in line with expectations that first or second order adjustments to policies are seen more often than fundamental changes in beliefs that in their turn alter policies. The described instances in Myanmar can be understood via this logic. As shown in the theoretical framework, recent authors emphasize the difficulty of pure incommensurability in practice (Carstensen, 2015; Princen & Van Esch, 2016; Alons, 2020). Their notions might even give a more realistic view on the above discussed anomalies or different policy goals. As also Wilder (2015) shows in his analysis, even in policy areas where paradigms are clear and coherent, strict paradigmatic thinking is often only momentarily. As Carstensen (2010, p. 851) eloquently summarizes: 'Ideologies, ideas and discourses are not powerful because they are perfectly coherent, but rather because they can contain ambiguity, cannibalize seemingly unrelated ideas in their ideational environment and still present a totalizing understanding of social reality'.

4.3 Mali

4.3.1 Context and European engagement

May 2021 marked the second coup in ten months for Mali. Logically following, this has deteriorated not only relations with ECOWAS, but also with the EU (Jourdain & Tuma, 2022). The EU followed ECOWAS in its sanctions for Mali, which were set in place because of the failure of the transitional authorities to organize elections (Kofi Aubyn, 2022). Nevertheless, when ECOWAS suspended its sanctions, the EU kept on implementing its targeted measures. This is interesting, because the international community praised the removal of sanctions by ECOWAS, due to its deteriorating effects on the Malian economy (Murrin, 2022). Especially the bonds between old colonial power France and Mali have experienced a very rapid split, instigated by both sides. France has been present in many ways in its former colonial regions, also military. Many troops were deployed to counter terrorism, which also serves European interests (Jourdain & Tuma, 2022). Nevertheless, the second coup led to a prompt withdrawal of French and other European troops, and this vacuum was soon enough filled by the Wagner Group. The popularity of the old colonial power in Mali has rapidly decreased. This is partly because of Russia, which spreads misinformation and builds on European missteps and local frustrations about France's inability to counter terrorism (ibid.; Melly, 2021). The on the opposite accelerated and easily growing influence of Russia in the Sahel region is watched with disguise by the EU (Lebovich, 2021). Mali and Russia have their own reasons for the intensifying cooperation. Due to economic incentives and Western expansion globally, Russia has increasingly involved itself in African affairs. For Mali it is beneficial that Russian assistance comes without conditionalities, unlike the European support (Elischer, 2022).

Conscious of its own stakes in the region, Europe increasingly involved itself in the Sahel from 2010 onwards (Pichon & Betant-Rasmussen, 2021). In 2021 it even appointed a Special Representative (EUSR) for the region, currently Ms. Del Re. The problems the Sahel is facing cause a rise in terrorist and criminal activities, which is seen as a threat to Europe according to HR/VP Borrell (EEAS, 2021b). In order to counter terrorism, irregular migration and organized crime, the EU seeks partnerships with the Sahel (European Commission, n.d.). Europe has thus focused more and more on security regarding this region, reflected in the Sahel regional action plan for 2015-2020 (Pichon & Betant-Rasmussen, 2021). Next to this, it has set up multiple bilateral and multilateral initiatives, funded the Sahel G5 with 50 million, and had active training missions, again reflecting Europe's efforts to be engaged in the region (Ghanem, 2017). However, next to these regional strategies, the EU also has to live up to its own Civil Protection and Humanitarian Aid Operations, which sometimes causes inconsistencies when human rights abuses had to be addressed to Sahelian governments. This is a first sign of a conflict in objectives: on the one hand, the EU wants a foot on the ground in a strategically important region and build good relations with leaders, on the other hand, it wants to live up to its own values and norms. Anomalies like this can build up to doubts about the choice to sanction and with that a contestation of the paradigm.

The EU is aware of the weak democratic structures in Mali and the challenge this poses to their policy in the region, and that the former strategy has not been able to anticipate on the coup (Pichon, 2020a). It therefore wants to move away from its main focus on security and put more effort in the political dimension, as stated in its strategic priorities for the Sahel in 2021 (Pichon & Betant-Rasmussen, 2021). With the introduction of the Global Strategy in 2016, the EU has tried to integrate its normative values and strategic interests in its policies, especially towards regions like the Sahel (Venturi, 2022). Issues of governance and human rights are the new central element of the European approach, instigated by experts from both inside and outside the EU (Pichon, 2020a). This could have altered the sanction paradigm. Nonetheless, in the Council conclusions on the Integrated Strategy in the Sahel, it is noted that violations of human rights can still be answered with sanctions (Council of the European Union, 2021), as we also see in practice. Thus the paradigm is not contested by these

intentions, but rather the paradigm still leads policymakers to see sanctions as the legitimate answer to the Sahelian problems. Especially since the Malian engagement with the Wagner Group, EU officials like HR/VP Borrell and EUSR Del Re have been vocal in their concerns regarding this cooperation and sanctions followed immediately after rumors of Wagner's presence (Venturi, 2022).

The functioning of the paradigm is clear: many policy choices could have followed after Russia's growing engagement in Mali, but the officials opted for sanctions without much discussion, as it is seen as the legitimate course of action. As a contrasting example, the U.S. provided billions of euros in humanitarian aid to Mali, primarily motivated by Russia's attendance in the Sahel (International Crisis Group, 2023). In this way, it wanted to counter the expansion of Russia's influence, which is filling the gap the West leaves behind. This kind of policy decisions are more in line with the proposed expectations based on the updated EU Global Strategy. The U.S. is well aware of the importance of keeping up good relations with strategic states and actively pursues this approach instead of resorting to punitive measures (ibid.). At the same time, president Macron vocalized his vision for a strong Europe, since in his view the U.S. is pulling back from the global stage, thereby creating a vacuum that is rapidly occupied by China and Russia (Liechtenstein, 2020). This stands in contrast with policy decisions and considerations regarding the situation in Mali. While the U.S. demonstrates a clear awareness of the shifting dynamics in relations, this factor does not hold significant weight in the EU's decision-making process, particularly in the case of France, regarding the imposition of sanctions. The following paragraphs seek an explanation for this counterintuitive outcome in the entrenched sanctions paradigm.

The EU strategy for the Sahel has thus been under change since 2010. Its focus is shifting, because the outcome of the policy did not match the desired expectations. The tension around Russia's growing influence in Mali also seems to be an important factor, which will be elaborated on in the following paragraphs. The EU is very interested in the developments in the Sahel and Mali, as it sees its own interests intertwined with it. It is thus important to keep good relations with the local governments and population. Oppositely, after ECOWAS suspended its economic sanctions, the EU kept on harshening its language towards the Malian regime. How come this is the case? It seems to be that ECOWAS was affected by international negative opinions on the sanctions, whereas the EU is too disturbed about Mali's engagement with the Wagner Group. Because of how the paradigm works, deviant opinions get filtered out or ignored by policymakers. The paradigm structures reality in such a way that sanctions are the legitimate way of answering to increased engagement with the Russian Wagner Group. The following paragraphs will elaborate on this and take a look at the stances of relevant actors.

4.3.2 Actors and their ideas

European officials are straightforward in their conviction about the deployment of the Russian paramilitary, together with concerns over the absence of a democratic transition (Agenzia Nova, 2022). In a meeting with the Transitional Government's Minister for Foreign Affairs, HR/VP Borrell made clear that European cooperation with Mali depends on Malian ties with the Wagner Group (EEAS, 2021b). He wants to stay engaged in the region, but not at any cost (Brzozowski, Fox & Pollet, 2022). A warning and deep concern over Malian connections with the Wagner mercenary are expressed by the HR/VP (Cook, 2022). Later, Borrell admitted himself that the sanctions were partly a consequence of the involvement of Wagner in Mali (Kamali Dehghan, 2022). He also concluded that violations of human rights, conducted by Mali's armed forces, should be punished (EEAS, 2020). France is decisively in favor of sanctions, as during its rotating EU presidency it pushed to impose individual, economic and financial restrictive measures on a European level (France24, 2022). According to the French Foreign Minister, Mali was now 'a European issue'. Here we see an interesting example of a legitimizing frame. It is stated without doubt that action is needed, in the form of sanctions. The structuring function of the paradigm filters possible reactions out and leaves sanctions as the legitimate, inevitable policy.

Furthermore, France seems to be driven by normative and emotional ideas, rather than rational considerations. Any sense of a failure of the sanctions policy is not present and the main focus seems to be on halting Russian influence in the Sahel, for which sanctions are a fitting instrument. The alternative idea that sanctions could further deteriorate the situation and bonds has not come up by these European officials. Here, the paradigm appears to be entrenched. This deviates from the notions of the HR/VP in the case of Myanmar, where he also mentioned the negative consequences of restrictive measures. Through the *lens* of these European officials, the reality is that cooperation with the Wagner Group is a misstep, on which it is legitimate to take action. In this *perception*, the policy to sanction is a perfectly fitting reaction and *instrument*, a sense of policy failure is not found in the opinion of officials on Mali. Regarding the *goals* of the policy, the acknowledgment of human rights is still important, but the sanctions can also be seen as a punishment for engaging with the Russian paramilitary and turning away from Europe.

Prior to the sanctions in February 2022 regarding the failed transition, the Parliament debated the European role in the Sahel, where MEPs of the committees on Foreign Affairs (AFET) and Development (DEVE) exchanged their divergent opinions (Preiss, 2022). The Deputy Director General Africa at the EEAS was in favor of sanctions against those who threaten peace, however these should also be supplemented with dialogue. The ‘hidden goal’ is to fend off the Wagner Group, which is seen as a direct destructive Russian influence in the region. However, some voices were also expressing concerns about the strategy, anxious to make the same *failures* as before, especially expressed by Belgian MEP Kanko (ibid.). Current policies are not working and only lead to more jihadist action in the region, as well as a free pass for Russia. What the EU should do, is stop seeing Africa as a ‘babysitting’ continent, and turn to trade partnerships. China and Russia are already increasing their influence in this manner, while the EU keeps on believing in outdated policies that are not working (ibid.). This opinion can be labeled as a contestation of the sanction paradigm: it is clearly criticized and alternative ideas are suggested. If more would adhere to this view, it could affect the core of the paradigm and lead to destabilization. Nevertheless, in the EU institutions that in the end decide on sanctions, this view is not reflected or echoed. This is again an example of how the paradigm filters out diverging ideas for policymakers.

Next to internal discussions, the Parliament has also criticized the Commission and the EEAS: their approaches lacked a focus on human rights, governance and coordination with the situation on the ground (Pichon & Betant-Rasmussen, 2021). EU action in the field should be better coordinated, also in line with regional actors and partners. The focus should shift away from security to these human aspects. Next to this, the EU-Africa Strategy is too much focused on diminishing migration, instead of addressing the root causes (ibid.). Just like concluded in the Myanmar case, most of the MEPs thus focus on human rights and policy failures in living up to this value. Their *lens* in the two cases is thus the same. It has the self-perception that it should adhere to policies that encourage or ensure human rights. For some MEPs, the current sanction policy *fails* to do this. The choice to sanction is under deliberation and is not automatically the only answer. In its *goal* to improve the situation for the Malian people, the *instrument* of cooperation in partnerships is named as an alternative for sanctions. Although highlighted policy failures are one of the factors that may lead to paradigm change, this has not been the case regarding Mali. The sense of a policy failure is not picked up by more policy actors inside the EU, which can be explained by the filtering and structuring working of the paradigm. Sanctions are not seen as failing among EU officials like HR/VP Borrell and president Macron, alternative ideas have not been picked up by them and inconsistencies are not admitted.

Logically, the notions of human rights organizations align with the critique of some MEPs. After the EU and ECOWAS sanctioned the country, Oxfam together with 12 other NGOs called attention to the situation of the Malian people (Oxfam International, 2022). Vulnerable people, like unemployed youth, displaced and marginalized groups and the borderland regions will most likely suffer the most

from restrictive measures (Kofi Aubyn, 2022). The same argument is brought up by some actors in discussions regarding sanctioning Myanmar, as this is more often a consideration actors ask themselves in the decision whether or not to sanction. NGOs thus asked for an aid exemption in the sanctions, especially since the arrival of Wagner and delay in elections (Kamali Dehghan, 2022). In line with this argumentation, peacebuilding actors also mainly see downsides of sanctions: they argue that dialogue and mediation are needed to bring communities closer to each other, instead of weapons or sanctions. The reasons the youth feels urged to pick up weapons should be looked into, as well as the never ending focus on the eradication of terrorism (United Nations, 2022). Regional, EU and ECOWAS sanctions are seen as hypocritical and situational, as countries with comparable troublesome situations have not been sanctioned (Tull, 2022). ECOWAS turned a blind eye to misconducts in Guinea, although this country is sanctioned by the EU. Undemocratic happenings in Chad have not been sanctioned by the EU and U.S.A., as they do not want to take the risk of destabilizing the country (Nodjimbadem, 2022). HR/VP Borrell states that Chad needs to continue fighting against insecurity in the region, and thus leaders went no further than ‘urging’ for a return of democracy (ibid.). At the same time, the very similar situation in Mali led to sanctions under the pretense of democracy: the main difference seems to be the presence of Wagner. The expectation that geopolitical considerations influence the decision to sanction is thus right. Nevertheless, in the case of Mali this factor does not lead to a new analysis of the consequences of sanctions as foreign policy instrument. The contestation by rights groups and anomalies of the policy are not picked up by the decisionmaking policy actors. In their reality, presented and structured by the paradigm, these anomalies are filtered out. In comparison with the Myanmar case, some differences and similarities can be found. On the one hand, regarding Myanmar rights groups mostly claimed that the junta should be under tough sanctions, which would in the end be beneficial for the population. This differs from the above critical stance on sanctions. On the other hand, in both cases the policymakers do not seem to be open to the ideas of NGOs and rights groups.

The notion of the need to focus on the Malian people, instead of Borrell’s focus on security and military force, is also present among experts (Venduti, 2022). The EU’s increased focus on security and use of military means lowers the possibility that the EU will successfully lower conflict in the region, or contribute to peacebuilding (Lavallée & Völkel, 2015). Some argue that new sanctions are a chance for the EU to move beyond self-interested strategic policies and let itself be led by its values, especially when other world leaders are failing to do so (Rickard-Martin & Nowe, 2020). More argue in line with this, and add that it is time to move beyond geopolitical calculations, because what is at stake is more important: the demise of democratic or at least pluralist political systems (Carbone, 2021). The only way to have an answer for terrorism in this region, is through stable governments. The EU should place greater emphasis on the political level regarding their Sahel policy, and should with their actions contribute to accountable government structures in the region. Until now, this is not translated into the policy, which is rather characterized by an inadequate vision (Schmauder, Soto-Mayor, & Goxho, 2020). European states should take responsibility for this process, which is not to act as France has done by simply pulling out of the region (Carbone, 2021). France should also not describe all the negative attitudes of Malians to Russian disinformation, but take the public opinion in Mali and the Sahel seriously (Lebovich, 2021). A sole fixation on Russia’s attendance in Mali undermines the focus on the role of Europe itself and the complex reality of the conflict. Sanctions will most probably only impede already difficult negotiations (International Crisis Group, 2022). Experts also point to the EU’s contradictory behavior regarding their urge to stay engaged, while at the same time exerting diplomatic pressure and threats in the form of sanctions (Tull, 2022). They threaten with measures, but they also want to avoid a rupture in diplomatic relations. The Malian government sees European sanctions and reactions until now as a bluff, also due to its hypocrisy (ibid.). Neither military interventions, nor sanctions have thus far improved the humanitarian situation in Mali (Drexler, n.d.). Rather, the EU should consider moving away from its sanctions and focus on dialogue about electoral reform

(International Crisis Group, 2022). Concluding, experts are thus critical of the use of sanctions and suggest alternative ideas and policies, as goes for the case of Myanmar. Rights groups, local actors and experts come to the table with other solutions to the situation in Mali, and point to the failing downsides of sanctions. Among these actors, the paradigm is contested. Clear anomalies have been pointed to, however these ideas do not seem to have the power to lead to policy change thus far. These contestations could hint at a start of incremental policy change. However, for this really to be the case, EU decision makers should also align with the anomalies and alternative ideas, and see failure in the policy. Ideational shifts may be present among influencing actors, but not among EU officials where the sanctions paradigm seems to be profoundly embedded.

All in all, we see an intent of the EU to focus more on a dialogue regarding their Sahel strategy, as is also advised by experts. However, the presence of Russia in Mali steered the policy into tougher judgment and action. The paradigm seems to be relatively strong: although some policy actors suggest learning from earlier mistakes, Russian presence has led to ongoing sanctions for Mali. This idea or frame of countering Russia is of course not new, but seems even more fatal in light of the war in Ukraine. The power of ideas regarding more focus on the human aspect and dialogue may be reflected to a certain extent in policies and strategies, however when they have to be translated in an answer to undemocratic transitions and engagement with Wagner, the outcome is again the choice to sanction. Although it is different for actors outside of the EU, European officials see sanctions as the legitimate policy. Some actors might see anomalies, but a crisis around the sanction policy has not taken place. The paradigm still structures reality and legitimizes the choice to sanction.

Taking the cases of Myanmar and Mali together, the sanctions paradigm appears to be quite strong in both instances. Regarding Myanmar, the doubts mostly stem from economic considerations, while European decisionmaking concerning Mali is steered by security concerns over Russia, catalyzed by the Ukraine war. Chinese presence in Myanmar causes some worries, however mostly still linked to trade. Although different in origin, some different ideas have thus come to the fore. In both cases, these economic and security issues have not led to third order change. The sanction paradigm has enough legitimizing power and there has not been a period of crisis. For the decisionmaking actors, sanctions still match the desired expectations and outcomes. This can be explained by the filtering function of paradigms: some instances are ignored, while other ideas and incentives are leading for the actors and their policies.

5. Conclusion

In this thesis, the EU sanction policy is scrutinized. The research question *'Why does the European Union stick to its sanction policy, despite its growing awareness of security and geopolitical considerations?'* is looked into on the basis of the cases of Myanmar and Mali. An explanation is sought in the paradigm literature, which argues that policy paradigms are relatively stable, until accumulated anomalies can no longer be ignored by policy actors. With this, new insights in the existing debate around EU sanctions are obtained, and the policy paradigm theory is further operationalized. It is found that the sanction paradigm is indeed quite strong in both cases and thus that the paradigm literature can explain the decision to sanction despite geopolitical considerations and negative remarks of other relevant actors such as the Parliament or journalists. Among these last actors, some contestation of the paradigm was found. However, due to the embeddedness of the paradigm, their notions are ignored by the decisionmaking actors, which see sanctions as a legitimate course of action. As Alons (2020) states, a policy can still be coherent, despite diverging ideas. It was thus actually useful to discover some doubts about sanctions, in order to see how the paradigm still steered towards sanctions because of how it structures reality. This is for instance seen in how the observations of rights groups hardly get picked up by the EU officials: these deviant opinions are not noteworthy. All in all, in line with the conclusions of policy paradigm theory, third order change within the EU sanction policy is not likely to happen any time soon. Gradual adjustments or slight changes in policy instruments (first and second order changes) could occur in the form of an adaption of sanctions, or which sanctions are likely to be imposed. The turn to targeted sanctions and the slight contestations found in the cases point to this.

As stated, rationalists and idealists could not give an exhaustive answer to this research question. Idealists cannot explain the intention of the EU to act as a hard power, whereas rationalists cannot explain why the EU sanction policy has not made this hard power turn yet. Thus to give new explanations of how policymakers come to their decisions, the paradigm literature was of help. It was furthermore expected to see growing concern over China's and especially Russia's presence in the cases, which was indeed found. Logically, this is a factor the EU keeps in mind when taking geopolitical decisions, especially currently in the face of the war. Notably, it was expected that the presence of Russia would cause more doubts about whether or not to sanction, because of negative consequences for Europe's position and the Malian people. As explained, the opposite happened: cooperation with the Wagner Group led to ongoing sanctions on Malian leaders by Europe. The policy paradigm helps to explain how this decision was made so easily whilst being counterintuitive: sanctions are a legitimate answer, and anomalies are interpreted the other way around or simply get ignored by policymakers. Another interesting finding was the change in the rigidity of economic sanctions regarding Myanmar. As explained, this slight contestation does not necessarily lead to third order paradigm change, as policies can still be coherent, despite alternative ideas (Alons, 2020). Changes in settings of the instrument can be seen as normal policymaking (Hall, 1993).

An effort is made to practicalize the policy paradigm literature, and it can be concluded that this theory is suitable in giving insights in the 'status' of a European policy field. The explaining power of paradigm literature for policies is quite extensive: it can explain altering as well as entrenched policies, it distinguishes between the different orders of change and takes on actors as well as their surrounding structure. This is also true for this thesis: in the case of Myanmar, it was helpful to determine the ideas of different actors, which of these were deemed legitimate and ultimately mattered for the decision to sanction. In the case of Mali, the paradigm could explain that the attendance of Wagner was a further trigger for sanctions, instead of a drawback. The operationalization based on Daigneault (2014b) is useful, mainly when supplemented with general notions and stances of the paradigm literature, for instance the hierarchy of goals by Hall (1993). This thesis has thus contributed to the debate around EU sanctions, but also to the practicality of the policy paradigm literature. Furthermore, suggestions of

critical scholars on paradigm change are taken into account, namely the possibility of incremental change. This thesis hints that ideational changes in times of normal policymaking are important as well.

Some limitations have come across in this research. Despite the functional operationalization of paradigms, it is still difficult to grasp ideas of actors. This is partly because the larger part of paradigm literature is theoretical instead of applied research, and thus scholarly discussions have mostly been about definitions or causations, instead of operationalizations. Another hardship in determining ideas was the limited empirical material. In order to profoundly grasp ideas, it is ideal to have insight into meetings where relevant actors can speak openly. Institutions like the UN have more open meetings than the EU, which might thus be easier to analyze. Another way to improve the obtainment of ideas would be to conduct interviews. Another limitation of this study is that the cohesion within and between different EU institutions is largely left unanalyzed. As pointed to by Hall (1993) and colleagues, it makes a difference whether the policy networks are open or closed, as well as if there is a shift of power. In future research, the institution and its policy actors could thus be under further scrutiny. That being said, it might be hard to determine whether a paradigm is contested between politicians, since discussion is inherent in politics. Again, making use of interviews might partly overcome these problems, in order to gather multiple opinions and see if actors adhere to the paradigm or challenge it. This research obtained a grand overview of the stances or debate around sanctions to detect a sense of contestation of sanctions policy. By taking on stances of MEPs, rights groups and experts, this thesis examined whether a debate surrounding the EU is upcoming, instead of solely focusing on debates between politicians. Furthermore, this described difficulty might be a shortcoming of methods and material, rather than a deficiency in the policy paradigm theory and its applicability.

Consequently, from these limitations stem some avenues for further research. The possibility of combining the more classical policy paradigm literature with its critics such as Carstensen, could be further investigated. For instance, the coherence between developing ideas in normal policymaking and crises could be looked into. Notions of incremental change also point to the need for further research. Because to what extent can rival ideas exist within a paradigm and coherent policy? When are ideas contesting a policy on an 'actionable' level (Alons, 2020) as opposed to affecting the core of a policy and its paradigm? At what point can we speak of a tipping point, and when is the paradigm 'just' stretched? The borders of incommensurability could be further scrutinized. Insights of recent authors on this subject might give a more realistic view on policymaking, but it could raise the question of when a paradigm is indeed contested, opposite from when it is common political deliberation. Incremental change and the possibility of combining or mixing paradigms (Alons, 2020) can bring important contributions to the paradigm literature, and thus deserve further research.

Regarding the explanatory power of policy paradigms for the EU sanction policy, it might be worthful to apply the theory to cases in which the EU continuously opts for no sanctions. A good example from the last few years might be Ethiopia, of which HR/VP Borrell expressed its regrets about the failure to impose sanctions (Von der Burchard, 2021). As earlier explained, this does not have to lead to a rejection of the stances taken in this thesis. Many scholars have pointed to the frequent use of restrictive measures by the EU, and have explained the steady patterns along which the EU does or does not impose sanctions: important states for the EU get sanctioned less. It would however be a valuable contribution to see how the repeated decision to not impose sanctions can be properly explained by the paradigm logics. Furthermore, future research could use the operationalization of policy paradigms in order to investigate grander paradigms. For instance, the case of Myanmar hints at a neoliberal paradigm, which might contest the normative paradigm. This thesis has stated that a change in the EU Foreign Policy is visible, especially regarding their security stance. In how far is this also true for their economic ideas? Could an economic or neoliberal paradigm be detected in this case, which might contest a normative paradigm? This of course relates to the debate between rationalists and idealists, but paradigm theory could paint a more profound picture. How entrenched are normative or economic

paradigms, and are any contestations detectable? As it seems from the cases of Myanmar and Mali, the Parliament acts according to a normative paradigm, whereas the Council and Commission legitimize their policies with self-interested ideas. Here lies another explanation for the viability of the sanctions policy, which also surmounts the debate between rationalists and idealists: sanctions are a joint solution for different objectives policymakers have. For normative, economic and geopolitical ambitions, sanctions are a proper policy tool, as they answer to self-interested as well as human rights considerations.

Apart from theoretical developments, this thesis has also discussed the humanitarian repercussions of politics, and with that its societal relevance comes to the fore. The cases of Myanmar and especially Mali once more point to the devastating consequences for populations of clashes between the East and the West. The African population suffered enough from Western expansion and the divide during the Cold War. Now that a new war around Russia emerged, it would be detrimental to lapse into the same behavior. Sanctions punishing governments for undemocratic actions are most of the time adhered to by the international community, and the fate of the humanitarian situation should indeed be the main driver behind sanctioning. In attempting to practicalize the applicability of policy paradigms, this thesis has focused on how the decisions could be explained by this strand of literature. In doing so, the normative implications of adhering to a paradigm have not come to the front. Because anomalies have to add up to change reality as presented by a paradigm, or a crisis has to occur, a lot has to happen before paradigms alter. Since policies directly affect human lives, it might be a very critical point if policy paradigms are indeed so severely entrenched and difficult to change, also in case of policy failure. As earlier stated, European foreign policies have a direct impact on lives all over the world. Consequently, it is important to get more grip on how these policies function and change, because we bear the responsibility of implementing them in a proper way.

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