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Pledge of Honesty

On my honour as a student of the Diplomatische Akademie Wien, I submit this work in good faith and pledge that I have neither given nor received unauthorized assistance on it.

Abstract

English. This thesis traces the potential impact of EU restrictive measures on the EU's collective identity. In this study, a qualitative analysis of the adoption of EU sanctions in response to Russia's invasion of Ukraine interlinked with Alexander Wendt's conception of collective identity sheds light on how EU restrictive measures can impact the EU's collective identity along Wendt's three causal mechanisms: structural context, systemic processes, and strategic practice. This further allows to identify potential obstacles for EU collective identity formation. I conclude that sanctions can act as a catalyst for collective identity formation, especially by means of repeated interaction and reflection on common norms and values. However, sanctions' limitations in addressing security threats can offset such effect, leading to increased dependencies on third actors, inconsistencies in the EU's CFSP framework, and individualized foreign policy approaches among member states.

Deutsch. Diese Arbeit untersucht mögliche Auswirkungen von EU Sanktionen auf die kollektive Identität der EU. Im Konkreten soll eine qualitative Analyse der Verabschiedung von EU Sanktionen als Reaktion auf Russlands Angriffskrieg gegen die Ukraine in Verbindung mit Alexander Wendts Konzept der kollektiven Identität beleuchten, wie EU Sanktionen entlang der drei Kausalmechanismen von Wendt - struktureller Kontext, systemische Prozesse und strategische Praxis - die kollektive Identität der EU beeinflussen können. Darüber hinaus ermöglicht diese Studie potenzielle Hindernisse für die kollektive Identitätsbildung der EU zu identifizieren. Ich komme zu dem Schluss, dass Sanktionen als Katalysator für kollektive Identitätsbildung wirken können, insbesondere durch wiederholte Interaktion und Reflexion über gemeinsame Normen und Werte. Allerdings überwiegen die Limitationen der Sanktionen bei der Bewältigung von Sicherheitsbedrohungen, wodurch es zu einer erhöhten Abhängigkeit von dritten Akteuren, Inkonsistenzen im Rahmen der GASP und individualisierten außenpolitischen Ansätzen der Mitgliedstaaten führt.

1. Introduction

The purpose of this qualitative study is to analyse and discuss the potential impact of EU restrictive measures on the EU's collective identity. Specifically, it studies the EU sanctions regime against Russia following its invasion of Ukraine and how it has affected the EU's structural context, systemic processes, and strategic practice. The research question is formulated as follows: How can EU restrictive measures affect the EU's collective identity?

Sanctions have been conceived differently by researchers. Hufbauer, Schott, and Elliott (1985, 1990) and Baldwin (1985, 2000) define sanctions as any move that puts unfavorable constraints on sanctioned individuals or entities, whereas Barber (1979), Portela (2010), and Miadzvetskaya (2022) refer to related frameworks, e.g. EU restrictive measures, trade sanctions under WTO law, etc. Some authors differentiate between targeted sanctions, such as asset freezes, travel bans, and arms embargoes, and economic sanctions, such as financial restrictions and commodity bans (Meissner 2022) (Miadzvetskaya 2022). The effectiveness of sanctions and the conditions for their success has always been a major topic of scholarly debate: depending on the objective to be achieved, answers to this question range from sanctions having a negative impact or not being effective at all (Peksen and Drury 2010) to sanctions being a powerful tool in e.g. promoting democracy (Soest and Wahman 2014) (Hufbauer, Schott, and Elliott 1985, 1990).

The reciprocal effect of sanctions on the sender has received relatively little scholarly attention although most authors implicitly acknowledge the presence of such effect (Walterskirchen, Mangott, and Wend 2022) (Haukkala 2015). Most literature in this regard focuses on the economic impact of sanctions on the sender (Redeker 2022). The EU's DG Trade and DG Agriculture hold accounts of EU exports to Russia (European Commission n.d.b.). Only a small part of existing literature mentions the role of sanctions in the EU's conceptualisation as an international actor (Driscoll, Halcoussis and Lowenberg 2011) (Portela 2010) (Özdamar and Shahin 2021). Elin Hellquist has studied sanctions as a means of defining the self rather than essentially bringing about change in the other (Hellquist 2012).

Most studies on collective identity in international relations have been published in the 1990s and 2000s (Wendt 1994, 1999) (Calhoun 1991) (Melucci 1989) (Kantner 2001). The EU's col-

lective identity and related implications have also been studied extensively, yet mostly indirectly using terms such as "de-Europeanization" (Smith 2021) (Dyduch and Müller 2021) "EU normative power" (Tocci 2008) (Manners 2002), and "European mindset" (Mertel 2019). Apart from brief mentions of sanctions' effect on the sender, the impact of sanctions on the EU's collective identity has not been conceived of.

To address this gap in existing literature in this thesis, I study the potential impact of EU restrictive measures on the EU through the lens of Alexander Wendt's concept of collective identity. In particular, I examine the EU's collective identity through the lens of EU restrictive measures adopted in response to Russia's invasion of Ukraine. By looking beyond material power explanations and acknowledging the dynamic nature of identities and interests, such constructivist theoretical framework allows for a more wide-ranging understanding of the impact of sanction on collective identity.

The study is structured into two main parts. Part I covers the information that is relevant for the analysis, including, an overview of EU-Russia relations and the EU restrictive measures adopted in response to Russia's invasion of Ukraine; a definition of sanctions and EU restrictive measures; and the theoretical framework, namely Wendt's concept of collective identity. In Part II, I analyse the potential impact of EU restrictive measures on the EU's collective identity along Wendt's three causal mechanisms of collective identity formation: structural context, systemic processes, and strategic practice. The conclusion summarizes the research findings and outlines suggestions for further research.

Limitations of this research are the following: First, collective identity formation is conditioned by multiple factors other than the adoption of sanctions. Thus, this research argues that sanctions can contribute to collective identity formation without precluding the presence of other factors, e.g. the geopolitical context, or the response of the target. Second, the research findings may not be readily applicable given the narrow scope of this research (EU sanctions against Russia following its invasion of Ukraine): different contexts in the adoption of sanctions may yield different conclusions regarding their potential impact on EU collective identity. The third limitation pertains to the evolving nature of the conflict and that of the related responses of the EU: Circumstances may change and influence the impact of sanctions on the sender. Thus, the research

is tailored to the context and the actual timeframe, and does not fully capture the future changes or long-term effects of sanctions.

For the EU, restrictive measures have evolved as a “go-to” tool to respond to events that it does not identify with. Since the 1980s, European countries increasingly started to use restrictive measures against third countries. Their number increased significantly following the introduction of the Common Foreign and Security Policy (CFSP) in 1993. Up until today, sanctions remain the EU's most coercive tool in its foreign policy conduct.

Following Russia's invasion of Ukraine, the EU imposed unprecedented sanctions against Russia. Unlike several other common foreign policy concerns, the decision to adopt the first sanctions packages was marked by unanimity (Folmar 2022). Up until the most recent 10th sanctions package, the main targeted sectors are the financial sector, the energy sector, Russia's defense sector, dual-use goods and measures specifically targeting Crimea, and the regions of Donetsk and Luhansk.

Sanctions can be a reflective tool that strengthens common ideas and shared perception by demonstrating a commitment to protecting and promoting the values. Yet, member states' common denominator - an aversion to war and a shared respect for territorial integrity - as a driver for unanimously adopting sanctions became increasingly difficult to sustain as the reciprocal impact of sanctions on the senders (the EU and its member states) increased. Especially EU restrictive measures targeting the energy sector became a major source of interaction among member states, leading to lengthy negotiations and derogations from the 6th sanctions package and onwards.

The disruption of energy supplies became an incentive to reduce dependence on third actors and to fast-forward the green transition as stated in the European Commission's REPowerEU Plan, "A plan to rapidly reduce dependence on Russian fossil fuels and fast forward the green transition" (European Commission 2022a). However, although all member states have stated a commitment to reduce dependency on Russian energy, immediate responses have differed widely: Slovakia and Hungary are hesitant about the adoption of sanctions in the energy sector because of the costs associated with them. In contrast, the Baltics, despite being highly dependent on

Russia's energy resourced are the most vocal advocates for more stringent sanctions so as to reduce the strong dependency therefrom. In addition, member states deal differently with the reduced dependency on Russian energy, further leading to difficulties in sustaining collectiveness within the EU. To buffer the immediate energy shortages, the EU also struggles to find a consistent approach in its foreign policy as it strengthens trade deals with countries with a number of political controversies and poor human rights records, notably Qatar and Azerbaijan (Kardaś 2023) (Directorate-General for Energy 2023) (Shayan 2023).

In addition, given the relative weakness of sanctions to respond to security threats, the EU and its member states have complemented the collective response with individual actions leading to changes in the EU's structural context. The most prominent actions in this regard are: the coordination of military responses of EU member states through NATO; Finland's and Sweden's decision to join the transatlantic alliance; and the extensive support from the US to NATO states and Ukraine. These actions have reaffirmed US dominance in the Western hemisphere and re-established NATO's primacy in European defense and security, thereby undermining the EU's pursuit of strategic autonomy.

Despite delays in their adoption, sanctions as a response to the common experience of a security threat remain up until today. Member states continue to engage in negotiations to adopt next sanctions packages and continue to shoulder the associated costs, albeit with additional individualized actions. The EU itself aims to capitalize on existing sanctions by e.g. using publicly owned Russian assets to support Ukraine's reconstruction after the war (European Commission n.d.c).

In sum, EU sanctions against Russia have significant implications for the EU, resulting not only in increased interactions and shared understandings but also revealing a sense of powerlessness in taking effective collective action. While the US remains a major provider of support and NATO continues to serve its purpose of collective defense, EU systemic processes remain complex, putting at stake the EU's strategic practice. For instance, the unanimity requirement for sanctions adoption undermines the common identity of the EU, emphasizing individual sovereignty over collective interests. To improve the effectiveness of sanctions, the EU should establish a centralized enforcement system and consider targeting accomplices of the main target

through secondary sanctions. Also, whereas sanctions currently reflect the EU's effort to conceive Russia as an anathema to the self, it is likely to be difficult to uphold such clear differentiation in the long run due to the geographical proximity and existing infrastructure (e.g. pipelines) that provides for interdependence between the two actors. Thus, the EU should work towards a long-term strategy for its relations with Russia.

2. Part I

2.1. Background Section

2.1.1. Characteristics of EU-Russia relations

EU-Russia relations are characterized by ups and down. This is because political and institutional developments between the two parties are built on charged grounds where historical legacies, traditions, and transatlantic concerns persist (Haukkala 2015, 2).

Since the 1990s, the EU has made several attempts to engage with Russia in an effort to align it with its political, economic, and governmental schemes. The completion of the Partnership and Cooperation Agreement (PCA) with Russia and subsequent events presented Brussels with a chance to boost its credibility as an international actor. In turn, Moscow repeatedly stated a willingness to join the Western community (Haukkala 2015, 4). However, Russia gradually proved to be a rather stubborn recipient of EU values, norms, policy best practices, etc. One of the reasons was that EU-Russia relations seemed to follow an asymmetric pattern whereby the EU tried to impose its values and policies on Russia whilst disregarding the different nature of values and policies of the Russian Federation. In other words, the EU's seemingly inclusive approach to Russia was characterized by an exclusionary logic: Russia was never considered a candidate for membership or accession to the EU or NATO. Russia attempted to correct the perceived asymmetry by pushing for additional demands but the EU essentially granted the same privileges to Russia as to its Eastern neighbours (Haukkala 2015, 13). Eventually, Russia decided to establish a counterpole in Eurasia rather than fall into the hands of the West: Eurasian institutions resembling the Western institutions have emerged: the Collective Security Treaty Organization (CSTO) as an analogy to Western NATO and the Eurasian Economic Union (EEU) an analogy

to the EU. Also, the EU's continuous practice of imposing sanctions on Russia and Russia's aggressive scepticism towards Western values accelerated the decline of EU-Russia relations (Haukkala 2015, 13).

A key element of EU-Russia relations has always been energy (Siddi 2020, 1). Initially, EU and Russia demands in this sector were complementary: The EU sought for reliable energy supplies and Russia aimed at capitalizing on its resources. The emergence of East-West energy networks has led to interdependence between the two entities, often referred to as the "hidden integration" of Europe (Högselius 2013, 3).

Following the start of the Ukraine crisis in 2014 EU-Russia energy relations have increasingly been framed as a security issue. But despite tensions between Brussels and Moscow on the normative, legal, and security side, reliance on Russian energy kept increasing after 2016, becoming one of the few industries where significant levels of cooperation have persisted even after the start of the Ukraine crisis in 2014 up until the Russian invasion of Ukraine (Siddi 2020, 2). After the Russian invasion of Ukraine in 2022, the EU has progressively reduced its energy dependency on Russia by investing in alternative resources, e.g. solar energy, and signing deals with new trading partners, e.g. Qatar (Psaropoulos 2023). In Michael Leigh's words, "putting the foot down on the accelerator in energy transition" was owed to the "major dose of realism coming into German and European energy policy" (Leigh 2023).

The conflict in Ukraine is, in Haukkala's words "culmination of a long-term crisis in EU-Russia relations" (2015, 1). Fearing that Ukraine might leave the Russian orbit, Russia started to pursue manipulative practices. Russia's 'success' was shortlived: Although Russia prevented Ukraine's signing of the Association Agreement (AA) with the EU in 2013, it only enhanced Ukrainian's determination to align with the EU in the long run (Haukkala 2015, 9).

The EU was surprised by the decision but accepted it without major consequences for any of the parties. Even after the illegal annexation of Crimea in 2014, the EU remained reserved in its reactions to Russia's actions. The EU imposed sanctions but these were mainly driven by the US. One of the main reasons was that the EU saw the conflict not only as a source for strained ties with Russia but also as source of destabilization within the EU. At that time, the EU refrained

from any major punishments against Russia and instead focused on preserving European unity: "Due to the existence of some misgiving concerning the chosen policy line of trying to sanction Russia, the onus for the EU has been on preserving internal unity" (Haukkala 2015, 11).

Over the years, the EU reacted to Russia's actions and imposed more stringent sanctions after e.g. the MH-17 plane crash in July 2014 or the poisoning and imprisoning of opposition members (e.g. restricted access to EU capital markets, import/export restrictions in certain things e.g. arms or dual-use goods) and became more determined to speed up the process of signing the AA. However, the EU maintained room for cooperative practices. In fact, it was not until the Russian invasion in Ukraine that EU and Russia had started to disrupt cooperative practices in the field of e.g. tourism and cultural exchange, energy policy, and finance. Following the invasion, the EU has gradually stopped working with Russia on projects in scientific research, environmental protection, counterterrorism, etc (General Secretariat of the Council 2023).

2.1.2. EU restrictive measures and the Russian invasion of Ukraine

The 2022 sanctions have become more severe, bringing about economic and political repercussions not only for Russia but also for Europe. From 23rd February 2022 and onwards the EU started to introduce sanctions packages in response to Russia's recognition of independence of Ukraine separatist regions and Russia's invasion in Ukraine. In addition, the EU has imposed sanctions on third countries beyond Russia including: Belarus - an ally to Russia, who also participated in waging and progressing the war, and Iran for its cooperative stance towards Russia through the production and sale of drones to Russia (Cafiero 2023). Since the beginning of the invasion, the EU's objective has been to "weaken Russia's economic base, deprive it of critical technologies and markets, and significantly curtail its ability to wage war." (General Secretariat of the Council 2023).

The adoption of the first sanctions packages was marked by cohesion among member states, acting unanimously in favour. To this day, the EU has released ten sanctions packages against Russia in response to the invasion.

The first sanctions package, introduced on February 23, 2022 in response to the Russia's recognition of Luhansk and Donetsk as independent regions package encompassed sanctions that were tied to the non-government-controlled areas of the Donetsk and Luhansk regions and included import/export bans on certain goods and technologies from/to the EU, and sectoral restrictions on trade and investment (European Commission n.d.c).

The second sanctions package, introduced on February 25, 2022 included travel bans and asset freezes against individual members of the Russian State Duma and National Security Council, Vladimir Putin and Sergey Lavrov. The EU further reinforced sanctions across different sectors – economy, finance, energy, transport and technology - and suspended facilitated procedures for visa applications for Russian public officials and businesspeople (European Commission n.d.c).

In the third sanctions package, introduced on March 2 and on February 28, 2022, the EU closed its airspace to all Russian aircraft, prohibited transactions with the Russian Central Bank, and introduced a SWIFT ban to a number of Russian banks. It further suspended broadcasting in the EU of state-owned media outlets and extended the list of individual sanctions (asset freezes and travel bans) not only against Russian citizens but also against Belarusians given Belarus' share in Russia's military invasion (European Commission n.d.c).

The fourth sanctions package, introduced on March 15, 2022, extended the list of individual sanctions, prohibited all transactions with certain-state owned enterprises, credit-rating services, investments into Russia's energy sector, exports of luxury goods, iron and steel imports from Russia to the EU (European Commission n.d.c).

The fifth sanctions package, introduced on April 8, 2022, sanctions exports of coal, other solid fossil fuels, wood, cement, seafood, and liquor to the EU. The list of individual sanctions was extended too (European Commission n.d.c). An important addition was a ban on Russian contractors participating in public procurement. Russian contractors are banned from receiving funding from numerous organizations acting under the EU's jurisdiction – both financially and through other forms of bilateral cooperation. Among others, the ban covers programs and entities such as Euratom, Erasmus+, Horizon Europe, etc. (European Commission n.d.c).

The sixth sanctions package, introduced on June 3, 2022, extended and strengthened the previous sanctions packages including new sanctions on both Belarus and Russia, updating the list of people and entities, and imposing service restrictions (consulting, public relations, accounting, broadcasting). The most crucial component of the 6th package is the ban on importing and transporting Russian crude oil into the Union and the introduction of a plan that decreases the usage of Russian oil during the next six and for petrol products during the next eight months (European Commission n.d.c).

The seventh sanctions package, introduced on July 21, 2022, included an import ban on gold, strengthened reporting requirements for sanctioned individuals, extended the list of banned export goods to Russia that might help Russia progress in the military and the security sector, a port access ban, financial sanctions that ban the acceptance of deposits of not only Russian legal but also natural persons, asset freezes, and medical and pharmaceutical exemptions (European Commission n.d.c).

The eighth sanctions package, introduced on October 5, 2022, further extended existing sanctions, but also introduced new measures. One such measure is the implementation of the G7 oil price cap, which permits EU operators to transport Russian oil non-EU nations as long as the price stays below a pre-set cap. The aim of this cap is to sustain global energy markets whilst reducing Russia's revenues. Also, it should help reducing inflation and maintain stable energy prices, in particular high gasoline prices. Another important aspect of the package is that it introduces a mechanism to prevent the circumvention of sanctions by listing a new criterion that facilitates the procedure to penalize anybody who assists in circumventing sanctions (European Commission n.d.c).

The ninth package, introduced on December 16, 2022, includes further listings, in particular of Russian armed forces, as well as particular officers and defense sector firms, members of the State Duma and Federation Council, ministries, Russian proxy authorities on occupied Ukrainian territory, as well as political parties. This was done in response to Russia's savage and planned missile attacks against people, the kidnapping and deportation of Ukrainian children to Russia, and the theft of agricultural supplies. To weaken Russia's military industrial complex, the list of export bans was extended including goods that may help Russia advance in its military activities

e.g. drone engines, camouflage gear, chemical and biological weapons, riot control chemicals, and electrical parts discovered in Russian military systems on the battlefield. Bans on Russian banks, restrictions on Russian media outlet, and restrictions on Russia's access to drones have also been included (European Commission n.d.c).

The tenth package, February 25, 2023, includes additional listing and actions taken against Iranians who work on the development of drones and other military-supporting components. The Wagner Group from Russia and its operations in other countries like Mali and the Central African Republic are also a target. Export bans have been implemented by the EU on critical dual-use goods and technology that supports Russia's military capabilities and scientific advancement. In addition the EU has listed goods that can easily be used as alternatives to dual-use goods, e.g. vehicles, construction equipment, items used in the aviation sector etc. Measures from the tenth sanctions package have also been directed at Iranian entities that have been exploiting EU components and supplying Russia with military drones to attack civilian infrastructures in Ukraine. With the introduction of these new prohibitions and limitations applied to EU exports and export bans from the previous packages the EU has sanctioned nearly half (49%) of its total exports to Russia for the year 2021. In addition to the €90 billion already sanctioned, these additional import prohibitions encompass over EUR 1.3 billion in EU imports, representing 58% of the EU's imports in 2021. The EU has further introduced a list of partner nations adding Australia, Canada, New Zealand, and Norway to the list (European Commission n.d.c).

The financial sector has also been addressed and imposes asset freezes and restrictions on three additional Russian banks. Russian citizens can no longer hold governing positions in vital infrastructure businesses owned by Member States. Additional steps have been taken to help EU operators to withdraw their investments from Russia, e.g., a shipping firm from a third country has been listed, which is suspected of aiding Russia in evading restrictions on oil exports. Regarding enforcement and anti-circumvention measures, the new package imposes reporting requirement on the assets of the Russian Central Bank. This step was taken to potentially use publicly owned Russian assets to help pay for Ukraine's reconstruction after the end of the war. Measures are taken to fight sanctions circumvention: Along with reporting obligations on frozen assets, notifications of private flights between Russia and the EU, David O'Sullivan, the EU's sanctions envoy, has addressed third countries to guarantee strict enforcement of the sanctions and prevent

their circumvention (European Commission n.d.c). In addition, a so-called inaugural Sanctions Coordinators Forum has taken place in Brussels on February 23, 2023, to bring together international partners and Member States to improve enforcement operations.

Taken together, the sanctions imposed on Russian economy represent the biggest and most comprehensive package of measures ever adopted by the EU in response to an international conflict. The impact of sanctions will be best understood after the conflict has ended or, at least, has “frozen”. However, it is already evident that these sanctions have a direct impact on the economy, industry, and infrastructure of EU states, and EU residents. The analysis discusses these aspects in further detail.

2.2. Definitions

2.2.1. *Sanctions*

Each study defines sanctions differently, but they are generally regarded as an economic tool of coercion that either aims at achieving economic goals or is intended to translate into political pressure (Portela 2010, chap. 1).

Portela differentiates between trade disputes and sanctions: Whereas the former aims at harming the target economically the latter aims at changing the political behaviour of a country. In addition, the bases of decision-making are different: For trade disputes, the WTO sanctions system is applied due to their purely economical nature (economic coercion to exert economic pressure). The WTO sanctions system provides clear mechanisms for dispute settlements and specifies countermeasures. As a result, decisions on sanctions imposed as a consequence of WTO rules violations are more predictable. The same applies for trade disputes in the EU context such as anti-dumping measures or remedies where EU legislation specifies breaches, which may lead to the adoption of countermeasures. In contrast, the EU has more leeway when it comes to deciding on sanctions against third countries in external relations policies that are not limited to trade (Portela 2010, chap. 1).

Miadzvetzkaya lists existing types of sanctions without providing a general definition, thereby including measures that are covered by the Common Foreign and Security Policy, the suspension of trade preferences, the withdrawal of development aid, sectoral economic sanctions, trade restrictions, and financial sanctions (2022, 6).

While coercing a target into changing its behaviour is the most commonly referred purpose of sanctions, many authors have argued that sanctions' purpose is plural and not limited to one particular goal: For example, Barber identifies three objectives; the first aim is to change the target's behaviour, the second is concerned with satisfying domestic expectations, the third aim is to uphold a balance in the broader international context (1979, 370). Based on these objectives, Antonin argues that sanctions are "a form of punishment of actors whose behaviour is deemed "deviant" from the dominant moral order, and they reflect a desire to extend national sovereignty" (Antonin 2022).

Walterskirchen, Mangott, and Wend identify five broad objectives a sender may pursue when imposing sanctions. The first objective, "coercion", aims at coercing the targeted state into undoing something. Second, "constraint", aims at constraining the targeted state in its capabilities to pursue specific actions, especially in the realm of military. The third objective refers to "deterrence" of a target from committing an objectionable act. Whereas the second objective aims at limiting the targets capabilities, the third objective aims at depriving the target of any possibility to undertake an objectionable act (2022, 3). The fourth objective is "destabilization", which can also be a condition for successful coercion. The fifth objective, "signalling" has proven theoretically more challenging. Some scholars discuss the addressee of the signal and argue that it can either be directed towards a domestic or an international audience. Others are generally sceptical about the signalling act arguing that it is mere doing something for the purpose of doing something. In line with Baldwin's assertion (2000, 102), Walterskirchen, Mangott, and Wend argue that signalling is an "influence attempt" that demonstrates determination, a willingness to act, and credibility and loyalty to allies/the broader international community (2022, 4).

Sanctions' effectiveness is a highly debated topic in literature: For instance, the naive theory holds that no leadership in a country will be able to withstand extreme economic pressure in the long run. It will either lead to a division of the elite or a split between the elite and the people,

further causing political pressure and political disintegration. Political leaders change as a result of provoked popular upheaval or new cost-benefit calculations: "the more value deprivation, the more political disintegration" (Galtung 1967, 388).

The shortcoming of the naive theory is that it disregards adaption as a form of response mechanism to sanctions. In practice, most political regimes 'accept' the sanctions regime and look for alternative means of engagement, i.e. circumvent sanctions (Portela 2010, chap. 1). Miadzvetskaya mentions that, "in a case like Belarus, it is not realistic to set too ambitious objectives and expect that the regime will commit political suicide so that sanctions are lifted." (2022, 5). Iran successfully overrides financial sanctions (including the ban from SWIFT imposed by the EU in 2012) via Dubai's market. Recently, Iran and Russia have linked their bank messaging system to circumvent the consequences SWIFT ban (Al-Monitor Staff, 2023). Nonetheless, the naive theory may be valid if there exists some sort of identification with the sender state and there is no better alternative other than compliance (Galtung 1967, 389).

In addition, Galtung questions whether value deprivation will ever lead to political disintegration since the targeted country's leadership may also capitalize on the imposed sanctions to strengthen its power (1967, 389). Among other examples, speculations related to this prediction were prominent in 2014, when Western countries sanctioned Russia for the annexation of Crimea and the fuelling of the Donbas war. Alekseev and Hale have found that political backfiring resulting in increased domestic support was marginal at that time in Russia (2020, 344). Contrastingly, Afon-tsev argues that increased economic costs as a result of sanctions are more likely to encourage domestic support for foreign policy decisions (2022).

Many scholars have considered the "identification with the sender state" as an important determinant of sanctions' success (Drezner 1999) (de Jonge Oudraat 2000) (Courtright and Lopez 2000). Drezner calls it the "sanctions paradox" as "sanctions against allies are more likely to be successful than between adversaries" (1999, 5).

The sanctions paradox has been criticized for being overly generalized: For example, Peksen criticizes the undifferentiated approach to authoritarian regimes arguing that the impact of sanctions differs across different authoritarian regimes. While sanctions directed against single-

party/military authoritarian regimes are unlikely to be effective due to their established strategies for circumvention, sanctions on personalist regimes may have the same level of effectiveness as sanctions on democratic governments because of missing institutional capacities to evade sanctions (2017, 1).

Along with domestic political conditions (political regime, etc.), Blanchard and Ripsman argue that a necessary precondition for economic sanctions to be effective is high political costs (1999,224). Sender states have to design sanctions in a way that considers the domestic and international conditions of the target and constrains other objectives, e.g. important strategic partnerships and economic relations of the target with third countries. Based on a deductive study, Pape argues that sanctions can be considered effective if the target complies with a significant portion of the sender's demands; the sanctions have been implemented prior to the target's compliance; and there is no other, more plausible, explanation for the target's change of behaviour (1997, 97). However, among several other aspects, Pape's dichotomous approach to sanctions effectiveness does not account for the partial effectiveness of sanctions across different goals and targets (Baldwin and Pape 1998, 195).

Whereas the external dimension of sanctions has been widely covered in scholarly and public debate, sanctions' effect on the sender is only marginally accounted for. Furthermore, given that sanctions are essentially an economic tool available literature predominantly analyses sanctions effect on trade and the economy. For instance EU's DG Trade and DG Agriculture holds accounts of EU exports to Russia (European Commission n.d.b.). Redeker looks at the impact of EU sanctions against Russia on the EU economy. He finds that each member state is affected differently as dependencies in exports, energy, automotive industries differ widely across EU member states (2022, 2).

Some authors implicitly acknowledge sanctions' influence on the sender through their identified objectives. Walterskirchen, Mangott, and Wend argue that the motives behind the imposition of sanctions are twofold: "states implementing sanctions might always have one eye on the target and the other on its constituency" (2022, 4). Along with coercing the target, Miadzvetskaya argues that sanctions aim at reaffirming the values one identifies with (2022, 13). Mostly, this serves as a signal to the broader international community. Based on Barber's identified objectives

"satisfying domestic expectation" and "upholding a certain international structure", Antonin interprets sanctions as an instrument for extending national sovereignty and for preserving the dominant 'normal' in the international order (Barber 1979, 370) (Antonin 2022).

In summary, there is no clear agreement on what constitutes the effectiveness of sanctions and when sanctions can be called effective. This holds true for both when assessing the effect on the target as well as on the sender. It is particularly challenging to assess any effects beyond the economic realm: these are likely to get lost in translation. Although any research on sanctions' impact beyond the economic realm assumes a certain "legal vacuum", this thesis aims at identifying the potential broader consequences of sanctions on the EU as a sender, and specifically in relation to the EU's collective identity. The following subchapter looks at the emergence of EU restrictive measures.

2.2.2. EU restrictive measures

When using the term "EU restrictive measures" in this thesis, I refer to Portela's definition of EU restrictive measures: Portela defines EU restrictive measures as sanctions whereby a mandate by the UN Security Council or by any other international organisation such as the Organization for Security and Cooperation in Europe is absent (2010, chapter 1). These cover the following legal frameworks: First, the legal framework for sanctions agreed upon in the framework of the Common Foreign and Security Policy (CFSP). Second, the suspension of development aid in the framework of Article 96 of the partnership agreement between the EU and the group of African, Caribbean and Pacific countries (ACP countries). Third, the withdrawal of trade preferences agreed upon under the General System of Preferences. Portela does not consider sanctions that are not covered by the CFSP legal framework, e.g. anti-dumping measures.

Following WWII, European states "allied" to prevent another bloodshed and established the so-called European Coal and Steel Community (ECSC) based on the premise of "whoever does not have power over the coal and steel industry will not be able to fight a war". Thus, European states sought stability and security through good economic relations but not necessarily a delegation of competences to a single overarching level. Yet, given particular international circumstances and the overlap of economic relations with foreign policy concerns to third countries,

European leaders quickly recognized the need to formulate common approaches beyond the economic realm.

Over the years, economic cooperation translated into other areas and expanded to other states: symbolic “European” features emerged and administrative, legal, and political started to develop at a common level. Despite a lacking institutional corps European states drafted joint documents on foreign policy issues such as the Middle East conflict. Several states acceded to the EU throughout the years. Border have shifted, neighbours have changed, and the European population has risen.

From the 1950s to the 1970s sanctions remained within the jurisdiction of individual states, which acted in accordance with the resolution of the UN Security Council or with national preferences, e.g. the protection of colonial interests (Sargsyan 2014, 102). Since the 1980s European countries increasingly started to use restrictive measures against third countries. Their number increased significantly following the introduction of the Common Foreign and Security Policy (CFSP) in 1993.

Pragmatic considerations led to the gradual development of a legal and institutional framework at the community level (Portela 2010, chap.1). The EC/EU autonomously imposed sanctions on third countries without the UN Security Council since the 1980s. First autonomous sanctions were imposed in 1980 against the USSR following the Soviet invasion of Afghanistan and in 1981 when Poland introduced martial law. In 1993, the European Political Cooperation (EPC) was replaced by the Common Foreign and Security Policy (CFSP). The CFSP became the second pillar of the Union’s new “three pillar system”. This marked the first step to a more integrated foreign policy at the Union level (White 2001, 94).

Since the 1980s, the number of sanctions regimes grew. For the EU, the international conditions were favourable to pursue a common policy that is based on restrictive measures and helpful in supporting EU's efforts to establish itself as a normative power (Pace 2007, 1051). Restrictive measures as an instrument proved to be more coercive than diplomacy and yet, not too coercive as military instruments. In addition, cooperation between senders has increased. Whereas earlier

sanctions involved maximum two senders, sanctions after the 1980s involved up to six senders although cooperation patterns differ widely (Borzyskowski and Portela 2016, 23ff.).

Sanctions are generally described as a tool between diplomacy and coercion. However, in the EU context sanctions are the most coercive instrument the EU can employ collectively against another international actor. The adoption of EU restrictive measures whose intended impact is not limited to the realm of trade is done within the framework of the Common Foreign and Security Policy (CFSP). Whereas EU trade sanctions have well established definitions, procedures, and penalties for non-compliance, the framework for EU restrictive measures under CFSP is broad and thus, the EU has more leeway in deciding when, what, and how to impose sanctions on third countries. There are principles that are codified and against which the EU should impose sanctions, e.g. human rights violations, but the challenge is that the countermeasures against the breaches are not specified. The United Nations Security Council's (UNSC's) rationale of resorting to sanctions once it has identified a "threat to international peace and security" is also wide-ranging and not as narrowly defined as economic sanctions falling under WTO dispute settlement system. Thus, sanctions as a foreign policy instrument still appear to be a construction site where clearly established processes are an exception to the prevailing circumstances with many actors, procedures, values and interests involved (Portela 2010, chapter 1).

Currently, the adoption of sanctions within the EU framework has two phases: First, there is a political decision adopted unanimously by the Council based on Chapter 2 Title V TEU (European Union 2012a). Depending on their type, sanctions are either adopted by the member states or by the community. Member states adopt restrictive measures when it concerns arms embargoes, diplomatic sanctions, and visa bans given that the underlying thematic areas are within the competence of member states. The Council may take decisions on composing and amending lists of items under arms embargoes. Sanctions that are within the competences of the Union have economic features and include some trade measures, flight bans, and financial sanctions (Kuijper et. al. 2015, 215ff.).

Article 29 of the Treaty on European Union (TEU) permits the Council of the European Union to decide to impose restrictive measures against third countries, non-state entities, or individuals in the context of the common foreign and security policy (CFSP) of the European Union (European Union 2012a). These actions are not punitive and are taken to force the target party/parties that

are seen to be responsible for objectifiable actions (e.g., disregarding international law or human rights, or pursuing policies or actions that go against the rule of law or democratic principles) to change their behavior. The actions taken must adhere to the goals of the EU's external action as outlined in Article 21 TEU (European Union 2012a).

Article 29 TEU outlines that the Council unanimously decides whether to implement, renew, or end sanctions regimes based on a proposal of the High Representative of the Union for Foreign Affairs and Security Policy (European Union 2012a). Under 215 TFEU, the economic and financial sanctions of such decisions (such as import/export restrictions and asset freezes) are implemented by the Council acting on the basis of a qualified majority upon a joint proposal from the High Representative and the European Commission (European Union 2012b).

EU sanctions may be applied either autonomously, that is, on the EU's own initiative, or on the basis of United Nations Security Council decisions. Example of EU restrictive measures are bans on the export of weapons and associated technology, entry restrictions/bans on entry (visa/travel bans), economic controls including import and export quotas, the freezing of cash and other resources controlled by targeted people or organizations. The Commission is in charge of ensuring, through monitoring, that the Member States execute and uphold the regulations imposing restrictive measures approved under Article 215 TFEU (European Union 2012b). By providing instructions and responding to interpretation queries put forth by national competent authorities, it also assists people, organizations, corporations, humanitarian workers, and Member States in their attempts to enforce sanctions (EUR-Lex n.d.).

The design of sanctions is a balancing act between idealist and realist considerations: it is not only driven by the triggering situation and conflict with EU values but also by economic considerations of member states (Miadzvetskaya 2022, 4) (Portela 2015). For instance, given the difficulties EU companies have been facing with implementing Belarus potash sanctions, diplomats in Brussels have requested to loosen the restrictions. Keeping the restrictions and buying from alternative source would lead to increased prices and lower quality potash (Nardelli and Fedorinova 2021). In other cases, member states are hesitant as sanctions might not only incur significant economic costs but also disrupt 'special friendships' of individual member states with third parties.

Some scholars have argued that the EU often struggles to identify clear objectives for adopting sanctions. For instance, Alekseev and Hale have argued that following the triggering situation in Ukraine 2014, the EU did not aim to overthrow Putin's regime but wanted to "inflict some kind of punishment on individuals in Russia who were behind its undesirable behavior and to pressure Russian leaders to join a peace process in their war with Ukraine" (2020, 356). This lack of a clear objective could be attributed to the differing capabilities of the EU and Russia in terms of engaging in power politics. While Russia has military means at its disposal, the EU's primary coercive instrument is sanctions. Consequently, the desire to inflict some form of punishment can be viewed as a realistic approach for the EU, given its limited capacity to fully engage in power politics.

To summarize, EU restrictive measures have become the most coercive common foreign policy instrument, thereby reflecting a compromise between the need for collective action and the reluctance to fully integrate security and defense at the common level. This allows member states to collectively respond and coordinate their actions in a more assertive manner compared to diplomatic measures, while still preserving their sovereignty and avoiding the convergence of security and defense policies, as well as other related policy areas. Further to that, the design of sanctions involves striking a balance between idealist and realist considerations, taking into account the triggering situation, EU values, and economic considerations of member states. In some cases, member states may hesitate to impose sanctions due to concerns about significant economic costs and potential disruptions to their diplomatic relationships with third parties. Scholars have also pointed out the EU's challenge in identifying clear objectives for sanctions. As will be discussed further, these factors contribute to the complexity and the ongoing formation of the EU's collective identity, as the EU seeks to find a balance between collective action, national sovereignty, values, economic interests, and individual diplomatic relationships in the adoption of restrictive measures. The following section outlines the theoretical framework for this research.

2.3 Theoretical Framework

This thesis focuses on the EU's collective identity in the face of EU restrictive measures. To capture the complexity of interactions between the EU and its member states, the EU and third coun-

tries, and EU member states and third countries, I use Wendt's constructivist framework for collective identity that allows for such complexity, is not limited to material power explanations, and does not hold identities and interests as constant.

2.3.1. Identity in international relations

What is identity in international relations? In constructivist terms, it refers to the "property of intentional actors that generates motivational and behavioural dispositions" (Wendt 1999, 224). These motivational and behavioural dispositions shape interests, which are further considered in the drafting of state policies. Knowledge and institutions provide grounds for cooperation, enabling states to form collective identities and shared interests through interaction. The interests and identities are not static but rather evolve through social practice. Actors can have different social identities that are influenced by subjective values and situational circumstances. Normative integration does not presuppose a cooperative intersubjective foundation of social identities. Instead, it relies on the existing social structure as the basis for intersubjective understanding.

According to Wendt "socially shared knowledge is knowledge that is both common and connected between individuals" (1999, 141). Structures created through human cooperation/communication are determined primarily by shared ideas rather than material forces (1999, 1). The EU for instance, was founded on the shared principle of fostering peace and stability among its member states. Further to that, the EU was established as an economic entity that reduces the significance of individual member states' material power. The development of the EU into a political entity with a normative foreign policy framework and the institutionalization of sanctions as an alternative coercive measure reflect the EU's efforts to establish limitations to material power structures. However, member states' possibility to invest in defense capabilities creates a counterbalance to the collective identity upheld at the European level.

In contrast, proponents of realism argue that power and human nature preclude significant cooperation to pursue a common good and to deal with normative issues. Realists posit that interests are pursued to satisfy the self. Interests of the other are disregarded (Wendt 1994, 384). Realist assumptions are static in the sense that they cannot explain the full spectrum of structural change. For realists, structural change occurs only when material capabilities of state actors

change, further leading to shifts in polarity. Thus, realism also does not consider the role of identities and interests as elements in driving structural change.

2.3.2. Collective identity in international relations

Identity can be approached in different ways: Wendt differentiates between corporate, type, role, and collective identity (Wendt 1994, 385). Corporate identity refers to the physical features of a country, e.g. location, size, shape. For instance, the EU is on the European continent and covers approximately 4,23 million km² of the earth's surface. Type identity refers to the typology of the country, e.g. the EU is a supranational entity that is founded on the values of democracy, human rights, freedom, equality, and rule of law (European Commission, n.d.a). Role identity only exists in relations to "Others" (Wendt 1999, 227). In international relations, it describes an entity's position in the international context. Article 3(5) TEU, which outlines the EU's aims "its relations with the wider world" alludes to the role of the EU in the international context: an exporter of values, a promoter of international law, a guarantor for peace, security and sustainable development (European Union 2012a).

Many scholars define collective identity as a "positive identification with the welfare of another, such that the other is seen as cognitive extensions of the self, rather than independent" (Wendt 1994, 386, Calhoun 1991, Melucci 1989). Whereas realists interpret identification with the other as an instrumental/situational act, constructivists argue that identification is empathetic: there are synergies of thought and feelings between one country and another. In that sense, the common language is sociologically driven, not economically. Even though the EU was shaped through economic cooperation at the initial stages, the underlying idea was a common sociological concern.

As per Wendt, collective identity "takes the relationship between Self and Other to its logical conclusion, identification" (Wendt 1999, 229). One of the drivers of collective identity formation is a shared perception that generates common interests and actions among actors (Wendt 1999, 343). The shared perception of future warfare brought about the creation of the European Coal and Steel Community (ECSC) and eventually developed into the EU. Wendt's elements of collective identity promotion have also materialized in the EU and include, among others, policy harmonization, and self-restraint in fiscal policies to maintain stability within the Eurozone.

In line with other constructivists, Wendt argues that collective identity is driven by empathy in the first place rather than practical considerations. Considering the self-other differentiation derived from actors' corporate identities identification is unlikely to ever be complete (Wendt 1994, 386). Cost-benefit calculations do remain, but decisions are no longer taken exclusively on the basis of these. In fact, increased identification with the other discourages free riding, encourages diffuse reciprocity and the fosters the readiness to bear costs without particular motivations (Wendt 1994, 386).

Collective identity can be promoted through mutual dependence, common fate, homogenization, and the principle of self-restraint (Wendt 1999, 343ff.). Interdependence emerges through common ties. These are predominantly established by economic partnerships. Common fate covers common experiences of threats, security and survival. In the absence of common experiences, the security and survival of the party and the alliance are at stake. Homogenization fosters similarities among countries including common understandings of ideology, socio-cultural aspects, and geography. The principle of self-restraint implies abstention from resorting to the use of force in inter-states dispute settlement. In legal texts, this principle often materializes in the form of a solidarity clause, such as Article 222 TFEU (European Union 2012b).

Collective identity may take the form of alliances or collective security systems although none of them are a prerequisite for a collective identity to emerge (Wendt 1994, 386). The rationale of alliances is instrumental: Self-interested states ally temporarily to respond to a specific threat. Once the threat has been dealt with the alliance loses its rationale. In contrast, collective security systems constitute a form of membership "with commitments to multilateral action against non-specific threats" (Wendt 1994, 386). Although not an essential requirement, collective identity fosters cohesion and the readiness to follow general rules of conduct. 'Membership' in collective security systems may come at a price for individual actors and thus, requires a balancing act between egoistic and altruistic behaviour (Wendt 1994, 386).

Wendt's conception of identity and interests as interdependent values further allows to conceive collective action not merely as a re-calculation of costs and benefits but as a process of redefining the self and the other. Wendt defines collective action as an interplay between self-interests and collective interests, which are not necessarily in opposition to each other: Self-interest can

cover also altruistic behaviour. Thus, Wendt argues that self-interest and collective interests are effects of social identities that result from identification. Identification leading to something 'common' depends on the degree of affinity with and the effects on the other. The results differ widely ranging "from conceiving the other as anathema to the self to conceiving the other as an extension of the self" (Wendt 1994, 386).

2.3.3. Mechanisms leading to collective identity formation

Wendt identifies three mechanisms that can lead to collective identity although the impact is likely to be nonlinear: (1) structural context; (2) systemic processes, and (3) strategic practice. Wendt focuses on the systemic level but mentions that the domestic level matters as well.

Structural context

The structural context expands on Wendt's argument of "anarchy is what states make of it" (Wendt 1994, 387). Structures at the regional or global level are forms of interaction that will either foster or inhibit collective identity formation. Whereas realists argue that structure is based on the balance of power principle, constructivists emphasize on its intersubjective nature while acknowledging some material aspects. Be it cooperative or conflictual, intersubjective structures define the anarchy states mediate in (Wendt 1994, 389).

Intersubjective systemic structures are a manifestation of common understandings, perceptions and social knowledge based on which states frame their identities and interests. The intensity and significance of intersubjective structures depends on the depth of interactions among state actors. Many proponents of constructivist theory argue that intersubjective structures emerge in cooperative settings whereas conflict is to be treated in material terms. However, Wendt argues that conflicts are intersubjective partially due to established common rules but essentially due to shared perception of threats.

Intersubjective structures ascribe meaning to material capabilities. The social reality determines the interactions between actors: In this regard, Wendt famously argues that "500 British nuclear weapons are less threatening to the United States than 5 North Korean nuclear weapons" (Wendt 1995, 73). In turn, material structures affect collective identity formation: In conflictual settings, actors are likely to interpret intentions in material terms, making it difficult to find positive iden-

tifications with the other. Some argue that material structures provide incentives to collective problem solving (e.g. Dan Deudney 1993 and nuclear weapons). If the structural context is asymmetric enough, it can lead to the formation of a hegemonic structure. According to Wendt, hegemony is a form of collective identity too - if material power is balanced, then hegemony is less likely to emerge as a collective identity structure (Wendt 1994, 389).

Systemic processes

Compared to structures, systemic processes and strategic practice have more linear causal impacts on collective identity formation: Wendt defines systemic processes as "dynamics in the external context of state action" (1994, 389). Two dynamics are important in this context: (1) rising interdependence and (2) the emergence/presence of a common other. One example for rising interdependence is an increase in interactions of trade and capital flows. The 'common other' may be a personification of an external aggressor or a more abstract threat such as a nuclear war, natural catastrophe, ecological collapse, etc. Both dynamics increase vulnerability and sensitivity for one another and add depth to the interactions.

Systemic processes also include transnational convergence of systemic values covering different issue areas such as culture (e.g. cultural globalization), language, politics (e.g. democratic institutions, the welfare state, concerns with human rights, etc.). Such convergence may arise from rising interdependence. But interdependence is always accompanied by certain fears and vulnerabilities. This explains why increased contact alone does not necessarily ensure cooperation. There might be a fear of losing control over a particular system or unease regarding new developments. States may resort to countermeasures and work towards safeguarding their egoistic identities (Wendt 1994, 389).

Strategic practice

Systemic processes describe collective identity formation as a process whereby actors' identities, interests and interactions continuously produce/reproduce agents and structures. Systemic structures and processes affect collective identity formation, but they rarely dictate specific actions. But strategic practice does, and it can directly reproduce/produce identities and interests. Wendt focuses on behavioural and rhetorical forms of interactions that can dictate specific forms of cooperation.

Borrowing from Robert Axelrod's strategy of reciprocity, Wendt argues that repeated acts of mutual cooperation between actors generate predictability but not necessarily common identity or common interests if one treats agents as egoistic constants. However, Wendt argues that identities' and interests' egoistic traits are paralleled by their dynamic feature and thus, an evolution of community through repeated acts of interaction is possible.

Over time, cooperation will affect identities and interests in two different ways: First, cooperation will have a reflective effect in the sense that agents develop identities by reflecting on their interaction with others. Cooperation may deepen if the others are significant enough (in material and/or intersubjective terms) to the self. Second, actors will attempt to project and maintain presentations of themselves through interaction.

Rhetorical practice includes "dialogues, discussion, persuasion, education, propaganda, symbolic actions, etc." (Wendt 1994, 391). The underlying assumption for these processes is that there is always some common ground with actors from all over the world. The objective of such practices is to alter others' perception of one's self-interests and foster solidarity in collective action. In this regard they may have a significant expressive function aside from their instrumental value in achieving group objectives.

3. Part II

3.1. EU restrictive measures and the EU's structural context

Following the Russian invasion of Ukraine, the EU autonomously imposed sanctions outside the UN framework while also attempting to coordinate its responses with those of the US (Congressional Research Service 2022, 3). The decision to adopt EU restrictive measures was taken unanimously, thereby implying an awareness of a common fate, encompassing common experiences of threats, security, and survival.

The awareness of a common fate resulting in the collective action of EU member states was paralleled by responses of other international actors, some of whom share the same understanding of

threats, security, and survival. To some degree, the US, EFTA countries and most countries covered by the enlargement policy (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia) conceived the EU's response in the form of sanctions as an extension of their self and also responded. The position of the two candidate countries, Republic of Serbia and Republic of Türkiye, is ambivalent, indicating a conflict between their social identities and interests (Stasiukevych et. al. 2022). Self-sanctioning has also taken place in the private sector: many international companies, even before the implementation of official government-imposed sanctions, have chosen to disrupt their business relations with Russia (Sonnenfeld and Tian 2022).

However, although the responses from the mentioned international actors reflected a common understanding of the threat, they varied significantly in terms of strength. The collective action taken by EU member states in the form of adopting sanctions seemed insufficient to counter to the common threat. Sanctions are primarily economic and diplomatic measures that should exert pressure and discourage certain actions, but they are not designed to stop ongoing wars. In addition, while the adopted sanctions aim at changing Russia's behaviour, it is not possible to fully steer their effectiveness. Thus, along with the military resources of individual member states, the US became an important provider of military resources to Ukraine and NATO the center for dealing with security implications of Russia's actions, thereby highlighting the EU's limited autonomy in the field of defense and security.

As outlined by Wendt, identifying with multiple social identities entails certain costs for one or the other identity, necessitating a balancing act between egoistic and altruistic behaviour (Wendt 1994, 386). Since the invasion of Ukraine, many international actors, the EU included, struggle to find this balance: The relative weakness of EU sanctions in effectively responding to Russia's power politics has prompted discussions and initiatives aimed at enhancing the EU's defense capabilities. One such initiative is the Permanent Structured Cooperation (PESCO), which was established by the EU in 2017 as an off-budget instrument to enhance defense cooperation among member states. In March 2022, the Council of the EU formally approved the Strategic Compass containing 80 actions for shaping a common security and defence policy (Council of the EU 2022a).

At the member state-level, many have turned to inward-looking politics by enhancing their security at the national level. Notably, Sweden has emerged as a frontrunner in enhancing its military capabilities by increasing defense spending at the national level and embarking on the path to NATO membership (O'Dwyer 2022). The developments in this regard are reminiscent of Jervis' conceptualization of security dilemma, which highlights the relative nature of building up security (Jervis 1978). In the EU context, security issues are dominated by member states regulatory framework and the EU's collective identity is threatened by member states' individual efforts of building their own military strength as well as member states' support to alternative collective defence frameworks. The EU has addressed this dilemma in the recent 2022 annual review on European defense report (CARD):

"Budget increases announced by most pMS are both an opportunity and a challenge. On the one hand, rising budgets provide more room to cooperate on acquiring or developing new capabilities. On the other hand, decisions could be taken in isolation without considering their medium to long-term impact on the EU defence landscape. This risk seems further substantiated by some pMS currently favouring individual, non-EU off-the-shelf procurements over long-term investments into Research & Development (R&D), including Research & Technology (R&T), and by the lack of progress achieved regarding collaborative and coordinated spending." (European Defence Agency 2022, 3)

Currently, despite efforts to enhance defence cooperation at the common level, protectionism prevails within defense sector. While a wide range of capabilities exist at the European level, the pursuit of national industry-specific interests hinders interoperability and the development of independent European military capabilities. This is evidenced by the recent European defense procurement trends, which lack coordination among member states. Data has shown that only 18 per cent of all defense investment by EU member states is conducted in cooperation with other EU countries (Besch 2022). In addition, there is a lack of a comprehensive portfolio on military production technology capabilities in the areas aerospace systems, ground combat, naval vessels, and cybersecurity at both the national and European levels. Furthermore, even though all states who are both EU and NATO member have raised their defense budget since 2015, overall defense expenditure in Europe remains fairly low with only a handful of nations - the UK, Poland, and the Baltic states—meeting NATO's two percent objective in 2021. Only Greece, at 3.6 per-

cent, has a GDP contribution to military that is comparable to that of the United States (Röhl, Bardt, and Engels 2023, 15) (Runkel 2023). To reach the two percent objective across Europe, European coordination and collaboration in the defense sector must include both higher defense spending and a strengthened European defense research infrastructure. Considering the lack of a coordinate European defense procurement system Röhl, Bardt, and Engels further argue for an establishment of a targeted procurement system encompassing all of Europe (2023, 15).

Homogenization of EU member states in the field of security and defense is structurally possible: The Lisbon Treaty provides for the possibility of developing a common security and defence policy in the EU. At the moment however, it remains predominantly a competence of the member states. In addition, Article 42.7 TEU - commonly referred to as the mutual defense clause - ensures a very subtle integration of the EU into Western structures currently dominated by the US in crises concerning the EU's and its member states' security and defense. This is comparable to the "hidden integration" of Europe with the emergence of East-West energy networks (Högselius 2013, 3). In particular, Article 42.7 TEU refers to NATO as being the cornerstone of collective defense: It lays out that the Union's commitments and cooperation in this field are required to align with the commitments made under the North Atlantic Treaty Organization (NATO). For states, which are members of both the EU and NATO, NATO "remains the foundation of their collective defence and the forum for its implementation" (European Union 2012a).

The "Russia question" in the war in Ukraine and the EU's lack of resources to counter the security threats resulting therefrom have brought back NATO's *raison d'être*. NATO's role in the Russia-Ukraine war is centered on ensuring the security and defense of its allies, supporting Ukraine, promoting stability, and addressing the broader implications of the conflict on Transatlantic security. NATO's established portfolio on defense has also led Finland and Sweden to apply for NATO membership in May 2022.

A strengthened NATO further undermines the EU's enhanced efforts of advancing its strategic autonomy due to potentially overlapping defense commitments and decision-making such as NATO's reliance on the US, resource constraints of individual member states to pursue two memberships, and political sensitivities in the context of transatlantic relations. Considering these aspects, many have dispelled the possibility of the EU's Security and Defense Policy evol-

ing into a counterbalance or substitute for NATO (Arrue 2023). The prospect of a "European caucus" within NATO, offering security assurances to the EU as a whole, is also unlikely since the combined weight of military capabilities of all EU member states is outweighed by the US (Moens, Vela, and Barigazzi 2022).

Another deficiency affecting the EU's structural context is owed to a missing centralized system that oversees the enforcement of EU restrictive measures that have not been approved under Article 215 TFEU (European Union 2012b). Unlike the United States, where the Office of Foreign Assets Control (OFAC) oversees the enforcement of sanctions, Brussels lacks a similar mechanism. Consequently, achieving consistent application of sanctions across all EU member states becomes challenging as the EU relies on national authorities. In fact, reports have shown that some member states may have violated the enforcement of sanctions, e.g. the Czech Republic and Sweden. Some Czech Republic companies are suspected of having connections to Russian sanctions individuals and companies (Bernatskyi 2022).

Fortunately, important steps have been made to advance harmonization of EU sanctions enforcement and the development of European criminal law. In November 2022, the Council adopted a decision to add the violation of restrictive measures (sanctions) to the list of particularly serious crimes ('EU crimes') under Article 83.1 TFEU. The Commission further presented a proposal for a directive on the definition of criminal offenses and penalties for the violation of Union restrictive measures (Council of the EU 2022b) (Caprile and Delivorias 2023, 8).

Beyond the political West, there are two important observations: Even though many countries took the same stance towards the conflict the EU's act of imposing Western values driven sanctions brought up an opposing common perception of the other: Europe or the political West. India's foreign minister's S Jaishankar's called it a "Europe's Problem is the world's problems" mindset. The African Union warned of the collateral impact of EU sanctions as they impede the purchase of grain and fertilisers (Mallet and Bounds 2022). Iran's overt aid to Russia can partially be explained by the shared experience of being sanctioned by the West and the resulting "shared attitude against the West". While Iran may not necessarily have a natural inclination to cooperate with Russia, it shares the burden of being subjected to Western sanctions (Cafiero

2023). In contrast, Belarus' support for Russia stems from dependencies and forces that compel Belarus to sympathize with Russia.

In short, the EU responded to the Russian invasion of Ukraine with an adoption of multiple sanctions packages. Sanctions as such are the most coercive instrument the EU can employ against security threats, which underlines the EU's commitment to solving conflicts without military means. However, in a situation whereby other international actors employ military means, sanctions are relatively ineffective and thus, require complementary forms of action, which indirectly lead to changes in the structural context of a collective identity. In particular, the coordination of collective military responses to Russia among European nations through NATO, the decision of Finland and Sweden to swiftly join the transatlantic alliance, and the extensive political and military support provided by the United States to NATO states bordering Russia and to Ukraine have reaffirmed the United States' dominance in the Western hemisphere and have re-established NATO's primacy in European defense and security. The development of the EU's strategic autonomy is undermined by these developments. Beyond the political West, the adoption of EU restrictive measures may have contributed to an opposing perception of Europe although it would be inaccurate to base this assumption exclusively on the EU's adoption of sanctions against Russia.

3.2. EU restrictive measures and the EU's systemic processes

Systemic processes in the EU context refer to the various mechanisms and procedures that govern the functioning of the EU as a supranational body. These aim at guaranteeing the smooth operation of the EU and institutions, the facilitation of decision-making and the promotion of EU member states collaboration. The most important EU systemic processes include its supranational decisions and the corresponding principles of subsidiarity and proportionality, the directions and priorities set by the European Council consisting of heads of state and government, and the legislative process.

EU restrictive measures adopted against Russia have highlighted the shortcomings of EU's systemic processes in fostering collective identity development. The adoption of EU restrictive measures served as a response against the emergence of a common external aggressor. Although

this resulted in increased interactions among member states it did not necessarily lead to enhanced cooperation across different sectors. As predicted by Wendt, the dynamics resulting from the adoption and effect of EU sanctions have not only made EU member states more vulnerable and sensitive to one another but have also made states turn towards defending their varying individual interests and goals.

The first five sanctions packages were imposed unanimously within a short period of time. At the initial stages the perception and understanding of the situation was shared among member states and strong enough to formulate a common response in the common habitual form of sanctions packages within the CFSP framework (Cardwell and Moret 2023, 1). In turn, the gradual development of the CFSP has provided the EU with an increasing willingness and ability to apply restrictive measures through an institutionalized decision-making process within the EU's legal system (Cardwell and Moret 2023, 3).

The unanimous response to the Russian invasion of Ukraine has somewhat defined a collective identity threshold, which is an aversion to war and a shared respect for territorial integrity. However, the CFSP only provides for quick and coherent responses as long as the understanding of a situation is shared between all member states, and it falls short of providing a framework for decision-making under divisive perceptions and interests. This is owed to the unanimity requirement in CFSP, which ascribes more meaning to national sensitivities rather than collective ones. Whereas the process of adopting first sanctions packages was surprisingly swift, the adoption of the sixth package turned into a lengthy process as it touched upon critical sources of EU-Russia relations - the energy sector - not only affecting the Russian Federation and its citizens but also seriously undermining the EU's energy supply.

In the early years of contemporary EU-Russia relations, EU's energy dependence was perceived as a balance to Russia's ambition of advancing its resources: Whereas Russia employed various strategies to supply its resources to partners, the EU sought to exert its power through policies that compel Russia to accept certain regulatory and market principles advocated by the EU (Siddi 2018, 1552). Dependence on Russian energy imports has increased over the years. In 2019, Russia accounted for approximately 29% of imported oil, 40% of imported natural gas, and 54% of imported coal. On the other hand, Norway provided 8% of oil imports and 21% of gas imports

(Redeker 2022). Notably, despite a drop in trade in other industries following the annexation of Crimea and the initiation of the Donbass conflict in 2014, imports of gas and coal have continuously increased during this period (Redeker 2022).

This strong interdependence brought about increased vulnerability to trade disruptions in this sector. In fact, vulnerability became the leitmotif of discussions concerning the adoption of sanctions from the sixth package and onwards. As such, trade disruption generally seems more damaging to Russia to whom the EU is its top-trading partner accounting for about half of all of Russia's exports. However, the total number does not consider the regional/national variations within the EU. In fact, direct economic consequences of trade interruptions with Russia are disproportionately concentrated in the Baltics and in other Central Eastern European countries (Redeker 2022).

The point in issue in the adoption of the sixth sanctions package, for instance, was an oil embargo on Russia. The two countries Hungary and Slovakia already voiced objection to the proposal before the EU summit as both strongly rely on Russian energy. Slovakia has been dependent on Russian oil since Soviet times and receives oil through the Druzhba pipeline. Hungarian PM Viktor Orban stated that such proposal would hurt the EU more than Russia (Al Jazeera 2022a) (Al Jazeera 2022b). As a result, the prohibition of imports from Russia of crude oil and refined petroleum products was adopted with exceptions: Bulgaria and Croatia received derogations and crude oil delivered by the pipeline was also exempted temporarily. Similar discussions prevailed in the following sanctions packages and the upcoming 11th sanctions package, which aims at cutting ties between France and Russia in the atomic sector, is also likely to result in derogations (Jack 2023).

National energy portfolios also affect vulnerabilities to energy supply disruptions: Countries possessing alternative structures to generate energy are less vulnerable to the adoption of EU restrictive measures against Russia in the energy sector. Denmark, Finland, and Sweden have high shares of renewable energy production; Bulgaria, France, Slovakia, and Sweden have high nuclear capacity; and the Czech Republic, Poland, and Romania have high domestic fossil fuel production, which makes them less prone to supply disruptions in the energy sector. Countries with liquified natural gas (LNG) capacity have a more diversified import base. Dependency on

Russian gas is particularly high and imports are more concentrated for EU countries that primarily rely on pipeline supplies (Ioannou et. al. 2023, 49).

But it is not just the varying dependencies that guide and complicate the adoption of EU restrictive measures. Divergent political attitudes towards Russia's energy imports also play an important role. In addition, EU energy policy provides for the possibility to be more lenient or be more stringent towards Russia as it is a shared competence between the EU and its member states (Siddi 2020, 3). Member state-level measures, such as arms embargoes, diplomatic sanctions, and visa bans, depend on the member state's individual perception of the conflict. Moreover, commercial actors contribute to shaping energy policy and play an essential role in EU-Russia energy trade. In contrast, in Russia, the state retains significant control over energy production and supply, allowing the Russian government to influence energy policies, pricing and distribution and thus, giving the Russian government considerable leverage in both domestic and international affairs via the energy sector (Siddi 2020, 3).

Interestingly, the Baltics, despite being highly dependent on Russian exports, are most vocal about advocating for more stringent measures against Russia. The Baltics and Finland have historically depended solely on Russian gas, utilizing a network of Soviet-era pipelines that continue to traverse the region to this day (Andzans 2022). While it may seem contradictory, A'Hearn argues that this aspect "intensifies both the struggle and the need for diversification" (2022, 22). The Baltics' historical experience under Soviet rule and their geographic proximity to Russia have made them more sensitive to Russia's actions and more vulnerable to security threats.

In contrast, countries like France and Germany adopt more lenient approaches. These positions already prevailed at the onset of the conflict: Up until the very last moment before the invasion, Scholz and Macron held out hope for a deal with Russia. In an effort to deter Russia from invading Ukraine, France and Germany had tried to revive the Normandy format¹ but were halted by the events of February 24, 2022, and onwards. Central and Eastern EU countries criticized the German and French approaches, accusing them of disregarding the nature of the Russian state and being overly dependent on Russian gas and financial gains (Euronews 2022). Despite this,

¹ The Normandy format is a diplomatic coalition that sought to peacefully resolve the conflict between Ukraine and Russia since 2014 (Lohsen and Morcos 2022). As of Russia's invasion of Ukraine, it became very difficult to uphold the Normandy Format.

President Macron actively continued to seek dialogue with President Putin during the early months of the war, leading to Prime Minister Morawiecki of Poland mockingly questioning the effectiveness of Macron's negotiations: "Macron, how many times have you negotiated with Putin? What have you achieved? Would you negotiate with Hitler, with Stalin, with Pol Pot?" (Euronews 2022). While Germany and France possess more resources to take a leading role in designing a clear response to Russia's invasion of Ukraine, they lack the trust of many Eastern EU member states, who have firm positions on the conflict but lack the resources to materialize them effectively.

The disruption of economic relations with Russia, which were predominantly shaped by the supply of energy as well as the ineffectiveness of sanctions in a geopolitical landscape driven by power politics became an incentive to invest in alternative sources of energy and to diversify its supplying partners. Some developments in this regard are indeed an opportunity to fast-forward the consolidation of norms and values in practice: The most prominent in this regard is the European Commission's REPowerEU Plan, "A plan to rapidly reduce dependence on Russian fossil fuels and fast forward the green transition" (European Commission 2022a). With the REPowerEU Plan, the EU has proposed to revise the renewable energy production target, with a goal of producing 45% of its energy from renewable sources by 2030. The plan addresses two main concerns: (1) pursuit of a sustainable future (2) independence from external actors (Martin 2019, 10).

At the same time, there have been developments, which may compensate for the energy shortages in the short run but significantly undermine the consistency and credibility of the EU's collective identity. For instance, the EU has invested in the expansion of LNG infrastructure, which allows for the import of gas from a variety of sources, including the United States and Qatar. This has helped to increase the diversity of the EU's gas supply and reduce its dependence on Russian gas. However, this approach may prove to be a costly and environmentally questionable endeavour. Conventional extraction of natural gas emits fewer emissions than fracking. In addition, unlike Russian pipeline gas, LNG from countries like Qatar and the US has to be liquefied before transportation. The energy losses during liquefaction and the carbon emission resulting from long-distance transportation also raise concerns about both the economic viability and environmental sustainability of this endeavour (Merk and Penke 2022).

Further to this, the EU has strengthened trade deals with Qatar and Azerbaijan, i.e. countries with poor human rights record. Even though the EU has repeatedly stated a commitment to promote and uphold human rights in its external relations, economic considerations often take precedence over normative principles. At the same time however, one could also argue that engaging with countries through trade and dialogue can be a means to promote positive change and encourage human rights reforms as initially done when building up relations with Russia in the 2000s and even between EU member states after World War II. By maintaining economic ties, the EU can encourage countries to improve their human rights practices over time.

Currently, concerns of individual member states take precedence over social identity concerns in the design, adoption, and enforcement of sanctions thereby impeding the EU from adopting a coherent stance towards the target and proceeding with a collective identity formation.

The EU should seek for more opportunities to capitalize on the negative impact resulting from its own sanctions, as done with the introduction of the REPowerEU plan. For instance, rather than letting frozen assets remain idle, the EU may explore ways to repurpose them. In this regard, the Commission has already discussed the possibility allocating frozen assets to support Ukraine's reconstruction efforts after the war (European Commission n.d.c). Along with providing much-needed assistance to Ukraine, the EU could increase interaction between member states through negotiations and potentially leverage the impact of sanctions on collective identity.

3.3. EU restrictive measures and the EU's strategic practice

As argued by many scholars, sanctions have an expressive function in signalling identification with a palette of norm and values. In the EU context, the adoption of sanctions against Russia signalled the presence of a collective identity, which, however, has proven difficult to uphold in the long run due to prevailing individual interests. In fact, the wide-scale adoption of EU restrictive measures resulted in a strategic practice marked by lacking coherence, masked by an assertive and principled rhetoric.

Initially, member states' collective identity was collective enough to acknowledge the invasion of Ukraine as a clear violation of Ukraine's sovereignty and territorial integrity and thus, formulate

sanctions against Russia. The unanimous adoption of the first sanctions packages has reflected a commitment to upholding the principles of international law and the territorial integrity of individual nations further cultivating a transatlantic solidarity on Russia-related issues. Imposing sanctions along this ideological track has also fostered interactions with the US although these did not result in more balanced transatlantic relations but rather reaffirmed US dominance in the political West (Shapiro and Puglierin 2023, 8).

Prior to 2022, the EU was successful in pursuing a dual approach towards Russia, combining the adoption of restrictive measures with cooperative measures and keeping channels open for interaction. The EU's rhetoric underlined the importance of peaceful resolution through negotiations and expressed a willingness to actively participate in diplomatic efforts. However, after February 24, 2022, the feasibility of cooperative measures became increasingly challenging. The EU's rhetoric in the adoption of restrictive measures against Russia became assertive and principled relative to previous adoptions. With the adoption of each new package, the EU's ability to engage in cooperative measures has gradually been constrained. Notably, the fifth sanctions package introduced a ban on Russian contractors participating in public procurement. This ban extended to various organizations operating under the EU's jurisdiction, prohibiting Russian contractors from accessing funding and other forms of bilateral cooperation from programs and entities like Euratom, Erasmus+, Horizon Europe, and more (European Commission n.d.c.).

Along with framing a particular narrative, sanctions as a response mechanism can mobilize public and international support on a particular issue. Although the reaction of states involved in the European enlargement policy to EU restrictive measures against Russia varied to some extent, most states supported and aligned themselves with the EU's stance on imposing sanctions. Also, EFTA countries (Iceland, Liechtenstein, Norway, Switzerland) - countries that are economically and geographically close to the EU have aligned their responses with those of the EU. However, sanctions' adoption does not guarantee mobilization. For instance, Israel, to whom the EU is its biggest trading partner did not officially react to the EU restrictive measures adopted against Russia. Israel maintains its own independent foreign policy and has its own considerations and priorities in its relations with Russia, which is owed to its close ties with both the EU and Russia. Israel has close ties with Russia, particularly in areas such as defense cooperation, trade, and cultural exchanges. At the same time, Israel maintains significant economic and diplomatic rela-

tions with EU member states. As such, Israel is likely to have been cautious in publicly expressing its position on the EU's restrictive measures to avoid jeopardizing its relationships with either party (Abrams and Weiss 2022).

In terms of public mobilization, an interesting development occurred in the context of the so-called Conference on the Future of Europe, which took place from April 2021 to May 2022. Proposed by the European Commission and the European Parliament in 2019, it was a series of citizen-led discussions centered on a number of EU key priorities and challenges related to the future of Europe. Whereas the initial conference had started before the adoption of EU restrictive measures against Russia's invasion of Ukraine, citizens considered the EU's response to the invasion and the effects resulting therefrom. Section 17 of the final proposal emphasizes on the importance of reducing dependency of the EU in economically strategic sectors. Among other suggestions, citizens have concluded that it is important to maintain an ambitious trade negotiation agenda, to diversify the supply of sources of critical raw material, and to work on a European-wide programme to support small local producers (European Parliament 2022, 61). Section 18 of the final proposal specifies the reduction of dependency of the EU from foreign suppliers in energy. It suggests adopting a strategy to promote greater autonomy in energy production, actively support public transport and energy efficiency projects, expand on clean and renewable energy (solar and wind), transition towards climate neutrality; increase collaboration on the assessment of the use of nuclear energy in light of the green transition (European Parliament 2022, 62). As such, EU citizens support the idea of achieving greater autonomy as an entity and of reducing dependence on third parties' strategic sources (European Parliament 2022).

The European Commission responded to the Conference proposals with a Communication identifying relevant points of the Conference proposal, discussing the current state of play, and highlighting a number of initiatives related to the adoption of restrictive measures: As an example, some of the initiatives are concerned with decarbonising particular sectors, e.g. the FuelEU Maritime and the RefuelEU Aviation initiatives. (European Commission 2022b).

Sanctions can also have economic and political repercussions that amplify already-existing disparities or create new ones by affecting various sectors or geographical areas unevenly. This can lead different intensities of sanctions' adoption and individual efforts to maintain important ties

with the target, further contributing to incoherence at the collective level. For instance, France maintaining commercial ties Rosatom in the atomic/nuclear sector is one example of individual efforts to preserve crucial ties (Jack 2023). Hungary has continuously sought to establish closer ties with China since the adoption of the first sanctions packages against Russia. This approach has been seen as a strategic move by Hungary to diversify its economic partnerships and reduce its reliance on Western countries, including the EU, especially in the face of EU sanctions against Russia. Certainly, this has drawn criticism and has raised concerns about Hungary's adherence with EU norms and values. But, vice versa, this also evidences that the EU's current institutional structure provides for this possibility and the adoption of EU restrictive measures increases the chance for this to occur. In general, Hungary has moulded the EU's common response to the invasion according to its own needs: While it was hesitant about imposing sanctions against Russia, Hungary nevertheless expressed its willingness to reduce energy dependency from Russia and even eliminating reliance on Russian gas by 2050 (Reuters 2022). However, the first steps in this regard, were not taken within the European orbit: In May 2023, Hungarian Foreign Minister Peter Szijarto announced that Hungary anticipates receiving three billion euros in Chinese investments in the automotive sector. This investment is expected to enhance Hungary's position as a regional hub in the shift towards electric mobility (Simon 2023).

Furthermore, EU restrictive measures also allow for reflection on whether there has been a shift or an emergence of new inconsistencies in the EU's strategic practice. For instance, one could argue that the impact of EU restrictive measures on the EU has significantly reduced the EU's capacity to act based on normative power principles. The EU's "buffering" practices to compensate for the effects of its own restrictive measures such as the signing of trade deals with Qatar – a country with a poor human rights record - do not align with the normative power principles based which it imposed sanctions on Russia. To reflect on Wendt's "500 British nuclear weapons are less threatening to the United States than 5 North Korean nuclear weapons" (1995, 73) in this context: Russia's violation of human rights are not treated the same as human rights violations of e.g. Qatar. Yet, one could also counter this argument if one refers to EU normative power not just as one that is derived from international law and institutions (Tocci 2008) (Manners 2002) but also as one that is dominated by the political West: Qatar does have a poor human rights record, but an energy deal with Qatar is still considered less threatening compared with the West's long term adversary Iran due to concerns over its nuclear program and foreign policies.

Moreover, previous cooperation with Russia, whose motivation to align with Western values has faded a long time ago, has also been marked by the same inconsistencies. In the long run, it is possible that all three gas-rich countries, Russia, Iran, and Qatar can influence the European gas market if sufficient diversification and green transition in the gas market does not occur (Shayan 2023).

Regarding the reflective effect of strategic practice, it is currently difficult to evaluate what identities member states will develop because of their interactions within the EU and beyond. The EU's major drawbacks are that it still lacks a comprehensive strategy for EU-Russia relations and that the wide-scale adoption of EU restrictive measures has become more habitual than strategic. In the worst case, this may strain the sense of a shared purpose within the EU.

In the future, the limits of EU jurisdiction can have implications for the EU's strategic practice, requiring diplomatic efforts to explain and justify the EU's action to other international actors. Inconsistencies can also create a vicious cycle within the EU, with member states justifying individual partnerships with countries common opponents based on the EU's inconsistent approach.

Yet, to end on a positive note: At the moment, despite the increasing difficulties associated with the adoption of new sanctions packages and increasing difficulties to uphold a consistent strategic practice diffuse reciprocity - whereby member states shoulder costs to respond collectively to a particular issues - has not faded completely. Aware of their common fate, derived from the common experience of a security threat, member states continue to preserve a common rhetoric, to negotiate on sanctions packages, and to share costs associated with them. Interestingly, the Baltics are being particularly vocal about imposing stricter sanctions against Russia despite being among the countries that are most heavily impacted by sanctions (A'Hearn 2022, 22).

4. Conclusion

The impact of sanctions on collective identity is conditioned by the geopolitical context, the degree of cohesion and unity within the group imposing them, the trajectory of sender-target rela-

tions, and the responses from both the target and the sender. Based on these determinants, sanctions can either be an effective tool that promotes collective identity or an obstacle that impedes collective identity.

How can EU restrictive measures potentially affect the EU's collective identity? By imposing sanctions, the EU expresses and reinforces normative identity covering its commitment to upholding principles of international law, human rights, and peaceful conflict resolution. Further to that, the adoption of sanctions reflects an awareness of a common fate that is rooted in shared experiences of security threats and survival. Reflective processes resulting from the adoption of EU restrictive measures following Russia's invasion of Ukraine have fostered interactions between the EU, its member states, the US, and NATO. The common experience of a security threat in the face of Russia's invasion of Ukraine has reinforced an "us-them" distinction between these actors and Russia.

However, such increased interaction did not necessarily advance the formation of a collective identity at the EU level. For member states, restrictive measures have produced similar concerns at the common level but asymmetric effects at the national level, further leading to divergent secondary responses. In addition, given that the energy sector – one of the main sectors targeted by EU restrictive measures – is not an exclusive competence of the EU, member states can pursue individual interests by negotiating individual trade deals and investments with/from third countries, thereby promoting disparities among EU member states. As an example, Hungary shares the common understanding of reducing energy dependency from Russia but also acts individually by striking deals with China.

For the EU, transatlantic cooperation remains strategically important. NATO's strengthened role as the primary collective defense alliance for most EU member states and the US' reaffirmed role as the security guarantor in the political West has moved the development of EU strategic autonomy into the remote future.

Furthermore, the EU's foreign policy conduct continues to be strained as it is compelled to complement its long-term values in foreign policy with short-term objectives that buffer the the ef-

fect of sanctions on the EU. Notably, the EU has strengthened partnerships with countries that have poor human rights records and governance practices.

The impact and effect of sanctions on the EU can be best understood once the conflict has ended or has, at least, frozen. Nonetheless, despite the already existing significant economic repercussions for EU member states, member states continue to preserve a common rhetoric, to negotiate on sanctions packages, and to share costs associated with them. Interestingly, the Baltics are particularly vocal about imposing stricter sanctions against Russia despite being among the countries that are most heavily impacted by sanctions.

In conclusion, sanctions are a potent foreign instrument that deviates from conventional notions of coercive state power. Yet, sanctions have limitations in addressing security threats, leading to increased dependencies on third actors, individual approaches to security and defense at the member state-level, and inconsistencies in the EU's foreign policy framework. To ensure a more coordinated and effective implementation of sanctions, the EU should establish a centralized system overseeing their enforcement. The EU should also consider adopting secondary sanctions, which would target accomplices of the targets.

To better understand how not to sanction, I suggest broadening the spectrum of theoretical approaches to studying sanctions' effect on the sender. For instance, it would be as valuable to explore the Russian invasion of Ukraine and EU-Russia relations from a realist perspective. Also, as EU restrictive measures reflect the broader challenges of EU's CFSP, I recommend to explore viable 'updates' for EU systemic processes, e.g. qualified majority voting, that reflect a commitment to collective interests over national interests. Finally, evaluating the sustainability of EU's current response would provide a better understanding of the future of EU collective identity and also help in formulating a strategy for EU-Russia relations.

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