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Sudan's Persian Gulf Power Games

By Omer Ismail

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The project to end genocide and crimes against humanity

COVER PHOTO: Omar al-Bashir shakes hands with a Middle Eastern dignitary at an Arab League summit.
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Executive Summary

Recent shifts in the politics of the Persian Gulf could benefit the ruling coterie in economically isolated and politically ostracized Sudan. Sudan's inclusion in the broader Arab coalition against the Houthis in Yemen,[1] the recent agreement in April on a framework for a nuclear deal to be finalized between Iran, the United States, and others,[2] and the rapprochement between Ethiopia and Egypt sealed by the Nile waters agreement,[3] all dramatically alter Sudanese President Omar al-Bashir's view of his opportunities. At first glance, these evolving relationships may make it harder for American policymakers, who are now part of the same fighting coalition as Sudan in Yemen, to exercise pressure on Sudan's ruling National Congress Party (NCP). However, Western diplomats are not without options. Sudan's growing economic dependence on Persian Gulf countries means that those countries now have even more leverage to press the NCP to agree to the political reforms and the negotiated compromises with the opposition that are needed to forge a lasting peace. American policymakers seeking to influence outcomes in Sudan should take advantage of their strong ties with the Gulf and the Gulf's strong ties to Sudan.

Sudan's traditionally strong relationships with Persian Gulf countries, particularly Iran, Saudi Arabia, and Qatar, have been a cornerstone of foreign policy in Khartoum for decades. Sudan's relations with the Arab Gulf countries have seen ebbs and flows over time, but Sudanese leaders have historically placed a premium on strong bilateral relations with those states. Although Iran, Qatar, the United Arab Emirates, and Saudi Arabia have been at odds with one another on many issues, Sudan's leaders have managed to

maintain fruitful relations with all sides. According to a leaked transcript of internal government deliberations, Sudan's Director General of Intelligence and Security Gen. Siddiq Amer allegedly suggested that "the Arab World got divided into two [axes] or alliances, the Resistance axis and the Moderate axis. We must have a foot hold in both camps."[4] This two-faced approach to foreign relations has become Sudan's signature geopolitical move. In Libya, Sudan and Qatar have collaborated militarily in their support to Islamist rebels for years.[5] Then, in 2014, after joint Emirati and Egyptian airstrikes on those same rebels, the Sudanese government publicly pledged its support to Libya's internationally recognized government.[6] Similarly, Sudan first worked with Iran to channel support to the Houthis in Yemen, but then Sudan reversed its policy and joined the Saudi coalition.

A Foot in Both Camps

As a result of this adept balancing act, Sudan's ruling NCP benefits from financial support from Qatar, military cooperation with Iran, and commerce with Saudi Arabia (described in further detail below). Additionally, Sudan's burgeoning gold trade means that its business links with refiners and dealers in the United Arab Emirates have grown increasingly important as well. On the whole, Arab Gulf countries—economic heavyweights in the region and strong American allies—have provided Sudan with vital foreign direct investment, foreign currency transfusions, banking ties, remittances, military aid, and significant trade ties. Political alliances with Sudan have now been cemented by Sudanese participation in the Saudi campaign against the Houthis in Yemen. Since joining the coalition, senior Sudanese government officials have boasted about Saudi deposits into the Central Bank and an impending cash infusion from newly solidified ties with Gulf allies.[7]

Saudi Arabia and the United Arab Emirates have had significant ties with Sudanese banks.[8] A suspension in these ties in early 2014[9] revealed the extent to which Sudan's currency liquidity relies on financial flows between these banks and others that link Sudan to the international banking system.[10] When Saudi and UAE banks suspended ties, Sudanese economists warned that the disruption would result in the loss of remittances from more than three million Sudanese people working in Saudi Arabia and could exacerbate a trade imbalance between Sudan and Saudi Arabia.[11] Agricultural products, including shipments of livestock to Saudi Arabia, were affected, and the development was noteworthy for a food-insecure Gulf country that relies heavily on such imports from Sudan.[12] The Sudanese government, however, dismissed these claims and denied that the suspension had had any negative effect on the national economy.[13] There were, however, several reports indicating that the suspension in Saudi and UAE banking ties also affected wire transfers, export payments, shipments of goods (including gold), and other forms of commercial exchange between Sudan and the Persian Gulf countries.[14] Sudan's inclusion in the Yemen coalition has quieted many of the fears within Sudan that were raised by the Gulf's 2014 suspension of banking ties.[15]

Persian Gulf countries are not only important investors, bankers, and military backers for Sudan; they are also significant trade partners in labor and goods for Sudan. Generations of Sudanese people were born and raised in the Persian Gulf; hundreds of thousands of Sudanese professionals and laborers live and work in that region.[16] These Sudanese expatriates send home remittances[17] that have provided the Sudanese economy with an important source of revenue and hard currency. Sudan also relies on Persian Gulf trade partners for imports and exports of goods. Sudan imports packaged food, petroleum products, electronics, and motor vehicles from the Persian Gulf countries. These countries in turn import agricultural products and livestock from Sudan.[18]

Although few official verifiable public records exist, Sudanese officials claim that Persian Gulf countries have provided significant foreign direct investment (FDI) to Sudan.[19] Saudi Arabia, Qatar, Bahrain, and the UAE have investments in Sudan's agriculture (including livestock) as well as infrastructure (including oil transit infrastructure).[20] Kuwait has invested in real estate and sugar production.[21] Sudan has received critically important military support, humanitarian aid, and infusions of foreign currency from Qatar in particular. Qatar has pledged $2 billion in foreign exchange to the Central Bank of Sudan and delivered a portion of that sum, according to news reports.[22] Qatar has also provided humanitarian assistance and pledged more than $88 million for the development of Darfur.[23] Qatar has also diplomatically supported peace talks surrounding the Doha Document for Peace in Darfur, though insistence on the Doha process has undermined progress toward a comprehensive peace for conflicts in Darfur, South Kordofan, and Blue Nile. International consensus has coalesced around the need for a comprehensive process.[24]

Beyond its economic reliance on Qatar and Saudi Arabia in particular, Sudan also depends heavily on Iran for industrial production of military materiel that serves as a significant source of revenue.[25] Iran reportedly has a 35 percent share of the Sudanese military industrial complex, El-Yarmouk, operated by Sudan's National Intelligence and Security Service, where Iranian technical experts and Revolutionary Guard Corps members also work.[26] Small Arms Survey and Conflict Armament Research have found that Sudan manufactures for its use and sale several types of artillery, rockets, and machine guns at El-Yarmouk.[27] Sudan's Iran-supported military manufacturing sector has grown and is continuing to grow.[28] This industry has not only armed Sudanese forces and their allied militias but also armed state and non-state actors in many conflict zones in Africa.[29] Revenues from these weapons sales provide Sudan with income and foreign currency. Iran's investment in Sudan includes the auto manufacturing sector. The Iranian group Société Anonyme Iranienne de Production Automobile (SAIPA) works with GIAD Motors Co. in Khartoum to distribute vehicles, including light pickup trucks, small vans, and cars.[30] GIAD also manufactures armored personnel carriers, with the help of advanced vehicle manufacturers from the West like France's Renault and Germany's MAN and Japan's Nissan, among others.[31]

The Muslim Brotherhood Remains a Wedge Issue in the Gulf

Sudan's NCP traces its roots to the political Islamist Muslim Brotherhood movement, which originated in Egypt and has since spread internationally.[32] Sudan's ruling junta is one of the world's oldest and longest-running political Islamist Sunni regimes.[33] While the regime has held on to power for over a quarter of a century, many Sudanese people strongly oppose the type of Islamist ideology and identity that the NCP has promulgated in Sudan.[34] Nevertheless, the international political Islamist movement has established Islamic banks in Sudan in order to help the movement grow. Sudan's Islamist movement and its supporters have brought hundreds of millions of dollars in investment to Sudan and helped establish and develop influence within banks.[35] These banks have helped build the modern foundations of Sudan's economy and infrastructure and have attracted additional investment, particularly by wealthy Arab states.[36] When an unprecedented rift involving Saudi Arabia and Qatar developed in 2014 over support for Islamist movements, Sudan's NCP also felt the fallout.[37] As Gulf neighbors renegotiate their relations after pursuing their campaign in Yemen,[38] continued economic support for the international Muslim Brotherhood and Sudan's NCP hang in the balance.

Qatar currently supports the international Muslim Brotherhood more strongly and overtly than Saudi Arabia, the UAE, and Bahrain.[39] The latter three recalled their ambassadors from Doha between March and November 2014, accusing Qatar at the height of the rift of violating the Gulf Cooperation Council's security agreement and principles.[40] Saudi Arabia, Bahrain, and the UAE asked Qatar to comply with an

undisclosed seven-point plan that was said by leaked sources to include expelling international Brotherhood leaders from Qatar and reallocating funds earmarked for support to the Brotherhood. Gulf states are now mending fences with one another.[41] Saudi Arabia and the UAE have pressured Qatar to alter its policy toward the international Islamist movements, including the international Muslim Brotherhood, and withdraw its support to these entities in order to align with the policies of its Persian Gulf neighbors.

Because Sudan is economically isolated, distressed,[42] and heavily dependent on a small number of financial backers, it is more vulnerable than ever to any loss of support. Sudan has long relied on natural resources and agriculture for its national revenue. Years of increasing internal economic hardship in Sudan, combined with external economic isolation, including international sanctions,[43] have created a severe financial crisis for the NCP. Double-digit inflation is rising as Sudan has lost revenue from oil in South Sudan's independence, and Sudan has subsequently lost oil transit fees in South Sudan's protracted conflict. Sudan has seen its own oil revenues and foreign currency reserves drop. NCP leaders face a cash crunch in battling these factors as they also continue to arm, equip, and pay those who lead the protracted violent attacks in Darfur, South Kordofan, and Blue Nile.[44]

In response to severe economic pressure, the Sudanese government has sought to capitalize on gold discovered in Darfur—an important potential revenue source for the regime, but one that does not fully compensate for the loss of oil revenue.[45] Exports of gold, particularly gold from North Darfur mines that have been the site of conflict, are currently a significant source of foreign exchange for the Sudanese government. Gold purchases by Sudan's Central Bank have, however, also exacerbated currency inflation[46] and further complicated the economic crisis, continuing to leave Sudan heavily dependent on Persian Gulf countries for funds, foreign exchange, and investment.

A New Source of Leverage

The NCP's grip on power remains firm, but its tendency to use the same tactics to meet increasingly daunting political and economic challenges is not sustainable. To encourage greater constructive engagement from the government of Sudan, U.S. policymakers should take advantage of strong relationships with Gulf allies to ask that these states use their considerable leverage to support a push for an end to Sudan's deadly internal wars, which will require serious compromises by the NCP regime that will not be made absent much greater pressure to alter its cost-benefit calculations. As part of that leverage, U.S. policymakers should encourage Qatar to avoid making further cash infusions into Sudan's Central Bank and dissuade Saudi Arabia from entertaining Bashir's requests for financial support in exchange for Sudanese participation in the Yemen coalition. The Dubai Multi Commodities Centre's recent decision to remove Kaloti from its list of approved refiners,[47] in large part due to suspicions about conflict-affected gold from Sudan entering the supply chain, illustrates the willingness by the United Arab Emirates to remove conflict-affected gold from the global supply chain. The gesture also shows the UAE government's potential to serve as a constructive partner in international efforts to change the calculus of Sudan's leaders. As U.S. relations with Iran evolve, a nuclear deal with satisfactory terms for both parties and a normalization of relations could present new opportunities for future cooperation on Sudan policy.

Endnotes

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[26] Africa Confidential, "Khartoum's military-industrial complex," November 2, 2012, available by subscription at http://www.africa-confidential.com/article/id/4664/Khartoum%E2%80%99s_military-industrial_complex; Small Arms Survey Human Security Baseline Assessment (HSBA) for Sudan and South Sudan, "The Military Industry Corporation (MIC)," pp. 1-2, July 2, 2014, available at http://www.smallarmssurveysudan.org/fileadmin/docs/facts-figures/sudan/HSBA-MIC-Open-Source-Review-2014.pdf. Conflict Armament Research also learned that workers from Yarmouk receive training in Iran for production of weapons and ammunitions. Conflict Armament Research, "The Distribution of Iranian Ammunition in Africa: Evidence from a nine-country investigation" (London: December 2012), pp. 24, 26, available at http://www.conflictarm.com/wp-content/uploads/2014/09/Iranian_Ammunition_Distribution_in_Africa.pdf.

[27] Africa Confidential, "Khartoum's military-industrial complex"; Small Arms Survey Human Security Baseline Assessment (HSBA) for Sudan and South Sudan, "The Military Industry Corporation (MIC)," pp. 1-2.
[28] Small Arms Survey noted that Sudan's Military Industry Corporation was one of the largest presenters at the late February 2015 International Defence Exhibition and Conference (IDEX) in Abu Dhabi, with a large increase in volume and variety of weapons compared to Sudan's display at IDEX in 2013. Many of these Sudanese-manufactured weapons were of Iranian and Chinese design. Small Arms Survey Human Security Baseline Assessment (HSBA) for Sudan and South Sudan, "Sudan's Military Industry Corporation display at the 2015 IDEX [International Defence Exhibition and Conference] convention," March 9, 2015, available at http://www.smallarmssurveysudan.org/fileadmin/docs/facts-figures/sudan/HSBA-IDEX-2015.pdf; Peter Dörrie "Sudan Is Arming Africa and No One Cares: Khartoum's weapons and ammo fuel conflicts across the continent," Medium, War is Boring blog, February 6, 2015, available at https://medium.com/war-is-boring/sudan-is-arming-africa-and-no-one-cares-3bf740d47304.
[29] A 2013 West Africa threat assessment by the U.N. Office on Drugs and Crime noted that Sudanese weapons and ammunition had been found in countries that do not purchase weapons from Sudan, including Burkina Faso, Côte d'Ivoire, Guinea, and Mali. U.N. Office on Drugs and Crime, "Transnational Organized Crime in West Africa: A Threat Assessment" (Vienna: February 2013), p. 35, available at http://www.unodc.org/documents/data-and-analysis/tocta/West_Africa_TOCTA_2013_EN.pdf. For evidence, including images and technical details, of Sudanese-manufactured and Sudanese-transferred weapons in the Central African Republic, including a Sudanese Karaba vehicle, see Conflict Armament Research, "Non-state Armed Groups in the Central African Republic: Types and sources of documented arms and ammunition" (London: January 2015), pp. 6, 8-13, available at http://www.conflictarm.com/wp-content/uploads/2015/01/NONSTATE_ARMED_GROUPS_IN_CENTRAL_AFRICAN_REPUBLIC2.pdf. References to the Karaba vehicle appear on pages 8-9 and 12 with the note that the vehicle had not previously been observed in the world since its display at the 2013 IDEX convention in Abu Dhabi. Peter Dörrie notes that Sudanese weapons have also appeared in Democratic Republic of Congo, South Sudan, Somalia, and Libya. Dörrie "Sudan Is Arming Africa and No One Cares." See also, Al Jazeera and agencies, "Libya accuses Sudan of arming rebels," September 8, 2014, available at http://www.aljazeera.com/news/middleeast/2014/09/libya-sudan-plane-20149794158236322.html.
[30] See SAIPA's list of overseas distributors, including Oday and GIAD Motors Co. in Khartoum, list available at http://www.saipacorp.com/en/agencies/overseasdistributor (last accessed May 2015).
[31] Business Monitor International Sudan & South Sudan Autos Report, "Sudan - Q4 2014," August 19, 2014. See also Giad Auto, "The Partners," available at http://www.giadauto.com/english/partners_e.htm (last accessed May 2015).

[32] The Muslim Brotherhood ("Brotherhood"), founded in Egypt in 1928, began as a community-based social organization that gained a broader political vision and developed into an Islamic resistance movement that sought to counter Western colonialism and neo-colonialism. The Brotherhood sought to unite like-minded Muslims throughout different countries and adapted its struggle in each context to the unique settings of individual countries. In 1954, the Brotherhood established a presence in Sudan, which had long struggled before that point to reconcile divisions between religious and secular political currents. The Brotherhood in Sudan established a political platform around an issue that united many Sudanese Muslims: the establishment of an Islamic constitution. The Brotherhood formed the Islamic Front for the Constitution (IFC), a political pressure group which countered secularist political agendas in Sudan. With the collapse of Sudan's military dictatorship in 1964, the Brotherhood reorganized itself with Hasan al-Turabi as its leader. Turabi in turn transformed the IFC into the Islamic Charter Front, a political party in its own right that was separate from the Brotherhood but represented the Brotherhood's interests. Turabi and the ICF were both marginalized and included from Sudanese governments between the late 1960s and the late 1970s, but Sudan's Brotherhood grew significantly in size and political, economic, financial (banking), and social influence in the mid-1970s. Prior to Sudan's 1988 elections Turabi reorganized his movement into a political party known as the National Islamic Front (NIF), which appeared to enjoy the support of urban, well-educated elites in the Khartoum area. While NIF was a strong political force, the prime minister at the time was unable to reconcile NIF's political platforms and interests with those of others. In 1989, NIF military supporters, led by Omar al-Barshir, seized power; in the early 1990s, NIF members formed Sudan's present ruling National Congress Party. Mohammed Zahid and Michael Medley, "Muslim Brotherhood in Egypt & Sudan," *Review of African Political Economy* 33 (10) (2006): 693-698.

[33] Sudanese leaders who have taken state power have done so with the support of the Brotherhood and have in turn welcomed Muslim Brothers as frequent visitors to Sudan. Hassan Turabi has acted as a kind of magnetic force field for drawing the most powerful Muslim Brothers from Algeria, Tunisia, Egypt, Somalia, Turkey, Qatar, Malaysia, and Indonesia. Muslim Brothers worldwide support Sudan because they view Sudanese Islamists in the government as a lynchpin in advancing their global interests. Sudan represents one of the few successes Muslim Brothers have had—and would like to replicate—in controlling political power in the world of Sunni Islam. Shi'a counterparts to the Muslim Brotherhood had seen similar success decades earlier in Iran.

[34] When they seized power in Sudan in 1989, Islamists worked hard to strip the traditional political parties of their power and exclude them from political processes. The new leaders adopted Sharia'a law, prompting escalation of war in the south and intensifying opposition by those across Sudan who favored secularism and recognition for Sudan's African identity.

[35] Abdel Ghaffar M. Ahmed, "One Against All: The National Islamic Front (NIF) and Sudanese Sectarian and Secular Parties" (Bergen, Norway and Khartoum, Sudan: Chr. Michelsen Institute 2008), pp. 4, 8, available at http://www.cmi.no/publications/file/3115-one-against-all-the-national-islamic-front-nif.pdf; Zahid and Medley, "Muslim Brotherhood in Egypt & Sudan," p. 697; Hans Visser, *Islamic Finance: Principles and Practice*, 2nd ed. Edward Elgar Publishing Northampton, Massachusetts, 2014, p. 119; Ahmed Elzobier, *Political Islam: The Logic of Governance in Sudan* (AuthorHouse: 2014), pp. 44-48; "Finance," in Helen Chapin Metz, ed. *Sudan: A Country Study*, Washington: U.S. Government Publishing Office for the Library of Congress, 1991, available at http://countrystudies.us/sudan/62.htm; Endre Stiansen, "Interest Politics: Islamic Finance in the Sudan, 1977-2001," in *The Politics of Islamic Finance*, Clement M. Henry, Rodney Wilson, eds. (Edinburgh: Edinburgh University Press, 2004): pp. 156-158.

[36] Magda Ismail Abdel Mohsin, "The Practice of Islamic Banking System in Sudan," *Journal of Economic Cooperation* 26 (4) (2005): 27-50, available at http://www.sesrtcic.org/files/article/82.pdf;
Muhammed Shahid Ebrahim, "Islamic Banking in Sudan," Durham Business School, Social Science Research Network, September 13, 2011, available at http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1926895.

[37] Al-Arabiya News, "Saudi, UAE and Bahraini envoys to return to Qatar," November 16, 2014, available at http://english.alarabiya.net/en/News/middle-east/2014/11/16/Gulf-leaders-meet-in-Riyadh-for-surprise-GCC-meeting-.html.

[38] Justin Vela, "Return of ambassadors to Qatar paves way for GCC summit," *The National*, November 17, 2014, available at http://www.thenational.ae/world/middle-east/return-of-ambassadors-to-qatar-paves-way-for-gcc-summit; Al Jazeera, "Gulf states reinstate ambassadors to Qatar," November 17, 2014, available at http://www.aljazeera.com/news/middleeast/2014/11/gulf-leaders-reinstate-ambassadors-qatar-20141116202842331341.html.

[39] Saudi Arabia and the United Arab Emirates label the Muslim Brotherhood a "terrorist organization."

[40] Dahlia Kholaif, "Will the GCC survive Qatar-Saudi rivalry?" Al Jazeera, March 18, 2014, available at http://www.aljazeera.com/indepth/features/2014/03/will-gcc-survive-qatar-saudi-rivalry-201431864034267256.html; Reuters, "Saudi Arabia, UAE and Bahrain end rift with Qatar, return ambassadors," November 16, 2014, available at http://www.reuters.com/article/2014/11/16/us-gulf-summit-ambassadors-idUSKCN0J00Y420141116.

[41] Jamie Dettmer, "Gulf States Coordinate Policy as Regional Violence Grows," Voice of America, February 20, 2015, available at http://www.voanews.com/content/gult-states-coordinating-policy-as-regional-violence-grows/2652005.html; Tamsin Carlisle, "Conflicts drive new level of Middle Eastern cooperation," Platts Energy Economist, p. 42 no. 400, February 3, 2015, available by subscription from Nexis; David Kirkpatrick, "Gulf States and Qatar Gloss Over Differences, but Split Still Hampers Them," *The New York Times*, December 20, 2014, available at http://www.nytimes.com/2014/12/21/world/gulf-states-and-qatar-gloss-over-differences-but-split-still-hampers-them.html.

[42] Precise reliable data on Sudan's national economic indicators is not readily available, and many argue that the limited available data fails to capture the extent of Sudan's economic difficulties. Economic analysis provided by Sudanese and non-Sudanese analysts in the following accounts collectively paint a picture of acute economic distress in Sudan. Eric Reeves, "Uprising in Sudan: What we know now (October 9, 2013) (Part One) Economic Realities: the engine of discontent," SudanReeves.org, October 10, 2013, available at http://sudanreeves.org/2013/10/10/uprising-in-sudan-what-we-know-now-october-9-2013-part-one-economic-realities-the-engine-of-discontent/; text of Arabic language commentary by Sudanese newspaper *Al-Ayyam*'s chief editor Mahjub Muhammad Salih in the "Sounds and Echoes" column, "The Full List of the New Measures has not been Announced yet," published September 24, 2013. Translation provided by BBC Monitoring, "Sudanese editor views consequences of lifting fuel subsidies," September 26, 2013; Eric Reeves, "The collapsing Sudanese economy," Sudan Tribune, May 28, 2013, available at http://www.sudantribune.com/spip.php?iframe&page=imprimable&id_article=46747; Sudan Tribune, "Sudan central bank says no fix for sliding currency without addressing trade gap," December 17, 2012, available at http://www.sudantribune.com/spip.php?article44892; Sudan Tribune, "Sudan central bank says it received new Forex infusion," November 12, 2012, available at http://www.sudantribune.com/spip.php?article44588; Sudan News Agency, "Central Bank of Sudan announces new measures on inflation and exchange rate," April 19, 2012, available at http://www.sunanews.net/english-latest-news/23171-central-bank-of-sudan-announces-new-measures-on-inflation-and-exchange-rate-.html; Sudan Tribune, "Sudan foreign currency reserves down 75 percent since 2006, IMF data shows," August 10, 2010, available at http://www.sudantribune.com/spip.php?article35909; TendersInfo, "Sudan : Central Bank of Sudan Announces an Increase of Oil Exports," July 21, 2010, available at http://www.sudantribune.com/spip.php?page=imprimable&id_article=35312.

[43] The U.N. Security Council levied sanctions on Sudan beginning with resolution 1556, passed in July 2004, with provisions further enumerated in resolutions passed in 2005, 2010, and 2012. U.N. sanctions on Sudan include an arms embargo on actors in Darfur and a travel ban and asset freezes on four individuals. The U.S. government has imposed an arms embargo and asset block on Sudan since 1997, beginning with Executive Order 13067. Sanctions were strengthened with additional U.S. Executive Orders in 2006 and 2011. For more detail on U.N. sanctions see "Security Council Committee established pursuant to resolution 1591 (2005) concerning the Sudan," available at http://www.un.org/sc/committees/1591/ (last accessed May 2015); see also U.N. Security Council, "Resolution 1556 (2004) Adopted by the Security Council at its 5015th meeting, on 30 July 2004," S/RES/1556 (2004), paras. 7. 8, available at http://www.un.org/ga/search/view_doc.asp?symbol=S/RES/1556%20(2004); U.N. Security Council, "Resolution 1591 (2005) Adopted by the Security Council at its 5153rd meeting, on 29 March 2005," S/RES/1591 (2005), para. 7, available at http://www.un.org/ga/search/view_doc.asp?symbol=S/RES/1591%20(2005). The list of four Sudanese individuals under travel bans and asset freezes is available at http://www.un.org/sc/committees/1591/pdf/1591.pdf (last accessed May 2015). For an overview of U.S. sanctions on Sudan see the U.S. Department of the Treasury's Office of Foreign Assets Control, "Sudan Sanctions Program," updated November 5, 2013, available at http://www.treasury.gov/resource-center/sanctions/Programs/Documents/sudan.pdf. In 2014 and 2015 OFAC issued general licenses to the sanctions regime allowing academic and professional exchanges and easier access by Sudanese journalists and human rights activists to U.S.-made communications software and hardware.

[44] Hamid Ali, from the American University of Cairo estimated that the government of Sudan spent $35.11 billion between 2003 and 2009 on the war in Darfur alone, the equivalent of 233 percent of the national GDP. In a 2014 report, Frontier Economics Danielle B. Goldberg, "Measuring the Cost of War in Darfur," Africa.com, available at http://www.africa.com/blog/measuring_the_cost_of_war_in_darfur/ (last accessed May 2015); In a 2010 report, Frontier Economics estimated that war in Sudan would cost more than $100 billion over 10 years, with $50 billion in Sudan's lost GDP, $25 million lost to GDP in neighboring countries, and $30 billion in international peacekeeping and humanitarian costs. Frontier Economics, "The cost of future conflict in Sudan" (London: 2010), available at http://www.frontier-economics.com/documents/2014/03/frontier-report-the-cost-of-future-conflict-in-sudan.pdf.

[45] Akshaya Kumar, "Fool's Gold: The Case for Scrutinizing Sudan's Conflict Gold Trade," The Enough Project, March 4, 2015, available at http://www.enoughproject.org/reports/fools-gold-case-scrutinizing-sudans-conflict-gold-trade.

[46] Kumar, "Fool's Gold," International Monetary Fund, "Sudan: 2014 Article IV Consultation and Second Review under Staff-Monitored Program—Staff Report; Press Releases; and Statement by the Executive Director for Sudan," December 2014, para. 32, pp. 15-16, available at http://www.imf.org/external/pubs/ft/scr/2014/cr14364.pdf.

[47] For detail surrounding the incident see Anthony McAuley, "DMCC removes Kaloti from Dubai Good Delivery list over gold sourcing," *The National*, April 13, 2015, available at http://www.thenational.ae/business/economy/dmcc-removes-kaloti-from-dubai-good-delivery-list-over-gold-sourcing. Kaloti has issued an undated press release indicating that a voluntary audit conducted by accountancy firm Grant Thornton had confirmed Kaloti's "full compliance with DMCC Guidelines, which are based on the OECD's, and are in line with international standards for responsible sourcing of precious metals." Kaloti Precious Metals, "Kaloti Precious Metals Confirmed as Fully Compliant," available at http://www.kalotipm.com/Media-Center-PressReleases-Details/5/KALOTI-PRECIOUS-METALS-CONFIRMED-AS-FULLY-COMPLIANT. Kaloti Precious Metals had a statement regarding the report, available at http://www.enoughproject.org/files/publications/KalotiAnnexureA.pdf.