



## Ordine internazionale e diritti umani

International Legal Order and Human Rights  
Ordenamiento Jurídico Internacional y Derechos Humanos  
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### COUNTERING TERRORISM FINANCING AT THE TIME OF ISIL: TRENDS AND PITFALLS IN THE EVOLUTION OF THE UN SECURITY COUNCIL TWO-TIER FRAMEWORK

During the last fifteen years, like other UN regulatory and sanctions regimes, the Security Council legal framework against terrorism and its financing has recorded a process of gradual ‘individualisation’ and ‘formalisation’, coupled to a progressive but significant ‘strengthening’. As a result, it is currently among the most stringent and complex normative and sanctions regimes created by the Security Council. Against this background, the paper examines the content, scope and legal relevance of the significant initiatives recently undertaken by the UN Security Council to better counter the evolving and changing ‘threat to the peace’ posed by ISIL and its affiliates. Focusing particularly on the Council’s decisions aimed to prevent, ‘dry up’ and (if necessary) destroy the equally changing and manifold sources of ISIL *financing*, the paper discusses the role that recent Council’s initiatives and measures against the multiple ISIL financing sources play - in fact - in the evolution of the original two-tier (1267/1373) SC counter-terrorism framework. This in terms both of its (further) ‘individualisation’ and ‘formalisation’ and of its (increased) ‘strictness’ (as to the obligations imposed on States). Finally, the paper identifies the limits and pitfalls that such a two-tier regime, in spite of its recent developments, still seems to show (*e.g.*, in terms of its actual effectiveness, degree of open-endedness and indeterminacy of the 1267/1989/2253 Sanctions List and of vagueness of the criteria for listing).