

## The Feasibility of Filing Lawsuits against Imposers of Sanctions for Crimes against Humanity in Domestic Courts

Azam Amini\*<sup>1</sup>, Ehsan Daryadel<sup>2</sup>

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### **Abstract**

Coercive unilateral economic sanctions are one of the tools with which big powers such as the US can exert pressure on the target country in order to force it to change its behavior or policies. This entails breaches of human rights against a civilian population. The sanctions are not in themselves banned under international law because it is the right of every country to limit its economic ties with other countries. However, when this endangers other fundamental human rights like the right to life, such measures are strongly condemned. If the scope of these measures deprives the population of the target country of its basic needs, it can be an example of crimes against humanity. The present research is seeking to answer the question of whether it is possible to bring a lawsuit against the imposers of such economic sanctions. A descriptive-analytical method is used in this research to study the feasibility of filing lawsuits against imposers of sanctions for crimes against humanity in domestic courts. The results show that by referring to the principles of international law, applying the principles of universal criminal and civil jurisdiction and in view of different approaches by the US courts to claims, bringing a lawsuit against the imposers of sanctions is possible in the domestic courts of other countries and the US under the Alien Tort Statute (ATS).

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1. Assistant Professor, Faculty of Law and Political Science, Ferdowsi University of Mashhad, Mashhad, Iran (Corresponding Author: amini.az@um.ac.ir.)

2. Master, Department of International Law, Shiraz University, Shiraz, Iran.

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### **1. Introduction**

International relationships are based on bilateral and multilateral relations between states, and in order to maintain order in state relations, international relations that are inherently based on choice rather than imposition of commitment favor states to, given the national considerations and short, medium- and long-term interests, accept international obligations or evade the obligations in an acceptable way within the framework of the international system. Yet, international law, in the course of its historical evolution, has reached enough maturity to recognize some international obligations that the common life of the international community depends on the protection and preservation of, as the collective interests of the international community. In addition, international law in some soft consistent forms, but in the context of emerging international regimes, can call on governments to preserve the sanctity of this common life and not to place the supreme interests of the international community, which unite the collective life of states, as their scene of power and unilateralism. Obviously, there is a long way to say about the rigid and consistent international framework for imposing commitments on governments in these areas. But the rule of law in the international community, ignoring these interests, especially by the great powers and the unilateralism of states such as the United States in withdrawing from international commitments or disregarding the moral values of the international community challenges the realization of the goal of international law in safeguarding the same international incomplete order. The following is an analysis of US unilateralism in the common interest of the international community and its implications, particularly in the context of international environmental law.

### **2. Transition from National Interests to International Interests and the Emergence of New Normative Frameworks in the International Arena**

Modern international law is based on the pillars of international peace

and security. The Charter of the United Nations, often referred to as the constitution of the international community, is inspired by the ideas of its founders in an effort to maintain peace in various ways and to establish it in various forms between states. Although the idea of peace has a long life of human creation, and humanity has always strived to achieve it, international law, which is the arena of the emergence of relations between states, has been so seriously threatened that it is as if the fight between the reality of the international community and peace and security has become its ideal and unattainable end. Indeed, the root of many of these conflicts and disputes seems to be the national utilitarianism of each state and the disregard for the interests that bind the international community of states together. That is why, since the birth of the UN Charter, governments have never given up their national interests and, however, have occasionally tried to ignore the interests of the international community, especially those that are somehow tied to their international prestige and status, they have always emphasized their national interests and put the status of clause 7 of article 2 of the Charter at the forefront of their international relations. It is clear that the legal rather than political equality of states in the international community, which is itself a sign of Westphalian sovereignty, has apparently been able to relatively establish relations between states, but the result of this unwritten agreement, from the veto in the UN Charter to the emergence of regimes, which has only sought to protect the interests of some governments, especially the world's economic and political powers, has itself shown inequality in the creation of norms, the implementation of international obligations and even the direction of international oversight mechanisms to investigating violations or non-compliance by the governments. This process, linked to the Americanization of international law and the dominance of the United States and some of its allies in the international legislative process, has led to the creation of international norms in such an unfortunate way that the only reflect of the regulation of international relations is due to the national interests of some states, and the present order seems to ignore the international system consisting of small and large actors, and it only concerns with guaranteeing the interests of few states. Thus, the international order

has been reduced to the desired order of the great powers (Anubhuti, 2010). However, international law is not exclusively dominated by power, and the emergence of regimes such as international environmental law, which shows the emergence of cooperation and solidarity of governments in preventing environmental degradation, promises the birth of superior norms in the international system, although in practice the implementation of these kinds of obligations sometimes goes to the slaughterhouse of national interest and expediency of some great powers, inspired by the process of humanization of international law, is in the supreme interests of the international community. In this failed oscillation between the national interest and the interests of the international community, international peace and security has become the most serious Achilles heel of international law, as if any threat to international peace and security harms the supreme interests of the international community by justifying the national interests of states.

Climate change is one of the most important threats to human security today and, consequently, international peace and security. Desertification, the melting of polar glaciers, the sinking of some land areas, the inversion of the air, and many other unintended effects of climate change are seriously affecting human life today, and it is feared that humans will gradually provide for its destruction. Serious concern about the need to pay attention to climate change and its adverse effects, especially with the increase in greenhouse gas emissions due to the growing prosperity of the industrial wheel, has caused serious reactions since the early 1970s, and has been added to international law literature since the early 1990s. And with the ratification of the Climate Change Convention in 1992, and the need to standardize on climate change, a serious step was taken in this direction (Powers, 2010: 20).

Yet, the implementation of the initial and general obligations arising from the Convention on Climate Change requires the cooperation and support of all countries in the world, especially the countries that are known as the most serious participants in environmental pollution. International figures from the European Union and US research institutes confirm that in the aftermath of the Industrial Revolution to the recent years, the US government and some of the world's most

industrialized countries have made the most serious contributions to environmental pollution and climate change. In this sense, the government's commitment to adhere to international norms, especially in the field of climate change, can have a significant impact on preventing global warming (Michael, 2010:155). However, the United States does not seem to accept and implement the international environmental commitments. The United States' disregard for environmental norms has been on the rise in recent years, and this is particularly significant in light of its position on the Kyoto Protocol and the Paris Convention. The US government's claims of opposition to Kyoto as a plan to slow the growth of the world's industrial democracy, or its claims of wealth transfer through developed countries, even highlighting Kyoto's inefficiency in dealing with the adverse effects of climate change on the US position on the Paris Convention indicate the culmination of the US unilateralism in preferring national considerations to the supreme interests of the international community.

### **3. The United States' Approach to the Norms of International Law**

Although implementing the rules of international law equally to all is desirable and decisive for the realization of international cooperation and solidarity and in order to ensure world peace and security, some determining world governments prefer the values and norms arising from the legal system, in cases where they consider international law to be against their own interests. Thus, they free themselves from the domination of international norms, and rule their own norms.

The performance of the United States shows that this government considers the equal application of the principles and rules of international law to all subjects of the international community to be unjust, and has repeatedly tried to establish its own specific and desirable rules (Hoffmann, 2011: 84). Relying on its cultural factors, national legal traditions, and political, economic, and military capabilities, this self-proclaimed leader of the international community has become a superior and influential force in world events. Powerful US parties (Democrats and Republicans) agree on American hegemony, but this phenomenon has often gained momentum under Republican rule (Nolte and Aust, 2013). Under

President Donald Trump, the imposition of American hegemony on the international community took on a new form. Trump, reckless and disregarding US international commitments, took a destructive approach to international documents and treaties, international organizations, and the region to which his government is a party or a member. It is in this context that “Trumpism” was formed. Trump’s performance in the political, social, and economic spheres, while close to that of the Republican Conservatives, yet differed in some aspects. However, in practice, his policies exemplified a mix of different Republican factions, including conservatives, neoconservatives, and moderates, and led to the belief that Trump was a symbol of American extreme nationalism and opposition to free trade and international institutions (Bellinger, 2019). The process of Americanization of international law has been present in recent decades, but it reached its peak during the Trump presidency, and the macro-policies of the United States, based on a completely uniform and transparent approach to international regulations and organizations, including the United Nations and international courts and arbitrations (see Tsakhiri et al., 2018).

Undoubtedly, the unilateral approach to international norms is not unique to the Trump administration, and has a historical background in the United States that seems to be inspired by the US realist approach<sup>1</sup> to international norms. For example, although Bill Clinton, the 42<sup>nd</sup> President of the United States, was a liberal, the 43<sup>rd</sup> President, George W. Bush, was undoubtedly a full-fledged realist, and one of his theorists, Secretary of State Condoleezza Rice as his second the United States Department of State. According to Rice (as a state-centric realist who in many cases recklessly espoused the military option), the Bush administration's foreign policy focused on three points: strengthening US military power, curbing threats from China and Russia, and curbing countries such as Iran, Iraq, and North Korea (Klarevas, 2004). The Bush administration was not afraid to resort to unilateral action to achieve its goals. Issues such as a different approach to the principle of the prohibition of the use of

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1. On the relationship between the school of realism and other schools of international law, see Shahbazi (2016).

force and a broad interpretation of its exceptions, e.g. legitimate defense under article 51 of the UN Charter, the use of targeted killings to combat terrorism, the Security Initiative against the proliferation of weapons of mass destruction, the International Criminal Court, etc., all indicate the imposition of the United States' will on the international community (Powaski, 2018).

However, a brief reflection on the US position on the recent international order confirms the fact that the Bush and Trump administrations are full-fledged representatives of the US unilateralist approach to international law—approaches that have gained strength, especially since September 11, 2001, and which strongly affirm that international law and international organizations have no intrinsic value (Talmon, 2019).

Trump sought to change the United States' position in the international community with a more radical view than that of the previous presidents. With an isolationist approach, he sought to reduce his government's spending on the international equations, which reduced US involvement in the international community, and of course such an approach was in serious conflict with the vision of the supreme collective interest and international cooperation and solidarity. On the other hand, given that from a neorealist point of view, states are the main actors in the international community, the position of other subjects of international law will be influenced by superior powers such as the United States, and the reduction of US international cooperation in the form of unilateralist approach results in weakening the UN role (Dueck, 2015: 157).

#### **4. A Healthy Environment in the Oscillation between the US National Interest and the Supreme Interests of the International Community**

The Paris Agreement is one of the implementing agreements, signed in 2015 by 195 countries at the UN Conference on Climate Change and ratified by 168 countries, and its commitments will be implemented from 2020. The Paris Agreement is a strategic document to guide world environment policy. The main goal of the Paris Agreement is not to increase the average global temperature by more than two degrees Celsius by gradually reducing the consumption of

fossil fuels, and of course it will be tried to limit this amount to 1.5 degrees. This agreement is a unifying achievement to create a public commitment to reduce greenhouse gas emissions, which seeks to pave the way for collective cooperation in achieving the goals of the document through the national participation of governments, regardless of the capabilities and limitations of each country (Vidal and Vaughan, 2015). Clause 2 of article 4 of the Agreement states:

“Each party must prepare, announce, and maintain its own consecutive national partnership plans that it intends to achieve. The parties must pursue national measures to reduce greenhouse gas emissions in order to achieve the objectives of each joint plan.”

According to the above paragraph, the first sentence of this regulation applies to each party, and thus creates individual obligations. It should also be acknowledged that these commitments are binding in relation to the preparation of reports and the maintenance of national participatory plan, as well as the follow-up of these measures to reduce greenhouse gas emissions (see Clark, 2018; Rajamani, 2016). In the negotiations leading up to the Paris Agreement, many parties, including the European Union, South Africa, and the small littoral states, believed that the parties should be required to achieve the goals of their partnership plans, and thus be committed to the outcome. The United States, China, and India opposed the move, saying they were not prepared for “legally binding obligations.” It can be said that the Paris Agreement was drafted somewhat close to the opinion of the second group (Rajamani, 2016: 353; also see Bodansky, 2016 and Mianabadi et al., 2019). In addition to the binding commitments in preparing and announcing national partnership plans, the parties are bound by more commitments. Each party must submit a report on its partnership plans every five years. When reporting on participatory plans, the parties are required to provide the information needed to create transparency and better understanding, which creates binding commitments for the parties<sup>1</sup>.

Under the agreement, developed countries will pay \$ 100 billion annually to developing governments from 2020 to reduce greenhouse

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1. Decision 1/CP.21 para, 20.) Draft decision-/CP.21, FCCC/CP/2015/L.9/Rev.1, Adoption of The Paris Agreement. Retrieved from <https://unfccc.int/resource/docs/2015/cop21/eng/109r01.pdf>.

gas emissions and adapt to new climatic conditions. A significant portion of these funds are spent in the most vulnerable countries. One of the conditions of financial aid is that it helps reduce greenhouse gas emissions and counteract the effects of climate change (Groves, 2016). Looking at the efforts made at the United Nations Conference on Environment and Development in Rio (1992) which led to the drafting and ratification of three non-binding documents, i.e. “the Rio Declaration”, “the Declaration of Principles for the Protection of Forests”, and “the Agenda 21” as well as two important treaties, including “the Convention on Biological Diversity” and “the Convention on Climate Change”, the members of the Convention on Climate Change at the Third Meeting of the Parties (3COP) on December 11, 1997 in Kyoto, Japan, established a protocol called the Kyoto Protocol, and approved that 39 countries e.g. the United States, Australia, and the European Union reduce 5.2 percent of their greenhouse gas emissions from 1990 that was their peak of emissions. Accordingly, these countries had to ratify the agreement in their legal institutions in order to join it. There is an important difference between the Paris Agreement and the Kyoto Protocol. In fact, the Paris Agreement does not provide any mechanism to reduce the responsibilities of developing countries, but rather the greenhouse gas emission targets are negotiated and agreed with each country separately and implemented voluntarily (Vidal and Vaughan, 2015). This feature of the Paris Agreement led US negotiators to recognize it as an executive agreement rather than a legally binding agreement, and therefore did not consider it necessary for ratification by Congress (Clark, 2018).

The United States signed the Paris Agreement in April 2016, and ratified it in September 2016, committing itself to a 26 percent reduction in greenhouse gas emissions over the next ten years and donates 3 billion dollars to developing countries in their efforts to reduce greenhouse gas emissions and adapt to climate change. However, in early June 2017, then-US President Donald Trump announced that the administration would withdraw from the Paris Agreement. According to him, the Paris Agreement is fueling the country’s economic crisis. Moreover according to Trump, it will cut \$ 3 trillion in GDP and destruct more than six million jobs, while

putting its economic rivals, China, and India, in the lead (Hongju Koh, 2016; See Goldenberg, 2020).

He said the 2015 Paris Agreement was the starting point for imposing unfair standards on American businesses and workers (Chakraborty, 2017). He went on to say that he would stick to his promise to the American people and defend the rights of the American people against an agreement he called “strict” (Smilowitz, 2017). The Trump administration’s decision was opposed by widespread domestic and international opposition. At the same time, China, the European Union and India, which along with the United States are the world’s four largest producers of carbon dioxide, reaffirmed their commitment to the Paris Climate Change Agreement (see Clark, 2018). Following Trump’s defeat in the 2020 US presidential election, President-elect, Joe Biden, announced one of his first plans to return to the Paris Agreement. This agreement, with the support of the international community, was ratified and will be implemented.

### **5. The Consequences of US Unilateralism in the Preference of National Interest over the Supreme Interest of the International Community**

It should be noted that from January 2017 to January 2021, the helm of the United States was in the hands of Donald Trump, an economic businessman, and his interventionist stance on economics, trade, and pro-US national economic policies was the basis for his administration’s official position and foreign policy in its international relations. Trump’s strategic stance, which is based primarily on the need for the US national interest to take precedence over the obligations imposed on it by membership in the international community, is a clear manifestation of its economic nationalism. Among the consequences of this economic nationalism are the restriction of the flow of workforce, capital, and goods to meet the macroeconomic goals of the United States domestically, and the tendency to create protective regulations to protect the parent industries and rely on the US national economy to regulate foreign relations. By taking such an approach that is not unique to Donald Trump, but Trump is its main flagship, the United States has withdrawn or threatened to withdraw from many international

agreements, treaties, and organizations in recent years. Trans-Pacific Trade Agreement, Paris Agreement on Climate Change, North American Free Trade Agreement (NAFTA), Joint Comprehensive Plan of Action (JCPOA), Nuclear Non-Proliferation Treaty (NPT), North Atlantic Treaty Organization (NATO), UNESCO, and United Nations Human Rights Council is just one example of this, but it has met with widespread domestic and international opposition. The US administration's stances, especially on the environment, also met with strong opposition. Meanwhile, China, the European Union, and India, which along with the United States are the world's four largest producers of carbon dioxide, reaffirmed their commitment to the Paris Climate Change Agreement and announced at a joint news conference that China and Europe have declared their solidarity with future generations and are aware of their responsibility to future generations. In this term, although US unilateralism, at least for the time being, has not met with serious compliance of its counterparts, it can potentially affect the implementation of the obligations under this convention in the future.

Despite Trump's defeat and Joe Biden's victory in the 2020 presidential election, it should be noted that the US government's policy of suspending its debt in the form of voluntary participation could create a deep crisis in international cooperation to counter the effects of climate change. In spite of the major protectionist positions taken by developing countries from the Paris Convention, it appears that it could pave the way for a financial crisis to achieve the goals of the Paris Agreement and in the near or distant future, lead other key members of the agreement to reduce support or withdraw from commitments (Pavone, 2018). On the other hand, this could seriously damage the balance between developing and developed countries in terms of their obligations under the Convention, and undermine the stability of developing countries, especially those based on fossil fuels, in fulfilling their obligations. It remains to be seen whether the new positions of the Biden government will be able to offset the negative effects of the previous government (Alvarez, 2020).

## **6. Conclusion**

International agreements are born, they live, and sometimes they end

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their lives by the procedure of governments or the initial agreement, but in the course of their lives, they impose rights and obligations on the parties. In the meantime, governments generally accept international commitments for their own short-, medium-, and long-term interests, and although these interests generally arise from the national considerations and macro-policies of each state in regulating international relations, and due to the necessity of life in common societies with other states, it cannot be in complete conflict with the supreme interests of the international community. The US decision to withdraw from the Paris Agreement or other international agreements, including environmental treaties, is not new and unprecedented. The incomplete rule of law governing international law has never been able to make governments obedient and strategic in the ways that national law benefits them, including the transnational coercive forces. In this regard, in some legal regimes, especially in the framework of international environmental law, it has sought to call on governments to comply minimally by providing flexible normative frameworks. Thus, states join international commitments and, if necessary, redefine their relations by withdrawing from them. However, concepts such as the supreme interests of the international community, which are the product of the more human nature of this incomplete order, have brought together the coexistence of all states, individuals, and international entities, and united more than seven billion people on Earth in a common realm called the environment. In this regard, especially in the context of human rights obligations or environmental considerations, the emphasis on the national interest, abandoning common environmental considerations in the international community, is not in line with the requirements of modern international law.

According to international estimates, if the United States pulls out of the Paris Agreement, it will raise the average global temperature by only three-tenths of a degree C in the worst case scenario by the end of this century, and although this figure may seem small, it could warn the world. US unilateralism in the preference of economic interests over the supreme considerations of the international community and disregard for environmental norms is worrying. But even more troubling is the business of a merchant who sells the “environment,”

the common realm of human life and other living beings, for a small price, without holding himself accountable to the present and future generations of humanity.

The most important strategy for combating American unilateralism is to defend the process of globalization. With the formation of an international federalism, the abnormal process can be sustained and its decline prevented. The direct exercise of power rather than the exercise of rights has no consequence other than rebellion and show of power, and if it replaces the rule of law, it will regress the international community, destroying the fruit of many years of effort. That the United States considers itself responsible for world order, from human rights abuses in one country to the existence of terrorist bases in another country or their non-democratic concern, and believes it is the only realization-maker of the Charter's lofty goals of achieving peace and security drives international law aside and leads to a unilateral rule over international relations.

### References

Alvarez, J. (2020). International Law in a Biden Administration. Retrieved from <https://www.iilj.org/wp-content/uploads/2020/11/Alvarez-Biden-and-IL.pdf>.

Anubhuti, A. (2010). Americanization of International Law. Retrieved from [https://papers.ssrn.com/sol3/Delivery.cfm/SSRN\\_ID1712286\\_code1279393.pdf?abstractid=1712286&mirid=1](https://papers.ssrn.com/sol3/Delivery.cfm/SSRN_ID1712286_code1279393.pdf?abstractid=1712286&mirid=1).

Bellinger, J. B. (2019). The Trump Administration's Approach to International Law and Courts: Are We Seeing a Turn for the Worse? *Case Western Reserve Journal of International Law*, 51(1), 7-27.

Bodansky, D. (2016). The Legal Character of the Paris Agreement. *Review of European, Comparative & International Environmental Law*, 25(2), 142-150.

Bradford, A., & Posner, A. E. (2011). Universal Exceptionalism in International Law. *Harvard International Law Journal*, 52(1), 3-53.

Chakraborty, B. (2017). Paris Agreement on Climate Change: US Withdraws as Trump Calls it 'Unfair'. *Fox News*, Retrieved from <https://www.foxnews.com/politics/paris-agreement-on-climate-change-us-withdraws-as-trump-calls-it-unfair>.

Clark, K. (2018). The Paris Agreement: Its Role in International Law and American Jurisprudence. *Notre Dame Journal of International & Comparative Law*, 8(2), 107-130.

Dueck, C. (2015). *The Obama Doctrine: American Grand Strategy Today*. New York: Oxford University Press.

Falk, R. (2016). "Voluntary" International Law and the Paris Agreement. Retrieved from <https://richardfalk.wordpress.com/2016/01/16/voluntary-international-law-and-the-parisagreement>.

Goldenberg, S. (2020). Obama Administration Pays out \$500m to Climate Change Project Environment. *The Guardian*, Retrieved from <https://www.theguardian.com/environment/2016/mar/07/obama-administration-pays-out-500m-to-climate-change-project>.

Groves, S. (2016). The Paris Agreement Is a Treaty and Should Be Submitted to the Senate. *Backgrounders*, 3103, Retrieved from <http://www.heritage.org/environment/report/the-paris-agreement-treaty-and-should-be-submitted-the-senate>.

Hoffmann, L. (2011). Becoming Exceptional? American and European Exceptionalism and Their Critics: A Review. *L' Europe en Formation*, 1(359), 83-106.

Hongju Koh, H. (2016). The Trump Administration and International Law. *Washburn Law Journal*, 56, 413-469.

Klarevas, L. (2004). Political Realism. *Harvard International Review*, 26(3), 18-23.

Martella, R. J., & Grosko, J. B. (2014). *International Environmental Law*. Retrieved from <https://www.bdlaw.com/content/uploads/2018/06/emerging-trends-in-latin-america-m-kadas-and-r-fraker-aba-international-environmental-law-guide.pdf>.

Michael, B. (2010). Development and the Future of Climate Change Law. In David Leary and Balakrishna Pisupati (Eds.). *The Future of International Environmental Law*. New York: UN University Press.

Mianabadi, H., Amini, A., & Daryadel, E. (2019). National Participation Program in Accordance with the Paris Agreement: From Point of View to Action. *Quarterly Journal of Strategic Studies of Public Silence*, 8(28), 19-47 (in Persian).

Nolte, G., & Aust, H. P. (2013). European Exceptionalism? *Global Constitutionalism*, 2(3), 407-436.

Pavone, I. R. (2018). The Paris Agreement and the Trump Administration: Road to Nowhere? *Journal of International Studies*, 11(1), 34-49.

Powaski, R. E. (2018). George W. Bush, Realism and Neo-conservatism, 2001- 2009 (104-106). In R. E. Powaskipp (Eds.). *Ideals, Interests, and U.S. Foreign Policy from George H. W. Bush to Donald Trump*.

Powers, A. (2010). Climate Change and Pollution: Addressing Intersecting Threats to Oceans, Coasts and Small Island Developing States (20). In D. Leary and B. Pisupati (Eds.). *The Future of International Environmental Law*. New York: UN University Press.

Rajamani, L. (2016). The 2015 Paris Agreement: Interplay between Hard, Soft and Non-Obligations. *Journal of Environmental Law*, 28(2), 337-358.

Shahbazi, A. (2016). *Philosophy of International Law: Positivism*. Tehran: Institute of Legal Studies and Research (in Persian).

Smilowitz, E. (2017). Trump: We are getting out of Paris Climate Deal. *The Hill*, Retrieved from <https://thehill.com/policy/energy-environment/335955-trump-pulls-us-out-of-paris-climate-deal>.

Talmon, S. (2019). The United States under President Trump: Gravedigger of International Law. *Chinese Journal of International Law*, 18(3), 645-668.

Tsakhiri, M. S., Musazadeh, R., & Alizadeh, M. (2018). Comparative Study of Legal Specificities versus International Law: American Exemption against EU Pluralism. *Quarterly Journal of Public Law Studies*, 48(1), 159-179.

Vidal, J., & Vaughan, A. (2015). Paris Climate Agreement May Signal End of Fossil Fuel Era. *The Guardian*, Retrieved from <https://www.theguardian.com/>.