

OFAC Publishes Fact Sheet on Humanitarian Assistance to Sanctioned Countries

With the global spread of the COVID-19 virus, inquiries by NGOs and others have been increasing with respect to the export of humanitarian goods and medical supplies to countries subject to U.S. economic sanctions to help combat the pandemic. The need for such assistance has become particularly acute in many of these countries as impaired infrastructures may be hindering their ability to effectively respond to the disease on their own.

On April 16, in an effort to clarify the available options for providing humanitarian assistance in response to the pandemic, the Office of Foreign Asset Control (OFAC) published a [Fact Sheet](#) that sets out a brief overview of various general licenses and exemptions from sanctions. It also summarizes relevant Frequently Asked Questions and licensing processes for parties seeking to export humanitarian goods (such as medical equipment, medicines, food, and other commodities) to Iran, Venezuela, North Korea, Syria, Cuba, and Ukraine/Russia, all of which are sanctioned to some degree.

The Fact Sheet seeks to consolidate information and highlight OFAC's efforts to expedite licensing for those seeking to engage in permissible transactions with affected countries. It does not provide any new guidance or easing of the sanctions programs. Rather, the Fact Sheet reminds parties interested in providing assistance to be mindful of OFAC regulations when seeking to conduct business during the global crisis.

Parties wishing to provide humanitarian assistance to one or more of the sanctioned destinations should carefully review the regulatory requirements relevant to the specific destination. Each sanctions program is different and not all general licenses and authorizations are available for every destination. For transactions not otherwise authorized by an OFAC general license or exemption, OFAC will consider specific license requests on a case-by-case basis. In addition, in many cases separate authorization under the Export Administration Regulations may be required from the Bureau of Industry and Security at the Department of Commerce.

On a final note, in order to address domestic needs for particular types of personal protective equipment during the COVID-19 pandemic, the Federal Emergency Management Agency (FEMA) has separately issued a rule barring the export of certain equipment until at least August 10, 2020. More information is available in a separate client update, available [here](#).

Anyone interested in engaging in transactions involving sanctioned countries or parties, with regard to humanitarian assistance or otherwise, is strongly encouraged to contact legal counsel.



Wayne R. Rohde

Member

wrohde@cozen.com
Phone: (202) 463-2507
Fax: (202) 912-4830



Kathryn Sobotta

Associate

ksobotta@cozen.com
Phone: (202) 463-2528
Fax: (202) 861-1905

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