Treasury Issues Additional COVID-19-related Sanctions Authorizations and Guidance

June 17, 2021

WASHINGTON — Today, in order to further aid the global fight against COVID-19, the Department of the Treasury’s Office of Foreign Assets Control (OFAC) issued three general licenses (referred to as the COVID-19-related GLs) to build upon Treasury’s existing authorizations for COVID-19-related transactions and activities. The new COVID-19-related GLs expand upon longstanding humanitarian exemptions, exceptions, and authorizations to cover additional COVID-19-related transactions and activities. These include transactions and activities involving the delivery of face masks, ventilators and oxygen tanks, vaccines and the production of vaccines, COVID-19 tests, air filtration systems, and COVID-19-related field hospitals, among others.

Today’s GL’s are part of the Administration’s efforts under National Security Memorandum – 1 which directed Treasury, Commerce, State, HHS, and USAID to promptly review existing United States and multilateral financial and economic sanctions to evaluate whether they are unduly hindering responses to the COVID-19 pandemic worldwide. These new authorizations will further support the critical work of governments, international organizations, non-governmental organizations, and private sector actors in providing COVID-19-related assistance to the people in certain sanctioned jurisdictions.

Concurrent with this action, OFAC issued six Frequently Asked Questions (FAQs) that provide further clarity on what the COVID-19-related GLs authorize, OFAC’s due diligence expectations for U.S. financial institutions facilitating activity authorized by the COVID-19-related GLs, and guidance for non-U.S. persons engaging in activities authorized for U.S. persons under the COVID-19-related GLs. For more information, please see FAQs 906, 907, 908, 909, 910, and 911.

OFAC encourages those interested in providing COVID-19-related relief to Iran, Syria, and Venezuela to avail themselves of the available exemptions, exceptions, and authorizations pertaining to humanitarian assistance, including the COVID-19-related GLs issued today (Iran GL N, Syria GL 21, or Venezuela GL 39). In the event that individuals,
governments, or entities have sanctions-related questions related to the provision of COVID-19-related relief or any other humanitarian assistance involving sanctioned jurisdictions or persons, or believe additional authorizations are needed, OFAC stands ready to provide guidance and respond to applications for specific licenses.

For transactions not otherwise authorized or exempt from sanctions, OFAC considers license requests on a case-by-case basis and prioritizes applications, compliance questions, and other requests related to COVID-19 relief and other humanitarian support. If you have additional questions regarding the scope of any sanctions programs’ requirements, or the applicability or scope of any humanitarian-related authorizations, please contact OFAC’s Sanctions Compliance and Evaluation Division at (800) 540-6322 or (202) 622-2490, or by email at OFAC_Feedback@treasury.gov.

OTHER CROSS-PROGRAMMATIC GUIDANCE

- “OFAC Licensing Process” – Provides guidance on the OFAC licensing process.
- “OFAC’s Fact Sheet: Provision of Humanitarian Assistance and Trade to Combat COVID-19” – The Fact Sheet also outlines specific guidance under the Iran, Venezuela, North Korea, Syria, Cuba, and Ukraine/Russia-related sanctions programs related to personal protective equipment and other COVID-19-related humanitarian assistance and trade. (April 2020)
- “Guidance Related to the Provision of Humanitarian Assistance by Not-For-Profit Non-Governmental Organizations” – Clarifies the reach of economic sanctions for the nongovernmental organizations involved in the provision of humanitarian assistance. (October 2014)

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