

Summary of Select Humanitarian Authorizations

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Territory	OFAC GL	Comments
<p>CRIMEA</p>	<p>EAR, 15 C.F.R. §746.6(a) Embargoes and Other Special Controls – Crimea region of Ukraine</p>	<ul style="list-style-type: none"> • BIS license required for export or reexport of items subject to the EAR <i>except food and medicine designated as EAR 99</i>. • Additional EAR license exceptions, such as the exception for gift parcels and humanitarian donations set forth in §740.12, may also apply.
	<p>OFAC GL-4 Authorizing the Exportation or Reexportation of Agricultural Commodities, Medicine, Medical Supplies, and Replacement Parts¹</p>	<ul style="list-style-type: none"> • Applies to exportation or reexportation of covered items from the United States or by US persons. • See paras. (d)(2)-(4) for definitions of covered medicine, medical devices, and medical supplies.²
<p>CUBA</p>	<p>EAR, 15 C.F.R. §746.2(b)(1) Embargoes and Other Special Controls - Cuba</p>	<ul style="list-style-type: none"> • License applications for exports of medicines and medical devices (as defined in part 772 of the EAR) will generally be approved, subject to exceptions. • Note: Medical exports are not eligible for Support for the Cuban People (SCP) exception at §740.21.

¹ https://www.treasury.gov/resource-center/sanctions/Programs/Documents/ukraine_gl4.pdf

² For a list of medical supplies covered by GL-4, see https://www.treasury.gov/resource-center/sanctions/Programs/Documents/med_supplies_ukr.pdf

CUBA	<p>Cuban Assets Control Regulations (CACR), 31 C.F.R. §515.575 Humanitarian projects</p>	<ul style="list-style-type: none"> • Certain travel-related transactions (see 31 CFR §515.560(c)) by persons subject to US jurisdiction related to humanitarian projects in or related to Cuba designed to directly benefit the Cuban people. • 31 C.F.R. §515.575(b) addresses medical and health-related project transactions, including travel-related transactions, for humanitarian projects in Cuba, such as disaster preparedness, relief, and response, and projects to meet basic human needs.
	<p>CACR, 31 C.F.R. §515.548 Overflight payments, emergency landings, and air ambulance service</p>	<ul style="list-style-type: none"> • Transactions by persons subject to US jurisdiction necessary for air ambulance and related medical services, including medical evacuation, for individual travelers in Cuba, authorized.
IRAN	<p>Iranian Transactions and Sanctions Regulations (ITSR), 31 C.F.R. §560.530 Commercial sales, exportation, and reexportation of agricultural commodities, medicine, medical devices, and certain related software and services.</p>	<ul style="list-style-type: none"> • Unless excluded, 31 C.F.R. §560.530(3)(i) authorizes the exportation or reexportation of agricultural and medical goods by a US person or US-owned or -controlled foreign entity to the Government of Iran, any individual or entity in Iran, or to persons in third countries purchasing specifically for resale to the foregoing. • Note: Shipments must take place within 12 months of the signing of a contract for the export or reexport. • Training related to safe and effective use of medicine and medical devices covered by the GL are authorized at 31 C.F.R. §560.530(3)(v). • See 31 CFR §560.532 for payment terms that are authorized in relation to exports or reexports under 31 CFR §560.530. • US persons are authorized at 31 C.F.R. §560.533 to engage in brokering of sales of agricultural commodities, medicine, and medical devices <i>by US persons</i> covered by GL. • Note: Per the EAR, at 15 CFR §746.7, if OFAC authorizes an export or reexport subject to the ITSR, such authorization also applies to items subject to the EAR.

IRAN	GL-E Authorizing Certain Services in Support of Nongovernmental Organizations' Activities in Iran	<ul style="list-style-type: none"> • NGOs authorized to undertake transactions, including services, in support of not-for-profit activities with Iran related to (i) provision of donated health-related services, (ii) provision of relief services related to natural disasters, (iii) distribution of donated articles (food, clothing, medicine) intended to relieve human suffering, and (iv) donated training for the foregoing. • Note: See §560.210(b) for an exemption under the ITSR for US persons donating articles, such as food, clothing, and medicine, intended to be used to relieve human suffering. • Note: Transactions, services, or training cannot exceed US\$500,000 in the aggregate over a 12-month period. Quarterly reporting requirement to OFAC about disbursements as required.
	GL-8 Authorizing Certain Humanitarian Trade Transactions Involving the Central Bank of Iran	<ul style="list-style-type: none"> • US persons authorized to engage in transactions and activities involving the Central Bank of Iran under GLs in ITSR §§ 560.530(a) and (b), 560.532, and 560.533, including transactions ordinarily incident and necessary to transactions and activities under the GLs and specific licenses issued under the ITSR.
NORTH KOREA	EAR, 15 C.F.R. §746.4(a) Embargoes and Other Special Controls – North Korea	<ul style="list-style-type: none"> • BIS license required for items subject to the EAR <i>except food and medicine designated as EAR 99</i>.
	North Korea Sanctions Regulations (NKSr), 31 C.F.R. §510.512 Certain services in support of nongovernmental organizations' activities	<ul style="list-style-type: none"> • US NGOs authorized to export or reexport <i>services</i> in support of not-for-profit activities, including distribution of medicine and health-related services and non-commercial projects directly benefiting the North Korean people, including infectious disease prevention. • 31 C.F.R. §510.512(b) authorizes export or reexport of medicine from a third country, provided it is not subject to the EAR. • US banks, broker-dealers, and money transmitters are authorized under 31 C.F.R. §510.512(c) to process funds transfers on behalf of <i>both</i> US and non-US NGOs in support of activities described in 31 C.F.R. §510.512 (a) to (c).

NORTH KOREA	NKSR, 31 C.F.R. §510.509 Emergency medical services	<ul style="list-style-type: none"> • US persons authorized to provide and receive nonscheduled emergency medical services otherwise prohibited by North Korea-related EOs.
SYRIA	EAR, 15 C.F.R. §746.9(a) Embargoes and Other Special Controls - Syria	<ul style="list-style-type: none"> • BIS license required for all items subject to the EAR <i>except food and medicine designated as EAR 99</i>. • Note: specific licenses are required for items subject to the EAR that are medical devices for export or reexport to Syria.
	Syrian Sanctions Regulations (SSR), 31 C.F.R. §542.510 Exports or reexports to Syria of items licensed or otherwise authorized by the Department of Commerce authorized; exports or reexports of certain services authorized	<ul style="list-style-type: none"> • Exports and reexports by US persons of items authorized by BIS as well as services (<i>e.g.</i>, funds transfers) that are ordinarily incident to the export or reexport of such items to Syria authorized.
	SSR, 31 C.F.R. §542.525 Exportation or reexportation of services to Syria related to the exportation or reexportation of certain non-US-origin goods authorized	<ul style="list-style-type: none"> • US persons authorized to provide services (<i>e.g.</i>, funds transfers) ordinarily incident to the export or reexport of non-US origin medicine and medical devices that would be designated as EAR 99 if subject to the EAR.
	SSR, 31 C.F.R. §542.516(a) Certain services in support of nongovernmental organizations' activities authorized	<ul style="list-style-type: none"> • US NGOs authorized to export or reexport <i>services</i> in support of not-for-profit activities, including (i) distribution of food and medicine, (ii) health services, and (iii) non-commercial development projects directly benefiting the Syrian people, including infectious disease prevention. • US banks, broker-dealers, and money transmitters are authorized at 31 C.F.R. §542.516(b) to process funds transfers on behalf of <i>both</i> US and non-US NGOs in support of activities described in 31 C.F.R. §542.516 (a), subject to conditions.

VENEZUELA	GL-4C Authorizing Certain New Debt Transactions and Other Transactions Involving Certain Blocked Persons Related to the Exportation or Reexportation of Agricultural Commodities, Medicine, Medical Devices, Replacement Parts and Components, or Software Updates ³	<ul style="list-style-type: none"> US persons authorized to engage in financial and other transactions prohibited under Venezuela-related EOs that are ordinarily incident and necessary to the export or reexport of medicine, medical devices, replacement parts and components for medical devices, or software updates for medical devices to Venezuela or third countries specifically for resale to Venezuela.
	GL-26 Emergency and Certain Other Medical Services Authorized ⁴	<ul style="list-style-type: none"> US persons authorized to provide and receive nonscheduled emergency medical services otherwise prohibited by the Venezuela Sanctions Regulations (VSR) or Venezuela-related EOs and “other medical services” involving the Government of Venezuela prohibited by EO 13884.
	GL-29 Certain Transactions Involving the Government of Venezuela in Support of Certain Nongovernmental Organizations’ Activities Authorized ⁵	<ul style="list-style-type: none"> US persons authorized to engage in transactions involving the Government of Venezuela that are ordinarily incident and necessary to certain activities of NGOs including provision of health services, distribution of food and medicine, and non-commercial development projects directly benefiting the Venezuelan people, including preventing infectious disease.

³ https://www.treasury.gov/resource-center/sanctions/Programs/Documents/venezuela_gl4c.pdf

⁴ https://www.treasury.gov/resource-center/sanctions/Programs/Documents/venezuela_gl26.pdf

⁵ https://www.treasury.gov/resource-center/sanctions/Programs/Documents/venezuela_gl29.pdf