

# **MEMBER ALERT**



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## **US DEPARTMENT OF THE TREASURY ISSUES FACT SHEET ON COVID-19 SANCTION EXEMPTIONS**

The US Department of the Treasury's Office of Foreign Assets Control (OFAC) has recently issued a Fact Sheet highlighting exemptions, exceptions and authorizations for humanitarian assistance and trade under the Iran, Venezuela, North Korea, Syria, Cuba, and Ukraine/Russia-related sanctions programs.

The exemptions, exceptions and authorizations in question allow for the provision of humanitarian assistance and the commercial sale and export of agricultural commodities, food, medicine, and medical devices, to sanctioned countries from the United States, or by US persons, or by US-owned or controlled foreign entities.

For COVID-19 related support, the US Department of the Treasury continues to stress that US and non-US persons may provide such humanitarian goods — including medicine and medical devices — to sanctioned countries under existing exemptions, exceptions and authorizations in US sanctions laws and regulations.

For example, most medicine and medical devices, including certain personal protective equipment and other items used for COVID-19 treatment — such as medical gowns, medical eye shields and goggles, surgical gloves, face shields, certain respirators and masks such as N95, N99, and N100 masks, and certain ventilators — already qualify for export and re-export to sanctioned countries under general licenses, without the need for further authorization from OFAC.

There are certain limited categories of items that may also be helpful for COVID-19 medical assistance — e.g., oxygen generators, full face mask respirators, including powered air purifying respirators, certain diagnostic medical imaging equipment, and certain decontamination equipment — for which OFAC regulations set forth a specific licensing policy for review of license applications on a case-by-case basis due to concerns about potential end use of these specific items. OFAC is prioritizing and expediting review of these license requests.

The Fact Sheet outlines specific guidance for OFAC-administered sanctions programs related to personal protective equipment (PPE) and other COVID-19-related humanitarian assistance and trade.

More details can be found at the OFAC website:

[https://www.treasury.gov/resource-center/sanctions/Programs/Documents/covid19\\_factsheet\\_20200416.pdf](https://www.treasury.gov/resource-center/sanctions/Programs/Documents/covid19_factsheet_20200416.pdf)