

Treasury Issues Two New General Licenses for Iran

September 10, 2013

Today, the U.S. Department of the Treasury (Treasury) announced the issuance of two general licenses by the Office of Foreign Assets Control (OFAC) permitting the provision of certain services to and from Iran.¹ Specifically:

- **General License E:** Authorizes non-governmental organizations (NGOs) to engage in activities related to: humanitarian projects to meet basic human needs in Iran; non-commercial reconstruction projects in response to natural disasters in Iran for a period of up to two years following the natural disaster, environmental and wildlife conservation projects in Iran that involve endangered species of fauna and flora and their supporting habitats; and human rights and democracy building projects in Iran. General License E also permits transfers of funds in support of these activities by a single NGO, provided that the amount does not exceed a total of \$500,000 USD over a 12-month period. Notably, this license imposes a quarterly reporting requirement on NGOs.
- **General License F:** Authorizes the importation of Iranian-origin services into the United States and the exportation or re-exportation of such services, directly or indirectly, from the United States or by a U.S. person, related to professional and amateur sporting activities and exchanges involving the United States and Iran, including activities related to exhibition matches and events, the sponsorship of players, coaching, refereeing, and training.

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Practice Areas

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While the United States continues to maintain stringent sanctions against Iran, these general licenses reflect the U.S. government's continued policy of encouraging goodwill and humanitarian exchanges between the United States and other countries. That being said, these general licenses are not without limitation. For example, under both licenses, U.S. persons are prohibited from engaging in transactions with persons whose property and interests are blocked pursuant to any part of OFAC's Iranian sanctions regulations other than the Iranian Transactions and Sanctions Regulations, 31 C.F.R. Part 560. Under General License E, U.S. persons are also prohibited from engaging in humanitarian activities that are in furtherance of Iranian military or industrial infrastructure or potential, or that involve the Iranian energy, automobile, shipping, or shipbuilding sectors. Accordingly, we recommend that U.S. persons carefully review any proposed humanitarian activities and athletic exchanges with Iran before partaking in such activities to ensure that they fall within the scope of the licenses.

¹ See U.S. Department of the Treasury Press Center: Treasury Issues General Licenses to Support Humanitarian Exchanges and Athletic Exchanges in Iran (Sept. 10, 2013).