

## Panelists

- *Alan Christian*, Senior Export Policy Analyst, Foreign Policy Division, BIS
- Andrea Gacki, Assistant Director for Licensing, Office of Foreign Assets Control (OFAC), Treasury
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## Trends and Developments in Foreign Policy-based Export Controls



## **Licensing Trends**

- Cuba
  - Increase in applications for medical sales
- Iran
  - Deemed exports/reexports of mostly Categories 3, 4, 5, and 7
- North Korea
  - Mostly humanitarian donations and items for United Nations operations



## **Licensing Trends**

Sudan

- Mostly items for United Nations operations

• Syria

- Mostly medical sales and humanitarian assistance



## **Licensing Statistics**

**Sanctioned Destinations** 

**All Countries** 

Returns Without Action 27%

<u>Denials</u> 1% Returns Without Action 14%

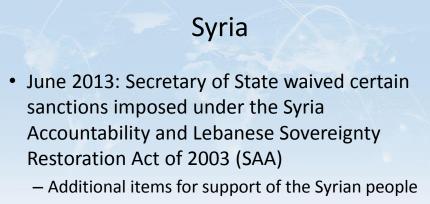
> <u>Denials</u> 1%



## **Key Application Errors**

- Failure to properly identify all parties to the transaction
- Inadequate technical description of items/no technical specifications
- Insufficient explanation of end use
- Failure to respond to request for additional information in a timely manner





- Case-by-case licensing policy



## Syria

- June 2013: SAA waiver (cont.)
  - Example categories of items considered on a caseby-case basis
    - Water supply and sanitation
    - Agricultural production and food processing
    - Power generation
    - Oil and gas production
    - Construction and engineering
    - Transportation
    - Educational infrastructure



## **Questions?**

#### For general inquiries on foreign policy-based export controls call: (202) 482-4252



# Office of Foreign Assets Control U.S. Department of the Treasury



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