



Export Control Reform:
Fulfilling the Promise
UPDATE
CONFERENCE ON EXPORT CONTROLS AND POLICY

Sanctions Panel

Moderator:
Anthony Christino III
Director, Foreign Policy Division
Bureau of Industry and Security (BIS)



U.S. DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY

Panelists

- *Alan Christian*, Senior Export Policy Analyst, Foreign Policy Division, BIS
- *Andrea Gacki*, Assistant Director for Licensing, Office of Foreign Assets Control (OFAC), Treasury
- *Aydin Akgün*, Program Manager, TSRA Licensing, OFAC, Treasury
- *John-Marshall Klein*, Deputy Director, Office of Sanctions Policy and Implementation, State



U.S. DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY

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

Returns Without Action

27%

Denials

1%

All Countries

Returns Without Action

14%

Denials

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



Syria

- June 2013: Secretary of State waived certain sanctions imposed under the Syria Accountability and Lebanese Sovereignty Restoration Act of 2003 (SAA)
 - Additional items for support of the Syrian people
 - Case-by-case licensing policy



Syria

- June 2013: SAA waiver (cont.)
 - Example categories of items considered on a case-by-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



Office of Sanctions Policy and Implementation U.S. Department of State

