

OFAC Issues Fact Sheet Summarizing Humanitarian- related Authorizations Under Russia Sanctions, New Humanitarian-related General License

April 21, 2022

On April 19, 2022, the Office of Foreign Assets Control (OFAC) issued a [fact sheet](#) with guidance on various humanitarian general licenses that authorize activities otherwise prohibited by U.S. sanctions, and respond to the threat Russia's war in Ukraine poses to global food and energy supply chains. The fact sheet provides consolidated guidance to non-governmental organizations, financial institutions, companies, and others regarding OFAC's authorizations for humanitarian assistance, agricultural trade, the provision of medical supplies and services, and other support to people impacted by the war.

Concurrent with the publication of the fact sheet, OFAC issued [General License \(GL\) No. 27](#), which additionally authorizes certain humanitarian relief efforts by nongovernmental organizations.

Background

As primarily chronicled [here](#), [here](#), [here](#), and [here](#), in response to the war in Ukraine, the United States established the new Russian Harmful Foreign Activities sanctions program (codified as Russian Harmful Foreign Activities Sanctions Regulations (RuHSR) at 31 C.F.R. part 587), which targets a variety of activities involving Russia. OFAC also expanded the embargo against the Crimea region of Ukraine under the existing Ukraine-/Russia-related sanctions program to impose embargo restrictions on the breakaway regions of the so-called Donetsk People's Republic (DNR) and the Luhansk People's Republic (LNR). Although sanctions against Russia are expansive, OFAC has issued a variety of authorizations to support the people of Ukraine and Russia impacted by the war.

Authorizations to Support the People of Ukraine and Russia

Authorizations under the RuHSR include:

- [GL 6A](#) – Authorizing certain transactions related to the exportation or reexportation of agricultural commodities; medicine; medical devices, replacement parts and components or software updates; the coronavirus disease 2019 (COVID-19) pandemic, or clinical trials
- [GL 25](#) – Authorizing certain transactions related to telecommunications and internet-based communications
- [GL 27](#) – Authorizing certain transactions in support of nongovernmental organizations' activities, including activities to support humanitarian projects; democracy-building initiatives; health,

food security, and water and sanitation projects; education; and environmental and natural resource protection

- [GL 18](#) – Authorizing U.S. dollar-denominated banknote noncommercial, personal remittances
- [GL 19](#) – Authorizing transactions related the personal maintenance of U.S. individuals located in Russia
- Section 587.508 – Authorizing the provision and receipt of nonscheduled emergency medical services
- Sections 587.205(b), 587.510 – Exempting transactions for the conduct of the official business of the U.S. government and the United Nations (including its specialized agencies and programs)
- [GL 7](#) – Authorizing overflight payments, emergency landings, and air ambulance service

Authorizations under Ukraine-/Russia-related sanctions program include:

Concerning Crimea

- [GL 4](#) – Authorizing the exportation or re exportation of agricultural commodities, medicine, medical supplies, and replacement parts
- [GL 6](#) – Authorizing noncommercial, personal remittances
- [GL 7](#) – Authorizing the operation of an account in a U.S. financial institution for ordinary residents of Crimea
- [GL 9](#) – Authorizing the exportation of certain services and software incident to internet-based communications
- [GL 25](#) – Authorizing journalistic activities and the establishment of news bureaus to engage in certain transactions in Crimea

Concerning DNR/LNR

- [GL 18](#) – Authorizing the exportation or re exportation of agricultural commodities, medicine, medical devices, replacement parts and components, or software updates and transactions related to the COVID-19 pandemic
- [GL 19](#) – Authorizing certain transactions related to the receipt or transmission or telecommunications, as well as certain transactions of common carriers involving mail and packages
- [GL 20](#) – Authorizing transactions for the conduct of the official business of certain international organizations and entities
- [GL 21](#) – Authorizing noncommercial, personal remittances and the operation of accounts of an ordinary resident in DNR and LNR
- [GL 22](#) – Authorizing the exportation of certain services and software incident to internet-based communications
- [GL 23](#) – Authorizing certain transactions in support of nongovernmental organizations' activities

in DNR and LNR

- [GL 24](#) – Authorizing transactions related to the provision of maritime services performed by individuals who are ordinarily resident in DNR and LNR
- [GL 25](#) – Authorizing news reporting organizations and employees in DNR and LNR to engage in certain transactions related to journalistic activities

Entities responding to the crisis in Ukraine or otherwise impacted by U.S. sanctions on Russia should carefully review the fact sheet, any relevant general licenses in detail, and associated FAQs issued by OFAC.