

# Humanitarian Assistance and Food Security Fact Sheet: Understanding UK and U.S. Sanctions and their Interconnection with Russia

## Introduction<sup>1</sup>

Since Russia launched its unprovoked full-scale war against Ukraine in February 2022, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) and His Majesty's Treasury's Office of Financial Sanctions Implementation (OFSI) have worked together and with foreign partners to reduce the impacts of Russia's war on global food supplies and prices and address humanitarian concerns associated with sanctions. The United States (U.S.) and the United Kingdom (UK) are committed to supporting activities that benefit the people of Ukraine as well as those around the world who are now facing food insecurity due to Putin's illegal war of aggression.

To provide additional clarity on U.S. and UK Russia-related sanctions and the relevant authorizations, exceptions, and public guidance issued by the U.S. and the UK, OFAC and OFSI are publishing this joint Fact Sheet. Humanitarian actors, non-governmental organizations (NGOs), financial institutions, and companies engaged in agricultural trade or the provision of medical supplies and assistance may use this as a guide when engaging in transactions that may be impacted by sanctions.

## Joint U.S.–UK Humanitarian Assistance–Related Frequently Asked Questions

### **Do U.S. and UK sanctions targeting Russia provide exceptions for non-government organisations (NGOs) or international organizations (IOs) providing humanitarian assistance?**

Activities by NGOs and IOs to provide relief to people impacted by the Russian Federation's war against Ukraine are not the target of U.S. or UK sanctions.

#### *U.S. Response*

To the extent transactions related to humanitarian assistance by NGOs or IOs may be otherwise prohibited by the Russian Harmful Foreign Activities Sanctions Regulations ([RuHSR](#)), OFAC has issued several relevant general licenses (GLs). Section 587.510 of the RuHSR authorizes all transactions prohibited by the RuHSR that are for the conduct of the official business of the following entities by employees, grantees, or contractors thereof:

- the United Nations, including its Programmes, Funds, and Other Entities and Bodies, as well as its Specialized Agencies and Related Organizations;
- the International Centre for Settlement of Investment Disputes (ICSID) and the Multilateral Investment Guarantee Agency (MIGA);
- the African Development Bank Group, the Asian Development Bank, the European Bank for Reconstruction and Development, and the Inter-American Development Bank Group (IDB Group), including any fund entity administered or established by any of the foregoing; and
- the International Committee of the Red Cross and the International Federation of Red Cross and Red Crescent Societies.

Russia-related [GL 27](#), "Certain Transactions in Support of Nongovernmental Organizations' Activities," authorizes transactions ordinarily incident and necessary to five categories of humanitarian activities by NGOs, provided that the only involvement of blocked persons is the processing of funds by financial institutions blocked pursuant to Executive Order (E.O.) [14024](#).

While the Crimea region of Ukraine and the so-called Donetsk People's Republic (DNR) and Luhansk People's Republic (LNR) regions of Ukraine are targeted by sanctions pursuant to E.O.s. 13685 and 14065, respectively, OFAC

<sup>1</sup> This Fact Sheet is for information purposes and is not legally binding. It does not supersede the legal provisions cited. The information and links cited in this Fact Sheet are current as of June 28, 2023. Note that authorizations, exceptions, and public guidance are subject to change; please refer to OFAC and OFSI websites for updates.

has issued numerous GLs under the Ukraine-/Russia-related sanctions program (31 CFR Part 589) to authorize humanitarian assistance, agricultural and medical trade, and other support to people in these regions impacted by Russia's malign activities.

For transactions neither exempt nor generally authorized by OFAC, OFAC considers specific license requests on a case-by-case basis and prioritizes license applications and other requests for guidance that are related to humanitarian activity. Please see [OFAC's License Application Page](#) for additional details regarding the specific licensing process.

#### *UK Response*

For the UK, OFSI has issued [GL INT/2022/1947936](#), which covers humanitarian activities and other activities that support basic human needs in relation to the conflict in Ukraine, including the non-government-controlled regions of the country, including Crimea, Donetsk and Luhansk Oblasts. The GL contains permissions for specified humanitarian organisations and their service providers to carry out any activity necessary for the delivery of these activities. There are conditions set out in the licence. These include permissions only extending to an approved category of organisations, and also ensuring that any funds are used for humanitarian assistance activities or to support basic human needs. The funds must not be owned, held or controlled by a designated person. The purpose of this condition is to ensure that designated persons cannot release frozen assets without prior permission from OFSI.

Should an NGO or IO need to provide humanitarian assistance and the activity it is undertaking is not covered by an existing general licence, then there is an option to apply to OFSI for a specific licence to permit the activity that would otherwise be prohibited. Humanitarian applications are always prioritised.<sup>2</sup>

### **Can U.S. and UK financial institutions process transactions related to the exportation of agricultural commodities, medicine, or medical devices to, from, transiting, or related to Russia?**

#### *U.S. Response*

The United States has not imposed sanctions on the exportation of agricultural commodities, medicine or medical devices to, from or related to Russia.

Russia-related [GL 6C](#) authorizes certain transactions related to agricultural commodities, agricultural equipment, medicine, medical devices, replacement parts and components for medical devices, or software updates for medical devices as well as transactions related to the prevention, diagnosis, or treatment of COVID-19 (including research or clinical studies relating to COVID-19), or clinical trials and other medical research activities. U.S. financial institutions are authorized to process transactions authorized by GL 6C. Foreign financial institutions may engage in or facilitate transactions that would be authorized for U.S. persons under GL 6C without exposure to sanctions.

#### *UK Response*

For the UK, this activity is permitted where the finances are being provided in the context of humanitarian delivery or other activities that support basic human needs.

### **Can U.S. and UK financial institutions process transactions involving Joint Stock Company Russian Agricultural Bank (Russian Agricultural Bank) related to the exportation of agricultural commodities to, from, transiting, or related to Russia?**

Yes, subject to certain conditions.

#### *U.S. Response*

Russian Agricultural Bank is not listed on OFAC's SDN List. It is not subject to blocking sanctions under the RuHSR or any other U.S. sanctions authority. However, U.S. persons are subject to certain restrictions on dealing in debt and equity of Russian Agricultural Bank. U.S. persons involved in a transaction where Russian Agricultural Bank is a counterparty should ensure that payment terms provided to Russian Agricultural Bank comport with these restrictions on dealing in its debt and equity.

<sup>2</sup> For trade sanctions, please refer to DBT's [guidance](#).

Specifically, Russian Agricultural Bank is subject to [Directive 3](#) under E.O. 14024, “Prohibitions Related to New Debt and Equity of Certain Russia-related Entities” (Russia-related Entities Directive). Russia-related Entities Directive prohibits, among other things, transactions and dealings by U.S. persons or within the U.S. in new debt of longer than 14 days maturity or new equity of Russian Agricultural Bank where such new debt or new equity is issued on or after 12:01 a.m. eastern daylight time on March 26, 2022. However, GL 6C authorizes certain transactions involving Russian Agricultural Bank that are prohibited by the RuHSR (including the Russia-related Entities Directive) related to agricultural commodities, agricultural equipment, medicine, medical devices, replacement parts and components for medical devices, or software updates for medical devices, as well as transactions related to the prevention, diagnosis, or treatment of COVID-19 (including research or clinical studies relating to COVID-19), or clinical trials and other medical research activities.

Russian Agricultural Bank is also subject to [Directive 1](#) under E.O. 13662, § 589.202 of the Ukraine-/Russia-Related Sanctions Regulations. The prohibitions of § 589.202 apply only to certain dealings in new debt or equity of Russian Agricultural Bank. For more information, please see OFAC Frequently Asked Questions (FAQs) [370](#), [395](#), and [419](#). U.S. persons should also review FAQs [1049-1055](#) for information on prohibitions related to E.O. [14066](#), E.O. [14068](#), and E.O. [14071](#).

#### *UK Response*

For the UK, where the Russian Agricultural Bank is subject to an asset freeze, under [GL INT/2022/2349952](#), Russia Regulations are not contravened by Designated Persons transferring Funds or Economic Resources to an exporter, producer, seller or transporter of Agricultural Commodities (who is not a Designated Person), DBT Licence Holders or UK Corporates in connection with the export, sale or production of Agricultural Commodities.

The Licence also allows a designated person to receive Funds or Economic Resources from an exporter, producer, seller or transporter of Agricultural Commodities (who is not a Designated Person), DBT Licence Holders, UK Corporates, Relevant Institutions or Insurance Providers in connection with the export, sale or production of Agricultural Commodities.

These permissions extend to Russian Agricultural Bank (JSC Rosselkhozbank) as a Designated Person.

## Relevant Humanitarian Authorizations– Current as of June 28, 2023

Jurisdiction	Activity	Key Authorizations
<b>U.S.<sup>3</sup></b> <b>Russian Harmful Foreign Activities Sanctions Regulations (RuHSR)</b>	Agricultural commodities, medicine, and medical devices, COVID-19 treatment, clinical trials	<a href="#">Russia-related General License 6C</a>
	Emergency medical services	<a href="#">Section 587.508 of the RuHSR</a>
	Telecommunications and certain internet-based communications	<a href="#">Russia-related General License 25C</a> <a href="#">Russia-related General License 65</a>
	NGO activities	<a href="#">Russia-related General License 27</a>
	Official business of certain international organizations and entities	<a href="#">Section 587.510 of the RuHSR</a>
	U.S. Dollar-denominated non-commercial, personal remittances	<a href="#">Russia-related General License 18</a>
	Personal maintenance of U.S. individuals located in the Russian Federation	<a href="#">Russia-related General License 19</a>
	Overflight payments, emergency landings, and air ambulance services	<a href="#">Russia-related General License 7A</a>
	Journalistic activities and establishment of news bureaus	<a href="#">Russia-related General License 52</a>
	For transactions neither exempt nor authorized by OFAC, OFAC considers specific license requests on a case-by-case basis and prioritizes license applications and other requests for guidance that are related to humanitarian activity. <sup>4</sup> Please see OFAC's <a href="#">License Application Page</a> for additional details regarding the specific licensing process.	<a href="#">Additional Licensing</a>

<sup>3</sup> Except as otherwise noted, this Fact Sheet does not discuss any OFAC sanctions other than those issued pursuant to the Russian Harmful Activities Sanctions Regulations, 31 CFR part 587. For information on additional humanitarian-related authorizations OFAC has issued pursuant to the Ukraine-/Russia-related Sanctions Regulations, please see 31 CFR part 589 and the relevant OFAC sanctions page (<https://ofac.treasury.gov/sanctions-programs-and-country-information/ukraine-russia-related-sanctions>). For related guidance, please see: [Preserving Agricultural Trade, Access to Communication, and Other Support to Those Impacted by Russia's War Against Ukraine Fact Sheet, Fact Sheet: Provision of Humanitarian Assistance and Trade to Combat COVID-19, and Ukraine-/Russia- Sanctions Regulations related FAQs.](#)

<sup>4</sup> In addition, certain items controlled under the Export Administration Regulations for export to Russia, including certain medical devices, may require a license from the Department of Commerce's Bureau of Industry and Security.

Jurisdiction	Activity	Key Authorizations
<b>UK</b>	Agricultural commodities including the provision of insurance and other services	<a href="#">General License INT/2022/2349952</a>
	Humanitarian Activity	<a href="#">General Licence INT/2022/1947936</a>
	Financial services and funds related to fertilisers	<a href="#">General Trade Licence Russia Sanctions</a>
	Russia Travel for UK nationals	<a href="#">General Licence INT/2022/1839676</a>
	Charities and Interim Managers and trustees	<a href="#">General Licence INT/2022/1834876</a>
	Telecommunications Services and News Media Services	<a href="#">General Licence INT/2022/1875276</a>
	Crown Servants, Contractors and their Family Members	<a href="#">General Licence INT/2022/1845976</a>
	For transactions neither exempt nor authorised under an HM Treasury (OFSI) General Licence, OFSI considers specific licence requests on a case-by-case basis under licensing grounds contained in Schedule 5 to the Russia (Sanctions) (EU Exit) Regulations 2019. OFSI will prioritise urgent and humanitarian cases, i.e., cases that involve a risk of harm or a threat to life. Key Licensing grounds <sup>5</sup> : <ul style="list-style-type: none"> <li>• Extraordinary Expenses</li> <li>• Extraordinary Situation</li> <li>• Prior obligations</li> <li>• Humanitarian Assistance activity</li> <li>• Medical goods or services</li> <li>• Food</li> <li>• Medical and educational purposes</li> <li>• Health and the environment</li> </ul>	<a href="#">Additional Licensing</a>

<sup>5</sup> See Schedule 5 to the Russia (Sanctions)(EU Exit) Regulations 2019 for licensing grounds and the prohibitions they relate to.

## Related Humanitarian Guidance and FAQs

<b>U.S.</b>	Guidance on permissible funds transfers involving sanctioned foreign financial institutions.	<a href="#">FAQ 978</a>
	Guidance on transactions for official business of international organizations, certain humanitarian-related trade, or the response to the COVID-19 pandemic.	<a href="#">FAQ 979</a>
	Guidance on how Executive Order 14068, which prohibits the importation into the U.S. of certain foodstuffs, impacts the Russia-related agricultural commodities authorization (GL 6C).	<a href="#">FAQ 1025</a>
	Guidance on Russia-related GL 18, which authorizes U.S. dollar denominated banknote non-commercial, personal remittances.	<a href="#">FAQ 1028</a>
	<a href="#">Russia-related FAQs</a>	
	<a href="#">Fact Sheet: Russia Sanctions and Agricultural Trade (July 14, 2022)</a>	
	<a href="#">Fact Sheet: Preserving Agricultural Trade, Access to Communication, and Other Support to Those Impacted by Russia's War Against Ukraine (April 19, 2022)</a>	

<b>UK</b>	Guidance on the applicability of asset freezes and other restrictions on persons, who are not individuals, owned or controlled by a designated person.	<a href="#">FAQ 1</a> (Russia Guidance)
	Aggregate ownership	<a href="#">FAQ 2</a> (Russia Guidance)
	Transfers via a designated bank	<a href="#">FAQ 5</a> (Russia Guidance)
	Subsidiaries located outside the UK	<a href="#">FAQ 8</a> (Russia Guidance)
	Payment of statutory taxes in Russia	<a href="#">FAQ 18</a> (Russia Guidance)
	Insurance for Russian ships and cargo carrying food and fertiliser to third countries	<a href="#">FAQ 24</a> (Russia Guidance)
	Provision of financial services for food and fertiliser exports to third countries	<a href="#">FAQ 25</a> (Russia Guidance)
	Production and distribution of fertiliser	<a href="#">FAQ 26</a> (Russia Guidance)
	<a href="#">Russia Guidance: Guidance for the financial and investment restrictions in The Russia (Sanctions) (EU Exit) Regulations 2019</a>	
	<a href="#">General Guidance for financial sanctions under the Sanctions and Anti-Money Laundering Act 2018</a>	
<a href="#">Charity Sector Guidance: Financial Sanctions guidance for charities and other non-governmental organisations (NGOs)</a>		
<a href="#">OFSI Blog on Humanitarian General Licence under Russia sanctions regime</a>		

## Additional information

Additional information relating to UK sanctions can be found in the UK's [Russia Guidance](#), [General Guidance](#) and [Charity Sector Guidance](#). Other exemptions and licensing grounds apply.

If you have additional questions relating to U.S. sanctions implemented by OFAC, you are encouraged to contact the OFAC Compliance Hotline at +1-800-540-6322 or email [OFAC\\_Feedback@treasury.gov](mailto:OFAC_Feedback@treasury.gov). As with specific licenses, OFAC prioritizes answering questions that are related to humanitarian activity.

If you have additional questions relating to UK financial sanctions, please email [ofsi@hmtreasury.gov.uk](mailto:ofsi@hmtreasury.gov.uk).

If you have any queries relating to UK trade export sanctions, please email [exportcontrol.help@trade.gov.uk](mailto:exportcontrol.help@trade.gov.uk) or [tradesanctions@trade.gov.uk](mailto:tradesanctions@trade.gov.uk)

## Crown Dependencies and Overseas Territories of the UK

For queries relating to financial sanctions in a Crown Dependency or a British Overseas Territory, you may wish to contact the relevant unit, Governor's Office, Commissioner or Chief Minister's office in the relevant jurisdiction in the first instance:

<a href="#">Guernsey</a>	<a href="#">Gibraltar</a>
<a href="#">Isle of Man</a>	<a href="#">Montserrat</a>
<a href="#">Jersey</a>	<a href="#">Pitcairn, Henderson, Ducie and Oeno Islands</a>
<a href="#">Anguilla</a>	<a href="#">St Helena, Ascension and Tristan da Cunha</a>
<a href="#">Bermuda</a>	<a href="#">South Georgia and the South Sandwich Islands</a>
<a href="#">British Antarctic Territory</a>	<a href="#">The Sovereign Base Areas of Akrotiri and Dhekelia in the Island of Cyprus</a>
<a href="#">British Indian Ocean Territory</a>	<a href="#">Turks and Caicos Islands</a>
<a href="#">Cayman Islands</a>	<a href="#">British Virgin Islands</a>
<a href="#">Falkland Islands</a>	