



## General Licence – Publication Notice

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### General Licence - INT/2023/3749168

OFSI has the power to issue General Licences for country and thematic sanctions regimes under the Sanctions and Anti-Money Laundering Act 2018.

On 14 November 2023, OFSI issued General Licence INT/2023 /3749168 under regulation 31 of the Counter-Terrorism (International Sanctions) (EU Exit) Regulations 2019 (“the CT2 Regulations”) pertaining to activities to provide humanitarian assistance, other activities that support basic human needs and facilitate the timely provision of those in relation to the conflict in Israel and the Occupied Palestinian Territories.

The issuing of General Licence INT/2023/3749168 is in response to the current conflict in Israel and the Occupied Palestinian Territories, to facilitate the delivery of humanitarian aid in this new factual context. It does not affect, nor should it be read as a statement on HMG’s position as to the legal position - including prior to the issuing of this General Licence or after the period which it expires.

The reporting requirements contained in General Licence INT/2023/3749168 are for monitoring and enforcement purposes. Reporting provided to OFSI pursuant to those requirements does not constitute an admission of breach or suspected breach of financial sanctions by the person undertaking the reporting; and receipt of that reporting by OFSI does not amount to an indication of whether or not OFSI considers that there has been a breach of financial sanctions or the conditions of General Licence INT/2023/3749168.

This General Licence does not provide for any changes to the application of the Terrorism Act 2000 (TACT 2000). Organisations named in the General Licence are therefore still required to meet their obligations under TACT 2000.

Any persons intending to use General Licence INT/2023/3749168 should consult the copy of this licence on this page for full details of the permissions and usage requirements.

For the purposes of General Licence INT/2023/3749168:

- **Designated Person** is any person or entity designated under the CT2 Regulations.
- **Relevant Person** encompasses the United Nations, including its Programmes, funds and other entities and bodies, as well as its specialised agencies and related organisations; humanitarian organisations having observer status with the United Nations General Assembly and members of those humanitarian organisations; bilaterally or multilaterally funded non-governmental organisations participating in the United Nations Humanitarian Response Plans, Refugee Response Plans, other United Nations appeals, or humanitarian clusters coordinated by the United Nations Office for the Coordination of Humanitarian Affairs; and the Occupied Palestinian Territories Humanitarian Fund and The Women’s

Peace and Humanitarian Fund. It also encompasses Médecins Sans Frontières International and its institutional members or affiliates, the Disaster Emergency Committee; any UK funded person; and any employee, grantee, subsidiary, or implementing partner of any organisation falling within the aforementioned to the extent that they are acting in those capacities. A 'UK funded person' is defined as any person that receives funding from any part of the Government of the United Kingdom for the purpose of providing humanitarian assistance or supporting basic human needs. The source of the funding need not date from the start of the conflict or relate to the conflict.

- **Relevant Activity** is activity to provide humanitarian assistance, other activities that support basic human needs and facilitate the timely provision of those activities in relation to the current conflict in Israel and the Occupied Palestinian Territories. This includes the provision, processing and payment of funds, or economic resources, and the provision of goods and services. The humanitarian assistance and other activities that support basic human needs and facilitate the timely provision of that assistance or those activities must solely relate to the conflict in Israel and the Occupied Palestinian Territories.

This General Licence is intended to include any humanitarian assistance and other activities that support basic human needs and facilitate the timely provision of that assistance or those activities in respect of neighbouring countries as long as it is related to the initial conflict affecting Israel and the Occupied Palestinian Territories and the CT2 Regulations would otherwise apply to it.

- **Relevant Institution** is a person that has permission under Part 4A of the Financial Services and Markets Act 2000 (permission to carry on regulated activities); a person that is authorised or registered under Part 2 of the Payment Services Regulations (SI 2017/752); a person that is authorised or registered under Part 2 of the Electronic Money Regulations (SI 2011/99); a person that is a "recognised clearing house", "third country central counterparty", "recognised CSD" or "third country CSD" for the purposes of section 285 of the Financial Services and Markets Act 2000; and a person that is an operator of a recognised payment system (or that is a service provider in relation to recognised payment systems) for the purposes of Part 5 of the Banking Act 2009.

#### Permission

Under General Licence INT/2023/3749168 subject to the condition set out below, a Relevant Person may perform the Relevant Activities provided that the Relevant Person believes that carrying out the Relevant Activities is so necessary to provide humanitarian assistance, other activities that support basic human needs and facilitate the timely provision of that assistance or those activities in relation to the conflict in Israel and the Occupied Palestinian Territories and there is no reasonable cause for the Relevant Person to suspect otherwise. This permission does not permit the use of economic resources owned, held or controlled by a Designated Person except where a Designated Person has received funds, goods or services in exchange for those economic resources from a Relevant Person to perform Relevant Activities.

#### Condition

Any funds used to affect the permission set out above must not be from funds or economic resources that are owned, held or controlled by a Designated Person except where a Designated Person has received funds, goods or services in exchange for those economic resources from a Relevant Person to perform Relevant Activities.

## Reporting Requirements

Any Relevant Person ~~who makes use of this licence~~ **undertaking Relevant Activities for the duration of this General Licence** will be required to provide OFSI with;

- 1) the details of the Relevant Person using this licence;  
*the suggested level of detail includes the name of the Relevant Person, their address and contact information.*
- 2) the details of the Relevant Activities that have been undertaken using this licence;  
*the suggested level of detail for "Relevant Activities" is to provide a list of the sectors of humanitarian action which the activities would fall within, for example those found within the Humanitarian Cluster Approach. Further detail of those sectors (known as clusters) is available here: <https://www.humanitarianresponse.info/en/coordination/clusters/what-cluster-approach>; and*
- 3) the total value of funds, economic resources, goods and services provided as part of the Relevant Activities.  
*the suggested level of detail for the value required is the estimated single total amount of funds for Relevant Activities in the period of this licence (in GBP), a breakdown of funding by sectors is not required.*
  - A single report from each Relevant Person would be considered sufficient to comply with the General Licence, as long as all information from employees, subsidiaries etc. is included within that reporting.

~~This information must be reported to OFSI no later than 30 days from the expiration of this licence.~~

### **Reporting to OFSI should be sent no later than:**

**A) 13 November 2024 in relation to activities undertaken under this General Licence prior to that date; and**

**B) 14 June 2025 in relation to activities undertaken under this General Licence prior to that date and after 13 November 2024.**

## General

The permissions in General Licence INT/2023/3749168 do not authorise any act which the person carrying out the act knows, or has reasonable grounds for suspecting, will result in a breach of the CT2 Regulations, save as permitted under licences granted under the CT2 Regulations.

General Licence INT/2023/3749168 takes effect from 11:59pm on 14 November 2023 and will expire on ~~15 May 2024~~ **14 May 2025** at 11:59pm.

On 20 December 2023 this licence was amended such that:

- The Disasters Emergency Committee was added as a Relevant Person
- The definition of a UK Funded Person was amended
- The geographical extent of this licence was clarified
- Reporting requirements were updated to make clear who has to report to OFSI

**On 30 April 2024 this licence was amended such that:**

- **Reporting requirements were changed to clarify that Reporting Requirements apply to any Relevant Person undertaking Relevant Activity for the duration of the General Licence.**
- **Extending the length of the General Licence by one year.**
- **Amending the deadline for Reporting Requirements to fall on 13 November 2024 and the 14 June 2025.**

Office of Financial Sanctions Implementation

HM Treasury