



THE PERMANENT MISSION  
OF THE  
UNITED STATES OF AMERICA  
TO THE  
UNITED NATIONS AND OTHER INTERNATIONAL ORGANIZATIONS  
IN GENEVA

April 17, 2024

Alena Douhan  
Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of  
human rights  
Geneva, Switzerland

Dear Special Rapporteur Douhan,

Please find enclosed the U.S. response to your letter dated September 11, 2023.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly Billingsley".

Kelly Billingsley  
Deputy Permanent Representative  
Human Rights

## **U.S. response to SP communication regarding U.S. Autonomous Sanctions and Belarus**

Sanctions are an appropriate, effective, peaceful, and legitimate tool for addressing threats to peace and security. They can be used to promote accountability for those who abuse human rights, undermine democracy, or engage in corrupt activities. In cases where the United States has applied sanctions, we have done so consistent with international law and with specific objectives in mind. These objectives include promoting rule of law or democratic systems, advancing respect for human rights and fundamental freedoms, or addressing threats to international security. Put simply, our sanctions do not target a country's population; they are aimed at those who abuse the human rights of those populations. The United States is not alone in that view or practice.

We received your letter dated September 11, 2023, in which you raise the discontinuation of medical dressings to Belarus by Swedish company Mölnlycke Health Care AB. We would refer you to Mölnlycke Health Care AB for information about their business practices and decisions. If any companies are under the misimpression that U.S. sanctions restrict the supply of humanitarian goods to Belarus, including medicines and medical devices, the United States would encourage them to consult the broad humanitarian authorizations in place under U.S. sanctions, as discussed in greater detail below.

The U.S. government does not maintain economic sanctions on the export to Belarus of the medical dressings described in the communications. The United States authorizes the official business of certain international organizations and entities (including the United Nations), certain transactions in support of nongovernmental organizations' activities, and transactions related to the provisions of food products, medicine, medical devices, and other items to sanctioned individuals for personal, non-commercial use. For transactions neither exempt nor generally authorized by the U.S. Department of the Treasury Office of Foreign Assets Control (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.

We take note that in your letter you admit no clear linkage between U.S. sanctions and this shortage. You merely characterize the timing as coincidental.

The United States has taken concrete actions to minimize unintended negative consequences of sanctions, including advancing, together with Ireland, the landmark UN Security Council resolution 2664, adopted in December 2022, which created a clear carveout for humanitarian efforts to asset freezes in all UN sanctions regimes. This historic initiative eased the delivery of humanitarian aid to those in need while helping ensure the aid is not diverted or abused by malicious actors. The United States has numerous authorizations in our domestic sanctions programs that are specifically designed to ensure our sanctions do not impede legitimate humanitarian-related activities. These authorizations include the humanitarian-related general licenses we announced in December 2022 that implement and build upon UNSCR 2664.

The United States has long included numerous humanitarian authorizations in our domestic sanctions programs that are specifically designed to ensure our sanctions affect intended targets while limiting the unintended consequences on others, particularly on vulnerable populations.