



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
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Dear Special Procedures Mandate Holders,

Please find enclosed the U.S. response to your letter dated February 8, 2024.

Sincerely,

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

Kelly Billingsley
Deputy Permanent Representative
Human Rights

U.S. response to Joint Communication regarding U.S. Autonomous Sanctions and Iran

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 a return to rule of law or democratic systems, advancing respect for human rights and fundamental freedoms, or responding to threats to international security. The United States is not alone in that view or practice.

We received your letter dated February 8, 2023, in which you inform that a subsidiary of the Swedish company Novartis AG and the French company Roquette Frères stopped supplying certain medications or medical ingredients to Iran. We refer you to Novartis AG and Roquette Frères for information about their business practices and decisions. The information you provided does not include any specific information concerning what role, if any, U.S. sanctions may have played in these companies' business decisions. If any companies are under the misimpression that U.S. sanctions restrict the supply of humanitarian goods to Iran, 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 United States has taken concrete actions to minimize unintended negative consequences of sanctions, including advancing UN Security Council resolution 2664, 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 long included numerous humanitarian provisions in our domestic sanctions programs that are specifically designed to ensure our sanctions affect intended targets while limiting the unintended consequences on others. These provisions include exceptions and authorizations permitting the export of humanitarian goods such as food and other agricultural commodities, medicine, and medical devices to Iran.

U.S. authorizations include long-standing exceptions, general licenses, and guidance for humanitarian goods transactions with respect to Iran, as well as additional humanitarian-related general licenses we announced in December 2022 that implement and build upon UNSCR 2664.

The U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) has also provided authorizations and guidance for U.S. and foreign financial institutions to engage in transactions involving Iranian banks. These facilitate payment for humanitarian goods without exposure to sanctions, including General License 8A. While companies and financial institutions can rely on these existing authorizations, exemptions, general licenses, and guidance, OFAC can also issue specific licenses and guidance where needed to facilitate transactions. For transactions neither exempt nor generally authorized, 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.

Tailoring U.S. sanctions to address a particular illicit activity or national security threat is essential to achieving their intended goals, including preventing nefarious actors from abusing the international financial system or undermining respect for human rights.