

The table on the following pages gives details of those countries against which financial sanctions have been imposed by either the United States or the European Union (sanctions can also of course be imposed by other states and bodies). Sanctions can be broadly split into two categories, “party” related sanctions and “activity” or trade related sanctions.

Party Related Sanctions

EU Sanctions

There a number of entities, bodies and individuals (the “designated persons”) whose assets are frozen. It is an offence to make funds (or other assets that can be converted into funds) available, directly or indirectly to or for the benefit of these sanctioned parties. Exclusions to these prohibitions are extremely limited.

The consolidated list of **EU targets** can be accessed [here](#).

Even if a search of the list reveals no hits, where a party is majority owned or controlled by a designated party it may fall within the prohibitions.

US Sanctions

The US maintains a list of designated persons (so called Specially Designated Nationals (“SDNs”) whose property is blocked.

The **US list** can be accessed [here](#) (this is a search against all sanctions lists administered by OFAC, including non-SDNs).

Guidance was issued in August 2014 on dealing with entities owned by individuals or entities designated. Where any entity is owned in the aggregate, directly or indirectly, 50% or more by one or more blocked persons it is itself considered a blocked person regardless of whether that entity itself is listed.

US persons (as defined) are generally prohibited from dealing with SDN’s. However, in respect of Iran for example, non-US persons can still be sanctioned for conducting transactions with those on the SDN list subject to secondary sanctions.

As a general point, simply because a person or entity has been designated under a particular sanctions program does not mean that person or entity necessarily resides in that country. It is a global risk with US SDN’s residing in over 150 countries. There are also non-country specific sanctions for example sanctions against Al Qaeda.

Activity or Trade Related Sanctions

Sanctions can also target specific activities and trades. In many of the below jurisdictions (and indeed others) arms embargos are also in force and specialist advice should be obtained in relation to the carriage of such goods.

Countries Subject to US or EU Financial Sanctions

	Party related sanctions		Trade related sanctions (excluding military and arms related restrictions)	
	US	EU	US	EU
Afghanistan	0	141	Not applicable	Not applicable
Balkans related	193	0	Not applicable	Not applicable
Belarus	25 ¹	4	Not applicable	Embargo on material that could be used for internal repression.
Burundi	11	4	Not applicable	Not applicable
Central African Republic	19	13	Not applicable	Not applicable
Cuba	79	0	See our briefing on Cuban sanctions	Not applicable
DRC	52	58	Not applicable	Not applicable
Egypt	0	9	Not applicable	Not applicable
Guinea	0	5	Not applicable	Not applicable
Guinea-Bissau	0	20	Not applicable	Not applicable
Iran	319	298	The US has now re-imposed all sanctions on Iran. See our dedicated page on Iran sanctions .	The EU has reiterated its commitment to the JCPOA and to mitigate the effects of the US sanctions on European companies. It has launched a process to use the 1996 blocking statute to attempt to neutralise the impact of the US withdrawal from the JCPOA on EU companies. In addition on 31 January 2019 France, Germany and the UK (together, the E3) announced that an SPV had been registered with the aim of facilitating legitimate trade between European businesses and Iran. As yet the SPV is not operational as there are still some technical and legal issues to be addressed.

¹ See US update regarding a general licence for transactions involving certain Belarus entities on the SDN list, which is effective to 25 October 2019 unless extended or revoked ([here](#))

				For an overview of the current Iran position see our dedicated page on Iran sanctions .
Iraq	212	239	Restrictions on transfer of Iraqi cultural property.	Not applicable
Lebanon	4	0	Not applicable	Not applicable
Libya	67	62	Narrow in scope . Details of the US relationship with Libya can be found here . On 26 February 2018, the US sanctioned 6 individuals, 24 entities and 7 vessels (press release) for “ <i>threatening the peace, security, or stability of Libya through the illicit production, refining, brokering, sale, purchase, or export of Libyan oil or for being owned or controlled by designated persons</i> ”.	Embargo on equipment that might be used for internal repression (see HMT guidance). There is also a UN ban on “illicit” crude oil exports from Libya and authority to inspect suspect ships on the high seas. More details of this can be found on the UN website . The EU has now implemented these measures, as well as the UN listing of the vessels CAPRICORN (now NADINE) and LYNN S (both now subsequently deleted from the Libya sanctions lists). There are also restrictions on the export and supply to Libya of inflatable boats (dinghies) and outboard motors.
Myanmar	0	0	Not applicable	Ban on equipment which might be used for internal repression.
Nicaragua	2	0	On 20 December 2018 the Nicaragua Human Rights and Anticorruption Act of 2018 came into force, which imposes targeted sanctions on any foreign person determined to be responsible for serious human rights violations and corruption.	Not applicable.
North Korea	353	250	See our briefing on North Korea sanctions and Circular dated 11 January 2019 .	See our briefing on North Korea sanctions and Circular dated 11 January 2019 .
Russia / Crimea	379	211	See our briefing on Russia sanctions Together with our dedicated page on Russian sanctions . Russia has also now introduced restrictions on (a) the import of products and/or raw materials originating from the USA and other foreign states;	See our briefing on Russia sanctions together with our dedicated page on Russian sanctions . Russia has also now introduced restrictions on (a) the import of products and/or raw materials originating from the USA and other foreign states; and (b) the export from Russia of products to foreign sectors. President Putin will

			and (b) the export from Russia of products to foreign sectors. President Putin will identify the products to fall within these restrictions.	identify the products to fall within these restrictions. Russia has also imposed sanctions on a huge number of Ukrainian individuals and companies and expanded and import ban on Ukrainian goods.
Somalia	20	16	Import ban on Somalian coal.	Import ban on charcoal
South Sudan	12	9	Not applicable	Ban on goods which could be used for manufacture and maintenance of products which could be used for internal repression.
Sudan	0	4	The vast majority of US sanctions have now been lifted (see our Industry News item) effective 12 October 2017 and which were formally removed on 28 June 2018.	Not applicable
Syria	546	326	See our Syria sanctions briefing as well as the OFAC Advisory to the Shipping Community providing a strong warning against petroleum trade with Syria.	See our Syria sanctions briefing
Tunisia	0	48	Not applicable	Not applicable
Venezuela	72	18	Please see our Industry News Update regarding PdVSA and the latest sanctions. US persons are also prohibited from engaging in any transactions relating to the Petro and there are various financing and other restrictions which also apply.	Embargo on equipment that might be used for internal repression and equipment, technology or software intended primarily for use in telecommunications monitoring or interception. The EU Foreign Ministers agreed on 28 May 2018 to introduce additional sanctions against specific individuals in Venezuela.
Yemen	5	5	Not applicable	Not applicable
Zimbabwe	141	3	Not applicable	Ban on exports of equipment for internal repression

Figures as at 22 October 2018. Please note that the figures are given as an indicative guide only and that entities and individuals can be designated under more than one program.

Last updated 22 October 2018.

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