






Cuba

Enhancing Support for the Cuban People (September 21, 2015; 80 FR 56898)

- Expanded License Exception SCP
 - Physical presence
 - Temporary exports and reexports
 - Software development
- Expanded License Exception AVS for certain temporary sojourns of vessels and aircraft
- Created civil aviation safety licensing policy (§ 746.2(b)(6))
- Revised deemed export and deemed reexport license requirements (§ 746.2(a)(2))

UPDATE CONFERENCE ON EXPORT CONTROLS AND POLICY 7

Iran

- BIS maintains license requirements in the EAR for exports and reexports of certain items subject to the EAR to Iran
- If you receive a license from OFAC for export or reexport of items subject to the EAR, you do not need to obtain a BIS license for the same transaction (EAR Section 746.7(2))
- The Joint Comprehensive Plan of Action (JCPOA) will provide Iran with phased sanctions relief upon verification by the International Atomic Energy Agency (IAEA) that Iran has implemented key nuclear-related measures described in the JCPOA

UPDATE CONFERENCE ON EXPORT CONTROLS AND POLICY 8




Iran

- Currently, all sanctions on Iran remain in place
- Of note, a violation of OFAC regulations involving an export or reexport of an item subject to the EAR is a violation of the EAR (EAR Section 746.7(e))
- Please refer to OFAC's website at <http://www.treasury.gov/resource-center/sanctions/Programs/pages/iran.aspx> for information about the JCPOA and for guidance about license requirements for, and restrictions on, exporting or reexporting items subject to the EAR to Iran

UPDATE CONFERENCE ON EXPORT CONTROLS AND POLICY 9




Russia

Russian Energy Sector Sanctions

(August 6, 2014; 79 FR 45675)

- Items for exploration or production of gas or oil from deepwater (500 feet), arctic offshore, or shale projects
- Applications with potential to produce oil reviewed under a presumption of denial

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