

Iran and Syria sanctions

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Publication Date: May 24, 2011

Iran sanctions - EU

The list of designated persons and entities targeted by the EU has been extended by Regulation (EU) No.503/2011 which comes into force today, 24 May. Over 100 individuals and entities have been added to the list, many due to their links with IRISL. The Regulation can be accessed [here](#).

The current regime list of designated persons has been updated by [HM Treasury](#).

It should be noted that there is also a second list of designated persons, for those responsible for serious human rights violations in Iran, which can be accessed [here](#).

Iran sanctions - US

Under the Iran Sanctions Act (ISA), as amended by the Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2010 ("CISADA"), the US Secretary of State is empowered to impose sanctions on persons determined to have made certain investments in Iran's energy sector or to have engaged in certain activities relating to Iran's refined petroleum sector. Today the Obama administration began the process of actually naming companies that will be subject to CISADA sanctions for their Iran dealings.

Secretary of State Hillary Rodham Clinton today imposed sanctions on seven companies for their activities in support of Iran's energy sector: PCCI (Jersey/Iran), Royal Oyster Group (UAE), Speedy Ship (UAE/Iran), Tanker Pacific (Singapore), Ofer Brothers Group (Israel), Associated Shipbroking (Monaco), and Petróleos de Venezuela (PDVSA) (Venezuela).

Petrochemical Commercial Company International aka PCCI (Jersey); Royal Oyster Group (UAE); and Speedy Ship aka Sepahan Oil Company or SPD (UAE/Iran): The US State Department calls these firms "among the largest current suppliers of refined petroleum

products to Iran and all three regularly engaged in deceptive practices in order to ship these products to Iran and evade U.S. sanctions." The sanctions imposed on these firms are among the strictest available, barring them from U.S. foreign exchange transactions, U.S. banking transactions, and all U.S. property transactions.

Tanker Pacific (Singapore), Ofer Brothers Group (Israel), and Associated Shipbroking (Monaco): These companies are being sanctioned for their respective roles in a September 2010 transaction that reportedly provided a tanker valued at \$8.65 million to the Islamic Republic of Iran Shipping Lines (IRISL), an entity that has been designated by the United States, and the European Union for its role in supporting Iran's proliferation activities.

Tanker Pacific and Ofer Brothers Group are barred from securing financing from the Export-Import Bank of the United States, from obtaining loans over \$10 million from U.S. financial institutions, and from receiving U.S. export licenses. They are not, however, subject to broader restrictions on U.S. currency and banking transactions.

Associated Shipbroking, charged with knowingly acting on behalf of an IRISL front company, has been dealt with more harshly, barred outright from U.S. foreign exchange transactions, U.S. banking transactions and all U.S. property transactions.

Petróleos de Venezuela (PDVSA): PDVSA, the state-owned oil company of Venezuela, reportedly delivered cargoes of reformat to Iran between December 2010 and March 2011. The sanctions State has imposed on PDVSA prohibit the company from competing for U.S. government procurement contracts, from securing financing from the Export-Import Bank of the United States, and from obtaining U.S. export licenses. These sanctions do not, however, apply to PDVSA subsidiaries and do not prohibit the export of crude oil to the United States.

Today's sanctions reflect a new Executive Order issued by President Obama yesterday, assigning the US Treasury new powers to implement and enforce CISADA financial sanctions on parties named by the Secretary of State.

In addition, the State Department took the opportunity to release detailed new CISADA guidance for the maritime and marine insurance industry, in its new *Guidelines About the Provision of Goods and Services, Including Insurance, to Entities That Ship Refined Petroleum to Iran.*

Syria sanctions - EU

Also coming into force today is Regulation (EU) No. 504/2011 which adds further individuals, including President Bashar al-Assad, to the list of designated persons. The Regulation can be viewed [here](#).

The changes are reflected in the HM Treasury current regime [list](#).

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