

**Cuba and Iran: Highlights of Regulatory Changes**  
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Cuba

- Embargo remains in place, with extensive authorizations for export, import, travel and financial activities.
- BIS License Exception SCP permits exports/reexports of EAR99 and AT1-controlled articles to private-sector end-users in agricultural and construction industries and to entrepreneurs, as well as for activities covered by OFAC general license, including establishment of physical presence in Cuba and travel.
- BIS License Exception AVS permits vessel departures to Cuba and exports/reexports of EAR99 and AT1-controlled articles for use in aircraft departing to Cuba and on vessels departing to or located in Cuba.
- Revised BIS licensing policy to favor exports for telecommunications, agricultural, civil aviation safety, environmental protection, human rights and news bureaus.
- Revised BIS case-by-case licensing policy for items used in agricultural production, artistic endeavors, education, food processing, disaster preparedness, relief and response, public health and sanitation, residential construction and renovation, public transportation, wholesale and retail distribution for domestic consumption by the Cuban people, construction of designated infrastructure facilities and that will enable or facilitate export from Cuba of items produced by the private sector.
- OFAC general licenses permit “persons subject to jurisdiction of the United States” to engage in export/reexport transactions and related activities, establish legal and physical presences in Cuba, and provide vessel carrier, legal, telecommunications and internet services, gift exports and donation remittances.
- OFAC general licenses allow bank financing for authorized exports or reexports, “u-turn” payments between foreign banks that get processed through U.S. banks, and dollar-denominated transactions by third-country banks.
- OFAC general licenses for twelve categories of travel: family visits; official business of the U.S. government, foreign governments, and certain intergovernmental organizations; journalistic activity; professional research and professional meetings; educational activities; religious activities; public performances, clinics, workshops, athletic and other competitions, and exhibitions; support for the Cuban people; humanitarian projects; activities of private foundations or research or educational institutes; exportation, importation, or transmission of information or information materials; and certain authorized export transactions.

Iran

- Suspension of most sanctions applicable to “non-U.S. persons” (foreign persons and companies), including foreign subsidiaries of U.S. companies.
- No reexports of U.S. origin items by foreign subsidiaries.
- Export and reexport license regime covering items intended for the Iranian civil aviation sector, including aircraft and spare parts and related services.
- Suspension of CISADA sanctions on activities relating to Iranian energy industries.
- Suspension of Executive Order 13628 sanctions on trade with Iranian automotive sector.
- Suspension of sanctions on third-country financial and banking and insurance transactions with Iran, trading in precious metals, designated metals and software, and trade with Iran's petrochemical and energy, ship, shipbuilding and ports, and nuclear proliferation industries.