



United States Revokes Sanctions on Sudan; Some Restrictions Remain in Place

On October 6, 2017, the United States announced that, effective October 12, 2017, it will substantially revoke sanctions on Sudan and the Government of Sudan in recognition of the Government of Sudan's sustained positive actions in connection with certain key policy concerns. This announcement completes a U.S. government review started in January 2017 (on which we reported [here](#) and [here](#)). Following revocation of the sanctions, U.S. persons will be permitted to engage in most transactions previously prohibited by the Sudanese Sanctions Regulations (31 C.F.R. Part 538) without requiring authorization from the U.S. Department of the Treasury, Office of Foreign Assets Control ("OFAC").

Although the comprehensive sanctions program targeting Sudan has been lifted, certain list-based sanctions and trade restrictions remain in place. Specifically:

- The national emergency declared with respect to Sudan pursuant to Executive Order 13067 has not been terminated;
- U.S. sanctions related to the conflict in Darfur, imposed pursuant to the Darfur Sanctions Regulations (31 C.F.R. Part 546), remain unaffected;
- The status of Sudanese persons designated under remaining sanctions authorities remains unchanged; and
- Sudan remains on the list of state sponsors of terrorism, which will continue to impose restrictions on certain dealings involving Sudan, including licensing requirements for exports or reexports of: (i) non-EAR99 items to Sudan; (ii) any items subject to U.S. export controls that implicate certain end-use or end-user restrictions; and (iii) certain agricultural commodities, medicine, and medical devices (unless authorized, subject to certain requirements, by a general license issued by OFAC that also will be effective on October 12, 2017).

In light of these continuing restrictions, U.S. and non-U.S. companies engaging in business with or involving Sudan should continue to carefully monitor any such business to ensure they remain in compliance with applicable U.S. law.

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