

28 March 2019

SANCTIONS RISK RELATED TO PETROLEUM SHIPMENTS INVOLVING IRAN AND SYRIA

On 25 March 2019 the US Office of Foreign Assets Control (OFAC) issued an Advisory alerting “*persons globally to the significant US sanctions risk for parties involved in petroleum shipments to the government of Syria*”.

Executive Order 13582 was first issued in 2011 and prohibits US persons having any dealings related to Syrian origin petroleum or petroleum products (see Britannia [circular](#) dated 13 May 2016). The Advisory issued by OFAC on 25 March 2019 states that Executive Order 13582 also provides grounds for sanctions against any non-US parties who supply petroleum to Syria. The Advisory also states that the same risk applies to any non-US parties involved in transactions relating to Iran origin petroleum or petroleum products.

A [client alert](#) issued by US lawyers Freehill Hogan and Mahar provides further details including a link to the Advisory.