

10 May 2019

Iran sanctions – iron, steel, aluminium and copper

On 8 May 2019 President Trump issued an [Executive Order](#) announcing new US sanctions relating to the iron, steel, aluminium and copper sectors of the Iranian economy.

Pursuant to the Executive Order any shipowner may now have any of its property in the US blocked (including bank transfers) if the Secretary of the US Treasury decides that it has transported to or from Iran “significant” goods used in connection with the Iranian iron, steel, aluminium or copper sectors. This could include coal transported to Iran for use in manufacturing steel. The meaning of the word “significant” shall be determined by the Secretary in accordance with the Office of Foreign Assets Control’s existing criteria but his conclusions cannot be predicted with any certainty.

The Executive Order also provides that a shipowner’s property may be blocked if it transports products produced by Iran’s iron, steel, aluminium and copper sectors.

The Executive Order became effective immediately upon it being issued, although parties involved in sanctionable transactions have a 90 day period from 8 May 2019 in which to wind down the transactions provided that such transactions were entered into before 8 May 2019. However, any new business entered into after 8 May 2019 will be in breach of the new sanctions regulations.

New York law firm Freehill Hogan & Mahar has issued a [client alert](#) explaining in more detail the scope and effect of the Executive Order.