

Alert | Export Controls & Economic Sanctions



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United States Terminates Sanctions Against Sudan

The Trump Administration has **announced** its decision to revoke the comprehensive economic sanctions against Sudan. The termination was effective as of Oct. 12, 2017.

In January 2017, President Obama suspended the Sudan sanctions regime for a period of six months, pending a final review of U.S. policy toward Sudan. In July 2017, the Trump Administration extended the suspension for an additional three months to provide sufficient time to complete its evaluation of whether to revoke the Sudan sanctions permanently.

Termination of Sudan Sanctions

In opting to terminate the Sudan sanctions, the **Secretary of State's report** cited the Government of Sudan's "positive actions" in the following five areas: "1) maintaining a cessation of hostilities [in the region]; 2) improving humanitarian access throughout Sudan; maintaining its cooperation with the United States on: 3) the conflict in South Sudan, 4) countering the Lord's Resistance Army (LRA); and 5) addressing the threat of terrorism." State Department officials emphasized that the United States government would continue to closely monitor Sudan's progress in these areas.

Certain Restrictions on Trade with Sudan Remain

Despite the removal of the U.S. economic sanctions against Sudan, important restrictions on trade with Sudan remain in place. Sudan remains listed as a State Sponsor of Terrorism (SSoT), a designation that carries restrictions on the export to Sudan of U.S.-origin goods, technology, and software. This means that, in many cases, U.S. government export licenses are still required before exporting or reexporting U.S.-origin commodities to Sudan.

In addition, other Sudan-related sanctions programs, including the Darfur Sanctions Regulations and the South Sudan Sanctions Regulations, remain in place. Accordingly, companies wishing to conduct business in Sudan or with Sudanese persons should continue to screen all parties to the transaction against the most up-to-date U.S. sanctions lists, and also consult with counsel to carefully analyze their proposed activities and identify any U.S. government licensing requirements.

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