

- The United States, in close coordination with our allies and partners, has been engaged in talks in Vienna aimed at achieving a mutual return to compliance with the Joint Comprehensive Plan of Action (JCPOA) by the United States and Iran. Those talks have made some progress but have not yet reached a positive conclusion.

- Our current Iran-related sanctions authorities remain in effect until they are lifted.

- We will continue to enforce these sanctions to make clear to Iran that they have a choice between returning to mutual compliance with the JCPOA and thus restarting legitimate international commerce or continuing their current path of escalating nuclear provocations.

- Industry sources report there has been a significant increase in Iran's crude oil production and export volume. Concurrently, reliable industry sources report that the National Iranian Oil Company (NIOC) has been negotiating with new and traditional customers to expand crude oil exports.

- We encourage our international partners to be aware of Iran's intent to expand crude oil production and exports, and to monitor for attempts to market and export petroleum and petroleum products from Iran. Iran may even offer a variety of inducements to make its exports more attractive, including discounts.

- The U.S. government still maintains a variety of secondary sanctions on Iran, including sanctions under E.O. 13846, targeting certain transactions relating to the purchase, including on credit, of petroleum and petroleum products from Iran.

- Pursuant to these authorities, non-U.S. persons risk exposure to sanctions for knowingly engaging in a significant transaction for the purchase, acquisition, sale, transport, or marketing of petroleum or petroleum products from Iran.

- Additionally, non-U.S. financial institutions may risk sanctions for knowingly conducting or facilitating any significant financial transaction for the purchase, acquisition, sale, transport, or marketing of petroleum or petroleum products from Iran.
  
- We seek to alert your governments to the sanctions risk related to these activities because the conduct of the vessels and entities knowingly transporting oil, petroleum products, or petrochemical products from Iran or engaging in certain transactions with SDNs could expose them to U.S. sanctions.
  
- For example, third-country persons that are knowingly involved in the management or operation of vessels known to be carrying sanctionable products, which could include charterers, technical and commercial managers, ship brokers, and liner agents, risk sanctions exposure.
  
- Third-country persons knowingly involved in the import, transport, and acquisition of such products, to include port and terminal operators, port agents, freight forwarders, and shipping service companies, could expose them to U.S. sanctions.
  
- In addition, certain transactions involving Iranian persons on the List of Specially Designated Nationals and Blocked Persons (SDN List) maintained by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) are sanctionable under the Iran Freedom and Counter-Proliferation Act of 2012 (IFCA).
  
- The United States has identified multiple Iranian-flagged vessels, owned and operated by National Iranian Transport Company (NITC) and Islamic Republic of Iran Shipping Lines (IRISL), which are assessed to have berthed and loaded/discharged at third country port and terminal facilities, or to have received certain services associated with the energy, shipping, or shipbuilding sector from third-party entities.
  
- We want to alert your government to this activity because entities registered in third countries that are involved in the provision of services to NITC or IRISL vessels, to include port and terminal operators, port agents,

freight forwarders, and shipping service companies, could be engaging in sanctionable activities.

- Iran uses sophisticated tactics to evade sanctions, to include falsifying documents, using ship-to-ship transfers (STS) at nighttime, disabling vessel tracking systems, and obscuring vessel numbers or using false names.

- The following measures listed in the OFAC Advisory to the Maritime Petroleum Shipping Community will assist local companies in determining if the origin of a petroleum shipment is Iranian or if the inbound vessel has engaged in AIS manipulation consistent with sanctions evasion: 1) verify cargo origin; 2) monitor for AIS manipulation; 3) review all applicable shipping documentation. For greater detail, please see OFAC's advisory: [https://home.treasury.gov/system/files/126/iran\\_advisory\\_09032019.pdf](https://home.treasury.gov/system/files/126/iran_advisory_09032019.pdf)

- For additional guidance on maritime best practices and identifying evasion techniques, please see this global advisory issued by the Departments of State and the Treasury and the U.S. Coast Guard: [https://home.treasury.gov/system/files/126/05142020\\_global\\_advisory\\_v1.pdf](https://home.treasury.gov/system/files/126/05142020_global_advisory_v1.pdf)

- We request that your government convey this information to appropriate law enforcement, port authority, and industry stakeholders so that they can independently investigate the reported activity and if warranted take appropriate action, which could involve denying port access and the provision of services.

- Please let us know if you have any additional questions or concerns.