



# CIRCULAR FOR P&I CLUBS

24 FEBRUARY 2026

**GLOBALPANDI, S.A.**  
P&I CORRESPONDENTS

# OFAC GL30B EVOLUTION AND SCOPE

General License 30 was issued on 5 August 2019 within the framework of the Executive Order 13884, which blocked property of the Government of Venezuela. Its practical purpose was to avoid the paralysis of essential maritime and aviation infrastructure by authorizing transactions and activities ordinarily incident and necessary to the operation or use of Venezuelan ports and airports. In essence, GL 30 created an operational carve-out aimed at maintaining minimum logistical continuity while preserving the core sanctions architecture.

The first important evolution of it occurred with General License 30A, issued on 2 February 2021, which replaced and superseded GL 30 in its entirety. While the underlying policy objective remained the same — allowing port and airport operations — the legal structure became more technically aligned with the codified Venezuela Sanctions Regulations (31 C.F.R. Part 591). A significant development was the explicit inclusion of transactions involving the Instituto Nacional de los Espacios Acuáticos (INEA) and entities owned 50 percent or more by INEA. This change recognized the key role played by INEA as a regulatory entity and provider of compulsory services such as tug and pilotage in Venezuelan maritime activity; therefore, without an explicit authorization,

***"This change indicates a shift toward consolidation and simplification of licensing language, placing greater reliance on the broader sanctions framework rather than enumerating specific prohibitions within the text itself..."***

essential port and shipping transactions could have remained legally uncertain. GL 30A preserved the prohibition on dealings involving diluents and maintained the general exclusion of transactions with blocked persons except where specifically carved out, thereby reinforcing compliance boundaries while improving operational clarity for shipping, port service providers and related stakeholders.

Now General License 30B has been introduced on 10 February 2026, replacing GL 30A and marking the current operative framework governing port and airport operations. The overall authorization remains substantially unchanged, i.e. transactions ordinarily incident and necessary to operations or use of ports and airports involving the Government of Venezuela and INEA

continue to be authorized. The main structural change lies in drafting methodology. Unlike prior versions, GL 30B eliminates the specific textual prohibition on diluents and instead relies on a general clause stating that transactions otherwise prohibited by the Venezuela Sanctions Regulations or other provisions of 31 CFR Chapter V remain unauthorized unless separately authorized. This change indicates a shift toward consolidation and simplification of licensing language, placing greater reliance on the broader sanctions framework rather than enumerating specific prohibitions within the text itself. Consequently, compliance analysis under GL 30B requires a much more comprehensive and thorough review of OFAC regulations and related licenses rather than reading GL 30B in isolation.

On the other hand, the introduction of General License 46 on 29 January 2026, later replaced and superseded by GL 46A, must be understood as a complementary — but distinct — development that significantly expands the context in which GL 30B operates. Historically, GL 30 and its successors allowed port and airport operations primarily to maintain humanitarian, commercial and logistical continuity, without creating authorization for oil trade transactions themselves; while GL 46 authorizes certain activities involving Venezuelan-origin oil by established U.S. entities and transactions such as arranging shipping and logistics services, including chartering vessels, obtaining marine insurance and protection and indemnity

(P&I) coverage, and arranging port and terminal services, including with port authorities or terminal operators that are part of the Government of Venezuela. Same types of transactions are also authorized for the sale of U.S.-Origin Diluents to Venezuela, under GL 47 issued on 3 February 2026.

Therefore, it is important to point out that GL 46 and GL 47 do not contradict GL 30B; rather, they overlay a broader commercial authorization on top of the pre-existing operational exception.

# **GLOBALPANDI, S.A.**

## **P&I CORRESPONDENTS**

### **Correspondents for:**

Alandia Marine, Aurora, Britannia, British Marine, Charterers P&I Club, China P&I Club, EF Marine, GARD, Hydor, ITIC, Korea P&I Club, MS Amlin, NNPC, NorthStandard P&I Club, Shipowners P&I Club, Skuld, Steamship Mutual, The American Club, The London P&I Club, Through Transport Club (TTC), Turk P&I and West of England

**Should you need any assistance or further information regarding the topic stated above, please feel free to contact us:**

Phones & Fax:

+58-242-3618159/3614453

+58-414-4071412/4071422

E-mail: [mail@globalpandi.com](mailto:mail@globalpandi.com)

Webpage: [www.globalpandi.com](http://www.globalpandi.com)

### **AOH:**

Mr. José Alfredo Sabatino Pizzolante

+58-412-4210036 & +507 6469 1784

Mr. Oswaldo Guerreiro

+58-412-4445715

*Disclaimer: This Circular is only intended to provide a general summary of the matter referred to, and so it does not constitute a legal advice as such. Specific legal advice should be taken with respect to particular cases.*

All rights reserved. Distribution of this Circular is authorized, provided that appropriate credit is given to the source.

# **CONTACT**