



CIRCULAR FOR P&I CLUBS

2 FEBRUARY 2021

GLOBALPANDI, S.A.
P&I CORRESPONDENTS

OFAC ISSUES AMENDED GL NO. 30A AUTHORIZING CERTAIN TRANSACTIONS NECESSARY TO PORT AND AIRPORT OPERATIONS

Following the 19 January sanctions imposed by the Office of Foreign Assets Control (OFAC) upon a number of individuals, oil trading firms and vessels, among them the inclusion of the National Institute of Aquatic Spaces, also known as INEA, in the SDN list (See our Circular for P&I Clubs dated 22 January 2021), raising concerns about the ability of this governmental agency to render services such as pilotage, towage and launch compulsorily needed within domestic ports and authorized under General License 30 of 5 August 2019, the OFAC issued today, the amended General License No. 30A expressly addressing the INEA designation and clarifying that all transactions and activities prohibited by E.O. 13850 involving INEA or any entity in which it owns directly or indirectly a 50% or greater interest, ordinarily incident and necessary to operations or use of ports in Venezuela are authorized.

"persons would not be sanctionable when using and paying pilotage, towage and launch services to the INEA..."

With the amended GL No. 30A, both U.S. and non-U.S. persons would not be sanctionable when using and paying pilotage, towage and launch services to

to the INEA, necessary to the operations or use of Venezuelan ports.

No doubt this is an important clarification for the shipping sector and those trading with Venezuela; however, the recommendation remains to be cautious and using if possible Euros bank accounts for payments or remittance of funds.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF FOREIGN ASSETS CONTROL

**Venezuela Sanctions Regulations
31 C.F.R. Part 591**

GENERAL LICENSE NO. 30A

Authorizing Certain Transactions Necessary to Port and Airport Operations

(a) Except as provided in paragraph (c) of this general license, all transactions and activities involving the Government of Venezuela prohibited by Executive Order (E.O.) 13884 of August 5, 2019, as incorporated into the Venezuela Sanctions Regulations, 31 C.F.R. part 591 (the VSR), that are ordinarily incident and necessary to operations or use of ports and airports in Venezuela are authorized.

(b) Except as provided in paragraph (c) of this general license, all transactions and activities prohibited by E.O. 13850 of November 1, 2018, as amended by E.O. 13857 of January 25, 2019, and incorporated into the VSR, involving the Instituto Nacional de los Espacios Acuáticos (INEA), or any entity in which INEA owns, directly or indirectly, a 50 percent or greater interest, that are ordinarily incident and necessary to operations or use of ports and airports in Venezuela are authorized.

(c) This general license does not authorize:

(1) Any transactions or activities related to the exportation or reexportation of diluents, directly or indirectly, to Venezuela; or

(2) Any transactions or activities otherwise prohibited by the VSR, or any other part of 31 C.F.R. chapter V, or any transactions or activities with any blocked person other than INEA, or any entity in which INEA owns, directly or indirectly, a 50 percent or greater interest, or any Government of Venezuela person that is blocked solely pursuant to E.O. 13884.

(d) Effective February 2, 2021, General License No. 30, dated August 5, 2019, is replaced and superseded in its entirety by this General License No. 30A.

Note to General License No. 30A: Nothing in this general license relieves any exporter from compliance with the requirements of other Federal agencies, including the Department of Commerce's Bureau of Industry and Security.

Bradley T. Smith

Digitally signed by Bradley T.
Smith
Date: 2021.02.02 12:02:15 -05'00'

Bradley T. Smith
Acting Director
Office of Foreign Assets Control

Dated: February 2, 2021

GLOBALPANDI, S.A.

P&I CORRESPONDENTS

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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.

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