



Understanding Afghanistan Sanctions Authorizations:

General License No. 14: "Authorizes the U.S. government, NGOs, and certain international organizations and entities, as well as those acting on their behalf, to engage in the provision of humanitarian assistance to Afghanistan or other activities that support basic human needs in Afghanistan." Basic human needs and other activities were not defined, leaving aid organizations vulnerable to sanctions, resulting in them being unable to deliver assistance without further clarity.

General License No. 15: "Authorizes certain transactions related to the exportation or reexportation of agricultural commodities, medicine, and medical devices (as well as replacement parts, components, and software updates for medical devices)." Certain transactions were not defined, leaving humanitarian aid organizations vulnerable to sanctions, resulting in agricultural and medical organizations unable to deliver assistance without further clarity.

General License No. 16: "Authorizes U.S. persons to engage in transactions that are ordinarily incident and necessary to the transfer of noncommercial, personal remittances, including through Afghan depository institutions, and that may involve the Taliban or the Haqqani Network, or any entity in which the Taliban or the Haqqani Network owns, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest...including clearing, settlement, and transfers through, to, or otherwise involving privately-owned and state-owned Afghan depository institutions, are authorized pursuant to GL 16." GL 16 omitted any reference to remittances for humanitarian aid or other organizations, as remittances could only be sent to individuals, and "do not include charitable donations of funds to or for the benefit of an entity or funds transfers for use in supporting or operating a business, including a family-owned business."

General License No. 17: "Authorize(s) all transactions that are for the conduct of the official business of the United States Government by employees, grantees, or contractors and that involve the Taliban or the Haqqani Network, or any entity in which the Taliban or the Haqqani Network owns, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest." GL 17 expands the U.S. Government's ability to operate both inside and outside of Afghanistan, by granting broader authority than incidental transactions.

General License No. 18: "Authorize(s) all transactions that are for the conduct of official business by employees, grantees, or contractors of certain international organizations (IOs) and that involve the Taliban or the Haqqani Network, or any entity in which the Taliban or the Haqqani Network owns, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest." GL 18 expanded certain IOs ability to deliver life-saving humanitarian aid with increased protections, including: (1) The United Nations, including its Programmes, Funds, and Other Entities and Bodies, as well as its Specialized Agencies and Related Organizations; (2) The International Centre for Settlement of Investment Disputes (ICSID) and the Multilateral

Investment Guarantee Agency (MIGA); (3) The African Development Bank Group, the Asian Development Bank, the European Bank for Reconstruction and Development, and the Inter-American Development Bank Group (IDB Group), including any fund entity administered or established by any of the foregoing; (4) The International Committee of the Red Cross and the International Federation of Red Cross and Red Crescent Societies; and (5) The Islamic Development Bank.

General License No. 19: “All transactions and activities involving the Taliban or the Haqqani Network, or any entity in which the Taliban or the Haqqani Network owns, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest...that are ordinarily incident and necessary to the activities described in paragraph (b) by nongovernmental organizations are authorized.” GL 19 expanded civil society’s ability to deliver life-saving humanitarian aid with increased protections, including: defining activities that fall under basic human needs for humanitarian projects, such as food, health services, supporting displaced vulnerable populations, and natural disaster relief; activities focused on “rule of law, citizen participation, government accountability and transparency, human rights and fundamental freedoms, access to information, and civil society development projects”; education; activities focused on “health, food security, and water and sanitation”; and activities to protect natural resources and the environment.

General License No. 20: Authorizing “all transactions involving Afghanistan or governing institutions in Afghanistan,” with the exception of “Financial transfers to the Taliban, the Haqqani Network, any entity in which the Taliban or the Haqqani Network owns, directly or indirectly, individually or in the aggregate, a 50 percent or greater interest, or any blocked individual who is in a leadership role of a governing institution in Afghanistan, other than for the purpose of effecting the payment of taxes, fees, or import duties, or the purchase or receipt of permits, licenses, or public utility services, provided that such payments do not relate to luxury items or services.” GL 20 authorizes all transactions to Afghanistan and its governing institutions provided those transactions do not involve financial transfers to the Taliban or the Haqqani Network – the groups specifically targeted in U.S. sanctions. However, it does allow for the payment of taxes, fees, duties, permits, licenses, and utilities to the Taliban and the Haqqani Network, so long as such payments are not for luxury items or services. This recognizes that there are some minimal transactions that are often necessary to facilitate essential humanitarian and other civil society services.