

**494. Does the 2017 Sudan Rule impact pending or future OFAC enforcement investigations against individuals or entities for apparent violations of the SSR relating to activities that are now authorized by the 2017 Sudan Rule but that occurred prior to the effective date of such rule?**

No. The 2017 Sudan Rule will not affect past, present, or future OFAC enforcement investigations or actions related to any apparent violations of the SSR relating to activities that are now authorized by the general license in the 2017 Sudan Rule but that occurred prior to the effective date of such rule. Under longstanding practice, apparent sanctions violations are analyzed in light of the laws and regulations that were in place at the time of the underlying activities, and civil and criminal enforcement authorities are applied accordingly. Current or future investigations regarding apparent violations of the SSR that occurred prior to the effective date of the 2017 Sudan Rule will not be impacted by the 2017 Sudan Rule and may result in OFAC enforcement actions after the effective date of the 2017 Sudan Rule. [01-13-2017]

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**Executive Order 13664, "Blocking Property of Certain Persons with Respect to South Sudan" ([Print](#))**

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**368. Are humanitarian aid groups prohibited from making payments to or otherwise transacting with non-designated individuals or entities in South Sudan, including militias and armed groups under the command or control of a designated individual?**

An entity in South Sudan that is commanded or controlled by an individual designated under [Executive Order 13664](#) is not considered blocked by operation of law. Payments, including "taxes" or "access payments," made to non-designated individuals or entities under the command or control of an individual designated under E.O. 13664 do not, in and of themselves, constitute prohibited activity. U.S. persons should employ due diligence, however, to ensure that an SDN is not, for example, profiting from such transactions. [06-02-2014]

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**Non-Governmental Organization (NGO) Registration Numbers for Activities in Sudan ([Print](#))**

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**57. Are Non-Governmental Organizations (NGOs) involved in humanitarian or religious activities in Sudan still required to obtain an NGO registration number**

No. The general license at 31 C.F.R. § 538.540 authorizes all transactions prohibited under the Sudanese Sanctions Regulations, 31 C.F.R. part 538, effective January 17, 2017. As a result, NGOs are no longer required to obtain an NGO registration number to operate in or transact with Sudan. [01-13-2017]

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**Exports of Agricultural Commodities, Medicine, and Medical Devices to Sudan**

Effective January 17, 2017, a specific license is not required to export or reexport agricultural commodities, medicines, or medical devices to Sudan, as such transactions are generally licensed pursuant to 31 C.F.R. § 538.540. For further information regarding exports and reexports of agricultural commodities, medicine, and medical devices to Iran and Sudan pursuant to the Trade Sanctions Reform and Export Enhancement Act of 2000 (TSRA), please see the [following topic](#).