

March 26, 2021

The Honorable Joseph Biden
President of the United States
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

Dear President Biden,

As a broad network of humanitarian, research, peacebuilding, faith-based, human rights, and other civil society organizations, we write to you regarding the review of existing United States and multilateral financial and economic sanctions mandated by the *National Security Directive on United States Global Leadership to Strengthen the International COVID-19 Response and to Advance Global Health Security and Biological Preparedness*. We commend your directive and leadership on this issue and applaud your decision to make this one of your first acts as President. Our organizations have long considered a review of the impact of sanctions on the global pandemic response and humanitarian situations overdue. We, therefore, write to you to express our experiences, concerns, and humanitarian needs regarding the review.

In particular, to improve the response to the COVID-19 pandemic and overall state of global security, we urge you to implement the following recommendations as well as the specific regulatory changes outlined in the attached memo previously sent to the Treasury Transition Team.

1. Make the results of the review of existing United States and multilateral financial and economic sanctions publicly available upon completion.
2. Issue a Global Temporary General License to exempt, at minimum, items such as:
 - a. Aid necessary for the treatment of COVID-19;
 - b. Equipment used in the recovery from the disease;
 - c. Goods required to address simultaneous needs and issues exacerbated by the pandemic such as food security, water supply, civilian energy infrastructure, and other health-related needs such as medical kits and equipment;
 - d. Necessary training required for the use of medical and humanitarian equipment;
 - e. Communication and partnerships with non-sanctioned organizations and individuals. (These exemptions would be necessary for contexts such as North Korea where a specific license is required for partnerships with non-sanctioned organizations and individuals);
 - f. Transactions and communications ordinarily incidental and necessary to accessing civilian populations in need of assistance.

3. Address the reluctance of financial institutions, as well as other entities within supply chains, to carry out transactions required for the delivery of this aid (see attached memo for specific recommendations).
4. Implement ongoing reporting protocols that monitor the impact and human cost of sanctions.
5. Indefinitely suspend broad-based sanctions on civilian sectors that cause significant economic damage and leave populations more exposed to sickness and disease, food insecurity, and other humanitarian emergencies.

The COVID-19 pandemic has highlighted the precarious and, in some cases, critical state of the health infrastructures and economies of sanctioned countries and locations. Without immediate intervention, millions of people will continue to face severe economic hardship, infection, and death. Civil society, independent experts, and officials have noted that, even prior to the pandemic, sanctions were already causing shortages of medical supplies, decimating livelihoods, blocking banking channels, and exacerbating already dire situations in places like Iran, Venezuela, North Korea, and Syria.^{1 2 3 4 5}

Further, the gendered impacts of sanctions have been well documented.⁶ Women, who disproportionately work in industries targeted by economic sanctions, like textiles in North Korea or Iran, are particularly vulnerable to loss of income and employment. Further, by raising food and fuel prices, impacting water infrastructure, and limiting access to medical care, economic sanctions deepen the burden of procuring food, water, and fuel, as well as caretaking, largely shouldered by women and girls.

These targeted locations now represent severe global security vulnerabilities, as these populations remain at high risk of infection and, in most cases, current sanctions regulations still prevent meaningful responses from the humanitarian community. The virus presents an overwhelming challenge to these under-resourced health infrastructures. As a result, sanctioned

¹ Office, U.S. Government Accountability. "Economic Sanctions: Agencies Assess Impacts on Targets, and Studies Suggest Several Factors Contribute to Sanctions' Effectiveness." U.S. Government Accountability Office (U.S. GAO), 2 Oct. 2019, www.gao.gov/products/GAO-20-145.

² "'Maximum Pressure': US Economic Sanctions Harm Iranians' Right to Health." Human Rights Watch, 29 Oct. 2019, www.hrw.org/report/2019/10/29/maximum-pressure/us-economic-sanctions-harm-iranians-right-health.

³ Sachs, Jeffrey, and Mark Weisbrot. "Economic Sanctions as Collective Punishment: The Case of Venezuela." Center for Economic and Policy Research,

⁴ "Report of the Panel of Experts." S/2019/691 - E - S/2019/691, 31 July 2019, undocs.org/S/2019/691.

⁵ "Humanitarian Impact of Syria-Related Unilateral Restrictive Measures." The Intercept, 28 Sept. 2016, theintercept.com/document/2016/09/28/humanitarian-impact-of-syria-related-unilateral-restrictive-measures/.

⁶ "The Human Cost and Gendered Impact of Sanctions on North Korea." Korea Peace Now. Oct. 2019, <https://koreapeacenow.org/wp-content/uploads/2019/10/human-costs-and-gendered-impact-of-sanctions-on-north-korea.pdf>.

countries and locations could continue to be, or could become, hotbeds of infection for years, and provide ample opportunities for the virus to mutate into more contagious and deadly strains.

In July 2020, the United Nations Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena Douhan, conducted a thorough review of the impact of unilateral sanctions and found that the pandemic made the impacts of sanctions “more obvious and more disastrous.” In her report to the General Assembly she concluded,

Targeted countries face shortages of medications and medical equipment, including oxygen supplies and ventilators, protective kits, spare parts, software, fuel, electricity, drinking water and water for sanitation, cannot use foreign assets for humanitarian imports, their citizens and medical personnel cannot get access to information about COVID-19, telemedicine or use communication and educational platforms. In the long-term perspective unilateral sanctions hinder targeted countries' ability to respond to COVID-19, to implement national response plans; result in breaches of existing regional and bilateral cooperation/integration mechanisms; make populations dependant on humanitarian aid and prevent the economic recovery of the targeted countries through the development and maintenance of necessary infrastructure. This violates labour rights, right to education, access to information, right to food and right to health of their populations.⁷

While the previous administration claimed repeatedly that exemptions exist for humanitarian assistance to these countries and locations, the exemptions are wholly inadequate; they do not provide relief agencies with practical pathways to deliver assistance effectively, nor do the current regulations provide the necessary reassurances to financial institutions that working with humanitarian actors is safe and lawful. In some cases, obtaining permission to send aid to sanctioned locations can take years, and regulations provide only vague guidance to organizations wishing to obtain permission.⁸

Further aggravating the situation, some humanitarian organizations have faced severe government scrutiny from the previous administration despite good-faith efforts at transparency and long-standing relationships with government agencies and officials.⁹ This scrutiny has damaged trust between civil society actors and government departments and disincentivizes humanitarians from raising clarifying questions with regulators for fear of becoming targets of

⁷ “Unilateral Sanctions Make It Harder to Fight COVID-19, Must Be Dropped, Says UN Expert.” *OHCHR*, www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=26393&LangID=E.

⁸ Kim, Jeongmin. “North Korea Aid Workers Faced Their 'Biggest Hurdles' under Trump: NK News.” *NK News - North Korea News*, 26 Jan. 2021, www.nknews.org/2021/01/north-korea-aid-workers-say-they-faced-their-biggest-hurdles-under-trump/?t=1611646696494.

⁹ O'Carroll, Chad. “Not-for-Profit Was Targeted in U.S. Sanctions Investigation, Sparking NGO Fears: NK News.” *NK News - North Korea News*, 6 Feb. 2020, www.nknews.org/2020/02/not-for-profit-was-targeted-in-u-s-sanctions-investigation-sparking-ngo-fears/.

government scrutiny. In effect, many finer points of sanctions regulations remain undiscussed obstacles to humanitarians and further impede aid delivery.

The urgent appeals listed above are based on a commitment to save human lives and build global environments of cooperation. The collective decades of research and on-the-ground experience of signatories to this letter have led us to the conclusion that broad, unilateral sanctions are harming ordinary civilians and inhibiting effective international cooperation to fight the COVID-19 pandemic.

We, therefore, urge you to take immediate emergency measures and consider long-term measures as well, that would allow the peoples of sanctioned countries and locations to respond to the devastating human and economic fallout of COVID-19.

Sincerely,

Alberto Lovera Bolivarian Circle
Alliance for Global Justice
Alliance for Peacebuilding
American Baptist Home Mission Societies
American Friends Service Committee
Amnesty International
Campaign for Peace, Disarmament and Common Security
Center for Economic and Policy Research
Center for International Policy
Charity & Security Network
Church of the Brethren Office of Peacebuilding and Policy
Churches for Middle East Peace
CODEPINK
Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
December 12th Movement International Secretariat
Demand Progress
Evangelical Lutheran Church in America
Friends Committee on National Legislation
G-REBLS
Global Ministries of the Christian Church (Disciples of Christ) and the United Church of Christ
Good Friends USA
International Action Center
Join Together Society America
Just Foreign Policy
Latin America Working Group (LAWG)
Leadership Conference of Women Religious

MADRE

Marin Interfaith Task Force on the Americas

Maryknoll Office for Global Concerns

Mennonite Central Committee U.S. Washington Office

Muslim Public Affairs Council

National Advocacy Center of the Sisters of the Good Shepherd

National Council of Churches

National Iranian American Council Action

Pax Christi USA

Peace Action

Popular Resistance

Presbyterian Church (USA)

Presbyterian Peace Network for Korea

Quincy Institute for Responsible Statecraft

RootsAction.org

SanctionsKill Campaign

SolidarityINFOService

Southern Anti-Racism Network

The United Methodist Church - General Board of Church and Society

TLtC Justice & Peace Committee

Unitarian Universalist Association

United Church of Christ, Justice and Witness Ministries

United for Peace and Justice

Veterans For Peace

War Prevention Initiative

Win Without War

Women Cross DMZ

Women's International League for Peace and Freedom US

World BEYOND War

CC: Secretary Antony Blinken

Secretary Janet Yellen

Secretary Gina Raimondo

Acting Secretary Norris Cochran

Acting Administrator Gloria D. Steele

House Foreign Affairs Committee Chairman Gregory Meeks

House Foreign Affairs Committee Ranking Member Michael McCaul

Senate Foreign Relations Committee Chairman Robert Menendez

Senate Foreign Relations Committee Ranking Member James Risch

Senate Committee on Banking, Housing, and Urban Affairs Chairman Sherrod Brown

Senate Committee on Banking, Housing, and Urban Affairs Ranking Member Patrick

Toomey

House Financial Services Committee Chairwoman Maxine Waters

House Financial Services Committee Ranking Member Patrick McHenry