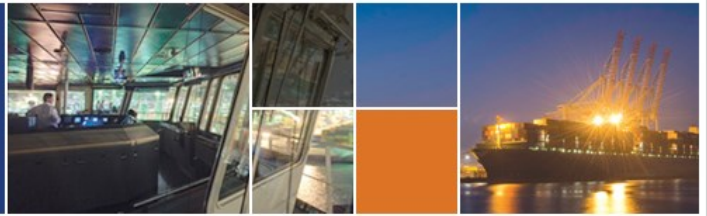




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Cuba - US Relaxation Measures

October 2016

With effect from 17 October 2016, the U.S. Treasury Department's Office of Foreign Assets Control (OFAC) and the Commerce Department's Bureau of Industry and Security (BIS) have further relaxed sanctions in respect of Cuba.

This follows amendments made in March reported [here](#).

Of particular note and interest to the shipping industry are amendments to the "180 day rule" pursuant to which, until now, (save for limited exceptions), vessels calling at a Cuban port have been prohibited from calling at US ports within 180 days thereafter.

Pursuant to a new general licence, OFAC has waived the restriction prohibiting foreign (non-US) ships from entering a US port for purposes of loading or unloading freight for 180 days after calling at a Cuban port if the items the ship carried to Cuba would, if subject to the Export Administration Regulations (EAR), be designated as "EAR99", or controlled on the Commerce Control List for anti-terrorism reasons only. Ships carrying military goods, and certain chemicals or electronic devices (deemed to be "dual-use") into Cuba would still be ineligible to enter the US for 180 days.

Copies of a US Treasury Department Fact Sheet, updated Cuba sanctions FAQs, and a BIS Export Licensing FAQ explaining the basis for EAR99 designation and the Commerce Control List can be downloaded below.

Members are advised to seek advice from their usual contacts in the Club when considering trade involving both Cuba and the US.

