

**Ms Andrea M. Gacki**

Acting Director  
Office of Foreign Assets Control  
U.S. Department of the Treasury  
Treasury Annex  
1500 Pennsylvania Avenue, NW  
Washington, DC 20220  
The United States of America

15 October 2018

Dear Ms Gacki,

BusinessEurope is the leading advocate for growth and competitiveness at European level, standing up for companies across the continent and campaigning on the issues that most influence their performance. A recognised social partner, we speak for all-sized enterprises in 34 European countries whose national business federations are our direct members.

It is in this context that I would like to address this letter to you to request clarifications related to the re-imposition of U.S. sanctions pursuant to the May 8, 2018 National Security Presidential Memorandum Relating to the Joint Comprehensive Plan of Action (JCPOA). This call becomes urgent, as the second package of U.S. sanctions against Iran will enter into force on 5 November 2018.

European companies are particularly diligent when operating in areas targeted by sanctions, complying with the relevant regulations and contributing with concrete experience in all efforts to improve the implementation of sanctions. In this regard, we would like to share a number of key concerns and concrete questions raised by European companies that you will find outlined in the accompanying note.

We appreciate the guidance documents issued by the Office of Foreign Assets Control. Nevertheless, a number of technical questions remain open. Companies need clear and predictable rules, especially when they operate in sanctions-affected areas. We also believe that the establishment of an intensified dialogue between authorities in the U.S. and the E.U as well as between authorities and business will contribute in more clarity and efficiency in the implementation of sanctions.

I thank you for your attention and for taking the concerns raised in this letter and accompanied note into consideration. BusinessEurope remains open to further discussing these issues with O.F.A.C.

Yours sincerely,

  
Markus J. Beyrer