



Yemen, One of the Last Sanctions-Related Actions of the Trump Administration

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On January 19, as one of the last sanctions-related actions of the Trump Administration, the U.S. Department of State designated Ansarallah as a Foreign Terrorist Organization and as a Specially Designated Global Terrorist (SDGT). Three of Ansarallah's leaders were also designated as SDGTs. (See press release [here](#)).

The State Department explained that Ansarallah, an Iranian-backed armed group known as the Houthi movement, was designated "to advance efforts to achieve a peaceful, sovereign, and united Yemen that is both free from Iranian interference and at peace with its neighbors." The international community has criticized the designation of Ansarallah based on the potential humanitarian impact that these designations may have in a country already suffering from a famine crisis. In practice, the designation will translate into a de facto ban in certain areas of the country controlled by the Houthis, specifically the north of the territory.

However, the administration has simultaneously issued several general licenses to support the provision of humanitarian assistance to the Yemeni people. Thus, also on January 19, the Office of Foreign Assets Control (OFAC) issued four General Licenses providing authorization (1) to conduct U.S. government official business in Yemen ([General License 9](#)), (2) to conduct official activities of certain international organizations ([General License 10](#)), (3) to support non-governmental organizations ([General License 11](#)), and (4) to export or reexport food, medicines, and medical devices ([General License 12](#)). With the intent to avoid an interruption on the provision of humanitarian items to Yemen, OFAC has also clarified certain concepts issuing three new Frequently Asked Questions ([875](#), [876](#), [877](#)).

Because this action was taken on the last days of Trump's presidency, it is certainly possible for the new Biden administration to delist Ansarallah rather quickly, if it considers that "the national security of the United States warrants a revocation of the designation" as allowed under the Antiterrorism and Effective Death Penalty Act of 1996.

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