

U.S. Terminates Myanmar Sanctions Program

October 10, 2016

On October 7, 2016, the President issued a new Executive Order, "[Termination of Emergency with Respect to the Actions and Policies of the Government of Burma](#)," which, together with related actions by the President, OFAC, and FinCEN, terminates U.S. sanctions against Myanmar. As a result:

- U.S. sanctions against Myanmar (Burma) have been lifted;
- All property and interests in property previously blocked under the Burmese Sanctions Regulations are now unblocked;
- The Myanmar Specially Designated Nationals ("[SDNs](#)") previously designated under the Burmese Sanctions Regulations have been removed from OFAC's SDN List
- Correspondent account restrictions on banks in Myanmar under Section 311 of the USA PATRIOT Act are suspended; and
- Compliance with the U.S. Department of State's Responsible Investment Reporting Requirements is now voluntary.

While the Burmese Sanctions Regulations are no longer in effect, please note that:

- All Myanmar SDNs designated under other OFAC sanctions authorities (e.g., counter-narcotics sanctions) will remain blocked; and
- The lifting of sanctions does not affect any pending or future OFAC enforcement action with respect to violations committed while the Burmese Sanctions Regulations were still in effect.

If you have any questions concerning this memorandum, please reach out to your regular firm contact or the following authors

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