Helfen statt Blockieren

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Understanding Blockades

What embargoes and sanctions are, what caution costs and how aid still gets through.

Sanctions are a tool of policy. Their effects reach far beyond the country they target: into banks, supply chains and families who send money home. This magazine explains the terms, the law and the figures, each with a source and a date. It sets out the facts and leaves the judgement to its readers.

Who bears the cost of a measure meant to hit someone else?

9 Dec 2022
UN Resolution 2664: a humanitarian exemption from all United Nations asset freezes
UN Security Council, 9 Dec 2022

30 years
EU Blocking Statute 2271/96, adopted on 22 Nov 1996
OJ L 309, 29 Nov 1996

6.36%
of the amount is the global average cost of sending a remittance
World Bank, Remittance Prices Worldwide, page of 18 Aug 2025

130 to 17
votes in the UN General Assembly for an end to the US embargo on Cuba, 25 abstentions
United Nations, 28 Oct 2026

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ABOUT THIS MAGAZINE

“Helfen statt Blockieren” (Help instead of Blockade) is non-partisan. No party, no party-affiliated foundation and no government acts as sponsor or supporter. The magazine reports what authorities, courts, governments and organisations decide and say; the views of the side imposing measures and of the side affected stand side by side.

It is not legal or sanctions advice. Anyone who wants to act should check the individual case with the competent authority or a specialist law firm. All information is as of 3 November 2026; sanctions change often. Please report errors to info@aciel-martinez-poll.com.

01

CHAPTER 1 · KEY TERMS

What a blockade is

In everyday speech many things are called a blockade. In law, four things can be distinguished, and they work very differently.

01

Embargo

An embargo prohibits trade with a country, entirely or for certain goods. An arms embargo covers only military goods. A comprehensive embargo such as the US embargo on Cuba covers almost all transactions by persons and companies subject to US law.

Source: Cuban Assets Control Regulations, 31 CFR Part 515

02

Sanctions

Sanctions, called "restrictive measures" in the EU, are usually more targeted: asset freezes and travel bans on listed individuals and companies, bans on certain sectors, services or financial transactions. Anyone listed is named in an annex.

Source: Art. 29 TEU, Art. 215 TFEU

03

Secondary and extraterritorial sanctions

Some sanctions laws do not apply only to a country's own citizens and companies. They also threaten companies in other states with penalties if they do business with a listed country. The US order on Cuba of 1 May 2026, for example, allows sanctions on foreign banks up to the loss of their correspondent accounts in the United States.

Source: Helms-Burton Act 1996; King & Spalding, 6 May 2026, on the order of 1 May 2026

04

Over-compliance and de-risking

Out of caution, banks and companies often do more than the law requires: they refuse permitted payments or terminate entire groups of customers. On 5 January 2022 the European Banking Authority wrote that unwarranted de-risking can exclude legitimate customers from the financial system and can be a sign of ineffective risk management.

Source: EBA, press release of 5 Jan 2022 (EBA/Op/2022/01)

Who imposes sanctions

UNITED NATIONS

Under Article 41 of the UN Charter the Security Council can decide on measures not involving armed force, such as interrupting economic relations. Its decisions bind all member states (Article 25).

Source: Charter of the United Nations, Arts. 25 and 41

EUROPEAN UNION

The Council of the EU adopts sanctions unanimously as a decision under the Common Foreign and Security Policy and implements the economic parts through regulations. They apply in the EU and to persons and companies from the EU, also abroad. The EU implements UN decisions and has its own regimes.

Source: Arts. 29 and 31 TEU, Art. 215 TFEU

INDIVIDUAL STATES

Besides the United States, the United Kingdom, Canada, Switzerland, Norway, Japan, Australia, New Zealand, South Korea and Ukraine, among others, maintain their own regimes or lists; Russia, China and Iran respond with countermeasures (overview in chapter 2). In the US they are administered by OFAC in the Treasury Department. Anyone who pays in US dollars or uses US banks comes into contact with US sanctions, even outside the United States; the UN Special Rapporteur criticises this reliance on the dollar.

Source: OHCHR, 21 Nov 2025; King & Spalding, 6 May 2026

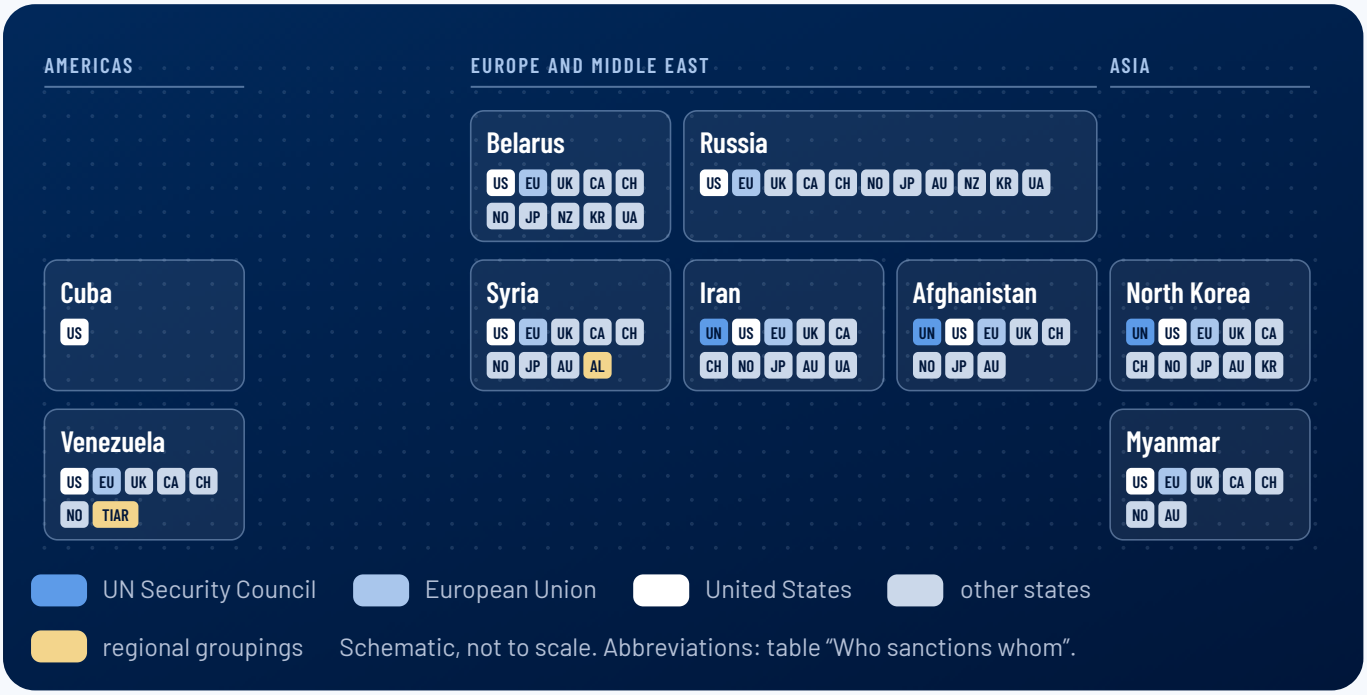
UNILATERAL COERCIVE MEASURES

The United Nations uses the term unilateral coercive measures for sanctions imposed by individual states or groups of states without a Security Council decision. The Human Rights Council has appointed a Special Rapporteur on them, currently Alena Douhan. Her report of 4 September 2023 to the General Assembly deals with secondary sanctions and over-compliance. Whether such measures are lawful under international law is disputed among states.

Source: United Nations, A/78/196 of 4 Sep 2023

The main sanctions situations

Nine countries and fourteen senders: the UN Security Council, the EU, ten states and two regional groupings. The map is schematic: the tiles show the approximate location, no borders and no sizes. Each tile shows who maintains measures against the country according to the official overviews.



Cuba

US

US embargo since the early 1960s, tightened in 2026. Plus obstacles within the country.

IMPOSED BY

United States. The overviews of the UN, EU, United Kingdom, Canada, Switzerland, Norway, Japan and Australia list no regime against Cuba.

MEASURES

Comprehensive US embargo (Cuban Assets Control Regulations; Helms-Burton Act 1996), tightened twice in 2026: a national emergency and additional tariffs on countries supplying oil (Executive Order 14380 of 29 January 2026), and secondary sanctions on foreign companies and banks (order of 1 May 2026). The EU has no economic sanctions against Cuba. More in chapter 5.

HUMANITARIAN EXEMPTIONS

Food, medicines and medical devices have been exempt since the US TSRA of 2000, with a licence and against payment in advance without US financing. Family remittances are officially exempt, but since Western Union withdrew in February 2025 they have been hard to receive.

Source: Baker McKenzie, 4 Feb 2026 (EO 14380); King & Spalding, 6 May 2026; TSRA 2000, Public Law 106-387; UN Special Rapporteur, 21 Nov 2025

Venezuela

US EU UK CA CH NO TIAR

US programme remains in place, with broad oil and gas licences since 2026.

IMPOSED BY

United States, European Union, United Kingdom, Canada, Switzerland, Norway, Rio Treaty (TIAR). In 2019 the Rio Treaty (TIAR) decided asset freezes and entry bans against 29 persons.

MEASURES

US sanctions programme since 2015; listings remain in place. After the arrest of Nicolás Maduro in January 2026, OFAC issued general licences for oil and gas transactions from 29 January 2026 (GL 46 and following). The EU has had its own regime with an arms embargo and listings since 2017.

HUMANITARIAN EXEMPTIONS

EU: humanitarian exemption since 27 Nov 2023. US: General Licence 60 of 25 June 2026 authorised payments for earthquake relief until 23 October 2026.

Source: Cleary Gottlieb and Akin Gump, Jan 2026 (GL 46); OFAC, Federal Register Doc. 2026-20831, 13 Oct 2026 (GL 60); Council Decision (CFSP) 2017/2074; Council of the EU, 27 Nov 2023

Belarus

US EU UK CA CH NO JP NZ KR UA

EU sanctions, extended in parallel with the Russia packages.

IMPOSED BY

United States, European Union, United Kingdom, Canada, Switzerland, Norway, Japan, New Zealand, South Korea, Ukraine.

MEASURES

EU economic and financial sanctions and listings, extended in April and July 2026 in parallel with the 20th and 21st Russia packages. The US also has sanctions.

HUMANITARIAN EXEMPTIONS

Exemptions with authorisation from the competent national authority; in Germany BAFA for goods, the Bundesbank for funds.

Source: Mayer Brown, Apr and Jul 2026; German Federal Ministry for Economic Affairs, page “Embargos”, accessed 3 Nov 2026

Russia

US EU UK CA CH NO JP AU NZ KR UA

21 EU sanctions packages and the listing package of 12 October 2026; the 22nd package has been announced.

IMPOSED BY

United States, European Union, United Kingdom, Canada, Switzerland, Norway, Japan, Australia, New Zealand, South Korea, Ukraine.

MEASURES

The EU has sanctioned Russia since 2014 and comprehensively since 2022. The listing package of 12 October 2026 (the 22nd sanctions package has been announced) lists 1,569 further individuals and companies, including 826 companies and 743 individuals; the total is now about 4,600 entries. It contains no new trade restrictions. The US, the United Kingdom and other states also have sanctions.

HUMANITARIAN EXEMPTIONS

Exemption for exclusively humanitarian purposes in Ukraine (Council, 13 Apr 2022); further exemptions with authorisation from national authorities.

Source: McCann FitzGerald, 30 Oct 2026 (Council Decision (CFSP) 2026/2279); Agence Europe, 14 Apr 2022

Syria

US EU UK CA CH NO JP AU AL

Economic sanctions largely lifted in 2025; targeted measures remain.

IMPOSED BY

United States, European Union, United Kingdom, Canada, Switzerland, Norway, Japan, Australia, Arab League. The Arab League sanctions date from 2011; Syria has been a member again since 7 May 2023.

MEASURES

On 28 May 2025 the EU lifted its economic sanctions and kept measures on security grounds and against those responsible. The US repealed the Caesar Act sanctions in the National Defense Authorization Act for 2026 in December 2025; the situation is reviewed every 180 days for four years.

HUMANITARIAN EXEMPTIONS

With the lifting, most authorisation requirements for trade and payments no longer apply.

Source: EU Sanctions Helpdesk, 28 May 2025; The National, 17 Dec 2025

Iran

UN US EU UK CA CH NO JP AU UA

UN sanctions back in force since September 2025; their status is disputed in the Security Council.

IMPOSED BY

UN Security Council, United States, European Union, United Kingdom, Canada, Switzerland, Norway, Japan, Australia, Ukraine.

MEASURES

At the request of France, Germany and the United Kingdom, UN sanctions came back into force on 27 September 2025 (snapback). Iran, Russia and China consider Resolution 2231 to have expired. The EU reintroduced its sanctions on 29 and 30 September 2025. The US maintains comprehensive sanctions.

HUMANITARIAN EXEMPTIONS

EU: transfers for food, healthcare, medical equipment, agriculture or humanitarian purposes are unrestricted below 10,000 euros, above that subject to notification, and with certain Iranian banks subject to authorisation from 100,000 euros.

Source: Mayer Brown, 3 Oct 2025; UN Security Council, SC/16491 (2026)

Afghanistan

UN US EU UK CH NO JP AU

UN sanctions on the Taliban, with a humanitarian exemption.

IMPOSED BY

UN Security Council, United States, European Union, United Kingdom, Switzerland, Norway, Japan, Australia.

MEASURES

UN Security Council sanctions regime under Resolution 1988 (2011): asset freezes, travel bans and an arms embargo against listed Taliban individuals. The monitoring team's mandate was extended by one year in February 2026.

HUMANITARIAN EXEMPTIONS

Resolution 2615 (2021) allows humanitarian assistance despite the listings; Resolution 2664 (2022) creates a general humanitarian exemption.

Source: UN Security Council, Resolutions 1988 (2011), 2615 (2021), 2664 (2022); Pajhwok Afghan News, 13 Feb 2026

Myanmar

US EU UK CA CH NO AU

EU measures extended until 30 April 2027.

IMPOSED BY

United States, European Union, United Kingdom, Canada, Switzerland, Norway, Australia.

MEASURES

On 27 April 2026 the EU extended its measures: asset freezes and travel bans on 105 individuals and 22 entities, an arms embargo, and export bans on surveillance equipment and on dual-use goods for the military and border police.

HUMANITARIAN EXEMPTIONS

EU humanitarian exemption since 27 Nov 2023.

Source: Council of the EU, 27 Apr 2026, as reproduced by Progressive Voice Myanmar, 27 Apr 2026; Council of the EU, 27 Nov 2023

North Korea

UN US EU UK CA CH NO JP AU KR

UN sanctions since 2006; the UN panel of experts ended in 2024, and eleven states have monitored since.

IMPOSED BY

UN Security Council, United States, European Union, United Kingdom, Canada, Switzerland, Norway, Japan, Australia, South Korea.

MEASURES

UN Security Council sanctions since Resolution 1718 (2006). After a Russian veto on 28 Mar 2024 the mandate of the UN panel of experts ended. Since October 2024 a monitoring team of eleven states (MSMT), including Germany, has reported. Its report of 18 September 2026 estimates 35,600 to 101,280 North Korean workers abroad, earning 450 to 800 million US dollars in 2025.

HUMANITARIAN EXEMPTIONS

Resolution 2664 (2022) applies here too; EU humanitarian exemption since 31 Mar 2023.

Source: JURIST, 28 Mar 2024; MSMT, joint statement of 18 Sep 2026 (Italian Ministry of Foreign Affairs); Government of Ireland, 31 Mar 2023

Further regimes

The EU has further regimes of its own, including on Nicaragua, Burundi, Guinea, Zimbabwe, Bosnia and Herzegovina and against cyber-attacks; a humanitarian exemption has applied to them since 27 November 2023. There are also United Nations regimes, including on Haiti, Yemen, Libya, Somalia, Sudan and South Sudan.

Source: Council of the EU, 27 Nov 2023 (via ReliefWeb); Government of Ireland, 31 Mar 2023

Who sanctions whom

For the nine countries on the map, the table shows which actors maintain measures there. Only what the actor's official overview or the cited source names is entered; the source is given in each row. As of 3 November 2026.

ACTOR	CUBA	VENEZ.	BELARUS	RUSSIA	SYRIA	IRAN	AFGH.	MYANMAR	N. KOREA	SOURCE
UN UN Security Council						● a	●		●	UN Security Council, overview of sanctions committees (15 active regimes), accessed 3 Nov 2026
US United States	●	●	●	●	● b	●	●	●	●	OFAC, Sanctions Programs and Country Information, accessed 3 Nov 2026 (Syria: PAARSS programme)
EU European Union		●	●	●	●	●	●	●	●	Profiles in this chapter; Afghanistan: Regulation (EU) No 753/2011
UK United Kingdom		●	●	●	●	●	●	●	●	GOV.UK, UK sanctions regimes, lists updated up to 30 Oct 2026
CA Canada		●	●	●	● c	●		●	●	Global Affairs Canada, Current sanctions imposed by Canada; Syria: page of 31 Jul 2026 (SOR/2026-23)
CH Switzerland		●	●	●	●	●	●	●	●	SECO, sanctions ordinances (28 entries), accessed 3 Nov 2026
NO Norway		●	●	●	●	●	●	●	●	DEKSA (Norwegian Agency for Export Control and Sanctions), Applicable Sanctions, accessed 3 Nov 2026
JP Japan			●	●	●	●	●		●	Ministry of Finance of Japan, overview of economic sanctions, as of 2 Oct 2026
AU Australia				●	●	●	●	●	●	DFAT, Sanctions snapshot (UN and autonomous regimes), accessed 3 Nov 2026
NZ New Zealand			● g	●						MFAT, Russia Sanctions (Russia Sanctions Act 2022); SunLive, 17 May 2022 (Belarus)
KR South Korea			● f	● f					●	Korea JoongAng Daily, 2 Dec 2022 (own North Korea listings); Korea Times, 5 Sep 2024 (export bans)
UA Ukraine			●	●		●				President of Ukraine, 1 Jul 2025 (adoption of EU listings on Russia, Belarus, Iran)
TIAR Rio Treaty (TIAR)		● e								Congressional Research Service, IN11116, 11 Dec 2019
AL Arab League					● d					SIPRI, arms embargoes database, accessed 3 Nov 2026

a In force again since 27 Sep 2025 at the request of France, Germany and the United Kingdom; Iran, Russia and China dispute this.

b The Caesar Act sanctions were lifted in December 2025; targeted measures continue under the PAARSS programme.

c Broad sectoral bans lifted on 13 Feb 2026; listings remain.

d Economic and financial sanctions from November 2011, arms embargo from 3 Dec 2011; SIPRI found no formal lifting after readmission in 2023.

e Decisions of 23 Sep 2019 (16 of 19 states parties) and 3 Dec 2019 (29 persons); a later status is not documented.

f Export bans, covering 1,402 items since 9 Sep 2024.

g Belarusian persons and defence firms, listed under the Russia Sanctions Act (17 May 2022).

How to read the table: an empty cell means that the actor's overview consulted names no regime of its own for that country. It does not mean that nothing applies there: decisions of the UN Security Council bind all member states (Art. 25 UN Charter), and many states implement them in their own law. Measures by Russia, China and Iran are aimed mainly at states that are not on the map; they are described below the table. The table does not judge whether a measure is justified.

UNITED NATIONS

The 15 active sanctions regimes of the Security Council

- Al-Shabaab (Committee 2713)
- ISIL (Da'esh) and Al-Qaida (1267)
- Iraq (1518)
- Democratic Republic of the Congo (1533)
- Sudan (1591)
- Lebanon, attack on Rafiq Hariri (1636)
- North Korea (1718)
- Iran (1737)
- Libya (1970)
- Taliban (1988)
- Guinea-Bissau (2048)
- Yemen (2140)
- South Sudan (2206)
- Haiti (2653)
- Central African Republic (2745)

The number in brackets is the resolution after which the committee is named. On 6 November 2025 the Council removed Syria's transitional president Ahmed al-Sharaa and interior minister Anas Khattab from the ISIL and Al-Qaida list (Resolution 2799, 14 votes in favour, China abstaining).

Source: UN Security Council, overview of sanctions committees, accessed 3 Nov 2026; ASIL, on Resolution 2799 of 6 Nov 2025

Countermeasures and own sanctions: Russia, China, Iran

RUSSIA

Import ban and list of "unfriendly" states

Since August 2014 Russia has banned imports of certain foods from the United States, the EU, the United Kingdom, Canada, Australia, New Zealand, Norway, Ukraine, Albania, Montenegro, Iceland and Liechtenstein. In September 2026 the government extended the ban to 31 December 2028.

Since early 2022 the government has kept a list of "unfriendly" states and territories; certain transactions with partners from these states require approval.

Source: HortiDaily, 22 Sep 2026; Al Jazeera, 8 Mar 2022

IRAN

Countersanctions against persons from the EU and the United Kingdom

On 24 April 2023 the Iranian foreign ministry imposed sanctions on 17 persons and 4 entities from the EU and the United Kingdom, among them eight European lawmakers and the German-Israeli Society. Tehran described this as a response to European sanctions against Iranian officials.

Source: Asharq Al-Awsat, 25 Apr 2023

CHINA

Lists, countermeasures, export controls

China keeps an Unreliable Entity List (81 entries in total up to 7 Aug 2026, including suspended ones) and, under the 2021 Anti-Foreign Sanctions Law, a countermeasure list (78 persons, 89 entities).

Examples: ban on exports of dual-use items to military users in Japan (6 Jan 2026); first blocking order against US listings of Chinese refineries (2 May 2026); 14 EU companies placed on the export control list in response to the EU's 21st Russia package (24 Jul 2026). The rare-earth export controls of 9 Oct 2025 are suspended until 10 Nov 2026; the controls of 4 Apr 2025 on seven rare earths remain in force.

Source: AnJie Broad via China Law Vision, 14 Aug 2026; GTAI, January 2026; Pillsbury, 13 Nov 2025

Regional groupings

AFRICAN UNION

Suspension after coups

After unconstitutional changes of government the Peace and Security Council suspends membership. Guinea-Bissau was suspended on 28 Nov 2025, Madagascar after the coup in October 2025. Sudan has been suspended since October 2021; the Council confirmed this in February 2026. Amani Africa lists Burkina Faso, Guinea, Mali and Niger as further countries in transition.

Source: Amani Africa, 16 Dec 2025; JURIST, February 2026

ECOWAS

Economic Community of West African States

After the coup in Niger in July 2023, ECOWAS suspended commercial and financial transactions, froze Niger's assets at the central banks and imposed travel bans. On 24 February 2024 it lifted these sanctions, as well as financial and economic sanctions on Guinea and restrictions on Mali.

Source: JURIST, 24 Feb 2024

ARAB LEAGUE

Syria 2011 to 2023

In November 2011 the League imposed economic and financial sanctions on the Syrian government and suspended Syria's membership; an arms embargo applied from 3 Dec 2011. Syria was readmitted on 7 May 2023. SIPRI found no formal lifting of the embargo.

Source: SIPRI, arms embargoes database; Al-Monitor, 7 May 2023

OAS AND RIO TREATY

Cuba 1962, Venezuela 2019

The Organization of American States excluded the government of Cuba from participation in 1962; on 3 June 2009 the General Assembly declared that decision without effect (AG/RES. 2438). Under the Inter-American Treaty of Reciprocal Assistance (TIAR), 16 of 19 states parties decided on 23 Sep 2019 on asset freezes against officials of the Maduro government; a list of 29 persons followed on 3 Dec 2019.

Source: OAS, AG/RES. 2438 (XXXIX-O/09); Congressional Research Service, IN11116, 11 Dec 2019

What caution costs

Sanctions work not only through prohibitions but also through the caution of those who comply with them. These figures are documented; they measure different things and cannot be added up.

206.1

BILLION US DOLLARS

was the global cost to financial institutions of complying with financial crime rules, according to a study of 1,181 professionals.

Source: LexisNexis Risk Solutions, press release of 26 Sep 2023

78%

OF INSTITUTIONS SURVEYED

say the web of regulations and sanctions constrains their business; in Europe, the Middle East and Africa the figure is 80 percent.



Source: LexisNexis Risk Solutions, 26 Sep 2023, via Finextra

8.83

BILLION US DOLLARS

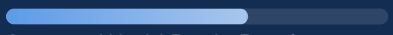
was paid by BNP Paribas in 2014 for violating US sanctions on Sudan, Cuba and Iran. The case concerned payments in US dollars through the US financial system.

Source: Al Jazeera, 30 Jun 2014

6.36%

OF THE AMOUNT SENT

is the global average cost of a remittance. The measure is the cost of sending 200 US dollars.



Source: World Bank, Remittance Prices Worldwide, home page of 18 Aug 2025, accessed 3 Nov 2026

3%

TARGET FOR 2030

The Sustainable Development Goals call for reducing remittance costs to less than 3 percent, with no corridor above 5 percent.



Source: World Bank, indicator SI.RMT.COST.OB.ZS, target 10.c

10 Feb 2025

WESTERN UNION

confirmed that it was suspending transfers between the US and Cuba indefinitely, after the US had added the processor Orbit S.A. to its list of restricted Cuban entities.

Source: Bloomberg Línea, 10 Feb 2025

UNITED NATIONS, 21 NOVEMBER 2025

What the Special Rapporteur found in Cuba

> *“De-risking policies and over-compliance have been substantially exacerbating the humanitarian situation.”*

Alena Douhan, UN Special Rapporteur on unilateral coercive measures, visited Cuba in November 2025. In her preliminary statement she describes banks refusing to carry out any transaction and transport companies refusing to guarantee deliveries. Remittances, she writes, are officially exempt but have become hard to receive since Western Union withdrew in February 2025. Payments and procurement have become more expensive, slower and less transparent.

She calls on the US to lift the measures and on banks and companies to avoid over-compliance. At the same time she acknowledges Cuba’s primary responsibility for protecting human rights and calls on the government to cooperate with UN mechanisms and to host further Special Rapporteurs. The final report was announced for the Human Rights Council in September 2026.

Source: OHCHR, end-of-mission statement, Havana, 21 Nov 2025

EUROPEAN BANKING AUTHORITY

De-risking can be a legitimate risk management tool, but when unwarranted it excludes people (5 January 2022). Guidelines of 31 Mar 2023, applicable since 3 November 2023: banks must consider several options before rejecting a customer and follow set steps before ending a relationship. Refusing entire categories of customers without looking at individual risk can be unwarranted. For the most vulnerable, such as refugees and homeless people, it can be a matter of survival.

Source: EBA, press releases of 5 Jan 2022 and 31 Mar 2023 (EBA/GL/2023/04); Finanssivalvonta, 2 Nov 2023

REPORT TO THE GENERAL ASSEMBLY

The Special Rapporteur’s report “Secondary sanctions, overcompliance and human rights” was submitted to the UN General Assembly on 4 September 2023. It examines how fear of penalties also prevents permitted business, aid and payments.

Source: United Nations, A/78/196 of 4 Sep 2023

What the law says

Three sources of law determine what applies in Europe when foreign sanctions and humanitarian aid meet.

REGULATION (EC) NO 2271/96

The EU Blocking Statute

The Regulation of 22 November 1996 prohibits companies and persons in the EU from complying with the foreign sanctions laws listed in its annex. Judgments based on them are not recognised in the EU; anyone harmed can claim damages. Those affected must inform the Commission within 30 days. Anyone who must deviate applies for an authorisation.

From the start its annex listed US laws on Cuba, Iran and Libya; since 2018 the renewed US sanctions on Iran have also been listed. On 22 November 2026 the Regulation turns 30.

Source: Reg. (EC) No 2271/96, OJ L 309, 29 Nov 1996; Delegated Reg. (EU) 2018/1100 of 6 Jun 2018

COURT OF JUSTICE OF THE EU, CASE C-124/20

The Bank Melli Iran ruling

On 21 December 2021 the Court ruled in Bank Melli Iran v Telekom Deutschland: the prohibition on compliance applies even where no US authority has issued an order.

Where the evidence suggests at first sight that a termination served to comply with foreign sanctions, the company must show otherwise in court; the prohibition does not, however, require reasons for a termination in every case. At the same time the courts examine whether the prohibition places a disproportionate burden on the company.

Source: CJEU (Grand Chamber), judgment of 21 Dec 2021, C-124/20, ECLI:EU:C:2021:1035

UN SECURITY COUNCIL, 9 DECEMBER 2022

Resolution 2664: the humanitarian exemption

The Resolution provides that funds, goods and services necessary for the timely delivery of humanitarian assistance or for other activities that support basic human needs do not violate UN asset freezes. It applies to UN programmes and agencies, to humanitarian organisations with observer status at the General Assembly and to certain non-governmental organisations.

It applies to all UN sanctions regimes; for the ISIL (Da'esh) and Al-Qaida regime initially for two years. It was put forward by Ireland and the United States. 14 members voted in favour; India abstained.

Source: UN Security Council, Resolution 2664 (2022), 9214th meeting, 9 Dec 2022; Security Council Report, Dec 2022

How the EU applies the exemption

13 APR 2022

Exemption for humanitarian partner organisations in the Ukraine regime, for exclusively humanitarian purposes in Ukraine.

Source: Agence Europe, 14 Apr 2022

FEBRUARY 2023

Resolution 2664 transposed in six UN-only regimes: Central African Republic, Haiti, Iraq, Lebanon, Somalia, Yemen.

Source: Government of Ireland, 31 Mar 2023

31 MAR 2023

Eight mixed regimes follow, including North Korea, Iran and Libya. 14 EU regimes now carry the exemption; no licence is needed.

Source: Government of Ireland, 31 Mar 2023

27 NOV 2023

Ten autonomous EU regimes receive the exemption, including Myanmar, Nicaragua and Venezuela. The Council reviews them regularly.

Source: Council of the EU, 27 Nov 2023 (via ReliefWeb)

19 FEB 2024

The EU counter-terrorism framework also receives an exemption, initially for twelve months.

Source: Agence Europe, 19 Feb 2024

UNITED STATES

OFAC implemented Resolution 2664 on 20 December 2022 with new and amended general licences that go beyond the UN regimes across its sanctions programmes, including for activities of non-governmental organisations.

Source: Buchanan Ingersoll & Rooney, on the OFAC action of 20 Dec 2022

GERMANY

Exemption authorisations are issued by the Federal Office for Economic Affairs and Export Control (BAFA) for goods, services and technical assistance, and by the Deutsche Bundesbank through its Financial Sanctions Service Centre for funds and financial resources.

Source: German Federal Ministry for Economic Affairs, page “Embargos”, accessed 3 Nov 2026

BASIC ACCOUNT

In Germany every consumer lawfully resident in the EU is entitled to a basic payment account, including asylum seekers and people without a fixed address.

Source: Section 31 German Payment Accounts Act (ZKG)

CHAPTER 5 · FOCUS

Cuba: blockade from outside, obstacles within

Cuba shows both: a US embargo that also reaches companies in third countries, and hardship that also has causes at home. This chapter sets out both sides with sources.

The US embargo

EARLY 1960S
The US imposes the embargo; the Cuban Assets Control Regulations have applied since 1963.
Source: 31 CFR Part 515

1996
The Helms-Burton Act is expressly aimed at companies from third countries too. It is one reason for the EU Blocking Statute.
Source: Reg. (EC) No 2271/96, annex

2000
The TSRA (Trade Sanctions Reform and Export Enhancement Act) allows sales of food and medicines, with a licence and against payment in advance.
Source: Public Law 106-387, Title IX

10 FEB 2025
Western Union suspends transfers to Cuba after the US listed the processor Orbit S.A.
Source: Bloomberg Línea, 10 Feb 2025

29 JAN 2026
Presidential order (Executive Order 14380): national emergency with respect to Cuba, additional tariffs on countries supplying oil.
Source: Baker McKenzie, 4 Feb 2026

1 MAY 2026
New order: secondary sanctions on foreign companies and banks in energy, defence, mining, finance and security.
Source: King & Spalding, 6 May 2026

UNITED NATIONS, 28 OCTOBER 2026

130 states for an end to the embargo

For the 34th time the General Assembly called for an end to the US embargo against Cuba: 130 states voted in favour, 17 against and 25 abstained. In 2025 the figures were 165 in favour, 7 against and 12 abstentions. Those voting against included the US, Israel, Argentina, Paraguay, Colombia, Ecuador and Costa Rica. The resolution is a recommendation and does not bind the US.

Source: United Nations, General Assembly, 28 Oct 2026; NTN24, 28 Oct 2026

WITHIN THE COUNTRY

Obstacles in Cuba itself

Decisions within the country also contribute to the hardship. On 1 January 2021 the government introduced the currency reform "Tarea Ordenamiento" and set a single official rate of 24 pesos per US dollar; severe inflation followed. State rules for the economy and trade and tight limits on private initiative add to this.

The power grid collapsed nationwide several times in 2026; on 3 August, by Bloomberg Línea's count, for the sixth time that year. Primicias cites as causes the fuel shortage, partly due to US oil pressure, and low generating capacity.

Source: Diario Libre, 10 Dec 2020; Bloomberg Línea, 3 Aug 2026; Primicias, 4 Aug 2026

AMNESTY INTERNATIONAL, 19 JANUARY 2026

Political prisoners

Amnesty International documents cases of people imprisoned in Cuba for political reasons. The organisation describes the releases of 2025 as selective and calls for the immediate release of the people imprisoned for political reasons.

Source: Amnesty International, "Cuba: a un año de excarcelaciones selectivas, exigimos libertad inmediata para las personas presas por motivos políticos", 19 Jan 2026, amnesty.org

Two views of the same hardship

UN SPECIAL RAPPORTEUR

After her visit, Alena Douhan described shortages of medicines, food, fuel and spare parts and attributed them largely to the US measures and over-compliance. She called on the US to lift the measures and at the same time acknowledged Cuba's primary responsibility for human rights.

Source: OHCHR, 21 Nov 2025

CUBAN OBSERVATORY FOR HUMAN RIGHTS

The Observatorio Cubano de Derechos Humanos (OCDH) disagreed: the crisis, it said, is a direct consequence of the failure of the communist system, not of sanctions. In its own survey only 3 percent of respondents blamed the embargo for their problems. It asked that democratic voices from Cuba also be heard.

Source: CiberCuba, 25 Nov 2025, on the OCDH's 8th report on social rights

On terminology: the Cuban government speaks of the "bloqueo", the United Nations of the embargo. This magazine uses "US embargo".

How aid still gets through

Humanitarian aid is permitted under almost all regimes. It often fails not because of the law but because of uncertainty. These routes are lawfully open; they do not replace checking the individual case.

1 Give through experienced aid organisations

Aid organisations with partners on the ground know the rules, check recipients and document how funds are used. A donation for a specific purpose is the simplest route; three examples for Cuba follow below.

2 Use humanitarian exemptions

Resolution 2664, the EU exemptions and the OFAC general licences permit humanitarian activities without individual authorisation. They apply to certain humanitarian actors such as UN organisations and recognised aid organisations, not to every private person; that is another reason why giving through an aid organisation is the simplest route.

Source: Resolution 2664 (2022); Government of Ireland, 31 Mar 2023; Buchanan Ingersoll & Rooney

3 Check the recipient

Before every payment, check whether the recipient or its bank is listed. The EU shows all regimes on its sanctions map (www.sanctionsmap.eu); the lists in the legal acts are binding.

Source: EU Sanctions Map, accessed 3 Nov 2026

4 Apply for authorisation

Where an exemption requires authorisation, in Germany BAFA is competent for goods and services and the Bundesbank for funds. In-kind donations also need an export and customs check.

Source: German Federal Ministry for Economic Affairs, page “Embargos”

5 Ask when refused

If a bank refuses a permitted payment, ask for the reason. Under the EBA guidelines, banks must assess the individual risk before refusing. Consumers are entitled to a basic account.

Source: EBA/GL/2023/04 of 31 Mar 2023; Section 31 ZKG

6 Know the Blocking Statute

Companies in the EU may not comply with the US laws on Cuba and Iran listed in its annex. Anyone disadvantaged by these laws informs the Commission within 30 days.

Source: Reg. (EC) No 2271/96

Note: this chapter describes the legal situation in general terms, as of 3 November 2026. It is not legal or sanctions advice. In the EU no funds or economic resources may be made available to listed persons and companies, not even as a donation; the humanitarian exemptions apply only to the actors and purposes named in them.

AID ORGANISATIONS WITH PROJECTS IN CUBA

Three aid organisations, one principle

These three aid organisations run projects in Cuba. At Helfen statt Blockieren, donations for the people of Cuba go directly to them, not to the organiser. The aid organisations do not thereby take any political position. The EU has no economic sanctions against Cuba.

EBM INTERNATIONAL

Project: microcredits in Cuba. “They are granted to women and men with a business idea that enables them to earn their own income.”

RECIPIENT
EBM INTERNATIONAL KdöR
IBAN
DE69 5009 2100 0000 0468 68
BIC
GENODE51BH2
REFERENCE
Kuba Microfinanzinvest P26570

jesuitenweltweit

Project “Hope for Cuba”: the Loyola Centres in Cuba, from Nuremberg above all the centres in Camagüey and Santiago de Cuba. According to the organisation, earmarked donations go to the project in full.

RECIPIENT
jesuitenweltweit
IBAN
DE61 7509 0300 0005 1155 82
BIC
GENODEF1M05
REFERENCE
X31251 Kuba HsB

Netzwerk InterRed Cooperacion e.V.

Project: a solar installation for a children’s hospital in Havana. According to the association, donations go to the solar project in full.

RECIPIENT
Netzwerk InterRed Cooperacion e.V.
IBAN
DE15 3702 0500 0007 6002 00
BIC
BFSWDE33MNZ
REFERENCE
Solaranlage Kinderkrankenhaus Havanna

Donation receipts are issued by each aid organisation. Logos of EBM INTERNATIONAL and jesuitenweltweit used with the organisations’ consent. Payment references as given by the organisations.

HELFEN STATT BLOCKIEREN 2026

Online workshops 16 to 19 November, culture week in Berlin 20 to 24 November, programme at www.helfen-statt-blockieren.com

Terms from A to Z

Briefly explained, in the sense used in this magazine.

Asset freeze
Funds and assets of a listed person are frozen; no one may dispose of them.

Basic account
A payment account with basic features to which consumers lawfully resident in the EU are entitled.

Blocking Statute
EU Regulation 2271/96. Prohibits compliance with certain foreign sanctions laws.

Correspondent bank
A bank that processes payments in a foreign currency, such as US dollars, on behalf of another bank.

De-risking
Banks end or refuse relationships with entire groups of customers instead of managing individual risk.

Dual-use goods
Goods that can be used for civilian and military purposes; their export often requires authorisation.

Embargo
A ban on trade with a country, entirely or for certain goods such as arms.

Extraterritorial effect
A law is meant to apply outside the state that enacted it.

General licence
A general permission from an authority such as OFAC for a group of transactions, without an individual application.

Humanitarian exemption
A rule under which humanitarian aid is permitted despite sanctions; also called a carve-out.

Listing
Adding a person or company to a sanctions list, with name and grounds.

Making available, ban on
A prohibition on providing funds or economic resources to listed persons, directly or indirectly.

OFAC
Office of Foreign Assets Control, the sanctions authority in the US Treasury Department.

Over-compliance
Doing more than sanctions require, out of fear of penalties.

Remittance
Money that people abroad send to their families at home; in Spanish remesa.

Secondary sanction
A threat of penalties against third parties who do business with a sanctioned country or listed person.

Snapback
The reinstatement of earlier UN sanctions against Iran under the procedure of Resolution 2231.

Unilateral coercive measures
UN term for sanctions imposed by individual states or groups of states without a Security Council decision.

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Helfen statt Blockieren

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