

Dear Secretary Pompeo:

We write to express our concern and to seek answers regarding the humanitarian impact that recently imposed U.S. sanctions are having on the Iranian people and on the efforts being undertaken by this Administration to ensure these sanctions do not target innocent Iranians. Successive U.S. administrations have sought to differentiate between the Iranian people and the Iranian government and have recognized that it serves U.S. national interests to seek positive relations with the people of Iran. However, in a November 7 interview with *BBC Persian* on the efficacy of humanitarian exemptions under Iran sanctions, you said that Iran's leaders have "to make a decision that they want their people to eat." Such rhetoric suggests that it may indeed be the intent of these sanctions to inflict collective punishment against ordinary Iranians rather than to target these measures against Iran's government.<sup>[1]</sup>

Credible reporting indicates that sanctions are indeed inhibiting the flow of humanitarian goods to the Iranian people, and this understanding is reflected broadly amongst the international community.<sup>[2]</sup> In recent weeks, shortages have been reported for anticoagulants and medicine to treat ailments including multiple sclerosis and cancer.<sup>[3]</sup> The head of Iran's haemophilia society has warned that when supplies run out in the months ahead, "the lives of thousands of patients will be at risk." Moreover, the October 16 sanctions designation of Bank Parsian, which had facilitated much of Iran's humanitarian trade in prior years, is likely to accelerate the negative humanitarian impact of U.S. sanctions on Iran.

According to reports, the governments of our close allies in France, the United Kingdom and Germany have pressed both the Treasury and State Departments to detail clear guidelines for safe humanitarian trade with Iran. According to French ambassador to the United States Gerard Araud, "*the banks are so terrified of sanctions that they don't want to do anything with Iran. It means that in a few months, there is a strong risk that there will be shortage of medicine in Iran if we don't do something positive.*"<sup>[4]</sup>

The International Court of Justice has also ruled that the United States must remove "any impediments" to the export of humanitarian goods, including food, medicine, and aviation safety equipment.

This is not the first time that sanctions have impacted the flow of humanitarian goods to Iran. Iran "experienced shortages ranging from 78-172 medicines every month between mid-2012 and September 2013," according to reporting by the UN Special Rapporteur amid the Obama administration's sanctions. However, the Obama administration took steps to address the humanitarian impact of sanctions, including through broadening humanitarian exemptions.

Your failure to address these humanitarian concerns in good faith will undoubtedly redound to the Iranian government's benefit by providing an opening to demonize the United States and lay the blame for economic failings at the feet of the U.S. government. They also risk impoverishing the Iranian middle class, undermining Iranian civil society, and enabling increased control of the Iranian economy by unaccountable and repressive forces that have flourished under sanctions and are threatened by Iran's economic integration with the world. Such hardline elements oppose

moderation with the West, victimize the Iranian people and treat dual nationals as political pawns.

As a result, we ask you to answer the following questions in detail no later than December 31, 2018:

1. Is it a deliberate strategy of the Trump administration to starve the Iranian people or deprive them of basic medicines? If not, what substantive steps has the administration taken to ensure the Iranian people have continued access to life-saving medicines?
2. Which foreign nations have expressed concern about the humanitarian impact of U.S. sanctions on Iran, and what have they asked the administration to do to ensure the free flow of humanitarian goods to Iran?
3. According to a report in *The Guardian*, the United Kingdom, France and Germany have pushed both the State and Treasury Departments to produce a “white list” that would “give clear guidelines about what channels European banks and companies should follow to conduct legitimate transactions with Iran without fear of future penalties.”[\[5\]](#) Has the State or Treasury Departments acted upon this proposal to establish a white channel to ensure the flow of humanitarian goods? If not, why not?
4. What additional measures have been contemplated to ensure the free flow of humanitarian goods to the Iranian people? If these were rejected, why were they rejected?
5. Are broader license authorizations or exemptions necessary to ensure the flow of humanitarian goods to Iran? If not, what is the evidence for this assessment?

If answers are not forthcoming, we will work with the chairs of relevant committees to ensure hearings on this topic.

Sincerely,

Members of Congress