



## Summary: Sanctions Law Issues within ISO

### 1. Introduction

Sanctions law issues arose within ISO in 2011 in connection with US Sanctions against embargoed countries. Participants in some ISO committees, particularly in the oil and gas sector, raised concerns that participation in the ISO standards development process might violate US sanctions against embargoed countries. ISO and ANSI, the ISO member in the US, took those concerns very seriously and addressed them over the past 5 years.

### 2. US Sanctions against embargoed countries

ISO requested independent legal advice from a law firm with expertise in US and EU sanctions law, and ANSI sought clarification from the *U.S. Treasury Department Office of Foreign Assets Control* (OFAC), the competent sanction law authority in the US. The various responses received over the past 5 years, including the latest response from OFAC of July 2016, are very clear: participation in the ISO standards development process is in compliance with US sanctions against embargoed countries.

### 3. Further Sanctions Programs

In addition, ISO, ANSI, and CEN addressed concerns of participants in ISO committees in relation with other sanctions programs. Concerning the EU sanctions, ISO again sought legal advice, and CEN requested clarification from the EU Commission. The responses received confirmed that the participation in the ISO standards development process complies with these sanctions law programs. More details of sanction law issues can be requested from the ISO central secretariat.

### 4. Conclusion concerning Sanction Law Issues

In light of the experience of the last 5 years, and on the basis of all the responses received from competent sanction law authorities (OFAC and the EU Commission), as well as the legal advice, ISO considers that: i) the current ISO standard development process is robust in light of sanction law issues, and ii) participation in the standard development process is compliant with sanctions laws.

Individuals and their organizations should decide for themselves whether to participate in ISO standards development. ISO therefore encourages those with any concerns to make their own assessment.

For further information on the above, please contact the ISO Central Secretariat or your National Standards Body ([http://www.iso.org/iso/home/about/iso\\_members.htm](http://www.iso.org/iso/home/about/iso_members.htm) and [central@iso.org](mailto:central@iso.org)).