



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

**Case No. RUSSIA-EO14024-2023-1035657-1**

Pola Raiz OOO  
c/o Curtis, Mallet-Prevost, Colt & Mosle LLP  
101 Park Avenue  
New York, New York 10178-0061  
Attn: Jason Wright

Dear Mr. Wright:

This letter is in reply to your request on behalf of Pola Raiz OOO (“Pola Raiz”) dated March 6, 2023, and additional correspondence dated April 28, 2023, to the Office of Foreign Assets Control (OFAC), requesting the issuance of a Frequently Asked Question (FAQ) clarifying that all transactions ordinarily incident and necessary to the transportation of agricultural commodities by Pola Raiz and its vessels are authorized by Russia-related General License (GL) 6C. Pola Raiz was added to OFAC’s List of Specially Designated Nationals and Blocked Persons (the “SDN List”) on February 24, 2023.

You state in the application that Pola Raiz is a shipping company whose shipments of grain are necessary for global food security. Further, you state that Pola Raiz and its vessels are currently shipping agricultural commodities, including grain. Pola Raiz has received licenses from the national authorities of Germany, Greece, Italy, and the Netherlands for several of its grain-transporting vessels. Pola Raiz also ships grains and fertilizers to Turkey, Morocco, Algeria, and Tunisia. You indicate in the application that Pola Raiz is concerned that its service providers will be unwilling to transact with Pola Raiz out of fear that by doing so, they would be violating U.S. sanctions in some manner.

As you are aware, the United States has not imposed sanctions on the exportation of agricultural commodities from, to, or involving Russia. In addition, OFAC has issued Russia-related GL 6C, which, subject to certain limitations, authorizes “all transactions prohibited by the Russian Harmful Foreign Activities Sanctions Regulations,” related to the production, manufacturing, sale, or transport of agricultural commodities and agricultural equipment, among other products and activities.<sup>1</sup> As with all OFAC GLs, GL 6C is “self-executing,” meaning that persons who determine that their activities are authorized by the GL may proceed without further assurance from OFAC. U.S. financial institutions are permitted to process transactions authorized by GL

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<sup>1</sup> For the purposes of GL 6C, agricultural commodities are defined as products that fall within the term “agricultural commodity” as defined in section 102 of the Agricultural Trade Act of 1978 (7 U.S.C. 5602) and are intended for use as food for humans (including raw, processed, and packaged foods; live animals; vitamins and minerals; food additives or supplements; and bottled drinking water) or animals (including animal feeds); seeds for food crops; fertilizers or organic fertilizers; or reproductive materials (such as live animals, fertilized eggs, embryos, and semen) for the production of food animals.

6C. In addition, foreign financial institutions may engage in or facilitate transactions that would be authorized for U.S. persons under GL 6C, without exposure to sanctions. Accordingly, to the extent that such transactions involving Pola Raiz are related to the transport of agricultural commodities, including grain, and are authorized under GL 6C, no additional OFAC authorization is necessary.

Please be advised that GL 6C does not authorize transactions prohibited by Executive Order (E.O.) 14066, E.O. 14068, or E.O. 14071, except for transactions prohibited solely by the determination of May 8, 2022, made pursuant to section 1(a)(ii) of E.O. 14071, “Prohibitions Related to Certain Accounting, Trust and Corporate Formation, and Management Consulting Services.” Transactions prohibited by E.O. 14066, E.O. 14068, and E.O. 14071 include new investment in the Russian Federation and the importation into the United States of certain products of Russian Federation origin, such as alcoholic beverages and fish, seafood, or preparations thereof. Additionally, GL 6C does not excuse Pola Raiz from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization from any other agency. Finally, to the extent that Pola Raiz is engaging in transactions that are not authorized by GL 6C, additional guidance should be sought from OFAC as U.S. persons may be prohibited from engaging in such transactions.

In light of the above, as well as existing guidance from OFAC clarifying the authorizations in GL 6C, including FAQ 978, FAQ 1025 and FAQ 1039, OFAC has determined that it is not necessary to issue a separate FAQ to further clarify that no additional OFAC authorization is necessary for transactions involving Pola Raiz that are authorized under GL 6C, including those related to the transport of agricultural commodities, such as grain.

For further information regarding Russia-related sanctions and humanitarian activity, please review the following two documents/fact sheets: “Food Security Fact Sheet: Russia Sanctions and Agricultural Trade” and “Fact Sheet: Preserving Agricultural Trade, Access to Communication, and Other Support to Those Impacted by Russia’s War Against Ukraine.”

If a U.S. or foreign financial institution has questions about processing a transaction related to agricultural trade involving Russia, please encourage them to contact the OFAC Compliance Hotline at 1-800-540-6322 or email [OFAC\\_Feedback@treasury.gov](mailto:OFAC_Feedback@treasury.gov).

Sincerely,

Nikole A.  
Thomas

Digitally signed by Nikole A.  
Thomas  
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Nikole A. Thomas  
Assistant Director for Licensing  
Office of Foreign Assets Control