

# United States Senate

WASHINGTON, DC 20510

October 8, 2024

The Honorable Antony Blinken  
Secretary  
United States Department of State  
Washington, D.C.

The Honorable Janet Yellen  
Secretary  
United States Department of the Treasury  
Washington, D.C.

The Honorable Lisa M. Palluconi  
Acting Director, Office of Foreign Assets Control  
United States Department of the Treasury  
Washington, D.C.

The Honorable Joseph DeCarolis  
Administrator  
United States Energy Information Administration

Dear Secretary Blinken, Secretary Yellen, Acting Director Palluconi, and Administrator DeCarolis:

On April 23, 2024, Congress passed H.R. 815, an emergency supplemental appropriation for Fiscal Year (FY) 2024, that was signed into law by President Biden on April 24. The supplemental package included additional funding for Ukraine, Israel, the Indo-Pacific, and humanitarian assistance. The national security package also included legislation to strengthen U.S. national security, including the Stop Harboring Iranian Petroleum (SHIP) Act and the Fight and Combat Rampant Iranian Missile Exports (Fight CRIME) Act. The SHIP Act includes important provisions to sanction foreign persons that knowingly engage in the petroleum trade with the Islamic Republic of Iran, and the Fight CRIME Act restricts certain missile-related activities and transfers by Iran. The legislation includes a number of regulation publishing and reporting requirements from the administration in order for Congress to track efforts to deny Iran the resources and ability to engage in destabilizing activities, commit human rights violations, support international terrorism, and fund weapons development.

For decades, there has been evidence that Iran has funded direct attacks on America and our allies. Since Hamas' attack on Israel on October 7, 2023, Iran has only become more emboldened to act against democratic interests across the globe. To cite just two recent events, the International Atomic Energy Agency confirmed in its August 2024 report that Iran continues

to increase its stockpile of enriched uranium,<sup>1</sup> and on September 10, 2024, the Pentagon confirmed reports that Iran has transferred shipments of Fath 360 close-range ballistic missiles to Russia to support their continued aggression against Ukraine. Iran is able to further these disrupting activities due to profits from their oil trade.<sup>2</sup> According to United Against Nuclear Iran, a non-partisan watchdog organization that tracks Iranian oil shipment, Iran exported 1,626,866 barrels per day in August 2024.<sup>3</sup> Due to the quantity of oil that Iran is able to trade and the subsequent profits, as well as their historical pattern of utilizing these funds to foster violence and chaos, it is vital that the United States take concrete action to disrupt their petroleum trade. Therefore, we ask the administration to honor the reporting deadlines and enforcement requirements prescribed within the SHIP and Fight CRIME Acts that were included in H.R. 815, the emergency supplemental appropriations.

To date, the administration has not met the following deadlines:

- By July 23, 2024 (90 after enactment, and every 180 days thereafter), the Secretary of State shall provide a report that identifies Iranian persons utilizing an unmanned combat aerial vehicle against a United States citizen. *P.L. 118-50, Div. K Sec. 6(a)*
- By August 12, 2024 (10 days before regulation enactment), the President shall notify the appropriate Congressional committees of the proposed regulations to combat proliferation of Iranian missiles. *P.L. 118-50, Div. K Sec. 5(f)(2)*
- By August 22, 2024 (120 days after enactment), the President shall promulgate regulations as necessary for the implementation of sanctions to combat proliferation of Iranian missiles. *P.L. 118-50, Div. K Sec. 5(f)(1)*
- By August 22, 2024 (120 days after enactment, and annually thereafter), the Administrator of the Energy Information Administration shall submit a report describing Iran's growing exports of petroleum and petroleum products, including their exports to the People's Republic of China and the ships and ports involved in the oil sales. *P.L. 118-50, Div. J Sec. 4(a)*
- By August 22, 2024 (120 days after enactment), the Secretary of State shall submit written strategy on the role of the People's Republic of China's role in evading U.S.-imposed sanctions on Iranian-origin petroleum products. *P.L. 118-50, Div. J Sec. 5*

The following deadlines are upcoming within the next 30 days:

- By October 11, 2024, (10 days before regulation enactment) the President shall notify and brief the appropriate Congressional Committees on the regulations to be established to implement the SHIP Act. *P.L. 118-50, Div. J Sec. 3(e)(2)*
- By October 21, 2024 (180 days after enactment), the President shall prescribe necessary regulations to implement sanctions enforcement. *P.L. 118-50, Div. J Sec. 3(e)(2)*

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<sup>1</sup> International Atomic Energy Agency: *Verification and monitoring in the Islamic Republic of Iran in light of United Nations Security Council resolution 2231 (2015)* (August 29, 2024)

(<https://www.iaea.org/sites/default/files/documents/gov2024-41.pdf>) (Accessed September 24, 2024)

<sup>2</sup> U.S. Department of Defense: *Iran Gives Russia Short-Range Missiles, While U.S., Partners Expect to Keep Bolstering Ukrainian Air Defense* (September 10, 2024) (<https://www.defense.gov/News/News-Stories/Article/Article/3901774/#:~:text=%22The%20United%20States%20has%20confirmed,Press%20Secretary%20Air%20Force%20Maj.>) (Accessed September 20, 2024)

<sup>3</sup> United Against Nuclear Iran: *August 2024 Iran Tanker Tracker* (September 3, 2024)

(<https://www.unitedagainstnucleariran.com/blog/august-2024-iran-tanker-tracker>) (accessed September 26, 2024)

- On and after October 21, 2024 (180 days after enactment), the President shall impose sanctions on foreign persons determined to have knowingly engaged in the Iranian petroleum trade. *P.L. 118-50, Div. J Sec. 3(a)*

Given the havoc Iran is wreaking in the Middle East and the wider region, this information is both timely and vital for Congress to carry out appropriate sanctions oversight and understand what greater legislative action is required to ensure Iran does not have the resources to harm the United States or our partners and allies. We look forward to these timely reports and enhanced understanding of the administration's plan to counter Iranian oil trade and accessible revenue for their funding of terrorism. We ask that you honor the October deadlines and work to address the deadlines already missed in order to provide Congress with the relevant reports as quickly as possible.

We further request that you provide our offices an update on your efforts and when to expect these reports no later than October 29, 2024. Thank you for your continued work and attention to this matter.

Sincerely,



Kyrsten Sinema  
United States Senator



Jacky Rosen  
United States Senator



Tammy Baldwin  
United States Senator



Chuck Grassley  
United States Senator



Robert P. Casey, Jr.  
United States Senator



Eric Schmitt  
United States Senator

A handwritten signature in black ink that reads "John Hoeven". The signature is written in a cursive style with a large, looped initial "J" and a long, sweeping underline.

John Hoeven  
United States Senator