OFAC ALERT

Sanctions Risks of Iranian Demands for Strait of Hormuz Passage

August 24, 2026

The Office of Foreign Assets Control (OFAC) is issuing this update to its May 1, 2026 alert to provide additional guidance in response to evolving Iranian threats to shipping and demands for "toll" payments and other requirements from the Government of Iran or its representatives in exchange for safe passage through the international Strait of Hormuz. U.S. and non-U.S. persons risk sanctions or penalties by engaging with the designated so-called Persian Gulf Strait Authority (PGSA), Persian Gulf Marine Insurance Company (PGMIC), and HormuzSafe Marine Services Authority (Hormuz Safe), including by accepting insurance or other services or responding to information demands for guarantees of safe passage, even if there is no associated payment or other exchange of value for these services.[1]

When demanded, tolls or fees could include various forms of payment, including fiat currency, digital assets, offsets, government-to-government deals, informal swaps, or other in-kind payments, such as nominally charitable donations made to, for example, the Iranian Red Crescent Society, Bonyad Mostazafan, or Iranian embassy accounts. OFAC is warning U.S. and non-U.S. persons about the sanctions risks of making these payments to, or soliciting guarantees from, the Iranian regime for safe passage. These risks exist regardless of payment method or structure.

U.S. persons and U.S.-owned or -controlled foreign entities are generally prohibited under U.S. sanctions from engaging in direct or indirect transactions with Iran or the Government of Iran, including the provision or receipt of services, unless exempt or authorized by OFAC. U.S. sanctions also generally prohibit U.S. persons from engaging in direct or indirect transactions with Iran's Islamic Revolutionary Guard Corps (IRGC), which is designated as a Foreign Terrorist Organization and is sanctioned pursuant to several authorities, including nonproliferation and counterterrorism sanctions authorities. U.S. persons are also generally prohibited from engaging with Iranian digital asset exchanges, which are considered blocked Iranian financial institutions under U.S. sanctions.

Additionally, non-U.S. persons may risk exposure to sanctions for engaging in transactions with the Government of Iran, PGSA, PGMIC, Hormuz Safe, or the IRGC that are not otherwise exempt or authorized for U.S. persons. This risk to non-U.S. persons includes secondary sanctions on participating foreign financial institutions, which could result in the prohibition or restriction of such foreign financial institutions' access to the U.S. financial

1 On May 27, 2026, OFAC designated PGSA pursuant to counterterrorism authorities, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, the IRGC. On July 29, 2026, OFAC designated PGMIC and Hormuz Safe pursuant to Executive Order 13902 for operating in the financial sector of the Iranian economy.

system. Non-U.S. persons engaging with Iranian digital asset exchanges may also risk sanctions for operating in or supporting the sanctioned Iranian digital asset or financial sectors. Further, non-U.S. persons could face civil and criminal enforcement liability should such payments cause U.S. persons, such as insurers, reinsurers, and financial institutions, to violate sanctions.

Please see FAQ 1249 for more information on sanctions risk for paying tolls or receiving or providing prohibited services directly or indirectly to or from PGSA, the Government of Iran, or the IRGC; and FAQs 1250, 831, and 1257 on engaging with Iranian digital asset exchanges and the Iranian financial sector.

Maritime industry participants involved with vessels calling at Iranian ports face significant sanctions risk under multiple sanctions authorities targeting Iran's shipping sector and ports, and OFAC will continue to aggressively target Iran's main revenue-generating sectors, in particular its shipping, petroleum, and petrochemical sectors, under Executive Order 13902 and other sanctions authorities. OFAC authorizations do not supersede the authorities of other U.S. government agencies and departments, including restrictive measures implemented by U.S. Central Command or the Department of War.

MARITIME SERVICE PROVIDERS

OFAC strongly encourages all maritime service providers to conduct enhanced due diligence on any vessels attempting to transit the Strait of Hormuz to ensure that such vessels have not engaged in any sanctionable conduct involving Iran, which could expose the service provider to sanctions risk. Service providers should carefully review all available information for red flags, including voyage planning or actual transits through Iranian territorial waters. Service providers should ask counterparties for details on who they coordinated with to transit the Strait of Hormuz and if any safe passage fees were or will be paid to Iran, or if any services, including insurance, were accepted from Iran. For more information about Iran's use of obfuscation techniques in maritime shipping, please see OFAC's Sanctions Advisory: Guidance for Shipping and Maritime Stakeholders on Detecting and Mitigating Iranian Oil Sanctions Evasion.

Mariners are encouraged to coordinate with U.S. authorities:

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