

November 16, 2020

The Honorable Michael R. Pompeo  
Secretary of State  
U.S. Department of State  
2201 C Street, N.W.  
Washington, D.C. 20520

Dear Mr. Secretary:

We, the undersigned Chief Executives of five operational International Non-Governmental Organizations working in Yemen, are writing to express our deep concern that designating Ansar Allah for sanctions could undermine the overstretched humanitarian response in Yemen, threatening the lives of up to 24 million Yemenis who require humanitarian assistance.

We share the U.S. Government's commitment to delivering principled humanitarian aid to Yemenis most in need, and we harbor no illusions about the difficult operating environment across Yemen. To this end, we welcome the collective support and diplomacy of the United States in collaboration with other donors to achieve this shared goal. And, despite ongoing challenges, NGO partners have continued to operate and deliver principled assistance with donor funds.

However, our experience as some of the largest humanitarian responders in Yemen and in conflict-settings globally makes clear that a designation would add new barriers and constraints to the already complex operating environment at a time when humanitarians must be enabled to respond at scale and move quickly to meet evolving and escalating needs.

**A group designation would come at a time of unprecedented challenges in Yemen.** Conflict is active along a record 47 frontlines – up from 33 in January. Violence is escalating in the North, including in the critical port city of Hodeidah under Ansar Allah control. In the first half of 2020, airstrikes more than doubled the rate of the previous six months and, in September, civilian casualties reached their highest levels this year. At the same time, COVID-19 and related restrictions have driven wider crises, with widespread lost livelihoods, record prices for basic foods, a further 25% drop in the rial's value, steep drops in remittances, and growing food insecurity. Needs are greatest in the Ansar Allah-controlled North, which hosts an estimated 70% of the population, a majority of whom are at risk of famine.

**24 million Yemenis – 80% of Yemen's population – need life-saving assistance, but limited funding means fewer and fewer are able to obtain it.** The 2020 UN Humanitarian Response Plan (HRP) is nearly 60% underfunded. Large donors have withheld humanitarian pledges and funding, with the U.S. even suspending funding for large amounts of NGO programming in the North. In this year alone, the number of Yemenis reached each month has fallen from 13 million to 9 million.

**In these dire circumstances, a new group designation of Ansar Allah could have a near paralyzing impact on already stretched humanitarian operations across the country.** The likely effects would not be contained to the North; it would affect those in need across the entire country. Unlike previous U.S. government designations on smaller-scale armed groups, Ansar Allah is the de facto state authority over the majority of Yemen's territory and, as such, most of the Yemeni population. They control Yemen's capital of Sana'a and a wide array of government institutions ranging from one arm of a divided Central Bank to civil infrastructure such as critical communications networks and major ports of entry. Based on

our experience globally, financial institutions and other commercial entities doing business in Yemen are unlikely to differentiate between areas controlled by Ansar Allah and areas controlled by other groups, instead inflating the risk profile of the entire country.

**These concerns are not theoretical: we have seen humanitarian responses undermined by U.S. designations in the past.** The famine in Somalia, which is estimated to have killed more than 250,000 people, serves as a stark warning. Despite clear early indications of a severe drought and pleas from the humanitarian community, the U.S. government declined to issue any sort of broad exemptions until it was too late to scale up an appropriate response. While no single factor was solely responsible for the famine in Somalia, after-action reviews and academic studies have demonstrated that the U.S. approach toward al-Shabaab contributed substantially to the death toll. A designation of Ansar Allah could cause even greater suffering, given the number of people under its jurisdiction, its control over state institutions, and the already frightening levels of food insecurity and humanitarian need across Yemen.

**We urge you to put Yemenis at the center of U.S. Yemen policy and refrain from taking any actions that could further jeopardize their access to lifesaving assistance.** Should a designation move forward notwithstanding the potential humanitarian risks, we urge the U.S. Government to take active and timely steps to mitigate the impact on humanitarian operations by pursuing an OFAC General License and other authorizations necessary to allow continued humanitarian assistance in Yemen. But we must be clear that even if such exemptions are issued, humanitarian programming will likely still be disrupted and many challenges will need to be addressed to ensure critical aid can be delivered to Yemenis in need. Moreover, regardless of any license or exemption, the likely negative effects on Yemen's economy will escalate humanitarian needs that our organizations will be unable to sufficiently meet.

As we do in challenging contexts around the world, humanitarians have stayed and delivered in Yemen in the midst of an extraordinarily complex crisis; but a designation against Ansar Allah would compromise our ability to do so at a moment when more Yemenis than ever depend on our assistance to survive.

Sincerely,

**Abby Maxman**  
President and Chief Executive Officer  
Oxfam America



**Janti Soeripto**  
President and Chief Executive Officer  
Save the Children



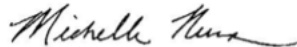
**Tjada D'Oyen McKenna**  
Chief Executive Officer  
Mercy Corps



**David Miliband**  
President and Chief Executive Officer  
International Rescue Committee



**Michelle Nunn**  
President and Chief Executive Officer  
CARE USA



Cc:

Mr. John Barsa, Acting Deputy Administrator, U.S. Agency for International Development

Mr. Timothy Lenderking, Deputy Assistant Secretary, Bureau of Near Eastern Affairs, U.S. Department of State

Mr. Richard Albright, Deputy Assistant Secretary, Bureau of Population, Refugees, and Migration, U.S. Department of State