

**Statement of Jeremy Konyndyk
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U.S. Senate Committee on Foreign Relations
Subcommittee on Africa

Hearing on:
Responding to Drought and Famine in the Horn of Africa
August 3, 2011

Chairman Coons, Ranking Member Isakson:

Thank you for inviting me to testify before the Sub-Committee today on the critically important issue of drought and famine in the Horn of Africa. I am here today in my capacity as Director of Policy and Advocacy for Mercy Corps, a global relief and development organization that responds to disasters and supports community development in more than forty countries around the world. Mercy Corps has worked in the Horn for many years, and we currently manage relief and development programs in the three countries most affected by the drought: Kenya, Ethiopia, and Somalia. In these countries we have hundreds of staff providing assistance to 900,000 drought victims. We are working in many of the areas most affected by the drought: North and Central Somalia, Eastern Ethiopia, and Northeastern Kenya. In these regions we are pursuing a range of drought-focused interventions, including providing access to water; supporting livelihoods so that people can afford to feed themselves and protect their livestock; aiding communities to better manage the scarce water resources that they have; and providing supplemental nutrition to at-risk children and mothers. We are undertaking these programs with the generous support of public and private donors, including the important contributions of the US Agency for International Development.

With 12.4 million people across the Horn in already in a state of humanitarian crisis – a figure that has increased by three million in just the past month – this emergency threatens to become the worst humanitarian catastrophe of the past several decades. While most attention has focused on Somalia, this is truly a regional emergency: people in Kenya, Ethiopia, and Djibouti all face major shortfalls in access to food and water as well. The situation within southern Somalia is catastrophic, with death rates in the worst-affected regions, particularly among children, up to triple the threshold for declaring a famine and levels of malnutrition that are also well beyond the famine threshold.¹ The situation in the rest of the region is less catastrophic, but still extremely dire. Across Kenya, Ethiopia, and central Somalia, Mercy Corps teams are seeing people's livelihoods collapse in real time, pushing the affected populations closer and closer to calamity. The situation, while already desperate, promises to worsen in coming months as remaining

¹ [FEWSNET/FSNAU: Evidence for a Famine Declaration \(July 19, 2011\)](#)

water and food stocks are further depleted. The international response, though it has accelerated in recent weeks, remains inadequate. In the hardest-hit region, southern Somalia, security obstacles continue to impede the delivery of assistance and international legal restrictions have further compounded the challenges of operating there. Without swift action on all fronts, the drought will have devastating human and regional impacts that will be impossible to roll back.

How is this crisis different?

While drought is common in the Horn of Africa, the current situation is far graver than the normal cycles of drought that occasionally hit the region. Several factors contribute to this. First is the rainfall over the past year, which in most areas is among the lowest ever recorded. The region has two main rainy seasons per year, one in the fall and one in the late spring to early summer. Over the past year, both largely failed, leaving the driest conditions that most parts of the Horn have seen in 60 years. Seven districts across swaths of northeastern Kenya and southern Ethiopia have recorded the driest season since 1950.² The broad area across which the rains failed is also unique: a typical drought in the region would be less uniform, enabling people to temporarily relocate to other areas to find water. This time, the broad coverage of the drought has meant that people's normal "backup" locations are themselves in a state of drought. Finally, this drought comes on the heels of another serious regional drought in 2008 which, though less severe than the current situation, left elevated vulnerability across the region.

The result has been a progressive erosion of the capacity of people in the region to cope with economic and climatic shocks. Most rural and nomadic populations in the Horn depend on livestock herding or small-scale agriculture to support themselves. Both forms of livelihood are heavily dependent on water and vulnerable to drought. In a milder drought, people would rely on a variety of "coping mechanisms" to see themselves through: shifting herds to different areas in search of alternate water sources; selling off land holdings or parts of their herds to generate extra income; substituting for less expensive foods; reducing meals; and cutting back on household expenses.

The severity of the current drought, coming on the heels of the 2008 drought, has exhausted these coping mechanisms and left people with no income and few options. The failure of the rains across the region has meant that there are few areas where livestock can be shifted to find alternate water sources. Those that exist are quickly depleted by the increased pressure. Selling livestock at market generates little to no income because the condition of most livestock is so poor that they can fetch little money. Livestock are a form of both income and savings for people in the region; as huge numbers of livestock have died off they have wiped out the savings and income potential of innumerable families. The poor rains have led to widespread crop failures across the region, greatly reducing the local supply of food both at a household level and in regional markets. The prices of locally produced staples accordingly reached record

² [USAID FEWS-NET: East Africa: Past year one of the driest on record in the eastern Horn \(June 14, 2011\)](#)

highs in June in most markets throughout the eastern Horn.³ In some parts of Somalia, prices of staple cereals like white maize have increased by as much as 350 percent above last year.⁴ This massive inflation has quickly wiped out what scant savings people may have. These factors, taken together, can quickly lead to a complete collapse in peoples' ability to feed themselves. With their livestock assets depleted or deceased, no yield from their own agriculture, their savings spent, their land sold, and food in the market priced beyond reach, people find themselves without options. Aid or migration become their only possibilities for survival.

In southern Somalia, as we are now vividly seeing, this process has fully run its course. The result is some of the most devastating human suffering that aid professionals have ever seen. The desperation and destitution of those who have fled to Kenya, central Somalia, and Ethiopia has been well-documented: "roads of death" on which mothers are forced to leave behind the children who die en route; cases of advanced malnutrition so severe that those lucky enough to obtain treatment still have only a 40% chance of survival⁵; a torrent of refugees and internally displaced persons so large that camps and reception centers have been quickly overwhelmed. As disturbing as the refugee situation is, there are many more within Somalia who are too poor or too weak to even make the journey out. The slowdown in refugee arrival numbers in Ethiopia and Kenya over the past week may indicate, ominously, that the bulk of those who were capable of leaving have now done so. The numbers from FEWSNET suggest that those who remain in the south are now dying in astronomically large numbers. Child mortality in every district of southern Somalia now surpasses famine levels. In the worst-hit areas, children under five are dying at a rate five times the famine threshold⁶. At this rate more than a tenth of the under-five population in these areas is being wiped out every two months. Tens of thousands of people are estimated to have already died, a number that could reach into the hundreds of thousands if the situation continues to deteriorate as expected.

In Kenya, Central Somalia, and Ethiopia, the wider availability of aid and the existence of government safety net programs have slowed the process of livelihood collapse. But existing aid flows are not keeping up with the growing challenges, and safety net programs are not built to handle such massive levels of need. UNICEF estimates that over a quarter of the more than two million acutely malnourished children across the drought-affected Horn are at risk of death.⁷ The humanitarian needs in Kenya and Ethiopia are important to address in their own right, but they have added significance given the growing refugee populations in both countries. It is well-established that provision of aid to refugees can provoke resentment and backlash from host communities, ultimately endangering the refugees, if the needs of those host communities are not also met.

³ [USAID FEWS-NET: East Africa Food Security Outlook Update \(July 2011\)](#)

⁴ [FSNAU, FEWS-NET: Somalia Dekadal Food Security and Nutrition Monitoring \(July 25, 2011\)](#)

⁵ [Voice of America: African Refugee Children at High Risk for Kalaazar Malaria Viral Infections \(July 27, 2011\)](#)

⁶ [FEWSNET/FSNAU: Evidence for a Famine Declaration \(July 19, 2011\)](#)

⁷ [UNICEF ESARO, Horn of Africa Crisis: Situation Report #2 \(July 28, 2011\)](#)

Mercy Corps teams in Ethiopia and Kenya report mounting needs that are approaching critical levels in many areas. In Kenya, while most international attention has focused on the Dadaab refugee camp, the Kenyan population in the northeast of the country is entering a critical phase. The current dry spell is expected to last through at least October and food insecurity will get worse over the next few months.⁸ Livestock are dying in large numbers due to lack of water, and this crop cycle will be a near-total failure in many parts of the country due to the drought.⁹ The situation is so desperate that our assessments have found instances of herders braving security challenges to take their remaining livestock into riverine parts of Somalia to attempt to water them there. This has led to a phenomenon of “drought widows” – women whose husbands have left to seek water for their livestock, leaving their families behind indefinitely. Malnutrition rates have been rising, and an estimated 40 percent of farming households in some districts are now skipping meals.¹⁰ Our teams expect to begin seeing elevated mortality rates in the very near future if swift action is not taken. In Ethiopia we are seeing a parallel situation. Recently-completed assessments by Mercy Corps in eastern Ethiopia revealed that the drought is already having a massive impact on the population. In some areas that we visited, entire villages were empty – their inhabitants forced to move as the drought devastated their ability to support and feed themselves. Dead cattle litter the landscape, and along one 40-kilometer stretch of road we visited not a single bit of foliage was visible. Many families have been reduced to eating one meal per day. Ethiopian colleagues who have been living and working in the region for decades have told us that they have never before seen anything like this.

Scaling up the Response

The international community’s response to the drought has been substantial, but nowhere near adequate. The United Nations estimates that nearly \$2.5 billion will be required to meet the region’s needs this year.¹¹ International contributions for humanitarian response, currently around \$1.3 billion, are well below this target, and indeed are running well behind the levels contributed just three years ago, when a lesser drought gripped the region. Compared to other major disaster such as the Haiti earthquake or the Indian Ocean Tsunami, the drought crisis in the Horn is receiving a fraction of the attention and support that was committed to those emergencies. This reflects the paradox that aid agencies often face with slow-onset disasters: compared to more-telegenic natural disasters, in which most of the death and injury occur instantaneously, in slow onset disasters we can potentially save far, far more of the threatened lives. Yet we typically have a much harder time mobilizing the resources required to do so. We are working hard to convey to the public in the US and other donor states that their support is badly needed. However, private contributions for this emergency are many times lower than the generous levels contributed after other major disasters.

⁸ [UNOCHA: Humanitarian Requirements for the Horn of Africa Drought \(July 28, 2011\)](#)

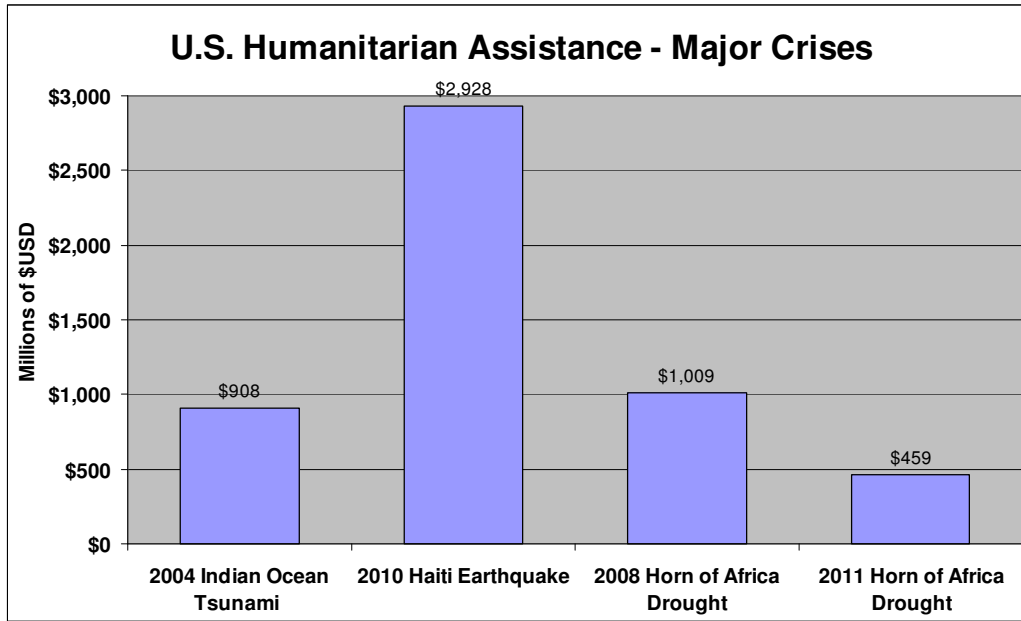
⁹ [USAID FEWS-NET: Kenya Enhanced Food Security Monitoring \(July 22, 2011\)](#)

¹⁰ [USAID, WFP, FEWS-NET Special Report: Kenya Food Security \(June 2011\)](#)

¹¹ [UNOCHA: Humanitarian Requirements for the Horn of Africa Drought \(July 28, 2011\)](#)

On the US side, the work of the government’s emergency responders in USAID’s Office of Foreign Disaster Assistance (OFDA) and Office of Food for Peace (FFP), as well as the State Department’s Bureau of Population, Refugees, and Migration (PRM) has been exemplary. These offices possess a high level of expertise and professionalism, and they have focused on this crisis with great seriousness and energy. Their response is to be commended. But they will need ample resources well into the next fiscal year if they are to sustain an aggressive response to this emergency.

US contributions to the Horn of Africa are down significantly relative to 2008. The Bush Administration’s humanitarian contributions that year topped one billion dollars region-wide, while this year the US has contributed less than half that amount.¹² To put this in perspective, the US contribution towards the drought this year amounts to roughly one-sixth of the amount that Congress appropriated for the Haiti response in the 2010 supplemental; this despite the fact that the population at risk in the Horn is greater than the entire population of Haiti. US support to this drought also lags far behind US contributions to other major crises, as the chart below demonstrates.



Sources: [GAO: USAID Tsunami Signature Reconstruction Efforts in Indonesia and Sri Lanka Exceed Initial Cost and Schedule Estimates, Face Further Risk \(February 2007\)](#); [GAO: Haiti Reconstruction - U.S. Efforts Have Begun, Expanded Oversight Still to be Implemented \(May 2011\)](#); [USAID Fact Sheet #10: Horn of Africa Complex Emergency \(October 31, 2008\)](#); [USAID Fact Sheet #4: Horn of Africa Drought \(July 28, 2011\)](#)

In Somalia specifically, US support dropped off drastically from 2008 to 2010, falling by 88%. While recent contributions have started to reverse this trend, the United States’ contribution to humanitarian response in Somalia still stands at only 15% of the international total, compared against a US share of 40% to 50% in the rest of the region. The US is the largest global donor to humanitarian relief, and other donors often follow

¹² [UN OCHA Financial Tracking System: Somalia Emergencies for 2008 - Total Humanitarian Funding per Donor](#); [UN OCHA Financial Tracking System: Somalia Emergencies for 2011 - Total Humanitarian Funding per Donor](#)

our lead. If the US steps up its assistance to the region, particularly to Somalia, this could have a powerful multiplier effect by influencing the behavior of other donors.

Challenges to the Response

There are several important reasons why the impact of the drought is proving so much more severe in southern Somalia than elsewhere in the region. The first is the long history of insecurity in the south, which has impeded aid actors and prevented development investments. Even before the southern militias imposed restrictions on aid access, the history of insecurity in the area prevented the sort of sustained food security and development programming that has been common in Kenya and Ethiopia. These programs build resiliency, improve natural resource management, and help people to mitigate the challenges posed by cyclical droughts. Southern Somalia has not benefitted from this kind of aid, and has been left less resilient to drought than its neighbors.

The next factor, as has been widely reported, is the restrictions on aid access by southern militias, and accompanying security risks to aid groups. The challenges to aid groups in the south have been well-documented, including in the recent report by the UN's Monitoring Group for Somalia.¹³ The report describes how aid groups were able to operate relatively freely in the south until 2010, when the operating environment deteriorated significantly as the militias began to impose unacceptable conditions on aid groups. Those conditions, which were inconsistent with core humanitarian principles, contributed to decisions by many aid groups to scale back their work. By the time that Mercy Corps and other aid groups were formally expelled from the south in September 2010, we had few operations left there in any case because of the deteriorating operating environment. It is important to note here that we and other groups have continued to operate in the northern and central regions of the country.

The final obstacle has been US legal restrictions on aid funding to Somalia, which pre-date the expulsion of aid groups by the militias. Reviewing the background of these restrictions is important not because I believe them to have been the principal obstacle to aiding southern Somalia – they were not. But these restrictions have been the only such obstacle that the US Government could unilaterally take out of the way. We are encouraged by the recent indications from the Administration that these restrictions have now been modified to allow greater support to relief efforts in the south. We have some remaining concerns about how the new arrangement will be implemented, particularly the fact that it only applies to programs that are wholly or partly funded by the US Government. This provides no protection to interventions implemented by US organization with funding from private foundations or European donors, for example. We hope to address those issues swiftly, but nonetheless the Administration should be commended for its willingness to alter the overall restrictions in light of the ongoing emergency. With this issue hopefully moving in a positive direction, I do not wish to dwell overly long on the past. But it is important, even as we look forward, to take stock of what we have until now been unable to do, and draw lessons from that.

¹³ [UN: Monitoring Group Report on Somalia and Eritrea \(July 18, 2011\)](#)

The challenges that have arisen from the legal restrictions on aid to Somalia over the past several years are fundamentally systemic. Despite the best efforts of the professionals at USAID, the restrictions have several times caused serious delays in the efforts of USAID and US relief groups to provide aid to Somalia. USAID, for its part, has faced a thicket of legal and political obstacles but has consistently done its utmost to deal with those in a way that enables responsible aid to continue. Throughout our deliberations over the past several years, USAID's professionals have been collaborative and constructive. The blame for the delays and obstacles ultimately lies with the nature of the restrictions themselves. They are overly broad, allowing automatic humanitarian exemptions only for medical supplies and religious materials. Obtaining humanitarian exemptions for anything outside of those two categories typically requires a license that is only approved after a cumbersome and lengthy interagency process. This is a system that cries out for serious review, as I believe the last two years have demonstrated.

The restrictions first became an obstacle in Somalia in April 2009, when USAID raised concerns that some US resources might be diverted in violation of US Government prohibitions on material support to groups designated by the US as terrorists. It was reported at the time that USAID was seeking an OFAC license for its work in Somalia, but that the Treasury Department was reluctant to grant this. Over the summer of 2009, USAID stopped processing new humanitarian response grants to UN agencies and NGOs while deliberations over a path forward dragged on.¹⁴ In the midst of a serious humanitarian crisis in much of the country, numerous US-funded humanitarian response programs were suspended as grant agreements expired and could not be renewed. An agreement was finally struck in late October of that year – nearly seven months after the issue first arose – to allow funding to move forward in FY2010.¹⁵

However, when the FY2010 grants began to expire in early FY2011, USAID again suspended grant processing. By this point, most UN and NGO partners were no longer operating in southern Somalia, and the grant requests that were held up were instead for northern and central regions of Somalia, which are not under the control of US-designated militant groups. By the time the FY2010 grants began expiring, the fall 2010 rainy season in Somalia had failed and it was clear that a dire humanitarian situation would arise in the coming months. Several months passed as the Administration sought a way out of the impasse. In late spring, UN and NGO partners entered into negotiations with USAID over whether to resume funding. An agreement to allow USAID to resume humanitarian funding to northern and central Somalia was finally struck in May of this year – nearly eight months into FY2011.

The eight months that were lost were a period in which the humanitarian community was well aware of the prospect of severe drought and famine. This was the very period when the US Government's UN and NGO partners could have been working full-tilt to prepare for the coming calamity. While the south was not accessible to us at that point, a great deal could have been done to preposition, prepare communities in accessible regions of the country, and assist the already-large flows of internally displaced people. Yet the

¹⁴ [New York Times: U.S. Delays Somalia Aid, Fearing it is Feeding Terrorists \(October 1, 2009\)](#)

¹⁵ [IRIN: US Government to Set New Aid Terms \(October 6, 2009\)](#)

bureaucratic tie-up over US legal restrictions left UN and NGO partners unable to obtain USG resources that would have enabled a much more robust response in the northern and central regions. This has been particularly damaging in central Somalia, which has been afflicted with drought every bit as severe as the southern areas, and also hosts tens of thousands of displaced southerners in desperate conditions.

The Road Ahead

The situation across the Horn of Africa is likely to worsen in the coming months as water sources dwindle and people's stocks of food and money are depleted. In southern Somalia – assuming that the Administration's moves to relax the legal restrictions will enable aid groups to resume programs there – many agencies will be eager to move ahead with relief efforts. The NGO community is strongly committed to ensuring that aid is not diverted away from those who need it most. I would emphasize that we do not know exactly what to expect in terms of access and security, and we do not discount the very real challenges that remain. But there are some reasons for cautious optimism, including the recent success of United Nations agencies and the International Committee of the Red Cross in making initial aid distributions freely and without interference.¹⁶

The recent report of the UN's Somalia Monitoring Group described how access for aid groups often varies considerably in different regions of the south, depending on local political and clan dynamics and their interplay with higher-level political factors. That dynamic will largely shape the opportunities for response in southern Somalia, and provides further grounds for cautious optimism over what may be achievable. Regardless of the high-level political movements – positive or negative – aid groups will ultimately have to negotiate terms of safe and effective access with local leaders in communities across the south. Many aid groups will choose to work with or support local Somali civil society organizations, which have capacity and long experience working on humanitarian response. This will result in a sort of “patchwork quilt” approach to assistance provision, with different agencies providing aid in whichever communities they are able to safely access. These arrangements are likely to remain highly fluid, and aid groups will have to show extreme flexibility and responsiveness to seize new opportunities quickly.

Beyond southern Somalia, there is a great deal that can be done to prevent the rest of the region from descending into famine conditions. The humanitarian community has learned a great deal over the past few decades about how to deal more effectively with food crises. No longer does the international response to famine and drought center mainly on camps and food distribution. Instead, we follow several “best practices” learned from past disasters:

- Work with markets, not against them: Mass food distribution is not always the best way to deal with a food crisis; it can sometimes distort and undermine local markets, put merchants out of business, and degrade important market supply links. Mass hunger is not a result simply of inadequate local food production, but rather of inadequate resources amongst the population to access food through their normal

¹⁶ [Devex: Aid Reaches Famine-Hit Region in Southern Somalia \(July 27, 2011\)](#)

means. This remains the case in the Horn, even in much of southern Somalia: food can be found in the markets, but it is priced well beyond the means of those who need it. This means that food voucher and cash-based interventions, which enable people to afford food, will be an important tool for combating hunger. These interventions can also be more efficient than distributing food aid, since they do not require the transport and importation of food nor complicated distribution networks. In-kind food aid will likely be needed to supplement what is available in markets, but should not be the automatic first resort.

- Preserve livelihoods, not just lives: Interventions that seek to support the livelihoods of at-risk populations, as well as save lives, will bear helpful dividends. The most effective way to mitigate long-term impacts of the drought is to provide assistance that protects the remnants of people's livelihoods in the near term and helps them to rebuild their livelihoods quickly in the medium term. This means interventions to protect remaining animal stocks, like veterinary services and water trucking; and agricultural support to ensure that farmers need not miss the next planting season due to depleted seed stocks. These sorts of livelihood-focused activities will reduce the need for prolonged humanitarian support.¹⁷
- Pay attention to health: In the 1991-92 famine in Somalia, the return of rain ironically posed major health challenges because the drought-weakened population was extra-vulnerable to water-borne diseases. Food aid and livelihoods support is not enough to save lives in this kind of situation – aggressive health care and emergency nutrition interventions are also necessary. Opportunistic diseases that prey on a weakened population will otherwise claim many lives.
- Help people where they are: Aid programs that assist people where they are, rather than inducing them to displace to other areas, are both more efficient and more humane than camp-based interventions. Preventing displacement minimizes social and economic disruptions, enables continuation of livelihood activities, and avoids the arduous and dangerous process of abrupt relocation. It also avoids creation of semi-permanent refugee and displacement camps, which are expensive to maintain and often hard to close down once a crisis ends.
- Invest in long-term resiliency: Even as we focus on the immediate crisis, the aid community and aid donors should be thinking hard about how to build better resiliency to this type of crisis. While this drought is extremely severe, lesser droughts have become a common occurrence in the Horn in recent years and are becoming a permanent fixture. Avoiding future humanitarian crises will require that we seek to work with governments and community leaders to help at-risk populations to better manage their natural resources and develop successful coping mechanisms. This must be a long-term investment and will need to be sustained by donors even after the energy around the current crisis has waned. Fortunately, sustaining longer-term investments in resiliency will save money over the long term by mitigating the impact of recurring droughts on the population, thus reducing the need for frequent humanitarian assistance.

¹⁷ [ALNAP: Slow-onset Disasters - Drought and Food and Livelihoods Insecurity \(2007\)](#)

We know what we must do; what remains in question is whether we will be able to do it. This rests on two important unknowns. The first is whether the region at large – Somalia, Kenya, Ethiopia, Djibouti – will receive sufficient resources to enable humanitarian agencies and regional governments to respond aggressively to mounting needs. The second is whether obstacles to humanitarian access in southern Somalia – principally the local restrictions and security threats, but also legal restrictions amongst donor states – will be removed in order to enable a response to scale up in that region. With these unknowns in mind, I would like to leave the committee with several recommendations:

1. Ensure a robust US Government response: As noted above, the US response this year stands at less than half of what the Bush Administration contributed to the region's drought response in 2008. While the US and global contributions this year are generous, they do not approach the level that will be required to avoid a large-scale catastrophe – as Secretary Clinton herself acknowledged on July 20th.¹⁸ USAID did a good job of regional prepositioning, and has been rapidly churning out new grants over the past month as the full scope of the disaster has emerged. But real questions remain about whether the US will be able to step up like it did in 2008. The FY2012 outlook is not encouraging, with the House of Representative proposing to slash the very accounts that are financing the US government response: Food for Peace (a 30% proposed cut below FY11 levels, and 50% below FY08 levels); International Disaster Assistance (a 12% proposed cut below FY11 levels); and Migration and Refugee Assistance (an 11% proposed cut below FY11 levels). Enacting such cuts in the face of the worst famine the world has seen in several decades would be disastrous, and I would urge the Senate to ensure that these accounts are protected in the FY2012 budget deliberations. But I suspect that even more must be done. In years past, a disaster of this magnitude would have been cause for a supplemental – like the three billion dollar supplemental that was passed last year to support the Haiti response. I would urge the Congress to consider a supplemental budget appropriation to address this crisis.
2. Engage the American public: Despite the severity of this crisis, there has been relatively little of the sort of active public engagement that we saw following the recent disasters in Haiti and Japan. This is troubling, because the ability of American aid organizations to respond robustly to a humanitarian disasters tends to track closely with the level of American popular engagement in the crisis. I would encourage all members of Congress, as they head back to their districts for the August recess, to alert their constituents to the severity of what is now taking place in the Horn of Africa. I would also urge the White House to be much more vocal about this crisis. As we saw after the Haiti earthquake, calls by the President and First Lady for generosity can have a tremendous galvanizing impact on the American public. The ideal scenario might involve joint appeals by Administration and Congressional leaders to demonstrate that responding to human suffering on such a massive scale transcends political boundaries.

¹⁸[Secretary Clinton: U.S. Response to Declaration of Famine in Somalia and Drought in the Horn of Africa \(July 20, 2011\)](#)

3. Reform legal restrictions on US response: As I noted earlier, the legal restrictions imposed under the Patriot Act and related law have thrown up significant roadblocks to the humanitarian response and impeded preparedness. The safety valve provided by OFAC licensing is useful and we hope that the Administration's recent announcement will be implemented in a way that truly enables us to provide relief without fear of legal exposure. As a general rule of thumb, we would ask that the protections now extended to USAID through their OFAC license be extended in full to USAID's partners as well. But this development notwithstanding, we have seen over the past two years that obtaining an OFAC license is often politically difficult and massively time-consuming. The fact that OFAC restrictions harmed US capacity to prepare for and respond to a famine that was anticipated months in advance should give Congress pause. I suspect that those who wrote the laws did not have this sort of outcome in mind. I would strongly advise that Congress re-examine the interplay between OFAC restrictions and humanitarian aid, and explore whether a more streamlined and responsive approach can be found. A good place to start would be by expanding the list of exempted categories beyond medical supplies and religious materials, to also include assistance related to food, water, and shelter needs.

I wish to sincerely thank the Sub-Committee for its focus on this tremendously important issue, and for extending me the privilege of testifying today.