

# Overview of current sanctions measures against Syria

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## Table of Contents

1. United Nations (UN) sanctions against Syria.....	1
2. United States (US) sanctions against Syria.....	1
3. European Union (EU) sanctions against Syria.....	3
4. United Kingdom (UK) sanctions against Syria.....	6
5. Canada (CA) sanctions against Syria.....	8

## 1. United Nations (UN) sanctions against Syria

None

## 2. United States (US) sanctions against Syria

### ARMS EMBARGO

Policy of denial for defense articles and defense services to Syria.

### ASSETS FREEZE

All property and interests in property that are in the United States, that come within the United States, or that are or come within the possession or control of any United States person, including any foreign branch, of the Government of Syria and of the designated persons are blocked and may not be transferred, paid, exported, withdrawn, or otherwise dealt in.

### FINANCIAL RESTRICTIONS

Any U.S. person holding funds, such as currency, bank deposits, or liquidated financial obligations, shall hold or place such funds in a blocked interest-bearing account located in the United States.

New investment in Syria by a United States person, wherever located, is prohibited.

Any transaction or dealing by a United States person, wherever located, including purchasing, selling, transporting, swapping, brokering, approving, financing, facilitating, or guaranteeing, in or related to petroleum or petroleum products of Syrian origin is prohibited.

United States persons, wherever located, are prohibited from approving, financing, facilitating, or guaranteeing a transaction by a foreign person where the transaction by that foreign person would be prohibited, if performed by a United States person or within the United States.

US government to impose sanctions on a foreign financial institution upon determining that the foreign financial institution knowingly conducted or facilitated any significant financial transaction for or on behalf of any person whose property and interests in property are blocked.

### **TRAVEL BAN**

The unrestricted immigrant and nonimmigrant entry into the United States of listed aliens, as well as immediate family members of such aliens, or aliens determined by the Secretary of State to be employed by, or acting as an agent of, such aliens, would be detrimental to the interest of the United States, and the entry of such persons into the United States, as immigrants and nonimmigrants, is hereby suspended.

### **IMPORT RESTRICTIONS**

The importation into the United States of petroleum or petroleum products of Syrian origin is prohibited.

### **EXPORT RESTRICTIONS**

The exportation, reexportation, sale, or supply, directly or indirectly, from the United States, or by a United States person, wherever located, of any services to Syria is prohibited.

### **EXPORT CONTROLS**

- The Bureau of Industry and Security (BIS) of the Department of Commerce administers dual-use EXPORT CONTROLS. BIS administers these controls through the Export Administration Regulations (EAR, 15 C.F.R. 730 et seq.), which includes the Commerce Control List (CCL) of dual-use technologies subject to controls. The EAR sets licensing policy for specific destinations, end use, and end user controls.
- Prohibition on the export to Syria of all items on the Commerce Control List (CCL) and a prohibition on the export to Syria of products of the United States, other than food and medicine.
- A license is required for the export or reexport to Syria of all items subject to the EAR, except food and medicine classified as EAR99 (food and medicine are defined in part 772 of the EAR).
- A license is required for the deemed export and deemed reexport of any technology or source code on the Commerce Control List (CCL) to a Syrian foreign national.
- Deemed exports and deemed reexports to Syrian foreign nationals involving technology or source code subject to the EAR but not listed on the CCL do not require a license.
- All license applications for export or reexport to Syria are subject to a general policy of denial.
- License applications for “deemed exports” and “deemed reexports” of technology and source code will be reviewed on a case-by-case basis.

**SOURCE:**

<https://ofac.treasury.gov/sanctions-programs-and-country-information/syria-sanctions> &  
<https://ofac.treasury.gov/sanctions-programs-and-country-information/syria-related-sanctions> &  
<https://www.bis.doc.gov/index.php/documents/regulation-docs/420-part-746-embargoes-and-other-special-controls/file> &  
<https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-126/section-126.1>

### **3. European Union (EU) sanctions against Syria**

#### **TRAVEL BAN**

Member States shall take the necessary measures to prevent the entry into, or transit through, their territories.

#### **ASSETS FREEZE**

- All funds and economic resources belonging to, or owned, held or controlled by listed persons and entities shall be frozen.
- No funds or economic resources shall be made available, directly or indirectly, to or for the benefit of, the listed natural or legal persons or entities.

#### **TRADE RESTRICTIONS**

- Prohibition on the sale, supply, transfer or export of certain equipment, goods and technology which might be used for internal repression or for the manufacture and maintenance of products which could be used for internal repression, to Syria by nationals of Member States or from the territories of Member States or using their flag vessels or aircraft, including technical assistance, brokering services, financing or financial assistance, and other related services.
- Prohibition on the purchase, import or transport of arms and related material of all types, including weapons and ammunition, military vehicles and equipment, paramilitary equipment and spare parts for the aforementioned, from Syria or originating in Syria, including financing or financial assistance, including financial derivatives, as well as insurance and reinsurance, and related brokering services.
- Prohibition on the sale, supply, transfer or export of equipment or software intended primarily for use in the monitoring or interception by the Syrian regime, or on its behalf, of the Internet and of telephone communications on mobile or fixed networks in Syria and the provision of assistance to install, operate or update such equipment or software.
- Prohibition on the purchase, import or transport from Syria of crude oil and petroleum products, financing or financial assistance, including financial derivatives, as well as insurance and related reinsurance.

- Prohibition on the sale, supply, transfer or export of jet fuel and additives specifically formulated for jet fuel to Syria by nationals of Member States, or from the territories of Member States, or using their flag vessels or aircraft, including financing or financial assistance, as well as insurance and reinsurance or related brokering services.
- Prohibition on the sale, supply or transfer of key equipment and technology for the following key sectors of the oil and natural gas industry in Syria, or to Syrian or Syrian-owned enterprises engaged in those sectors outside Syria, by nationals of Member States, or from the territories of Member States, or using vessels or aircraft under the jurisdiction of Member States: (a) refining; (b) liquefied natural gas; (c) exploration; (d) production, including technical assistance or training, financing or financial assistance, and other related services.
- Prohibition on the delivery of Syrian denominated banknotes and coinage to the Central Bank of Syria.
- Prohibition on the direct or indirect sale, purchase, transportation or brokering of gold and precious metals, as well as of diamonds to, from or for the Government of Syria, its public bodies, corporations and agencies, the Central Bank of Syria, as well as to, from or for persons and entities acting on their behalf or at their direction, or entities owned or controlled by them.
- Prohibition on the sale, supply, transfer or export of luxury goods to Syria by nationals of Member States or from the territories of Member States or using their flag vessels or aircraft.
- Prohibition on to import, export, transfer or provide related brokering services for cultural property and other items of archaeological, historical, cultural, rare scientific and religious importance which have been illegally removed from Syria, or where reasonable suspicion exists that they have been illegally removed from Syria, on or after 15 March 2011.

## **RESTRICTIONS ON FINANCING OF CERTAIN ENTERPRISES**

- Prohibition on the granting of any financial loan or credit to enterprises in Syria that are engaged in the Syrian oil industry sectors of exploration, production or refining, or to Syrian or Syrian-owned enterprises engaged in those sectors outside Syria.
- Prohibition on the granting of any financial loan or credit to enterprises in Syria that are engaged in the construction of new power plants for the production of electricity in Syria.
- Prohibition on the acquisition or extension of a participation in enterprises in Syria that are engaged in the Syrian oil industry sectors of exploration, production or refining, or in Syrian or Syrian-owned enterprises engaged in those sectors outside Syria, including the acquisition in full of such enterprises and the acquisition of shares or securities of a participating nature.
- Prohibition on the acquisition or extension of a participation in enterprises in Syria that are engaged in the construction of new power plants for the production of electricity in Syria, including the acquisition in full of such enterprises and the acquisition of shares or securities of a participating nature.
- Prohibition on the creation of any joint venture with enterprises in Syria that are engaged in the Syrian oil industry sectors of exploration, production or refining and with any subsidiary or affiliate under their control.

- Prohibition on the creation of any joint venture with enterprises in Syria that are engaged in the construction of new power plants for the production of electricity in Syria and with any subsidiary or affiliate under their control.

### **RESTRICTIONS ON INFRASTRUCTURE PROJECTS**

Prohibition to participate in the construction of new power plants for the production of electricity in Syria, including technical assistance or financing or financial assistance.

### **RESTRICTIONS ON FINANCIAL SUPPORT FOR TRADE**

Member States shall exercise restraint in entering into new short and medium-term commitments for public and private provided financial support for trade with Syria, including the granting of export credits, guarantees or insurance, to their nationals or entities involved in such trade, with a view to reducing their outstanding amounts, in particular to avoid any financial support contributing to the violent repression against the civilian population in Syria. In addition, Member States shall not enter into new long-term commitments for public and private provided financial support for trade with Syria.

### **FINANCIAL SECTOR**

- Member States shall not enter into new commitments for grants, financial assistance or concessional loans to the Government of Syria, including through their participation in international financial institutions, except for humanitarian and developmental purposes.
- Prohibition on any disbursement or payment by the European Investment Bank (EIB) under or in connection with any existing loan agreements entered into between Syria and the EIB.
- Prohibition on the continuation by the EIB of any existing Technical Assistance Service Contracts for sovereign projects located in Syria.
- Prohibition on the direct or indirect sale or purchase of, or brokering or assistance in the issuance of Syrian public or public-guaranteed bonds issued after 1 December 2011 to and from the Government of Syria, its public bodies, corporations and agencies, the Central Bank of Syria, or banks domiciled in Syria, or branches and subsidiaries within and outside the jurisdiction of Member States of banks domiciled in Syria, or financial entities that are neither domiciled in Syria nor within the jurisdiction of the Member States, but are controlled by persons and entities domiciled in Syria as well as any persons and entities acting on their behalf or at their direction, or entities owned or controlled by them.
- Prohibition on the opening of new branches, subsidiaries, or representative offices of Syrian banks in the territories of Member States, and the establishment of new joint ventures, or the taking of an ownership interest, or the establishment of new correspondent banking relationships by Syrian banks, including the Central Bank of Syria, its branches and subsidiaries and financial entities that are not domiciled in Syria, but are controlled by persons or entities domiciled in Syria, with banks in the jurisdiction of Member States, shall be prohibited.
- Prohibition for financial institutions within the territories of the Member States or under their jurisdiction on opening representative offices, subsidiaries or banking accounts in Syria.

- Prohibition on the provision of insurance and re-insurance to the Government of Syria, its public bodies, corporations and agencies or to any persons or entities acting on their behalf or at their direction, or to entities owned or controlled by them, including through illicit means.

## **TRANSPORT SECTOR**

- Member States, in accordance with their national legislation and consistent with international law, in particular relevant international civil aviation agreements, shall take the necessary measures to prevent access to the airports under their jurisdiction of all exclusively cargo flights operated by Syrian carriers and all flights operated by Syrian Arab Airlines.
- If Member States have information that provides reasonable grounds to believe that the cargo of vessels and aircraft bound for Syria contains items whose supply, sale, transfer or export is prohibited or subject to authorisation, they shall inspect, in accordance with their national legislation and consistent with international law, in particular the law of the sea and relevant international civil aviation agreements and maritime transport agreements, such vessels and aircraft in their seaports and airports, as well as in their territorial sea, in accordance with decisions and capabilities of their competent authorities and with the consent, as necessary in accordance with international law for the territorial sea, of the flag State.
- Member States, in accordance with their national legislation and consistent with international law, shall, upon discovery, seize and dispose of items whose supply, sale, transfer or export is prohibited.
- Member States shall cooperate, in accordance with their national legislation, with inspections and disposals undertaken.
- Aircraft and vessels transporting cargo to Syria shall be subject to the requirement of additional pre-arrival or pre-departure information for all goods brought into or out of a Member State.

## **CIRCUMVENTION & FACILITATION**

Prohibition to participate, knowingly or intentionally, in activities the object or effect of which is to circumvent the prohibitions.

## **CLAIMS**

Prohibition to satisfy certain claims made by certain persons, entities or bodies.

SOURCE:

<https://www.sanctionsmap.eu/#/main/details/32/?search=%7B%22value%22:%22%22,%22searchType%22:%7B%7D%7D>

## **4. United Kingdom (UK) sanctions against Syria**

The Syria (Sanctions) (EU Exit) Regulations 2019 and the Syria (United Nations Sanctions) (Cultural Property) (EU Exit) Regulations 2020 are intended to ensure that certain sanctions measures relating to Syria continue to operate effectively.

The latter gives effect to the UK's obligations under paragraph 17 of United Nations Security Council Resolution 2199 (2015) to prevent the trade in illegally removed Syrian cultural property.

## **PROHIBITIONS ON FINANCE**

- Asset freeze in relation to designated persons
- Prohibition to make funds available to, or for the benefit of, designated persons
- Prohibition to make economic resources available to, or for the benefit of, designated persons
- Prohibition for UK credit or financial institutions to have accounts, correspondent banking relationships, joint ventures with Syrian credit or financial institutions, or open a representative office or establish a branch or subsidiary in Syria
- Prohibition on opening of, or taking up of business by, a representative office, branch or subsidiary of Syrian credit or financial institution
- Prohibition to have business arrangements with, or anyone acting on behalf of, a designated person
- Prohibition on acquisition or extension of ownership interest by Syrian credit or financial institution
- Prohibition on the sale or purchase of Syria related bonds
- Prohibition on insurance and reinsurance services
- Prohibition on investments in relation to crude oil and electricity production
- Prohibition on circumventing

## **DIRECTOR DISQUALIFICATION SANCTIONS**

## **PROHIBITIONS ON IMMIGRATION**

- Refusal of leave to enter and/or remain in the United Kingdom
- Cancelling a persons leave to enter or remain in the United Kingdom

## **PROHIBITIONS ON TRADE**

### Definitions

- Export restricted goods and restricted technology - aviation fuel and aviation fuel additives (but not for the purpose of technical assistance), goods and technology relating to chemical and biological weapons, goods and technology relating to crude oil and natural gas, interception and monitoring goods and technology, internal repression goods and technology
- Prohibition on the export (or for use in), supply, delivery, making available, transfer, technical assistance, financial services and funds, brokering services in relation to export restricted goods and restricted technology

- Prohibition on the import, purchase, transport, transfer, financial services and funds in relation to military goods and technology, crude oil and petroleum products
- Prohibition on the export, supply, delivery, making available of bank notes and coinage
- Prohibition on the export, import, supply, delivery, making available, acquire, technical assistance, financial services, brokering services of gold, precious metals or diamonds
- Prohibition on the export, supply, delivery, making available, technical assistance, financial services and funds, brokering services of luxury goods
- Prohibition on the export to (or for use in), supply, deliver, making available, technical assistance, financial services in relation to goods relating to electricity production
- Prohibition on the provision of interception and monitoring services
- Prohibition on circumventing

#### **PROHIBITIONS IN RELATION TO AIRCRAFT**

- Prohibition on landing in the United Kingdom

SOURCE: <https://www.gov.uk/government/collections/uk-sanctions-on-syria>

## **5. Canada (CA) sanctions against Syria**

Sanctions related to Syria were enacted under the Special Economic Measures Act in response to the humanitarian crises and resulting breach of international peace and security in the region. Subject to certain exceptions, the measures imposed against Sri Lanka include:

#### **IMPORT BAN**

The import of goods, excluding food for human consumption, from Syria.

#### **FINANCIAL RESTRICTIONS**

The provision or acquisition of financial services to, from or for the for the benefit of or on the direction or order of Syria or any person in Syria

#### **INVESTMENT BAN**

New investments in Syria

#### **EXPORT BAN**



The export to Syria of goods, including technical data, used for monitoring telecommunications

## **LUXURY GOODS - EXPORT**

The export of luxury goods to Syria

## **EXPORT BAN**

The exports of goods listed in Schedule 2 of the Regulations, including any technical data related to such goods.

## **CIRCUMVENTION & FACILITATING**

Causing, facilitating or assisting in prohibited activities is likewise prohibited.

## **TRAVEL BAN**

Listed individuals are inadmissible to Canada.

### SOURCE:

[https://www.international.gc.ca/world-monde/international\\_relations-relations\\_internationales/sanctions/syria-syrie.aspx?lang=eng](https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/syria-syrie.aspx?lang=eng)