

## **European Commission Frequently Asked Questions: February 2025 update to EU sanctions concerning Syria**

### 1. Which measures were suspended on 24 February 2025? What has changed?

On 24 February 2025, the EU decided to suspend several restrictive measures (‘sanctions’) in view of the situation in Syria. This decision is part of the EU’s efforts to support an inclusive political transition in Syria, and its swift economic recovery, reconstruction and stabilisation. This decision required the amendment of the legal acts enshrining EU sanctions concerning Syria: Council Decision 2013/255/CFSP and Council Regulation 36/2012.

To facilitate engagement with Syria, its people, and businesses, **EU sanctions no longer restrict the following activities:**

#### Energy

- The import of crude oil or petroleum products from Syria
- The export of equipment and technology for key sectors of the oil and gas industry
- Participation in the construction or installation of new power plants for electricity production
- Granting of loans to or participation in the exploration, production or refining of crude oil, or the construction or installation of new power plants

#### Transport

- The export of jet fuel or additives to Syria
- Providing access to airports in the EU for cargo flights operated by Syrian carriers, and all flights by Syrian Arab Airlines.
- The provision of funds or economic resources to Syrian Arab Airlines

The amendments also allow the **export of Syrian denominated banknotes and coinage** to the Central Bank of Syria.

*Last updated 7 April 2025*

### 2. What does it mean that the sanctions are ‘suspended’?

The EU’s decision to ‘suspend’ several sanctions means that those restrictions are no longer in force and do not apply. EU operators are free to engage in those suspended activities without restriction as this would be in compliance with EU law.

*Last updated 7 April 2025*

### 3. How has the EU ensured the availability of financial and banking channels? Will European companies and citizens be allowed to open bank accounts in Syria?

Financial and banking channels are essential for engagement with the Syrian economy. **It is now possible** for an EU financial or credit institution to **open a new bank account in Syria**, to **establish correspondent banking** relationships with Syrian financial institutions, to **open a new representative office** or branch in Syria, or to **establish a new joint venture** with any Syrian financial institution **in the following cases:**

- For the provision of humanitarian assistance and other activities that support basic human needs

- For reconstruction, stabilisation, restoring economic activity, institution-building, the provision of basic services, or other civilian purposes
- For activities in connection with suspended sanctions in the Energy or Transport sectors<sup>1</sup>.

*Last updated 7 April 2025*

**4. Which activities are covered by the exemptions for humanitarian and reconstruction purposes introduced to the prohibition on banking relations with Syrian banks and financial institutions?**

*Humanitarian:* This exemption covers **financial transactions** necessary for provision of humanitarian assistance and other activities that support basic human needs, including but not limited to the opening of bank accounts, payments to local suppliers, service providers, and contractors for humanitarian operations, and payment of employee salaries and operational costs for humanitarian organisations.

Some examples of humanitarian assistance and other activities that support basic human needs may be found among the activities funded by the European Commission ([Directorate-General for European Civil Protection and Humanitarian Aid Operations](#) ('DG ECHO')). Activities include, but are not limited to, the sectors of camp coordination and camp management, coordination, humanitarian early recovery and livelihoods, education, emergency telecommunication, food security and agriculture, health, logistics, nutrition, protection, shelter and non-food items, and water, sanitation and hygiene ('WASH').

The following non-exhaustive examples demonstrate activities facilitated by the exemption:

- The procurement of essential items for the rehabilitation of essential infrastructure and public facilities, including for instance local irrigation systems and local electrical networks.
- Activities related to the provision of healthcare and health-related services (such as the rehabilitation of health facilities; the procurement, import and distribution of medical equipment, supplies, and pharmaceuticals).
- Activities related to the provision of WASH services such as the rehabilitation of conflict-damaged water systems, sanitation, and hygiene infrastructure; supplying associated spare parts internationally, support for maintenance of equipment; and rehabilitation of irrigation pumps and canals.

*Reconstruction:* This exemption covers **financial transactions** necessary for reconstruction, stabilisation, restoring socio-economic activity, institution-building, the provision of essential services, or other civilian purposes. This could include, but is not limited to, the provision of resources for the rehabilitation and reconstruction of damaged infrastructures, as well as stabilisation activities, e.g., by restoring economic activity and building capacities for governance in Syria, with the aim of creating conditions for sustainable peace and preventing the resurgence of conflict through enhanced resilience.

The following non-exhaustive examples demonstrate activities facilitated by the exemption:

Energy:

- Provision of resources, such as maintenance supplies, to ensure repairs to energy sector infrastructure.

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<sup>1</sup> This includes for exclusively cargo flights operated by Syrian carriers and all flights operated by Syrian Arab Airlines.

- Building, repairing and upgrading substations and power plants, as well as other damaged electrical infrastructure, equipment and transmission lines to help stabilise and expand the electricity grid, including the connecting of powerlines Syria's neighbours.
- Production and provision of gas and fuel to operate Syria's power plants.

Transport:

- Provision of resources for the building, rehabilitation and maintenance of Syria's transport networks, e.g., airports, highways, railways, ports and urban transport systems.
- Provision of resources for the building and rehabilitation of damaged residential areas, including residential buildings, but also schools and other structures for public service provision.

Stabilisation and capacity building:

- Provision of training towards capacity-building and governance strengthening for institutions (e.g., central, governorate, local, semi-public and public enterprises).
- Provision of educational programmes, scholarships as well as partnerships with Syrian universities.
- Civil society support.

Restoring economic activity:

- Support and engagement with the Syrian agricultural and private sector, for instance through funding programmes for Syrian farmers or the provision of resources and technical assistance for small and medium enterprises.

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5. *Which activities would not be allowed under the the exemptions for humanitarian and reconstruction purposes introduced to the prohibition on banking relations with Syrian banks and financial institutions?*

Examples of activities not permitted are those contrary to the aim of creating conditions for sustainable peace and preventing the resurgence of conflict through enhanced resilience. Such activities could involve military, militias, armed factions, or work for the benefit of listed persons and entities.

*Last updated 7 April 2025*

6. *Do the humanitarian exemptions included in the EU's sanctions concerning Syria cover early recovery activities?*

Yes. Early recovery activities are covered.

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7. *Who can benefit from the new exemptions for humanitarian and reconstruction purposes introduced to the prohibition on banking relations with Syrian banks and financial institutions?*

All economic actors involved in the provision of humanitarian aid and reconstruction activities benefit from protection of these exemptions. All actors delivering humanitarian aid must comply with humanitarian principles.

*Last updated 7 April 2025*

8. *What has happened to the listings of individuals and entities?*

As part of the efforts to facilitate engagement with the Syrian economy, the EU has **removed 5 entities** from the list of individuals and entities subject to asset measures and a prohibition to make funds or economic resources available to them. These entities are the Industrial Bank, the Popular Credit Bank, the Savings Bank, the Agricultural Cooperative Bank, and Syrian Arab Airlines.

the EU has now made **it possible to make funds and economic resources available to the Central Bank of Syria**. However, it is still subject to an asset freeze.

The EU has decided to **maintain listings** related to the **Al-Assad regime, the chemical weapons sector and illicit drug trade**. These individuals and entities are still subject to an asset freeze, and it is still prohibited to make funds or economic resources available to them.

*Last updated 7 April 2025*

9. *Is the humanitarian exemption from asset freeze measures and the prohibition on making funds or economic resources available to listed persons, introduced after the 2023 earthquake, still in force?*

Following the February 2023 earthquake, the Council adopted a humanitarian exemption to facilitate the speedy delivery of humanitarian assistance. This exemption waived the need for the specific categories of humanitarian operators to seek prior permission from NCAs to provide funds or economic resources intended for humanitarian purposes to listed persons and entities.

The exemption was introduced for an initial period of 6 months and has been prolonged several times. The EU has **retained this exemption and has removed any expiry date** applying to it.

*Last updated 7 April 2025*

10. *Can Syrian nationals who are residing in the EU return to Syria with their belongings?*

Syrians living in the EU must be able to return to Syria with their belongings. To facilitate this, the EU has introduced an exemption for ‘personal use’ from the prohibition on the export of luxury goods from the EU to Syria. Returning Syrians can take with them luxury goods<sup>2</sup> intended for personal use and limited to personal effects, household effects or vehicles owned by those individuals and not intended for sale in Syria.

*Last updated 7 April 2025*

11. *I have to make or receive a payment to/from Syria. Is this permitted?*

Yes. Payments to or from Syria are generally permitted. They are only prohibited if:

- they benefit, directly or indirectly, natural or legal persons who are subject to restrictive measures; or
- they are made to or via Syrian banking and financial institutions subject to restrictive measures restrictions; or
- they relate to goods or services whose import or export is restricted under the EU’s sanctions concerning Syria.

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<sup>2</sup> As listed in Annex X of Council Regulation 36/2012

*Last updated 7 April 2025*

12. *I am a humanitarian, development or other economic actor active in Syria. How can I reassure banks and suppliers that my activities are not subject to EU sanctions?*

The EU's decision to suspend and introduce exemptions from several sanctions on Syria has changed the landscape for the banking sector when engaging with Syria. Operators should be ready to support the banks in processing related transactions.

When initiating a transaction for non-prohibited activity in Syria, operators are encouraged to share all relevant information with banks and other private actors, including legal references of the applicable EU sanctions and exceptions. For humanitarian and development actors, this might also include comfort letters that a donor may have granted them, their risk assessment of the action and the mitigating measures, and possible certifications they may have been awarded.

*Last updated 7 April 2025*

13. *Are EU International Financing Institutions allowed to finance projects in Syria?*

EU International Financing Institutions ('IFIs') such as the European Investment Bank ('EIB') or the European Bank for Reconstruction and Development ('EBRD') are bound by EU sanctions. EU IFIs are permitted to finance projects in areas not prohibited by EU sanctions.

However, according to the EU's Syria Regulation, the EIB is prohibited from making any disbursement or payment in connection with any existing loan agreements entered into between the State of Syria or any public authority thereof and the EIB, and is obliged to maintain the suspension of all existing Technical Assistance Service Contracts relating to projects financed under the loan agreements, and which are intended for the direct or indirect benefit of the State of Syria or any public authority thereof to be performed in Syria.

When financing projects in Syria, EU IFIs must ensure that EU funds are not channelled, directly or indirectly, to listed individuals or entities, unless exceptions apply.

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14. *Who can I ask if I have doubts on whether my activities, as a humanitarian, development or other economic actor, would be subject to EU sanctions?*

Sanctions implementation and enforcement is the responsibility of the Member States. When doubts arise, the Member State National Competent Authority ('the NCA') should be contacted.

The NCAs of each Member State are identified on the websites listed in Annex III of Council Regulation (EU) No 36/2012 concerning restrictive measures in view of the situation in Syria ('Syria Regulation'). Operators must address the NCA with which they have the closest link.

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15. *Will further measures be suspended? What will happen if the sanctions are reinstated?*

The Council has committed to closely follow the developments in Syria, which will be duly considered during regular reviews of the sanctions. The suspension of further restrictions or the introduction or

reintroduction of any measures will require the unanimous decision of the Member States in the Council and will require the adoption of new legislation to introduce these sanctions.

*Last updated 7 April 2025*

16. What is the interplay between EU sanctions and US sanctions in relation to Syria? Am I subject to US sanctions if I am a humanitarian, development or other economic actor based in the EU?

Operators under the jurisdiction of a Member State are not required to comply with US sanctions. They are only required to comply with EU sanctions.

US sanctions might be intended to produce effects beyond the US territory and seek to regulate the behaviour of EU economic operators that have no significant connection to the US. However, the EU does not recognise the extra-territorial application of laws adopted by third countries and considers such application to be contrary to international law.

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17. Are financial transactions carried out through specialised messaging banking services, such as the SWIFT network, allowed?

Yes. There are no restrictions on the use of specialised financial messaging services, such as SWIFT, in the EU's sanctions concerning Syria.

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18. Is the export from the EU to Syria of general industrial machinery, related components and related technical services allowed?

Yes. The export of general industry machinery, related components, spare parts and related technical services is permitted, provided that they are not goods listed in Annexes Ia, V, VIII, IX, X of Regulation 36/2012 and that they are not dual-use goods.

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19. Are EU operators allowed to purchase or import handcraft, agricultural, forestry and fishing products from Syria?

Yes. There are no restrictions on the purchase or import into the EU of the above-mentioned goods from Syria. There are no restrictions on the supply of transport and financial services related to those goods, provided that the goods are not purchased from individuals or entities subject to individual restrictive measures.

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