

European Commission Frequently Asked Questions – EU sanctions concerning Syria

November 2025 update

1. Which sanctions were lifted on 28 May 2025? What has changed?

On 28 May 2025, the EU **lifted almost all sectoral economic sanctions on Syria**. Most significantly, this includes the lifting of sanctions concerning **banking and finance, energy, transport**, and certain import and export restrictions.

The decision aims at supporting a peaceful transition in Syria following the fall of the Al-Assad regime in December 2024 and facilitating Syria's economic recovery.

2. What does it mean that sanctions are 'lifted'?

The EU's decision to lift several sanctions means that those **restrictions are no longer in force** and do not apply. EU operators are free to engage in those activities without restriction as this would be in compliance with EU [sanctions as of 28 May 2025](#).

3. Which sanctions have been maintained?

The EU's decision to implement a broad lifting of sanctions on Syria is part of its support for a peaceful transition. In line with this, the EU has decided to **maintain a small number of restrictions**. [Restrictions maintained are:](#)

- A prohibition on the supply of **arms** to Syria
- Restrictions on the export to Syria of items that could be used for **internal repression**
- Restrictions on the import from/export to Syria of items that could be used for **telecommunications monitoring or interception**
- Restrictions on the import from/export to Syria of **cultural heritage items**
- Listings of individuals and entities linked to the **Al- Assad regime**.

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

The broad lifting of sanctions has involved the **delisting of 29 entities**. Several of these entities are banks, including the **Central Bank of Syria**, and companies operating in **key sectors** for Syria's **economic recovery** such as oil production and refining, cotton production, telecommunications, and media.

In practice this means that these individuals and entities are no longer subject to an asset freeze, and it is no longer prohibited to make funds or economic resources available to them.

The EU has maintained the [listings of individuals and entities linked to the Assad regime](#), including leading businesspersons operating in Syria linked to the former al-Assad regime, members of the Al-Assad or Makhlouf families, or Syrian Government Ministers in power between May 2011 and December 2024.

5. What does the lifting of sanctions mean for banking relationships between EU and Syrian banks?

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 Syrian financial institutions.

6. I need to make or receive a payment to/from Syria. Is this permitted?

Yes. **Payments to or from Syria are generally permitted.** EU sanctions do not prohibit EU banks from processing transactions to or from Syria or from transacting with Syrian banks. Payments 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.

Operators must still comply with obligations stemming from Anti Money Laundering and Counter-Financing Terrorism rules.

7. Are International Financing Institutions allowed to finance projects in Syria?

Yes, according to the applicable conditions.

International Financing Institutions ('IFIs') that are constituted under EU treaties, such as the European Investment Bank ('EIB'), or that implement EU projects in line with EU budget rules (e.g., the European Bank for Reconstruction and Development ('EBRD')) are bound by EU sanctions. Those IFIs are permitted to finance projects in areas not prohibited by EU sanctions. There is **no prohibition on the financing of projects in Syria by such IFIs.** However, when financing projects in Syria, IFIs must ensure that EU funds are not channeled, directly or indirectly, to listed individuals or entities, unless exceptions apply.

8. 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?

The EU has retained this exemption and has removed any expiry date applying to it. 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.

9. 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 lift sanctions and introduce exemptions from several sanctions on Syria has changed the landscape for the banking sector when engaging with Syria, making possible a wide range of transactions. 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.

10. 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.

11. 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 or carrying out operations in the EU are only required to comply with EU sanctions. Compliance with **US sanctions is therefore discretionary upon them**. 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.

12. 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 in the EU's sanctions concerning Syria. This means incorporated under the law of a MS, such as can provide specialised financial messaging services and operators can make bank transactions with Syrian banks using SWIFT codes.

13. 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 or IX of Regulation 36/2012 and that they are not dual-use goods.

14. 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.

15. What about contracts between EU operators and Syrian operators whose performance became prohibited when sanctions vis-à-vis Syria came into force in 2012 and thereafter?

Sanctions prevail over contractual agreements. Hence, contracts between EU and Syrian operators that were at odds with supervening sanctions could not and should not be performed. EU operators were shielded from legal consequence for non-performance of such contracts under Article 27 of Council Regulation 36/2012.

However, the imposition of sanctions *does not* mean that the contract rendered non-performable due sanctions restrictions is terminated. It is for the parties to settle, whenever possible, their contractual situation. Where this was not possible, and depending on the circumstances, contracts could effectively be suspended by the parties, if a sanctions measure made the performance of the contractual action prohibited. In this vein, now that restrictions are lifted, the contracts might simply be resumed by the parties, if that is allowed pursuant to the applicable law of the contract.

Claims brought forward by persons indicated in Article 27 (1)(a) -(c) of Council Regulation 36/2012 must not be upheld, including by Member State courts, if they are raised in connection with any contract or transaction the performance of which has been affected **while the relevant restriction was in force**. In other words, a Syrian person or entity, or designated persons, entities or bodies listed in Annex II, IIa or IIb, or persons, entities or bodies that were listed in Annex II, IIa or IIb prior to 28 May 2025, cannot claim damages after 28 May 2025 from an operator in a Member State for non-performance of an action which was restricted before that date, even if the claim is brought forward after 28 May 2025.