

Are EU sanctions impeding Syria's medical response to Covid-19?

No, EU sanctions do not concern medicines, medical equipment or medical assistance provided to the population at large. As such, medical equipment, including oxygen, powered ventilators, personal protective equipment and respirators as well as medicines and other medical items required to fight the COVID-19 pandemic are not subject to any direct restrictions on export, supply, financing or use in Syria.

Are sanctions affecting the availability of respirators, testing kits and chemicals used to disinfect?

No, EU sanctions do not prohibit the export to Syria of respirators, disinfectants, hand sanitizers or detergents used to respond to Covid-19. Some of the latter goods may contain specific chemicals for which there need to be assurances that they will be used for medical purposes and not to fabricate chemical weapons or conduct internal repression. The same applies for respirators and personal protective equipment: traders just need to make sure that they will not be used for military purposes or internal repression.

Testing kits commonly used for Covid-19 testing are not subject to EU restrictive measures. Nothing prohibits their sale, supply, transfer or export, financing or use.

Are sanctions affecting the capacity of humanitarian operators to carry out their activities?

No, humanitarian operators can carry out their assistance with no limitations. They have derogations for activities needed to provide humanitarian assistance that allow, for example, buying fuel to transport medical devices, exchanging currency or building makeshift hospitals. They can also transfer funds to local organisations in Syria to fight the coronavirus.

Humanitarian operators can also liaise with persons and entities on the sanctions list if this is needed to organise the provision of humanitarian aid in a safe and efficient manner, as long as these persons do not receive funds or economic resources for that. This means that persons and entities on the sanctions list should not be paid for helping the distribution of aid to the population and should not receive goods or medical equipment that they could resell for a profit.

Can persons and entities on the sanctions list purchase items required to respond to Covid-19?

Yes, EU sanctions include waivers that allow even persons and entities on the sanctions list to buy, import and finance the purchase of items **if the purpose is solely to provide humanitarian relief in Syria or assistance to the civilian population in Syria**. These humanitarian waivers apply at all times and for all humanitarian aid, including assistance related to Covid-19.

Moreover, humanitarian aid and medical assistance can be directly provided to anyone, even if they are on the sanctions list, as long as they do not make a profit reselling items or charging others for services.

Can EU banks open a new bank account with a Syrian credit or financial institution to support humanitarian aid fighting the COVID-19 pandemic?

Yes, if it is for the purpose of providing assistance to the Syrian population they can ask for a derogation.

Are Europeans unwilling to help Syrians?

No, the EU is actually the largest humanitarian donor for the Syrian crisis. The EU has spent over 17 billion euros since the crisis started and continues to do so, providing all sort of assistance and humanitarian relief. Sanctions target specific persons and entities who participated, financed or helped the repression, the war against the Syrian people and the use of chemical weapons. Trade between the EU and Syria never stopped and continues now, even though some EU economic operators can be “over-compliant” with the sanctions as they are not aware of the numerous humanitarian exceptions and derogations. This is why we published this guidance note.