



# Compliance Communiqué

## Guidance for the Provision of Humanitarian Assistance to Syria

AUGUST 8, 2023

The U.S. Department of the Treasury remains committed to ensuring that humanitarian assistance flows to the Syrian people. To that end, the Office of Foreign Assets Control (OFAC) continues to authorize humanitarian support to the Syrian people by non-governmental organizations (NGOs), the United Nations (UN), and the U.S. government, including the United States Agency for International Development (USAID), as explained in full detail below. These authorizations are intended to ensure sanctions do not stand in the way of providing legitimate humanitarian assistance to the Syrian people. This guidance addresses specific questions OFAC has received in connection with humanitarian efforts in Syria and explains how to provide legitimate humanitarian assistance to the Syrian people in compliance with U.S. sanctions. It also further clarifies that financial institutions are permitted to process transactions for humanitarian-related activities. Finally, this guidance reaffirms that beyond humanitarian aid, certain economic activity is permitted in certain non-regime held areas.

### Key Authorizations and Guidance for Providing Humanitarian Assistance to Syria

The Syrian Sanctions Regulations, [31 CFR part 542](#), contain several exemptions and general licenses (GLs) authorizing humanitarian-related activities in Syria:<sup>1</sup>

**NGO Activities:** [Section 542.516](#) (the “Syria NGO general license”) authorizes certain services, transactions, and activities in support of nongovernmental organization (NGO) not-for-profit activities.<sup>2</sup> See FAQs [231](#), [937](#) and [938](#). As explained in FAQ [937](#), U.S. depository institutions, U.S. registered brokers or dealers in securities, and U.S. registered money transmitters can process such transactions and may rely on the statements of their customers that such transactions are authorized unless they know or have reason to know a transaction is not authorized.

**International Organizations (IO):** 31 CFR [§ 542.513](#) (the “Syria IO general license”) authorizes all transactions and activities that are for the conduct of the official business of the United Nations (UN), including its Specialized Agencies, Programmes, Funds, and Related Organizations (see FAQ [1107](#)) and for such conduct by employees, contractors, or grantees thereof, subject to certain limitations.<sup>3</sup>

**U.S. Government Official Business:** Pursuant to the exemption at 31 CFR [§ 542.211](#) and the general license at 31 CFR [§ 542.522](#) (the “USG general license”), transactions for the conduct of the official business of the United States government by employees, grantees, or contractors thereof are exempt or authorized.

**Certain Economic Activity in Non-Regime Held Areas:** Beyond humanitarian aid, [GL 22](#) authorizes transactions ordinarily incident and necessary to activities in 12 economic sectors in certain non-regime held areas in northeast and northwest Syria.<sup>4</sup> See FAQs [1041](#), [1042](#), [1043](#), [1044](#), and [1045](#).

**Noncommercial, Personal Remittances:** 31 CFR [§ 542.512](#) (the “Syria Remittances general license”) authorizes U.S. persons to send noncommercial, personal remittances to Syria or individuals ordinarily resident in Syria, subject to certain conditions. Please note the Syria Remittances general license does not authorize charitable donations to Syria.

<sup>1</sup> None of these authorizations relieve any person from compliance with any other federal laws or requirements of other federal agencies. See the questions below about exporting or reexporting items to Syria. Foreign persons do not risk exposure to U.S. sanctions for engaging in activity for which a U.S. person would not need a specific license issued pursuant to the Syrian Sanctions Regulations.

<sup>2</sup> Those relying on this authorization should be aware of two key limitations. The authorization does not permit: (1) transactions involving any person whose property and interests in property are blocked pursuant to the Syrian Sanctions Regulations other than the Government of Syria, as described in 31 CFR [§ 542.305\(a\)](#), unless separately authorized; and (2) the importation into the United States of petroleum or petroleum products of Syrian origin prohibited by 31 CFR [§ 542.208](#).

<sup>3</sup> Specifically, this general license does not authorize any transactions or activities with or involving persons whose property and interests in property are blocked pursuant to 31 CFR [§ 542.201\(a\)](#), other than the Government of Syria.

<sup>4</sup> Those relying on this authorization should be aware of two key limitations. The authorization does not permit: (1) transactions involving any person, including the Government of Syria, whose property or interests in property are blocked pursuant to the Syrian Sanctions Regulations or the Caesar Syria Civilian Protection Act of 2019; and (2) the importation into the United States of petroleum or petroleum products of Syrian origin prohibited by 31 CFR [§ 542.208](#).

## Donating Money and Raising Funds for Humanitarian Efforts in Syria

### Can I donate money to NGOs in support of humanitarian efforts in Syria?

**Yes.** U.S. persons may donate funds to and raise funds on behalf of U.S. and third-country NGOs that provide authorized humanitarian assistance in Syria. For more information about authorized NGO activities involving Syria, please review the [Syria NGO general license](#) and FAQs [231](#), [937](#) and [938](#).

### Can I raise funds for humanitarian efforts in Syria through crowdfunding?

**Yes.** As one example, a U.S. religious organization could raise funds via a crowdfunding platform to support humanitarian relief in Syria and then donate those funds to a U.S. NGO that conducts authorized activities in Syria. As another example, a U.S. individual could raise funds via a crowdfunding platform in support of medical care for a family member in Syria. The U.S. individual could then remit those funds to their family member in Syria in accordance with the [Syria Remittances general license](#), which authorizes noncommercial, personal remittances to Syria.

### Are there any caps on fundraising for humanitarian efforts in Syria?

**No.** The Syrian Sanctions Regulations do not impose restrictions on the amount of funds raised for humanitarian efforts in Syria.

## NGOs Providing Humanitarian Aid to Syria

### Can NGOs engage in activities to support humanitarian projects in Syria? What activities are authorized?

**Yes.** The [Syria NGO general license](#) authorizes transactions related to humanitarian efforts in Syria that would otherwise be prohibited by the Syrian Sanctions Regulations, subject to certain conditions. For more information, including an overview of authorized activities, please review FAQs [231](#), [937](#), and [938](#).

### Are NGOs authorized to provide humanitarian assistance in areas controlled by the Government of Syria?

**Yes.** The authorization in the [Syria NGO general license](#) is not limited to specific regions in Syria. Note that [GL 22](#) authorizes all U.S. persons to engage in additional transactions beyond humanitarian aid across a range of economic sectors in certain non-regime held areas of northeast and northwest Syria. For more information on what activities are authorized under [GL 22](#), please review FAQs [1041](#), [1042](#), [1043](#), [1044](#), and [1045](#).

### Are NGOs authorized to provide disaster relief?

The [Syrian NGO general license](#) authorizes NGOs to engage in disaster relief activities that fall within five categories of activities: humanitarian projects that meet basic human needs, democracy-building, education, non-commercial development projects directly benefitting the Syrian people, and the preservation and protection of cultural heritage sites. These include the provision of healthcare and health-related services (such as the restoration of health facilities; the distribution of medical equipment, supplies, and pharmaceuticals; and technical training for and supervision of

healthcare workers); the provision of agricultural-related services (such as the refurbishment of mills, silos, and bakeries to improve food security); and activities related to shelter and settlement assistance, and clean water assistance (such as the rehabilitation and restoration of conflict-damaged water systems, sanitation, and hygiene infrastructure; supplying associated spare parts, training, and support for maintenance of equipment; and rehabilitation of irrigation pumps and canals). For more information, including an overview of authorized activities, please review FAQs [231](#), [937](#) and [938](#).

## Can U.S. financial institutions process transactions related to authorized humanitarian assistance by NGOs in Syria?

**Yes.** As explained in FAQ [937](#), U.S. depository institutions, U.S. registered brokers or dealers in securities, and U.S. registered money transmitters can process such transactions and may rely on the statements of their customers that such transactions are authorized unless they know or have reason to know a transaction is not authorized.

## Are NGOs permitted to provide humanitarian aid in areas where sanctioned groups operate?

**Yes.** The [Syria NGO general license](#) authorizes transactions related to humanitarian efforts in Syria that would otherwise be prohibited by the Syrian Sanctions Regulations, subject to certain conditions. In addition, on December 21, 2022, OFAC added an NGO general license to the Global Terrorism Sanctions Regulations and to the Foreign Terrorist Organizations Sanctions Regulations. Pursuant to these two general licenses, NGOs that are not blocked persons are authorized to engage in non-commercial activities in support of humanitarian projects to meet basic human needs, including disaster relief. These general licenses also permit the transfer of funds necessary to engage in these activities, provided the intended beneficiary is not blocked under the relevant

counterterrorism authority (with certain exceptions for taxes, fees, or import duties). For more information, see 31 CFR §§ [594.520](#) and [597.516](#).

## Can NGOs export goods to Syria in support of humanitarian projects?

Note that most food and medicine do not require a BIS license for export to Syria. All questions regarding exporting U.S.-origin goods to Syria should be directed to the Department of Commerce, Bureau of Industry and Security (BIS): [Foreign.Policy@bis.doc.gov](mailto:Foreign.Policy@bis.doc.gov) or 202-482-4252.<sup>5</sup>

## Can U.S. companies provide goods and services to NGOs conducting authorized humanitarian activities in Syria?

U.S. companies may provide services and most food and medicine to NGOs in support of authorized humanitarian activities in Syria pursuant to the [Syria NGO general license](#) or the general license for non-U.S. origin food, medicine, and medical devices (31 CFR [§ 542.525](#)). All questions regarding exporting goods to Syria should be directed to the Department of Commerce, BIS: [Foreign.Policy@bis.doc.gov](mailto:Foreign.Policy@bis.doc.gov) or 202-482-4252.

## Can NGOs purchase refined petroleum products of Syrian origin for use in Syria?

**Yes.** The [Syria NGO general license](#) authorizes the purchase of refined petroleum products of Syrian origin for use in Syria, subject to certain conditions.

<sup>5</sup> BIS regulates the export and reexport to Syria of "items subject to the Export Administration regulations," which includes U.S.-origin items, items exported from the United States, and certain foreign-origin items.

# United Nations and U.S. Government Humanitarian Activities

## Are the United Nations and the U.S. government permitted to conduct stabilization and early recovery-related activities and transactions involving Syria? Does this apply to their contractors and grantees as well?

**Yes.** The [Syria IO general license](#) authorizes the United Nations, its Specialized Agencies, Programmes, Funds, and Related Organizations, and their employees, contractors, or grantees to engage in all transactions and activities in support of their official business in Syria, subject to certain conditions. In addition, 31 CFR [§ 542.211\(d\)](#) and the [USG general license](#) exempt and authorize, respectively, the U.S. government and its employees, grantees, and contractors to engage in all transactions in support of their official business in Syria, which may include stabilization and early recovery-related activities in support of their official business. See FAQ [934](#) for more information.

## May U.S. and non-U.S. persons provide humanitarian assistance to Syria if they are doing so as an employee or contractor of or have received a grant from the United Nations or the U.S. government (including USAID)?

**Yes.** Subject to certain limitations, transactions and activities that are for the conduct of the official business of the United Nations, including its Specialized Agencies, Programmes, Funds, and Related Organizations by employees, contractors, or grantees of those organizations, are authorized pursuant to the [Syria IO](#)

[general license](#). Similarly, transactions for the conduct of the official business of the United States government by the employees, grantees, or contractors thereof are authorized pursuant to the [USG general license](#) or are exempt pursuant to 31 CFR [§ 542.211\(d\)](#).

## Sending Money to the People of Syria

### May I send money directly to friends and family in Syria?

**Yes.** Pursuant to the [Syria Remittances general license](#), U.S. persons may send funds to their friends and family in or ordinarily resident in Syria, subject to certain conditions. Specifically, the funds transfer may not involve the Government of Syria or other blocked persons. Please note noncommercial, personal remittances do not include charitable donations of funds to or for the benefit of an entity or funds transfers for use in supporting or operating a business, including a family-owned business.

### Can U.S. banks and money services business (MSBs) process remittances to Syria?

**Yes.** U.S. depository institutions, U.S. registered brokers or dealers in securities, and U.S. registered money transmitters are authorized to process noncommercial, personal remittances to Syria, subject to certain conditions. These entities may rely on the statements of their customers that such transactions are authorized unless they know or have reason to know a transaction is not authorized.

## Can I use digital payments, instant payments, or online platforms or services to send authorized noncommercial, personal remittances to friends and family in Syria?

**Yes.** Pursuant to the [Syria Remittances general license](#), U.S. depository institutions, U.S. registered brokers or dealers in securities, and U.S. registered money transmitters are authorized to process noncommercial, personal remittances to Syria, subject to certain conditions.

## Sending Goods to Syria

### May I export or reexport food or medicine to Syria?

The Department of Commerce, Bureau of Industry and Security (BIS) has jurisdiction over the export or reexport to Syria of U.S.-origin items and all other items subject to the Export Administration Regulations (EAR). Most food and medicine do not require a BIS license for export to Syria. All questions regarding exporting goods from the United States to Syria should be directed to BIS by email at [Foreign.Policy@bis.doc.gov](mailto:Foreign.Policy@bis.doc.gov) or by phone at 202-482-4252.

Pursuant to 31 CFR [§ 542.525](#), U.S. persons may provide services to Syria that are ordinarily incident and necessary to the export or reexport of non-U.S.-origin food, medicine, and medical devices to Syria, provided that such items would be designated EAR 99 if they were subject to the EAR.

### May I export items other than food and medicine to Syria in connection with humanitarian efforts?

**It depends.** The exportation or reexportation of U.S. origin items, or of non-U.S. origin items exported from the United States to Syria is authorized, provided that the exportation or reexportation of such items to Syria, or of non-U.S. origin items that

contain more than ten percent U.S.-origin content, is licensed or otherwise authorized by the Department of Commerce. Most food and medicine do not require a BIS license for export to Syria. For more information and to apply for an export license, U.S. persons should consult the BIS [Syria web page](#) or contact BIS by email [Foreign.Policy@bis.doc.gov](mailto:Foreign.Policy@bis.doc.gov) or by phone at 202-482-4252.

## Activity Involving the Government of Syria

The term “**Government of Syria**” as defined in 31 CFR [§ 542.305\(a\)](#) includes “[t]he state and the Government of the Syrian Arab Republic, as well as any political subdivision, agency, or instrumentality thereof, including the Central Bank of Syria.” While the [Syria NGO general license](#) does authorize certain transactions with persons who meet the above definition of Government of Syria, the Syria NGO general license does not authorize transactions involving any entity owned 50 percent or more by the Government of Syria (such as state-owned entities), or any entity controlled by the Government of Syria.

### Are transactions related to humanitarian efforts in Syria prohibited if they involve the Government of Syria?

**No.** Certain transactions ordinarily incident and necessary to humanitarian efforts in Syria involving the Government of Syria, as defined in 31 CFR [§ 542.305\(a\)](#), are authorized by the [Syria NGO general license](#). Note that the [Syria NGO general license](#) does not authorize transactions involving other persons blocked pursuant to the Syrian Sanctions Regulations, including corporations, partnerships, associations, or other entities directly or indirectly owned or controlled by the Government of Syria. The [Syria NGO general license](#) applies only to transactions in support of NGOs humanitarian efforts and other certain not-for-profit activities.

## Am I allowed to pay taxes, tolls, and fees to the Government of Syria in connection with humanitarian efforts?

**Yes.** The broad authorization in the [Syria NGO general license](#) includes transactions such as taxes, tolls, and fees paid to the Government of Syria, as defined in 31 CFR [§ 542.305\(a\)](#), related to humanitarian efforts in Syria.

## Are transactions related to humanitarian efforts in Syria prohibited if they involve the Government of Syria?

**No.** Certain transactions ordinarily incident and necessary to humanitarian efforts in Syria involving the Government of Syria, as defined in 31 CFR [§ 542.305\(a\)](#), are authorized by the [Syria NGO general license](#). Note that the [Syria NGO general license](#) does not authorize transactions involving other persons blocked pursuant to the Syrian Sanctions Regulations, including corporations, partnerships, associations, or other entities directly or indirectly owned or controlled by the Government of Syria. The [Syria NGO general license](#) applies only to transactions in support of NGOs' humanitarian efforts and other certain not-for-profit activities.

## Activity by Foreign Governments in Syria

### Can foreign governments provide assistance to NGOs operating in Syria for humanitarian efforts without facing exposure to U.S. sanctions, including in Assad regime-held areas?

**Yes.** Non-U.S. persons do not risk exposure to U.S. sanctions for engaging in or facilitating transactions that would be

authorized for U.S. persons by the [Syria NGO general license](#) or any other general license issued pursuant to the Syrian Sanctions Regulations. We encourage our foreign government partners to reach out to OFAC with any questions related to humanitarian assistance. Please see FAQ [884](#) for more information.

## Can foreign governments or commercial entities invest or engage in commercial activity in Syria?

Beyond humanitarian aid, [GL 22](#) authorizes transactions ordinarily incident and necessary to activities in 12 economic sectors in certain non-regime held areas in northeast and northwest Syria. See FAQs [1041](#), [1042](#), [1043](#), [1044](#), and [1045](#). We encourage commercial entities or foreign government partners to reach out to OFAC with any questions related to [GL 22](#).

## Caesar Syria Civilian Protection Act of 2019 (Caesar Act)

### Do non-U.S. persons, including NGOs and financial institutions, risk exposure to U.S. sanctions pursuant to the Caesar Act for activities that would be authorized under the Syrian Sanctions Regulations?

**No.** With respect to non-U.S. persons, OFAC will not consider transactions to be “significant” for the purpose of a sanctions determination under the Caesar Act if U.S. persons would not require a specific license from OFAC to participate in such a transaction. Accordingly, non-U.S. persons, including NGOs and foreign financial institutions, would not risk exposure to sanctions under the Caesar Act for engaging in activity or facilitating transactions and payments for such activity that is authorized for U.S. persons by a general license issued pursuant to

the Syrian Sanctions Regulations, including the [Syria NGO general license](#). For more information, please see FAQ [884](#).

## Construction and Building Safety Activities in Syria

### Does OFAC authorize U.S. persons to engage in construction projects in Syria?

[GL 22](#) authorizes U.S. persons to engage in certain activities in certain non-regime held areas of northeast and northwest Syria in the following economic sectors: agriculture, information and telecommunications, power grid infrastructure, construction, finance, clean energy, transportation and warehousing, water and waste management, health services, education, manufacturing, and trade. Please see the Annex to [GL 22](#) and FAQs [1041](#), [1042](#), [1043](#), [1044](#), and [1045](#) for more information.

Further, NGOs are authorized to provide a range of humanitarian services in Syria, including non-commercial development projects directly benefiting the Syrian people, which may involve some construction. Specifically, the [Syria NGO general license](#) authorizes

NGOs to engage in non-commercial development projects directly benefiting the Syrian people, including preventing infectious disease and promoting maternal/child health, sustainable agriculture, and clean water assistance. As noted in FAQ [938](#), this general license authorizes activities related to shelter and settlement assistance, and clean water assistance (such as the rehabilitation and restoration of conflict-damaged water systems, sanitation, and hygiene infrastructure; supplying associated spare parts, training, and support for maintenance of equipment; and rehabilitation of irrigation pumps and canals).

### May I engage in or fund building safety inspections in Syria?

Building safety inspections are authorized to the extent they are ordinarily incident and necessary to activities authorized by the [Syria NGO general license](#), the [Syria IO general license](#), or the [USG general license](#). For example, an NGO engaging in the authorized restoration of health facilities could conduct a building safety inspection of such facilities. Similarly, an NGO engaging in the authorized rehabilitation of a local school could conduct a building safety inspection of the school.

## Additional Information

OFAC prioritizes specific license applications and requests for guidance related to humanitarian activity. For transactions that are neither exempt nor generally authorized by OFAC, please see OFAC's [License Application Page](#) for information about the specific licensing process.

For more information regarding compliance with OFAC regulations by NGO and not-for-profit entities, we encourage you to review OFAC [guidance on this topic](#).

If you have information about activities that do not comply with OFAC sanctions, please contact the OFAC Compliance Hotline.



### OFAC Compliance Hotline

1-202-622-2490  
1-800-540-6322

[OFAC\\_Feedback@treasury.gov](mailto:OFAC_Feedback@treasury.gov)

