

### Frequently Asked Questions (FAQs) for Syria General License 25

### Updated June 30, 2025

On June 30, 2025, President Trump issued an Executive order (E.O. of June 30, 2025) that removes U.S. sanctions on Syria, effective July 1, 2025. Sanctions will remain on Bashar al-Assad and his associates, human rights abusers, captagon traffickers, persons linked to Syria's past proliferation activities, ISIS and Al-Qa'ida affiliates, and Iran and its proxies. OFAC previously issued Syria General License (GL) 25, which authorizes transactions otherwise prohibited by the Syrian Sanctions Regulations, 31 CFR part 542 (SySR). To the extent still necessary, persons may continue to rely on GL 25 (and the related Syria GL 25 Fact Sheet issued on May 28, 2025) with respect to its authorization against the other OFAC sanctions programs named in GL 25.

#### Revocation of sanctions authorities with respect to Syria:

E.O. of June 30, 2025 revokes the following six Executive orders that form the foundation of the Syria sanctions program and terminates the national emergency underlying those Executive orders, effective July 1, 2025.

- E.O. 13338 of May 11, 2004;
- E.O. 13399 of April 25, 2006;
- E.O. 13460 of February 13, 2008;
- E.O. 13572 of April 29, 2011;
- E.O. 13573 of May 18, 2011; and
- E.O. 13582 of August 17, 2011.

As a result, OFAC will remove the Syrian Sanctions Regulations, 31 CFR part 542 (SySR) from the Code of Federal Regulations (CFR) following the July 1, 2025 revocation. Persons designated solely pursuant to these orders have been removed from OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List). Certain persons, including Bashar al-Assad and certain other destabilizing regional actors, will remain on the SDN List if they have also been designated under a different sanctions authority, including new designations under E.O. 13894, as further amended by E.O. of June 30, 2025.

#### Additional action and relief for Syria in E.O. of June 30, 2025:

• <u>Caesar Act Suspension</u>: Directs the Secretary of State to examine whether to suspend the imposition of some or all of the sanctions required under the Caesar Syria Civilian Protection Act of 2019 (Caesar Act). This follows the May 23, 2025 action by the

- Secretary of State to waive the imposition of certain sanctions described in the Caesar Act for 180 days.
- Export Controls: Waives the requirements to impose certain export controls under the Syria Accountability and Lebanese Sovereignty Restoration Act of 2003 and the Chemical and Biological Weapons Control and Warfare Elimination Act of 1991 (CBW Act).
- <u>Counterterrorism and SST Designations</u>: Directs the Secretary of State to take all
  appropriate action with respect to the designation of Hay'at Tahrir al-Sham (HTS) as a
  Specially Designated Global Terrorist (SDGT) and Foreign Terrorist Organization
  (FTO), as well as the SDGT designation of Abu Muhammad al-Jawlani, and Syria's
  designation as a State Sponsor of Terrorism.
- <u>Assistance Restriction and Sanctions Waiver</u>: Waives restrictions on Syria related to foreign assistance, U.S. government credit or other financial assistance, and loans and credit from U.S. financial institutions under the CBW Act.

Please consult the Departments of State and Commerce for information on these actions.

#### Maintaining sanctions on Assad and certain other destabilizing regional actors:

• To maintain sanctions on Bashar al-Assad and certain other destabilizing regional actors, E.O. of June 30, 2025 also expands the scope of the national emergency declared in E.O. 13894 and further amends the criteria therein for the imposition of sanctions on Bashar al-Assad and his associates, human rights abusers, captagon drug traffickers, and certain other destabilizing regional actors. Additional authorities maintain sanctions on other actors in Syria and the region, including those supporting terrorism, Iran and its proxies, and Syria's past proliferation activities.

The following FAQs were published on May 28, 2025 to provide guidance related to Syria General License (GL) 25, which authorizes transactions otherwise prohibited by the Syrian Sanctions Regulations (SySR). Until the termination of the SySR becomes effective on July 1, 2025, persons may continue to rely on GL 25 and the guidance below. Persons may also continue to rely on GL 25 with respect to its authorization against the other OFAC sanctions programs named in GL 25 (e.g., the Global Terrorism Sanctions Regulations).

### 1. What does Syria General License (GL) 25 authorize?

GL 25 lifts U.S. sanctions on Syria by authorizing transactions previously prohibited under the Syria Sanctions Regulations, including:

- The provision of services to people and companies in Syria;
- New investment in Syria;
- The import of or dealing in petroleum and petroleum products from Syria;
- Transactions with the new Government of Syria;
- Transactions involving certain blocked persons, which are listed in the Annex to GL 25.

Examples of authorized transactions under GL 25 include but are not limited to: telecommunications-related services; power grid infrastructure rehabilitation and other energy-related services; health care-related services; education-related services; agricultural-related services; civil-aviation and other transportation services; construction-related services; water and waste management-related services; and financial and investment services. U.S. banks are authorized to process transactions for any activities authorized by GL 25. U.S. persons and members of the Syrian diaspora community are authorized to provide support to the new Government of Syria.

### GL 25 does not authorize the following:

- Any transaction involving any individual or entity on OFAC's Specially Designated Nationals and Blocked Persons List (SDN List)—such as Bashar al-Assad, his enablers, and Captagon traffickers Taher al-Kayali and Khaldoun Hamieh—and any entity in which one or more of such SDNs own 50 percent or more, other than those listed in the Annex of the GL;
- The unblocking of any blocked property or interests in property blocked as of May 22, 2025:
- Any transactions for or on behalf of the Government of the Russian Federation, the Government of Iran, the Government of the Democratic People's Republic of Korea (DPRK), or related to the transfer or provision of goods, technology, software, funds, financing, or services to or from Iran, Russia, or the DPRK.

OFAC GLs are "self-executing," meaning that persons who determine that certain activities are authorized under a GL may proceed without further assurance from OFAC.

## 2. Does Syria General License (GL) 25 authorize activities and transactions with the Government of Syria, including its leaders and governing institutions?

Yes. GL 25 authorizes transactions involving the Government of Syria, as defined by 31 CFR § 542.308, as in existence on or after May 13, 2025. GL 25 does not authorize transactions involving Bashar al-Assad or other SDNs who are not listed in the Annex, nor does it unblock any property that was blocked as of May 22, 2025. Please refer to FAQ 1 for further guidance on authorizations in GL 25.

## 3. Can U.S. persons engage in transactions with blocked persons in the Annex to Syria General License (GL) 25?

Yes. GL 25 authorizes transactions with any blocked person listed in the Annex to GL 25, as well as entities owned 50 percent or more by such blocked persons. Please refer to FAQ 1 for further guidance on the authorizations in GL 25.

#### 4. Does Syria General License (GL) 24 remain in effect?

GL 24 will remain in effect until it expires on July 7, 2025. On May 23, 2025, OFAC issued GL 25, which generally authorizes transactions previously authorized by GL 24 and provides further broad authorization for activities described in FAQ 1.

## 5. Do non-U.S. persons face sanctions risk for engaging in transactions authorized by Syria General License (GL) 25?

No. Non-U.S. persons would not risk exposure under U.S. sanctions for engaging in activities or facilitating transactions or payments for such activities that would be authorized for U.S. persons pursuant to GL 25. Furthermore, on May 23, 2025, the Department of State issued a 180-day waiver pursuant to the Caesar Syria Civilian Protection Act of 2019 (Caesar Act) waiving the application of certain sanctions described in the Caesar Act to foreign persons.

# 6. Will OFAC continue to enforce its sanctions on Assad, terrorist groups, and other persons sanctioned in connection to their harmful activities in Syria?

Yes. The U.S. government will continue to enforce sanctions on Assad and his enablers, serious human rights abusers, Captagon drug traffickers, and persons involved in terrorist and proliferation activity. Syria General License (GL) 25 does not authorize dealings with designated persons other than those listed in the Annex to GL 25. Please see FAQ 2 for authorized transactions involving the Government of Syria, as in existence on or after May 13, 2025.

### 7. Can U.S. financial institutions process transactions with the Central Bank of Syria?

Yes. Syria General License (GL) 25 authorizes transactions by, to and through the Central Bank of Syria. However, GL 25 does not unblock any property of the Central Bank of Syria.

## 8. Does Syria General License (GL) 25 remove any existing authorizations for humanitarian aid?

No. GL 25 is a broad authorization, which may overlap with humanitarian-related authorizations in existing GLs issued under certain authorities, such as the Global Terrorism Sanctions Regulations (GTSR) and the Foreign Terrorist Organizations Sanctions Regulations (FTOSR). This includes authorizations for the following:

- transactions in support of certain nongovernmental organizations' activities (31 CFR §§ 594.520; 597.516);
- official business of the U.S. Government (31 CFR §§ 594.518; 597.514); and
- official business of certain international organizations (31 CFR §§ 594.519; 597.515).

OFAC general licenses are "self-executing," meaning that persons who determine that certain activities are authorized under a GL may proceed without further assurance from OFAC. Where multiple authorizations may apply, U.S. persons may rely on the broadest applicable authorization.

With respect to transactions in support of certain nongovernmental organizations' activities, 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.

# 9. How can I get in touch with the Office of Foreign Assets Control (OFAC) if I have questions on Syria General License (GL) 25?

OFAC encourages anyone with questions to reach out to the OFAC <u>Compliance Hotline</u>. Please note that OFAC prioritizes specific license applications and requests for guidance related to humanitarian activity. As departments and agencies work to implement the President's directive to cease sanctions on Syria, the U.S. Department of the Treasury will continue to engage with U.S. companies, civil society, and relevant humanitarian stakeholders.