



Licenses for Authorizing Exceptions from the US Sanctions against Syria 2020- 2022

جسور للدراسات
JUSOOR FOR STUDIES



By: Khaled Alterkawi – Senior research fellow
Bashir Nasrollah - Research assistant

Analytical Maps

May, 2022



We are an independent research institution and a think tank specialized in information management, preparation of political, economic, and social studies and research. We are also interested in activities, events, and training to create mutual influence between officials, decision makers and all circles of influence and opinion at the local, regional and international levels. We also target all state specializations and development sectors related to the Syrian issue, to help reaching the goals and strategies through data, ideas and recommendations in a professional, realistic and accurate manner.

Preamble:

Imposing sanctions on the Syrian regime by the USA and issuing licenses to authorise exceptions are considered the most important issues related to the political, field and social scene in Syria and the region; because the imposed sanctions and the issuance of authorizations directly impact economics in all regions not only inside Syria, but also in the region and around the world.

From the second half of 2020 until mid-2022, the US Treasury Department's Office of Foreign Assets Control (OFAC), issued 3 licenses excluding some sectors from the American sanctions imposed on Syria. The last license that was issued in May 2022 caused a greater uproar than the rest of the regulations. Perhaps this is because the last one was the most important and comprehensive in terms of exceptions.

This study provides details about the previous regulations, which are titled as: "General License No. 20"¹, "General License No. 21"², and "General License No. 22"³ in addition to the latter's attached map.

¹ Authorizing Transactions and Activities Necessary for Wind Down of Transactions with Emma Tel LLC. OFFICE OF FOREIGN ASSETS CONTROL, 29-09-2020, [link](#)

² Authorizing Certain Activities to Respond to the Coronavirus Disease 2019 (COVID-19) Pandemic. OFFICE OF FOREIGN ASSETS CONTROL, 17-06-2021, [link](#)

³ Authorizing Activities in Certain Economic Sectors in Non-Regime Held Areas of Northeast and Northwest Syria. OFFICE OF FOREIGN ASSETS CONTROL, 12-05-2022, [link](#)

First: License authorizing exceptions from US sanctions on Syria 2020

Exceptions were authorized in September 2020 for a 3-months period only. This license authorized an exception allowing to wind down the suspended transactions with Emma Tel LLC and entities in which Emma Tel owns 50% or more of their shares .

Emma Tel is a telecommunications company established in December 2018 by the Syrian businessman "Khader Ali Taher", nicknamed "Abu Ali Khader". He is a partner of the Syrian regime and works for Bashar al-Assad's wife, ⁴"Asma al-Assad."

His name was put in the sanctions list at the same month the license was issued. Later on, the US administration officially put Emma Tel on the sanctions list as a prohibited entity.

The company used to import smart phones and IT products from several companies, including the American "Apple," according to commercial contracts and financial transactions with agents or regional branches; thus, OFAC gave a provisional license to wind down transactions without opening new ones.

The US license confirmed that Emma Tel will remain under sanctions, and that the exception does not authorise exceptions for any other individuals or companies from the sanctions list.

⁴ CAESAR'S SANCTIONS TARGET ASMA AL-ASSAD ILLICIT NETWORK [Link](#)

SANCTIONS

SANCTIONS

May 2022



Licenses for Authorizing Exceptions from the US Sanctions against Syria

2020



License issuance date: September 30, 2020

License Expiry Date: December 30, 2020



Title

- Authorizing transactions and activities necessary to wind sown transactions with Emma Tel LLC



The major transactions authorized

- All necessary transactions to wind down all direct and indirect transactions, with Emma Tel LLC - Transfer Money
- Delivering on pledges of goods and services



Prohibitions

- To unblock any prohibited transactions.
- To conduct any prohibited transactions or activities with any prohibited individuals except for those benefit from the exceptions authorised in this License.

Second: License authorizing exceptions from US sanctions in Syria 2021

The second license that authorized exemptions from US sanctions was issued in June 2021, in conjunction with the spread of the Corona epidemic and its variants around the world. The duration of the license was set for a year, and the specialized organizations, led by the World Health Organization and the United Nations, had demanded the delivery of anti-epidemic equipment to all regions because it is a global pandemic that requires to be dealt with comprehensively and not in a regional or country levels.

At the same time, civil society organizations close to the Syrian regime insisted on the demands to completely lift the sanctions that had been imposed on the regime. In addition, some organizations shared the same demands, arguing that the sanctions undermine the regime's ability to import treatment requirements; therefore, they said that sanctions must be lifted for humanitarian purposes connecting to combating the epidemic.

Faced with this scene, the US administration issued License No. 21, which provides for facilitating the delivery of any supplies related to combating the Corona epidemic to the regime's areas and institutions, including Polymedics LLC and Letia Company or any entity in which these two companies own 50% or more of their shares. The two mentioned companies are for Lina Muhammad Nazir al-Kinaya, who is close to Asma al-Assad.

The US new license included vaccines, research and services needed for treatment, in addition to protective supplies, whatever their source is.

It is noted that the license authorized exemptions for all organizations and companies that wish to import anti-epidemic equipment. However, it allocated companies close to Asma al-Assad; because most of the civil organizations that requested to have a permit were close to Asma al-Assad. The license emphasized that the regime's army and security institutions should not benefit from any technologies that could support their technical capabilities.

SANCTIONS

SANCTIONS

May 2022



Licenses for Authorizing Exceptions from the US Sanctions against Syria

2021



License issuance date: June 17 , 2021

License Expiry Date: June 17 , 2022



Title

- Authorizing some activities in response to the Coronavirus 2019 (COVID-19) pandemic



The major transactions authorized

- All transactions and activities related to the export, re-export, sale or supply, directly or indirectly, services to Syria to combat the epidemic (including research or clinical studies related to COVID-19).
- Authorize all activities related to the prevention, diagnosis or treatment of COVID-19 that include certain prohibited individuals.



Prohibitions

- Exporting or re-exporting any goods, technology, or services owned by buyers or importers in the army, intelligence, or government of the Syrian regime.
- Unblock any property prohibited under any part of Chapter 5 CFR 31.
- Any prohibited transactions or activities or involving prohibited individuals other than the ones specified in Paragraph (A) of this year's license.

Third: License authorizing exceptions from US sanctions in Syria 2022

The license was issued on May 12, 2022, just two days after the “Conference to Support the Future of Syria and the Region” held in Brussels, where the United States of America, the European Union and the rest of the donors donated an amount of more than 6.4 billion euros. The license was issued only one day after the Rabat meeting in which foreign ministers of the countries of the International Coalition to defeat ISIS participated in. That meeting stressed in its final communiqué the continuation of the coalition’s support for comprehensive recovery and local stability in the areas liberated from ISIS in Iraq and Syria.

The license authorized exemptions for 12 economic and service sectors in the regions of north and northeastern Syria. The license did not cover neither the Syrian regime nor Hay’at Tahrir al-Sham-held areas. Some areas held by the Syrian opposition factions, like Afrin and neighbouring villages were not mentioned in this license. Tal Rifaat, which is controlled by the Syrian Democratic Forces (SDF) was not covered by this license neither.

It is noted that this license covered a group of major economic sectors to start a development process in the aforementioned areas. It did not specify a time period for the license. Moreover, it is remarkable that the license allowed companies or organizations operating in the mentioned sectors to benefit from the Syrian oil products necessary for their work. The license confirmed that the regime's institutions and individuals remain on the banned list, and they are prohibited from participating or benefiting from these exceptions.

SANCTIONS



May 2022



Licenses for Authorizing Exceptions from the US Sanctions against Syria

2022



License issuance date: May 12, 2022

License expiry date: Unspecified



Title

- Authorizing activities in certain economic sectors in areas not under the regime's control in northeastern and northwestern Syria.



The major transactions authorized

- Transactions necessary for activities in the exempted sectors.
- Processing and transfer of funds on behalf of third country entities to or from Syria to support authorized transactions.
- Authorizing the purchase of refined petroleum products of Syrian origin due to the necessity of using these sectors in Syria.

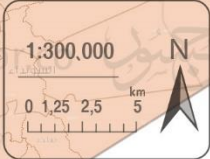
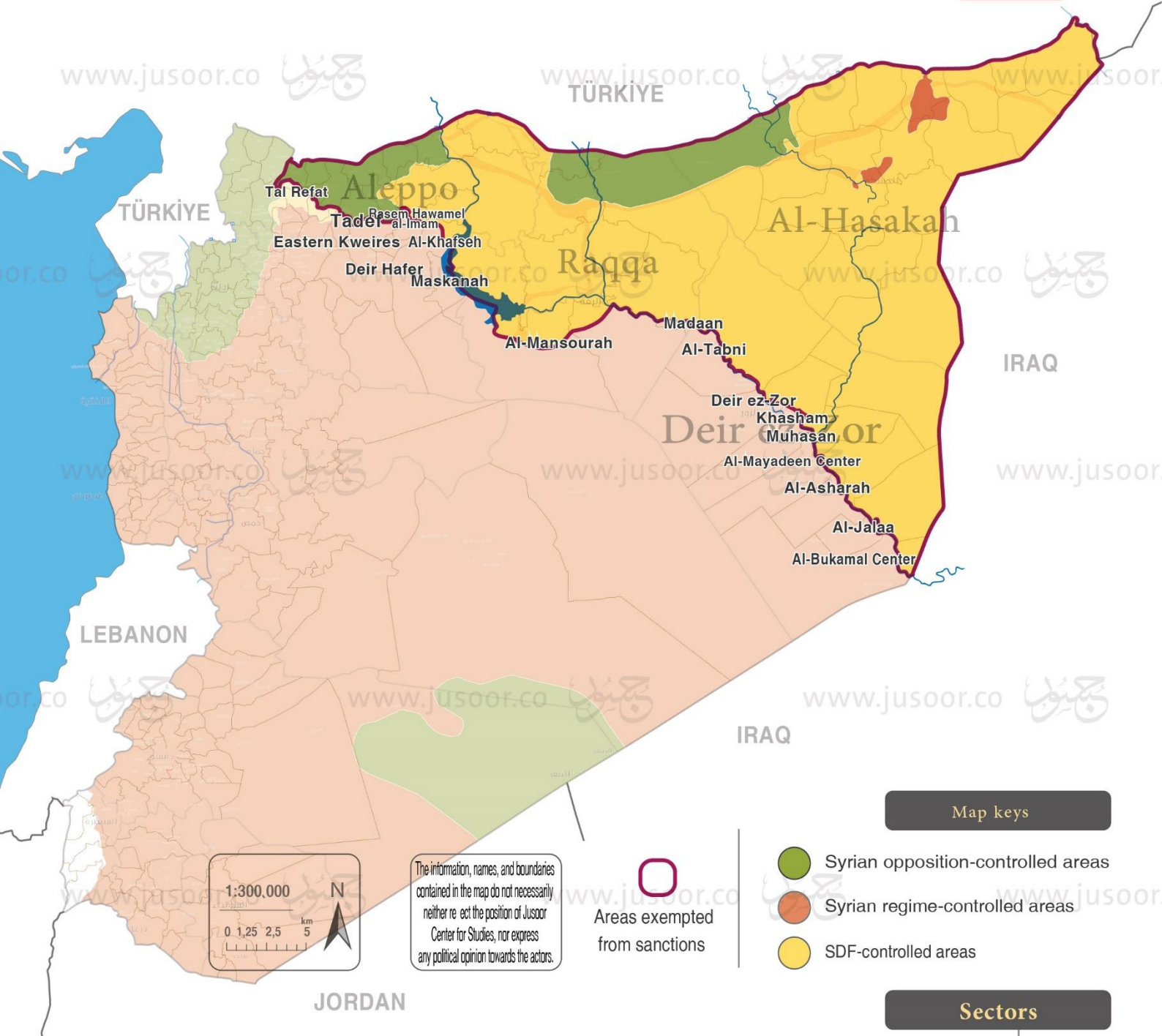
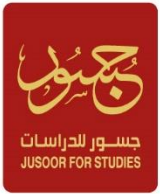


Prohibitions

- Any transactions involving any sanctioned individuals (including the regime government) under the Law of the Unified Syrian Regime or the Caesar Law for the Protection of Civilians in Syria of 2019.
- Importing oil or petroleum products of Syrian origin to the United States.

The Map of Licenses for Authorizing Exceptions from the US Sanctions against Syria 2022

May 2022



The information, names, and boundaries contained in the map do not necessarily reflect the position of Jusoor Center for Studies, nor express any political opinion towards the actors.

Areas exempted from sanctions

Map keys

- Syrian opposition-controlled areas
- Syrian regime-controlled areas
- SDF-controlled areas

Sectors



Conclusion:

By following up on the US sanctions and the authorized exemptions, the US strategy becomes clear in the continuous and long-term pressure on the Syrian regime and all associated entities and individuals. This happens in line with the continuous assessment of the effects and efficiency of these sanctions in addition to the side effects that affect wider circles of the regime beside some of non-associated entities; therefore, the US sanctions have been continuously excluded civil sectors that have direct effects on civilians.

The first license to authorise exceptions was issued in 2020 to provide foreign companies a window of opportunity to wind down transactions at a specific time. In this way these companies are not affected by the effects of their previous dealings with companies linked to the regime.

Then the second license came in 2021 in response to the exceptional circumstances that the world witnessed with the spread of the Corona epidemic. Although this license allowed the regime to benefit from some exceptions to the the public health sector and related sectors of medical supplies, it spared the US administration the responsibility for the aggravation of the humanitarian situation, whose the regime deliberately neglects in order to put pressure on civil society organizations.

The most important license among the US exeptions from sanctions is the third one that serves the general US strategy in isolating the regime and its regions' economics and achieving maximum pressure on it. The US administration, in fact, aims to create a different working environment in areas outside the regime's control, as it aims to relatively weaken trade exchanges between the regime and the areas outside its control. Moreover, the American strategy intends to expand the possibility of trade exchanges between these areas, as well as lifting the pressure on regional and international actors supporting local actors in the areas outside the regime's control. This might attract international investments in these areas.

جسور

جسور للدراسات
JUSOOR for STUDIES

📍 Mall of Istanbul-office Plaza
2nd Floor, Office#3-Başakşehir
İSTANBUL / TURKEY

☎ + 90 555 056 06 66

🐦 /jusoorstudies

f /jusoorstudies

📌 /jusoorstudies

✉ info@jusoor.co

🌐 www.jusoor.co