

JOINT LETTER: SANCTIONS RELIEF FOR SYRIA



January 28, 2025

The Honorable Donald J. Trump President of the United States The White House 1600 Pennsylvania Avenue NW Washington, D.C. 20500

Dear President Trump:

We, the undersigned 161 American, Syrian, and international organizations and groups, write to urge your immediate attention to the issue of U.S. sanctions on Syria. The Syrian people have endured unimaginable suffering, including chemical weapons attacks, widespread torture, enforced disappearances, mass forced displacement, and the systematic targeting of civilians and destruction of civilian infrastructure and properties. However, after 54 years of authoritarian rule and 14 years of war, their patience and persistence has paid off. The collapse of the Assad regime and its allies marks a historic and pivotal moment in Syria's history. Syria now desperately needs an urgent economic recovery—which will require sanctions to be eased or lifted.

Bashar al-Assad left behind a failed economy, destroyed infrastructure, impoverished people, shattered state institutions, one of the world's worst humanitarian crises, and the legacy of multiple sanction regimes. While the six-month General License (GL) 24 is a step in the right direction, it falls short of the comprehensive relief Syrians need. Intensive sanctions continue to choke Syria's economy and complicate the provision of aid to the country. Accordingly, we respectfully request the Administration immediately take the following interim measures:

- 1. **EXPAND GEOGRAPHIC SCOPE OF GL 22:** Now that the Assad regime is gone, the Office of Foreign Asset Control (OFAC) should expand General License 22, which authorizes investments and commercial transactions in several economic sectors in parts of Northwest and Northeast Syria, to cover all areas of Syria.
- 2. EXPAND NGO LICENSE TO ALLOW MORE ACTIVITIES: OFAC should amend the general license referenced in 31 CFR § 542.516 to authorize NGO transactions related to or in support of economic development projects that directly benefit the Syrian civilian population and the removal of landmines and unexploded ordinances. This would allow NGOs to carry out the activities in section (g) without the need for specific licenses.
- 3. **EXTEND AND EXPAND GL 24:** OFAC should expand the recently-issued GL 24 to (a) run indefinitely or at least for two years, giving it more meaningful effect, (b) authorize all transactions with the Central Bank of Syria, (c) authorize new investments by U.S. persons in Syria, and (d) authorize all transactions incidental and necessary to the exportation of goods to Syria permitted by a new export license exception. OFAC should also clarify what types of transactions with Syrian governing institutions are allowed under GL 24, and

particularly authorize the provision of professional, engineering, construction, and internet/telecom services. This would align GL 24 to broader licenses the U.S. has issued for <u>Afghanistan</u>, <u>Iraq</u>, and <u>Sudan</u>, after a change of government.

- 4. **RESOLVE COMPLIANCE CONTRADICTIONS:** The State Department should clarify the distinction between Hay'at Tahrir al-Sham (HTS) and the Syrian government and consider removing HTS' FTO designation. To counteract the chilling effect of material support laws, which are not excused by OFAC licenses, the Justice Department should provide comfort that it will not prosecute any dealings allowed by OFAC with HTS or Syrian governing institutions as "material support for terrorism" or a violation of 18 U.S.C. § 2332d.
- 5. **REMOVE THE BAN ON U.S. INVESTMENTS AND SERVICES:** The President should issue a new Executive Order that amends E.O. 13582 by striking sections 2(a), (b), (d), and (e), in order to permit new investments in Syria and the exportation, sale, or supply of services to Syria by U.S. persons. With U.S. aid for Syria currently frozen, this would enable Syrian-Americans and U.S. businesses to play a proactive role in Syria's recovery.
- 6. **ISSUE A BROAD EXPORT LICENSE EXCEPTION FOR SYRIA:** U.S. export controls prohibit the export of most items except for food and medicine to Syria, challenging the work of humanitarian organizations. The Commerce Department (DOC) should issue a broad license exception that mirrors OFAC's authorizations and allows more U.S. exports to Syria without requiring individual export licenses. The exception should include equipment needed for electric grids, construction, clearing landmines, education, and internet. DOC should commit to expedite specific license processing as it did after the 2023 earthquake.
- 7. TEMPORARILY SUSPEND CAESAR ACT SANCTIONS: The Caesar Act was untimely extended for five years shortly after the fall of the Assad regime, hindering much-needed foreign assistance to Syria as well as FDI that could accelerate Syria's recovery. The President should find the conditions for suspension in Section 7431 of the Caesar Act met and temporarily suspend the imposition of all Caesar sanctions for 180 days.

These measures address emergency needs and facilitate Syria's stabilization and recovery, while allowing for lengthier discussions on its future and a roadmap for lifting other sanctions, including Syria's designation as a State Sponsor of Terrorism. These measures are also reversible and allow for U.S. oversight. Sanctions can always be reimposed if conditions change. By taking these pragmatic steps however, the United States can set U.S. engagement with the new Syria on the right track, preventing backsliding, fostering stability, and developing a constructive partnership with the Syrian people.

THE CONSEQUENCES OF SYRIA SANCTIONS

Sanctions on Syria were imposed to hold the Assad regime accountable for its destabilizing behavior and deprive it of access to the global financial system. These sanctions have fulfilled their

purpose and are now outdated and no longer justified. Maintaining sanctions on a free Syria would disproportionately punish an entire population for a regime no longer in power and impede Syrians' ability to rebuild their country at this fragile moment.

- Humanitarian Impact: Syria sanctions and export controls hamper the ability of Syrians to access essential goods, services, and agricultural supplies, exacerbating hardship for millions and worsening an already dire crisis. Humanitarian needs are critical and widespread across all of Syria, with shelter, access to food, and electricity as the top three needs.
- Limiting Shelter: Syria sanctions and export controls hinder the reconstruction of destroyed houses. In 37% of communities assessed in a recent study, the majority of people were living in either a damaged residential building, unfinished or abandoned house, non-residential structure, or in tents.
- Economic Impact: Sectoral sanctions cut off Syria from the global financial system, restricting commercial transactions, paralyzing the economy, hindering business activities for small and medium-sized enterprises, and discouraging foreign investors—stunting opportunities to generate jobs and drive economic recovery, a precursor for political stability.
- Digital Impact: Syria sanctions obstruct access to the internet, software and digital services, including by Big Tech companies, which hinders the development of Syria's inadequate digital infrastructure. This negatively impacts Syrian society's ability to innovate, access information, communicate with the outside world, work virtually, participate in business, cultural, and educational activities, and exercise their fundamental human rights.
- Disabling the Diaspora: Syrian-Americans are eager to help rebuild Syria and tackle its humanitarian and socioeconomic crises by volunteering their medical, psychological, legal, and technical expertise, but sanctions prohibiting investments and services hold them back.
- Preventing Refugee Returns: Syria sanctions and export controls restrict access to equipment and financing needed to repair infrastructure, restore basic services and utilities, rebuild schools, and clear explosives, in addition to impeding the generation of jobs. The country's electricity crisis has cascading effects on other essential needs and services, including water pumping, heating, and internet. These issues pose severe challenges to Syrians and disincentivize millions of refugees and IDPs from returning home. System strain and infrastructure damage were one of the two main reasons why IDPs who initially went back to their place of origin eventually returned to camps.

Syria's humanitarian and economic crisis demands an urgent response, and sanctions relief would accelerate stabilization and early recovery. Accordingly, sanctions originally imposed on Assad's regime should not be continued or repurposed for unrelated goals. Without major sanctions reform—not just carving out partial exemptions or temporary suspensions—Syria has no realistic path toward humanitarian recovery and economic renewal. The U.S. Government should coordinate and harmonize efforts to rescind sanctions on Syria with key allies and

international bodies, several of whom already have roadmaps or are calling for lifting sanctions. Syrians deserve the chance to rebuild their country and livelihoods free from the burden of sanctions.

SANCTIONS RELIEF FOR SYRIA ADVANCES U.S. INTERESTS

Sanctions relief for Syria aligns with America's values, commitment to democracy, and leadership in the Middle East. It also serves U.S. strategic interests, particularly at this sensitive juncture with Syria facing destabilizing factors and competing influences and agendas.

Early recovery and economic stability in Syria are an essential precursor for the stable, inclusive political transition we all hope to achieve. This is why measures to ease sanctions on Syria are critically needed now—precisely because the country's political future is taking shape, not in spite of it. Sanctions relief makes America safer and stronger for the following reasons:

- Countering Radicalization and ISIS Resurgence: With over 90% of Syria's war-weary population living in poverty and the security situation in Syria still unstable, the conditions that drive radicalization persist and are ripe for exploitation by bad actors and ISIS terrorists. Sanctions relief can prevent Syria from falling back into chaos and suffering.
- Facilitating Checks and Balances: Sanctions relief would revitalize the private sector and civil society. Facilitating private investments would help restore Syria's shrinking middle class. These factors foster checks and balances on the government—benefiting both U.S. and Syrian long-term interests.
- Fostering Resilience and Regional Stability: U.S. engagement in Syria's recovery can help transform local institutions into resilient mechanisms that effectively serve the people, protect human rights, and ensure security and stability in Syria and the region.
- Reducing Future Financial Burdens: Lifting Syria sanctions could reduce long-term reliance on U.S. and international aid by allowing Syrians, international companies, and the private sector to rebuild infrastructure, industries, and institutions.

Further, the United States is able to employ less harmful tools, alongside diplomatic engagement, to ensure its national security interests and encourage good behavior. Thus far, the transitional authorities in Damascus have demonstrated themselves to be good-faith, rational actors who can be engaged through negotiations and diplomatic channels. This approach reduces the need for maintaining coercive measures such as sanctions, which would only risk undermining the global standing of the U.S. dollar, making America weaker.

Thank you for your attention and we look forward to your leadership in addressing this urgent matter.

Sincerely,

Access Centre For Human Rights (ACHR)	Big Heart Foundation
Access Now	BINAA Organization for Development
Action For Humanity	Brücken der Hoffnung (Jusoor Al-Amal) Organisation
Adalaty Organisation	Caesar Families Association
Administrative Development Center	
Al Sham Humanitarian Foundation	Change Makers Organization
Al-Baghouz Hope for Development	Charity & Security Network
AlKafaat Team (Congregation of Competencies)	Chemical Violations Documentation Center and Research (CVDCR)
Amal Organization for Relief & Development	Child Guardians (Syrian Child Protection Organisation)
American Coalition for Syria (ACS)	Christian Aid
American Friends Service Committee (AFSC)	Citizens for a Secure and Safe America
Americans For A Free Syria	(C4SSA)
Arab American Association of New York	CIVICUS
Assistance Coordination Unit (ACU)	Civilian Council for American Security
Association Sans Menottes	Council on American-Islamic Relations
Assyrian Democratic Organization (ADO)	Damma Organization
Assyrian Human Rights Network	Deirna Organization
Ataa Development Organization	Doctors of the World-USA
Awda Organization for Development	Emgage Action
Bader for Development	Engineering Creative Team
Balloon Organization	Enma Al Jazeera Development
Basmet Amal for Humanitarian Relief	Enmaa Development Organization
Baytna pour le soutien de la société civile	Ensaf for Development
Bedaya Organization	Fajjet Khuraq Atelier Project
Beit Alkoll (All House Team)	Families For Freedom
Den Aikon (An House Team)	

Future Makers Team Karam Shaar Advisory Limited

Ghiras Al-Nahda Kattee Family Foundation

Global Justice Kesh Malek

Halab Today TV Lawyers and Doctors for Human Rights

(LDHR)

Hand in Hand for Aid and Development

(HIHFAD) Leading Women Organization

Hope Organization Lelun Victims Association

Hope Revival Organisation Let's Build (LBD) Team

Horan Foundation Life for Relief and Development

Humanists Volunteer Team Local Development & Small-Projects Support

(LDSPS)

Mehad

Mozaic

Ihsan Relief and Development

Mahabad Organization for Human Rights

Immigrants Act Now (MOHR)

Inaash Organization For Development Masarat Initiative

Innovative and Powerful Vision (IPV)

Massar Families Association

International Civil Society Action Network MedGlobal

(ICAN)

Jusoor

International Humanitarian Relief (IHR)

Mercy Without Limits (MWL)
Ishtar Development Organization

Mizan Organisation for Legal Research and

Jaber Othurat Al-Kiraam Team Human Rights

Judy Organization for Relief and Molham Team

Development (JORD)

Multifaith Alliance

Jusoor Al-Amal (Bridges of Hope)

Organization Musawa Women's Studies Center

Justice Paths Musawat (Equality) Organization

Kara Family Foundation Muslim Public Affairs Council (MPAC)

Karam Foundation Nihna Qudha Group

Syria Solidarity Campaign Nisan Cultural Forum

Observatory of Political and Economic Syria Students Union (SSU)

Networks Syrian American Council (SAC)

Omran Center for Strategic Studies

Syrian American Development & Investment

Quorum (SADIQ) **Orange Organization**

Physicians Across Continents | Turkey Syrian American Engineers Association

(SAEA)

Presbyterian Church (USA), Office of Public

Witness Syrian American Lawyers' Network

Pro-Justice Syrian American Medical Society (SAMS)

Rahma Worldwide Aid and Development Syrian British Consortium (SBC)

Rajeen Initiative SBC Investigations Team

Roya Organization for Training and Syrian Canadian Foundation

Development Syrian Center for Media and Freedom of

Sada Aljanub Expression (SCM)

Sadad Humanitarian Organization Syrian Christians USA

Sanabel Al-Furat Organization Syrian Computer Society

Shafak Organization Syrian Economists' Syndicate

SKT Organization Syrian Expatriates Medical Association

Sobh Cultural Team Syrian Forum USA

Social Development International (SDI) Syrian Network for Human Rights (SNHR)

Souriyat Across Borders (SAB) Syrian NGO Alliance (SNA)

Stabilization Support Unit Syrian Orphans Organization

SYCAC Syrian Society for Scientific Research

(SySSR)

Syria Faith Initiative

Syria Relief & Development (SRD)

Syrian Youth Empowerment (SYE) Initiative Syria Film Festival

SYRIAWISE

Takaful Al Sham (TAS)

Task Force of Survivors of Chemical Attacks Union of Medical Care and Relief in Syria Organizations (UOSSM) Tayif Humanitarian Organization Union of Revolutionary Bureaus The Day After (TDA) Violet Organization The Empower Peace Initiatives and Strategies Warsheh Team of Action Organization (EPISA) We Are With You Charity Team The MENTOR Initiative Woman Support Association The Syria Campaign Women Support Unit The Syrian Legal Development Programme Women's Support and Empowerment Center (SLDP) in Idlib The Tahrir Institute for Middle East Policy Zat Initiative (TIMEP) Zenobia Association for Syrian Women The White Helmets (Syria Civil Defense) Zorna Development Organization Together For AlJarniyah