

Frequently Asked Questions (FAQs) for Syria General License 25

May 28, 2025

In any case where conflict may arise between the following Frequently Asked Questions (FAQs) and OFAC's previous guidance, these FAQs supersede previous guidance.

On May 13, 2025, President Trump announced a directive to cease U.S. sanctions against Syria, consistent with U.S. policy to support the country's new government in establishing a stable and united Syria. In line with this policy, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) issued Syria General License (GL) 25 on May 23, 2025, authorizing transactions otherwise prohibited by the Syrian Sanctions Regulations, effectively lifting sanctions on Syria. The U.S. Department of State concurrently issued a waiver under the Caesar Syria Civilian Protection Act (Caesar Act) that enables our foreign partners, allies, and the region to further unlock Syria's potential. Together, the GL and State's waiver are significant steps in support of a broader U.S. government effort to remove the full architecture of sanctions imposed on Syria due to the abuses of the Bashar al-Assad regime. U.S. sanctions relief has been extended to the new Syrian government with the understanding that the country will not offer a safe haven for terrorist organizations and will ensure the security of its religious and ethnic minorities. The U.S. will continue monitoring Syria's progress and developments on the ground.

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.