# UNITED STATES SIGNIFICANTLY RELAXES SANCTIONS AND EXPORT CONTROL RESTRICTIONS ON SYRIA

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**US Policy and Regulatory Alert**

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The Trump administration has taken recent steps to rescind longstanding sanctions and export control restrictions on Syria. Aligning US policy with President Donald Trump's Executive Order 14312 of 30 June 2025, “Providing for the Revocation of Syria Sanctions,” these actions signify a new approach to US-Syria relations and reflect the president's view that the conditions justifying original sanctions—particularly those linked to the former Assad regime—have been fundamentally altered by the positive actions of the new Syrian government under President Ahmed al-Sharaa. As detailed below, these steps are as follows.

First, the US Department of Commerce's Bureau of Industry and Security (BIS) published a final rule (the BIS Rule), effective 2 September 2025, implementing significant changes to the Syria export control measures under the Export Administration Regulations (EAR), 15 C.F.R. Part 730 *et seq*. Among other changes, the BIS Rule broadly permits, with limited exceptions, the export and reexport of all EAR99 items to Syria and also broadens certain license exceptions for other EAR items.

Second, on 26 August 2025, the US Department of the Treasury's Office of Foreign Assets Control (OFAC) published a final rule (the OFAC Rule) removing the Syria Sanctions Regulations (SySR) in its entirety from the Code of Federal Regulations. The SySR had been effectively revoked by issuance of OFAC General License 25 broadly authorizing transactions otherwise prohibited by the SySR, as described in our prior blog alert.

While important restrictions remain—in particular, certain persons and entities in Syria remain designated under other OFAC sanctions programs, Syria remains subject to a military embargo, and all commodities, software, and technology described on the EAR's Commerce Control List (CCL) still require a specific or general authorization—these mark the effective end of major economic and trade sanctions that the United States had imposed on Syria for decades.

## RELAXATION OF EAR-BASED EXPORT CONTROLS

Syria had been subject to significant EAR-based export controls that restricted nearly all exports and reexports to Syria of items subject to US jurisdiction, including EAR99 items, with the exception of EAR99-classified food and medicine. (EAR99 is a broad category that captures all EAR items not specifically described in the CCL.) Because the EAR applies extraterritorially, these restrictions applied not only to US parties but also non-US persons dealing with items subject to EAR jurisdiction, which includes items produced in or exported from the United

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States, as well as non-US items incorporating certain above de minimis US-controlled content or that are the direct product of certain controlled US technology or software.

## EAR99 Items Now Generally Permitted

The BIS Rule effectively eliminates the ban on export and reexport of EAR99 items by creating a new License Exception Syria Peace and Prosperity (License Exception SPP) under Part 740 of the EAR. License Exception SPP, codified at 15 C.F.R. § 740.5, permits export and reexport of EAR99 items to Syria without requiring a specific BIS license, with the exception of exports and reexports for restricted end uses or end users as provided under Part 744 of the EAR. Notably, exports and reexports of EAR99 items will continue to be restricted to persons in Syria that remain identified on the OFAC Specially Designated Nationals and Blocked Persons List.

## Additional Easing of EAR-Based Restrictions

Although nearly all EAR items identified on the CCL will continue to require a specific license, the BIS Rule will ease restrictions by expanding the availability of general licenses under EAR Part 740 as follows:

### *License Exception Consumer Communications Devices (License Exception CCD), 15 C.F.R. § 740.19*

License Exception CCD authorizes exports and reexports of certain consumer communication devices (such as mobile phones, computers, and software) to support personal communications that are identified on the CCL. The BIS Rule amends License Exception CCD to include Syria as an eligible destination for License Exception CCD. This change will enhance connectivity and economic activity in Syria by facilitating the Syrian people's access to key communications technology.

### *License Exception Aircraft, Vessels, and Spacecraft (License Exception AVS), 15 C.F.R. § 740.15*

The BIS Rule expands the scope of License Exception AVS by adding Syria as an eligible destination for exports and reexports of equipment and spare parts for permanent use on an aircraft or vessels as well as ship and plane stores. Such equipment, spare parts, and stores must be classified as EAR99 or controlled on the CCL for anti-terrorism reasons. Additionally, eligible vessels and aircraft may not be registered in, owned or controlled by, or under charter or lease to a country included in Country Group D:1, Cuba, or a national of any of those countries.

### *License Exception Temporary Imports, Exports, Reexports, and Transfers (License Exception TMP), 15 C.F.R. § 740.9*

The BIS Rule expands the scope of items authorized under License Exception TMP to include items described in § 740.9(a)(3) (technology for a US person (or employee of a US person) on temporary assignment in Syria), § 740.9(a)(7) (certain containers), § 740.9(a)(9) (items for use by the news media), § 740.9(a)(10) (exports to a US person's foreign subsidiary, affiliate, or facility abroad), and § 740.9(a)(11) (certain personal protective equipment). Previously, only items described in § 740.9(a)(9) were eligible for export or reexport to Syria under License Exception TMP.

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### *License Exception Servicing and Replacement of Parts and Equipment (License Exception RPL), 15 C.F.R. § 740.10(a)*

The BIS Rule expands certain export and reexport authorizations in License Exception RPL provided they do not support the Syrian police, military, or intelligence-sensitive end users or uses pursuant to Supplement No. 2 to EAR Part 742.

### *License Exception Governments (License Exception GOV), 15 C.F.R. § 740.11*

The BIS Rule enlarges the scope of License Exception GOV to certain exports and reexports to Syria under US government authorization pursuant to § 740.11(b)(2), exports, reexports, and transfers (in country) to Cooperating Governments and the North Atlantic Treaty Organization pursuant to § 740.11(c), and items for international inspections under the Chemical Weapons Convention pursuant to § 740.11(d).

### *License Exception Technology and Software—Unrestricted (License Exception TSU), 15 C.F.R. § 740.13*

Finally, the BIS Rule expands the scope of the current authorization for Syria under License Exception TSU to include exports and reexports of copies of technology that were previously authorized for export or reexport to the same recipient.

## Easing of License Application Review Policy

The BIS Rule also changes licensing policy by establishing a presumption of approval for exports and reexports of EAR items on the CCL to Syria provided such items are for:

> Commercial end uses that support economic and business development in Syria or that support the Syrian people, including through the improvement or maintenance of telecommunications, water supply and sanitation, power generation, aviation, or other civil services that support peace and prosperity in Syria without making a significant contribution to the military potential of Syria or the ability of Syria to support acts of international terrorism.

BIS will review license applications not meeting the above condition on a case-by-case basis for alignment with US national security and foreign policy.

For items that generally do not require a license for export to Syria, appropriate due diligence remains essential for compliance with General Prohibition Five of the EAR, which restricts the export, reexport, or transfer of any item subject to the EAR to an end user or for an end use that is prohibited under Part 744 of the EAR.

## Continuation of the Military Embargo on Syria

Notwithstanding the easing of EAR-based export and reexport restrictions, Syria remains subject to a general US military embargo. In particular, Syria remains an embargoed destination for the export and transfer of defense articles and defense services controlled under the International Traffic in Arms Regulations, 22 C.F.R. Part 120-130. Licenses for export or reexport of any such defense articles or defense services will be subject to a policy of denial.

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## REVOCATION OF OFAC SANCTIONS

In parallel with the BIS Rule, the OFAC Rule was issued to remove the SySR from the Code of Federal Regulations. The OFAC Rule also clarifies that while the SySR are removed, actions and proceedings based on conduct before 1 July 2025, as well as maturing rights and prior penalties, remain unaffected. Most notably, former Syrian president Basher al-Assad and persons associated this his regime remain subject to designation. Additionally, sanctions authorities related to terrorism, chemical weapons, human rights abuses, and designated individuals or entities remain in place. Some individuals previously sanctioned have been redesignated under other executive authorities, such as Executive Order 13894 of 14 October 2019, “Blocking Property and Suspending Entry of Certain Persons Contributing to the Situation in Syria.” OFAC intends to issue a separate rule amending 31 C.F.R. Part 569 to rename it the Promoting Accountability for Assad and Regional Stabilization Sanctions Regulations and to incorporate remaining sanctions authorities.

Finally, the provisions of OFAC General License 25 (covered in our prior blog alert) remain valid and continue to authorize transactions that remain restricted under sanctions authorities other than the SySR.

Please contact any member of the firm's International Trade group for more information on this development or other questions on US sanctions and export control compliance requirements.

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