

CLIENT ALERT: U.S. Department of the Treasury Issues New Authorizations Under Syrian Sanctions Regime

January 9, 2025

Introduction

On January 6, 2025, OFAC issued Syria General License (“GL”) 24, authorizing various activities and transactions previously prohibited under the Syrian Sanctions regime. In addition, OFAC also issued a series of FAQs to clarify the scope and purpose of GL 24, as well as its applicability to other previously issued authorizations. These authorizations came as a result of the end of Bashar al-Assad’s regime and the Treasury Department’s commitment to supporting humanitarian assistance to the Syrian people.

The authorizations currently last six months (i.e. through July 7, 2025) as the situation in Syria is being closely monitored.

Notably, GL 24 does not unblock the property or interest in property of any blocked person under any of OFAC’s sanctions programs and does not authorize financial transactions to blocked persons barring the exceptions detailed below.

The U.S. Treasury Press Release concerning the issuance of GL 24 can be found [here](#).

General License 24: Authorizing Transactions with Governing Institutions in Syria and Certain Transactions Related to Energy and Personal Remittances

As mentioned above, GL 24 authorizes certain transactions related to the provision of public services and humanitarian assistance for the Syrian people.

Specifically, section (a) of GL 24 states that the following transactions are authorized through July 7, 2025:

1. transactions with governing institutions in Syria following December 8, 2024;
2. transactions in support of the sale, supply, storage, or donation of energy, including petroleum, petroleum products, natural gas, and electricity, to or within Syria; and
3. transactions that are ordinarily incident and necessary to processing the transfer of noncommercial, personal remittances to Syria, including through the Central Bank of Syria.

Section (b) of GL 24 further states that the GL does not authorize:

1. The unblocking of any property blocked pursuant to any part of 31 CFR chapter V;
2. Any transactions involving military or intelligence entities, or any persons acting for or on behalf of such entities;

3. Transactions prohibited by 31 CFR § 542.208 (importation into the United States of petroleum or petroleum products of Syrian origin);
4. Any transactions for or on behalf of the Government of the Russian Federation or the Government of Iran or related to the transfer or provision of Iranian-origin or Russian-origin goods, technology, software, funds, financing, or services;
5. Financial transfers to any person blocked pursuant to the GTSR, FTOSR, or SySR other than for the purpose of effecting (i) the payment to governing institutions in Syria of taxes, fees, or import duties, (ii) the payment of salaries or wages of Syrian governing institution employees who are not identified on the Office of Foreign Assets Control's List of Specially Designated Nationals and Blocked Persons, or (iii) the purchase or receipt of permits, licenses, public utility services, or other public services in Syria; or
6. Transactions prohibited by 31 CFR § 542.206 (new investment in Syria), except contributions of funds for salaries or wages of employees of governing institutions in Syria consistent with subparagraph (b)(5).

Nothing in GL 24 relieves any person of compliance with any other applicable laws, including trade requirements under the International Traffic in Arms Regulations (ITAR) and the Export Administration Regulations (EAR).

The full text of GL 24 can be found [here](#).

Issuance of New and Updated FAQs Related to the Syrian Sanctions Regime:

In connection with the issuance of GL 24, OFAC also issued eight new FAQs (FAQs 1205-1212) and one amended FAQ (FAQ 227) to clarify the scope of GL24 as it relates to transactions and governmental institutions.

FAQs 1205-1212 can be found [here](#).

Amended FAQ 227 can be found [here](#).

Generally speaking, FAQs 1205-1212 clarify the scope of the authorizations under GL 24, and FAQ 227 clarifies the impact of GL 24 on the ability to send money to family or friends in Syria.

Impact of GL 24 on Shipping Community

Moving forward, the main impact of GL 24 on the shipping community is likely the authorization of transactions “in support of the sale, supply, storage, or donation of energy, including petroleum, petroleum products, natural gas, and electricity, to or within Syria” as set forth in sub-section (a)(2) of GL 24. We view this authorization as covering the provision of ocean shipping services in connection with the sale, supply, or donation of petroleum, petroleum products, or natural gas to Syria. Notably, however, GL 24 and FAQ 1207 make clear that the GL does not authorize the importation of Syrian petroleum or petroleum products into the United States.

Entities seeking to engage in transactions involving Syria should continue to carefully examine the details of each potential transaction to ensure the transaction complies with all applicable sanctions laws.

If you have any questions about the contents of this alert or would like further information regarding U.S. sanctions, please feel free to contact the authors, Bill Pallas at pallas@freehill.com, or Mike Dehart at dehart@freehill.com.

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