



Dynamics and unintended effects of unilateral coercive measures against the Syrian Arab Republic

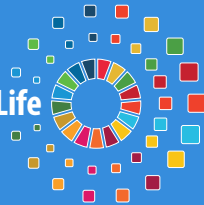


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Abbreviations

AANES	Autonomous Administration of North and East Syria
DRC	Danish Refugee Council
ESCWA	Economic and Social Commission for Western Asia
GoS	Government of Syria
HTS	Hay'at Tahrir al-Sham
KRG	Kurdistan Regional Government (in Iraq)
IDP	internally displaced person
INGO	international non-governmental organization
NAFS	National Agenda for the Future of Syria
NCDs	non-communicable diseases
NGO	non-governmental organization
OFAC	Office of Foreign Assets Control (in the United States)
SARC	Syrian Arab Red Crescent
SYP	Syrian Pound
UCMs	unilateral coercive measures
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNRCO	United Nations Resident Coordinator's Office
WASH	water, sanitation and hygiene
WHO	World Health Organization

Acknowledgments

The National Agenda for the Future of Syria (NAFS) led this study with the aim of examining the unintended impacts of the unilateral coercive measures (UCMs) on the Syrian Arab Republic. NAFS coordinated with United Nations Country Team (UNCT) in the Syrian Arab Republic through the United Nations Resident Coordinator's Office (UNRCO) during the period from November 2022 and May 2023, which provided support for coordination and data collection efforts. The objective of the study is to assess people's perceptions and analyse the impacts of UCMs on social sectors, the population's livelihoods and humanitarian assistance.

This is a summary of a longer research that was developed and authored by Dr. Joseph Daher.

NAFS engaged an expert group including specialists, scholars, and representatives of think tanks engaged in working on this issue (including representatives from United Nations agencies, the Carter Center, the Rand Corporation, the Middle East institute, the Association of Certified Anti-Money Laundering Specialists and Carnegie Europe). The expert group meetings contributed to the discussions and provided background information for the study.

Introduction

Over twelve years after the onset of the conflict in the Syrian Arab Republic, the country still faces multiple interlinked predicaments, amid a deepening socioeconomic crisis. The Syrian population's need for humanitarian assistance has increased, as 16.7 million people were in need of humanitarian assistance as of January 2024, up from 15.3 million in 2023.¹ Meanwhile, humanitarian financial assistance provided to the Syrian Arab Republic and the crisis-struck neighbouring countries has been dwindling. In 2021, it amounted to \$3.6 billion, its lowest level since 2015,² barely covering over a third of the total funding requirements. This is noticeable in the severe underfunding of the Syrian Arab Republic Humanitarian Response Plan for 2023. It has collected no more than 37.8 per cent of the \$5.41 billion needed, according to the United Nations financial tracking system figures for December. For 2022, it only received 37 per cent of the required annual funding.

Since the beginning of the conflict in 2011, various countries and regional entities have imposed unilateral coercive measures (UCMs)³ against the Syrian Arab Republic. These measures were preceded by a series of sanctions imposed by the United States as of December 1979.⁴ The post-2011 sanctions were led by the United States and the European Union, followed by the League of Arab States, Türkiye, and other like-minded countries such as Australia, Canada, Japan and Switzerland. Those measures have been described as being among “the strictest and most complex collective sanctions regimes in recent history”.⁵

As a result of the conflict, the Syrian Arab Republic has become fragmented. Areas have become controlled by the Government of Syria (GoS), the Autonomous Administration of North and East Syria (AANES) in the north-east of the country, the Turkish military and their Syrian allies, and Hay'at Tahrir al-Sham (HTS) in the north-west. The living conditions, links to external actors and how rules are being applied in these areas differ widely. Also, the way in which the various sanctions regimes impact humanitarian actors in the Syrian Arab Republic differs depending on the areas in which they operate.⁶

Comparative and global evidence on the effects of sanctions reveal various trends of intended and unintended repercussions on ordinary citizens. In the case of the Syrian Arab Republic, it is key to comprehend the unintended short-term and long-term effects of unilateral measures on various sectors and, consequently, on the life and living conditions of the population.⁷

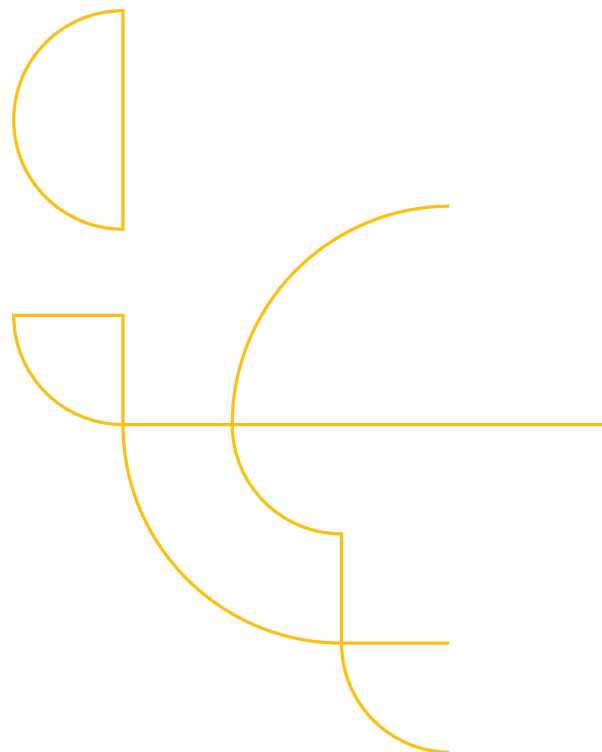
Section 1 of this study features a brief overview of UCMs imposed against the Syrian Arab Republic and is followed in section 2 by an assessment of the existing literature on the humanitarian effects of these measures. Section 2 identifies gaps in studies that analyse the effects of sanctions compared with those of armed conflict and other factors.

As for section 3, it provides a unique systematic insight into citizen perspectives regarding sanctions. It analyses the perceptions of the surveyed Syrians regarding UCMs. Based on the respondents' perspectives, the original representative survey conducted for this study investigated the extent to which UCMs have impacted the respondents' livelihoods and well-being, in comparison with other factors that may have affected their life.

In section 4, the social effects of UCMs are further examined and disaggregated into key social sectors, namely healthcare and pharmaceuticals; education; water, sanitation and hygiene (WASH); food security and agriculture; protection of cultural heritage sites and humanitarian assistance. The debate about the effects of sanctions against the Syrian Arab Republic is

thus put on a solid empirical foundation, and discussions on how to address the effects of sanctions on humanitarian indicators and assistance are stirred up.

Finally, recommendations are developed and addressed to relevant actors with the aim of limiting the humanitarian repercussions of sanctions.



Section 1.

Unilateral coercive measures on the Syrian Arab Republic: brief overview

Following the outbreak of the conflict in the Syrian Arab Republic, and in return for the Government's response to demonstrations, the United States and the European Union imposed UCMs against Syrian targets as of May 2011, hitting individuals and entities, and involving sectoral bans. In parallel, sanctions were imposed by several regional organizations and countries, including Australia, Canada, Japan, Norway, Switzerland, Türkiye and the League of Arab States.

These measures have targeted key members of the political community, military and security apparatus, as well as businesspersons and investors with affiliations with Damascus.

The sectoral sanctions have targeted economic sectors such as oil, electricity, information technology and banking, among others. Prohibitions have been imposed on the provision of certain financial services, including currency services for the GoS and on the direct or indirect sale, purchase or brokering of gold, precious metals and diamonds. In addition, the export of power turbines and their spare parts to the Syrian Arab Republic from the United States and the European Union has been banned, and so is the provision of telecommunications equipment or the import of Syrian oil products. The following sections focus on the UCMs imposed by the United States and the European Union as the main sanctioning entities.

A. Sanctions imposed by the United States of America

The Syrian Arab Republic has been subject to sanctions by the United States since 1979, when it was placed on a United States list of State Sponsors of Terrorism "because

of its continuing policies in supporting terrorism, its former occupation of Lebanon, pursuing weapons of mass destruction and missile programmes, and undermining United States and international efforts to stabilize Iraq", according to the United States Department of State. The United States imposed additional administrative sanctions against the Syrian Arab Republic in 1986, referring to evidence of direct Syrian involvement in an attempt to blow up an Israeli airplane. In December 2003, former United States President George W. Bush signed the Syria Accountability and Lebanese Sovereignty Restoration Act into law, which introduced additional sanctions against the Syrian Arab Republic. The new restrictions, which were imposed in May 2004, included freezing specific Syrian assets in United States banks, banning commercial flights between the Syrian Arab Republic and the United States and restricting the movement of Syrian diplomats in the United States. Exports from the United States to the Syrian Arab Republic, except food and medications for humanitarian purposes, were also forbidden.

In August 2011, following the outbreak of the conflict, the United States president issued Executive Order 13582,⁸ which blocks the property of the GoS, provides additional authority for designated individuals and entities, prohibits new investments in the Syrian Arab Republic by Americans,

prohibits the export or sale of services to the Syrian Arab Republic by Americans, prohibits the import of petroleum or petroleum products of Syrian origin, and prohibits Americans from getting involved in transactions involving Syrian petroleum or petroleum products.

On 20 December 2019, The Caesar Syria Civilian Protection Act was adopted, and it entered into force in June 2020. It serves to significantly expand United States extraterritorial (or secondary) sanctions – largely taking the form of asset freezes, travel bans or other penalties – which prohibit a range of third-country transactions carried out by individuals, companies and entities engaging in certain areas of business with the Syrian Arab Republic, the Syrian Government, as well as persons and companies under United States sanctions.⁹

The Act allows for the punishment of any government or private entity seen to aid the GoS, as well as groups and entities linked to it, or to contribute to the reconstruction of the Syrian Arab Republic, in addition to providing any assistance to the Governments of Russia and Iran in the Syrian Arab Republic. Based on this Act, any international company or individual that invests in the Syrian Arab Republic's energy, aviation, construction or engineering sectors can be sanctioned, as well as anyone who lends funds to the GoS.

As under other UCMs, the United States (and other sanctioning entities) have sought to limit the adverse effects of those measures on the population and on humanitarian action. For example, the United States Treasury's Office of Foreign Assets Control (OFAC) stated that acceptable recovery-related transactions and activities include four issue areas: the provision of healthcare and health-related services; the provision of educational support and training services; the provision of agriculture-related services; activities related to shelter and settlement assistance and clean water assistance.

Following the adoption of United Nations Security Council Resolution 2585 (2021), acknowledging that “humanitarian activities are broader than solely addressing the immediate needs of the affected population and should include support to essential services through water, sanitation, health, education and shelter early recovery projects”, amendments were recently made to some of the most limiting sets of UCMs, namely in the form of changes to Syrian sanctions regulations (SySR) in November and December 2021 under the Caesar Syria Civilian Protection Act.

On 12 May 2022, OFAC issued general license 22 (GL 22), which lifts sanctions on localized commercial activities to “improve the economic conditions in non-regime held areas of north-east and north-west Syria and support ongoing stabilization efforts in the region”. Furthermore, it explicitly excludes investments in oil and natural gas, the most important natural resources from north-east Syria.

Following the earthquake that hit the country in 2023, the United States applied temporary exceptions (GL23), and so did the European Union, Switzerland and the United Kingdom. Those exceptions were designed to facilitate transactions related to relief efforts, and the purchase of oil and petroleum-related products in the Syrian Arab Republic, particularly by humanitarian actors.¹⁰ However, the United States administration did not extend or reissue GL23 in August 2023, which authorized “direct transactions with the Assad regime for 180 days after the February Türkiye–Syria earthquake”, contrary to the European Union and Switzerland. The exemptions of the European Union, originally adopted on 23 February 2023, have been extended until 24 February 2024.

It is worth noting as well that the United States authorities introduced a new bill, “Assad Regime Anti-Normalisation Act of 2023”,¹¹ in May 2023 to expand the list of possible Caesar Act targets to encompass all members of the Syrian parliament, senior members of the ruling Baath Party and those responsible for diverting international humanitarian aid.

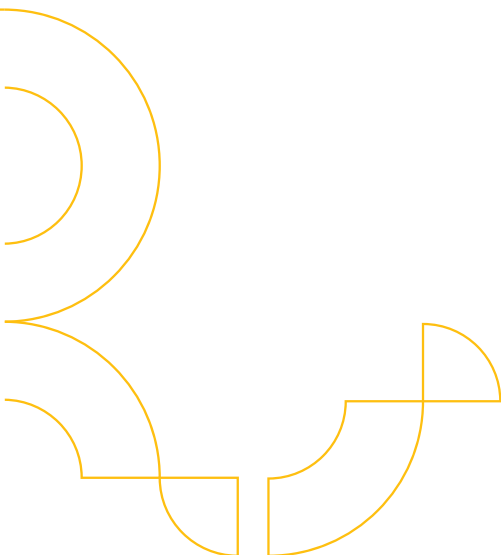
B. Sanctions imposed by the European Union

The European Union introduced sanctions against the Syrian Arab Republic in May 2011, following the response of the Government to demonstrations and protests. Prior sanctions had been imposed since 1986; they included a ban on arms sales and were of a minor nature. These measures were lifted in 1994. The European Union has subsequently extended its measures as of October 2022, and the European Union blacklist of individuals and entities with links to the GoS included nearly 350 individuals and 90 entities. The measures imposed by the European Union “also include a ban on the import of oil, restrictions on certain investments, a freeze of the assets of the Central Bank of Syria held in the European Union, and export

restrictions on equipment and technology that might be used for internal repression, as well as on equipment and technology for the monitoring or interception of internet or telephone communications”.

In theory, all sanctions regimes, including those of a multilateral or autonomous nature, permit the continued trade in essential goods and allow for humanitarian activities in the Syrian Arab Republic.

In principle, Damascus is still able to trade with numerous countries and can theoretically import nearly any product it requires. In practice, however, the licensing frameworks can be complicated and confusing, and costs associated with ensuring compliance are prohibitively high for many organizations (profit and not-for-profit alike), especially in the case of products characterized as “dual use goods”. This is particularly the case since the global sanctions practice is increasingly composed of multiple and overlapping sanctions regimes.



Section 2.

Social and humanitarian effects of unilateral coercive measures

This part builds on the existing knowledge in other comparative studies about the impact of sanctions on the Syrian Arab Republic. It provides a comprehensive literature review that integrates findings and perspectives from many previous theoretical and empirical studies.¹²

Over the past 15 years, academic and policy-related literature on the effects of international sanctions has massively expanded. Along with the increasing use of sanctions as instruments of international conflict resolution, research on different aspects of economic statecraft has developed. Generally, sanctions can be understood as “the deliberate, government-inspired withdrawal, or threat of withdrawal, of customary trade or financial relations”¹³ to achieve a foreign policy goal.

The efficiency of sanctions is contested. According to a prominent study by Hufbauer and others,¹⁴ sanctions attain their goals in around one-third of all cases. Others established a far lower success rate.¹⁵

The underlying theory of change assumes that the economic and political costs of sanctions may lead to change by the targeted government and/or to increased pressure exerted by the political elite and/or the general population in the targeted country. However, in addition to forcing a change in behaviour (referred to as “coercing” in research), two other functions should be included in the evaluation of this foreign policy instrument: sanctions restrict the counterpart’s room for manoeuvre (constraining), for instance when arms embargoes or technology and financial sanctions are imposed. Also, sanctions send costly signals to different recipients:

the sanctioned target itself, third parties and the sanctioning entities’ own population (signalling).¹⁶

According to academic research, sanctions have adverse repercussions, often called unintended effects, on the living conditions, human rights protection and the level of democracy in targeted countries. The widespread humanitarian suffering that the international economic embargo against Iraq during the 1990s inflicted on Iraqi citizens prompted both this research and a policy focus on targeted sanctions.¹⁷

The existing literature has revealed that, on average, economic sanctions have negative effects on *social* indicators such as public health,¹⁸ poverty,¹⁹ income equality²⁰ and food security.²¹ Sanctions might also contribute to decreased human rights protection.²² These adverse impacts have a clear gender dimension, as women, on average, are 24 per cent more affected than men.²³ Children are also particularly vulnerable.²⁴ In addition, targeted sanctions – that explicitly aim at limiting broader adverse impacts – seem to be associated with similar consequences as more comprehensive measures.²⁵ Consequently, critique about the adverse humanitarian effects of (targeted) external pressure abounds.²⁶

It remains challenging to disentangle the impact of sanctions in conflict and post-conflict contexts from that

of government policies and the armed conflict itself. As particularly decisive factors, the human suffering and physical destruction caused by armed conflict regularly override the effects of sanctions.²⁷ This measurement problem is particularly acute for macro-economic studies that seek to quantify the economic and financial repercussions of the restrictions. For instance, a World Bank study²⁸ estimated that between 2011 and early 2017 the conflict in the Syrian Arab Republic led to “between 400,000 and 470,000 estimated deaths and more than half of the country’s 2010 population forcibly displaced”. About a third of the country’s buildings and half of medical and education facilities were destroyed.²⁹

In such settings, it is extremely difficult to quantify the effect of sanctions, which are arguably a “weaker” measure than military warfare. To overcome these limitations, economists work with matching techniques³⁰ or gravity models.³¹ For instance, by controlling for the potential endogeneity of economic sanctions, Gutmann and others³² find that the effects of sanctions vary “considerably” between different forms of human rights.

However, substantial challenges persist. First, the task consists in isolating the effects of the sanctions, meaning to quantify the damage caused by conflict alongside or versus sanctions. It is often unclear whether adverse effects are mainly due to direct effects (effects attributable to imposed restrictions, for example export controls) or indirect effects such as actors’ over-compliance or general “chilling effects”.³³

On the one hand, studies tend to use quantitative approaches to establish general relations between sanctions and selected dependent variables, for instance to determine whether sanctions “work” and achieve their objectives.³⁴ On the other hand, in-depth case studies have examined the effects of sanctions on political dynamics in targeted countries.³⁵ Both approaches have fundamentally

broadened the knowledge about the repercussions of sanctions, but the two methodological perspectives – quantitative and qualitative approaches – and their respective strengths are not regularly combined. In addition, certain outcomes might be directly caused by the sanctions, while others may be an indirect consequence, because the actors that are not directly targeted change their behaviour.

Finally, what is also regularly missing is the perspective of citizens in targeted countries, although this is of key importance to comprehensively assess the economic and broader effects of outside pressure, as the measures are regularly meant to contribute to a change in behaviour.

In sum, the following gaps characterize most of the current research on the effects of sanctions:

- Academic studies and policy reports are often produced in isolation from each other.
- Research on the impact of sanctions is developing but is still limited, fragmented and essentially qualitative in nature.
- Quantitative and qualitative studies are mostly conducted in isolation (average vs. on-the ground impacts and perspectives).
- Systematic research on implementation and the mechanisms through which sanctions cause or amplify unintended effects (policy studies on over-compliance, de-risking and chilling effects) is largely missing.
- Existing research barely differentiates between the direct and indirect effects of the sanctions.
- Increased calls from analysts to sanctioning entities and countries to regularly evaluate the effectiveness of their sanctions against the stated objectives.
- Little is known about the perspectives of citizens in targeted countries, particularly in conflict and post-conflict -conflict settings.

Section 3.

Citizen perceptions on the impacts of unilateral coercive measures

This section focuses on the perceptions of Syrians regarding the sanctions imposed against their country, and on how these measures affect their livelihoods. It is one of the very few representative surveys in a conflict-affected country that assess how average citizens perceive sanctions.

To discuss the effects of sanctions in a severely conflict-affected country such as the Syrian Arab Republic, it is important to gather systematic evidence on the perceptions of average citizens: Do they support the outside pressure imposed on the country? How are they affected by sanctions? In which respects – if at all – do they consider them to be particularly harmful?

To answer these questions, an original representative citizen survey in the Syrian Arab Republic was conducted. For this purpose, a detailed and anonymized perception survey was designed and administered to approximately 1187 individuals in the urban centres of the de facto control areas. The selection of participants in the survey was random and statistically large enough, which allowed making valid inferences.³⁶ The survey constituted a basis for understanding the attitudes of the public toward sanctions. The results were disaggregated by gender, education and age, and between Syrians living in GoS-held areas and those living in the north-east and north-west.

A. General attitudes

Most of the survey's respondents to this question (1179)³⁷ in the three regions opposed UCMs, despite differences

between Government-held areas, the north-east and the north-west.³⁸ In the latter, the opposition to UCMs was 47.3 per cent. This is still higher in comparison to the respondents expressing their support to UCMs, with 36.9 per cent in the north-west. Respondents in the north-east and in the GoS-controlled areas, in their far majority have expressed their opposition to UCMs respectively by 82.5 per cent and 67.7 per cent (table 1).³⁹

A substantial proportion of the surveyed individuals mentioned two types of reasons for their views:

First, UCMs harm the livelihoods of the population (due to inflation, shortage of basic goods and commodities, etc.) and the prevailing economic and security situation.

Second, UCMs have been missing their targets, as they have affected the population rather than the Syrian Government officials and the businesspeople connected to them, who are perceived to circumvent the UCMs and even benefit from the sanctions through their networks and various economic schemes.

Notably, only a small number of respondents who have voiced their opposition to UCMs perceive them as the result of foreign conspiracy against the GoS.

A total of 22.3 per cent of the survey respondents were supporters of imposing UCMs against the GoS. The main argument of the vast majority of those respondents was that UCMs are an important tool to pressure the GoS to make political concessions and/or accept to engage in a process of political transition. A high number of respondents who were “partially” in favour of UCMs argued for the necessity to reshape or adapt these measures to reduce their negative impact on the non-targeted population and the economy. Finally, a very small proportion of the respondents were indifferent to the UCMs, and most of them stated that the sanctions did not affect their daily life or livelihoods.

The totality of respondents in favour of UCMs voiced their opposition to the GoS. Meanwhile, individuals who were “against the UCMs” had diverse political orientations and consisted of both opponents and supporters of the Government.

At the time of the study, it was too early to determine whether the decision by the OFAC in May 2022 to issue GL22, which authorizes “specific economic activities in certain non-regime-held areas of north-east and north-west Syria”,⁴⁰ would radically change the opinion of the population in these regions regarding UCMs, as dynamics connected to “over-compliance”, or “chilling effects” would probably remain in the context of any investments in these regions.

Table 1. General attitude of survey respondents toward unilateral coercive measures

	In favour of sanctions (completely)	In favour of sanctions (partially)	Against sanctions (completely)	Against sanctions (partially)	Indifferent	Total (without No answers)
Northeast	14 – 5.6%	18 – 7.1%	151 – 59.9%	57 – 22.6%	12 – 4.8%	252
Northwest	33 – 12.8%	62 – 24.1%	53 – 20.6%	66 – 25.7%	43 – 16.7%	257
Government controlled areas	107 – 16%	28 – 4.2%	364 – 54.3%	90 – 13.4%	81 – 12.1%	670
Total	154	108	568	213	136	1179
Percentage	13.1	9.2	48.1	18.1	11.5	100

B. The perceived impact on the respondents’ daily life

Table 2. Perceived impacts of unilateral coercive measures on survey’s respondents livelihoods

	Affect livelihoods	Not affected	Total	No answers
Total	1 050	92	1 142	45
Percentage	92	8	100	

The vast majority of respondents (92 per cent) stated that UCMs were affecting their livelihoods in several aspects (socially, economically and in terms of money transferring), regardless of their position towards the UCMs and the GoS. Only 8 per cent stated that UCMs had no impact on their daily life (table 2).

The social repercussions of UCMs have been the most mentioned (table 3 and table 4). The five main factors impacting life (such as the prices of goods; Syrian Pound devaluation, energy shortage and costs; violence and insecurity, food shortage and access to healthcare services), as indicated by the respondents, were structured by the

specificities and dynamics of the various areas, despite several common elements.

For instance, the prices of goods are among the most significant elements affecting the respondents' life in the three different zones of influence, where they reached high and relatively high levels: 81.1 per cent in areas held by the GoS, 87.4 per cent in the north-east and 59.9 per cent in the north-west. This reflects the increase in the average cost of living due to rising food prices, which is impacting the population of the whole country.

The nutrition and health impacts of UCMs are most severe in all three areas studied. In the north-east for instance, 83.8 per cent and 78.6 per cent of the individuals answered that UCMs affected nutrition and health, respectively.

The impact of UCMs on health was however mentioned more often in the north-west than nutrition, with 76.6 per cent and 56.8 per cent of individuals, respectively, referring to these two aspects. In the Government-held areas, nutrition and health were referred to on a nearly similar level.

Table 3. Perceived impacts of unilateral coercive measure on surveyed population by geographical areas

	Affect livelihoods	Not affected	Total	No answer
North-east	229 (90.2%)	25 (9.8%)	254	0
North-west	222 (88.8%)	28 (11.2%)	250	11
Government-controlled areas	599 (93.9%)	39 (6.1%)	638	34
Total	1050	92	1142	45
Percentage	92	8	100	

Figure 1. Perceived impacts of unilateral coercive measures on the livelihoods of survey respondents [Total answers: 1142/no answer: 45]

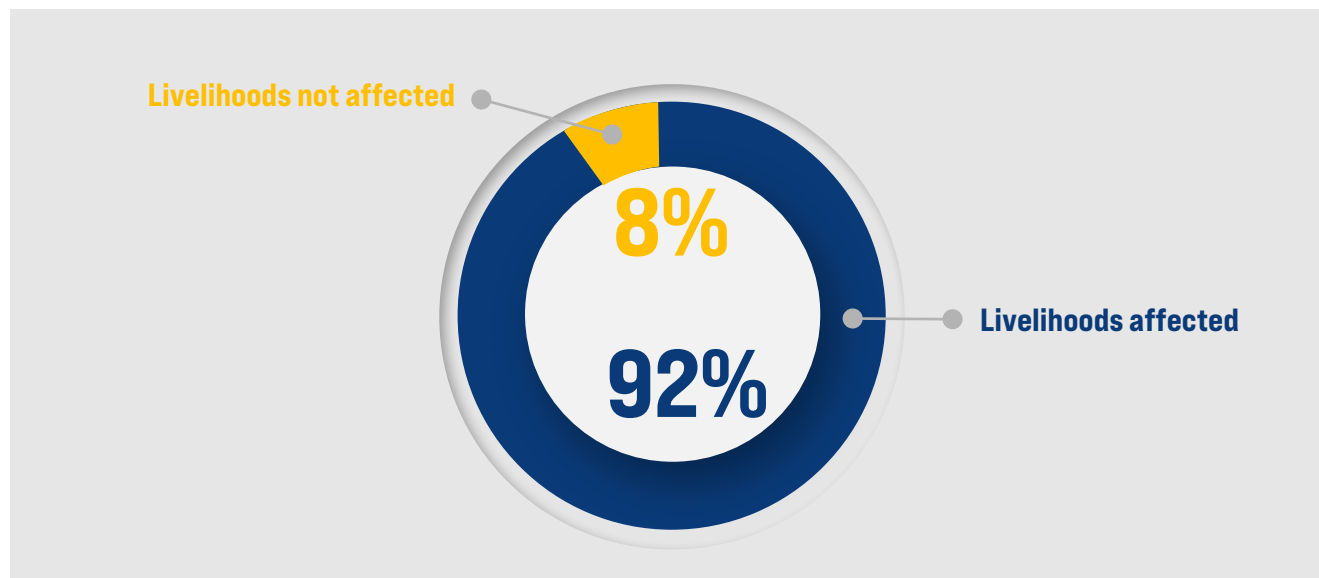


Table 4. Perceived impacts of unilateral coercive measures on the affected survey respondents (Total respondents: 1050)

Area		Northeast (total answers: 229)		Northwest (total answers: 222)		Government- controlled areas (total answers: 599)	
[total answers: 229]		Northwest	Percentage	Number of answers	Percentage	Number of answers	Percentage
[total answers: 222]	Government-controlled areas	192	83.80	126	56.80	350	58.40
	(total answers: 599)	180	78.60	170	76.60	348	58.10
	Shelter	118	51.50	72	32.40	233	38.90
	Water	78	34.10	48	21.60	77	12.90
Economic aspects	Reduction of salaries	175	76.40	128	57.70	231	38.60
	Rise in prices and difficulty to find particular products	94	41	83	37.40	280	46.70
	Work loss	54	23.60	81	36.50	64	10.70
	Having to change jobs	93	40.60	97	43.70	280	46.70
Money transfer		110	48	80	36	280	46.70

In relation to the economic repercussions of UCMs, the reduction of salaries was indicated as the first element in both the north-east and north-west (respectively 76.4 per cent and 57.7 per cent of respondents in each region), quite ahead of other elements such as the increase in prices, difficulty in reaching particular products and having to change jobs. In Government-held areas, 46.7 per cent of the respondents referred to two main economic elements, namely the increase in prices and difficulty in reaching particular products and having to change jobs, while 38.6 per cent referred to the reduction of salaries.

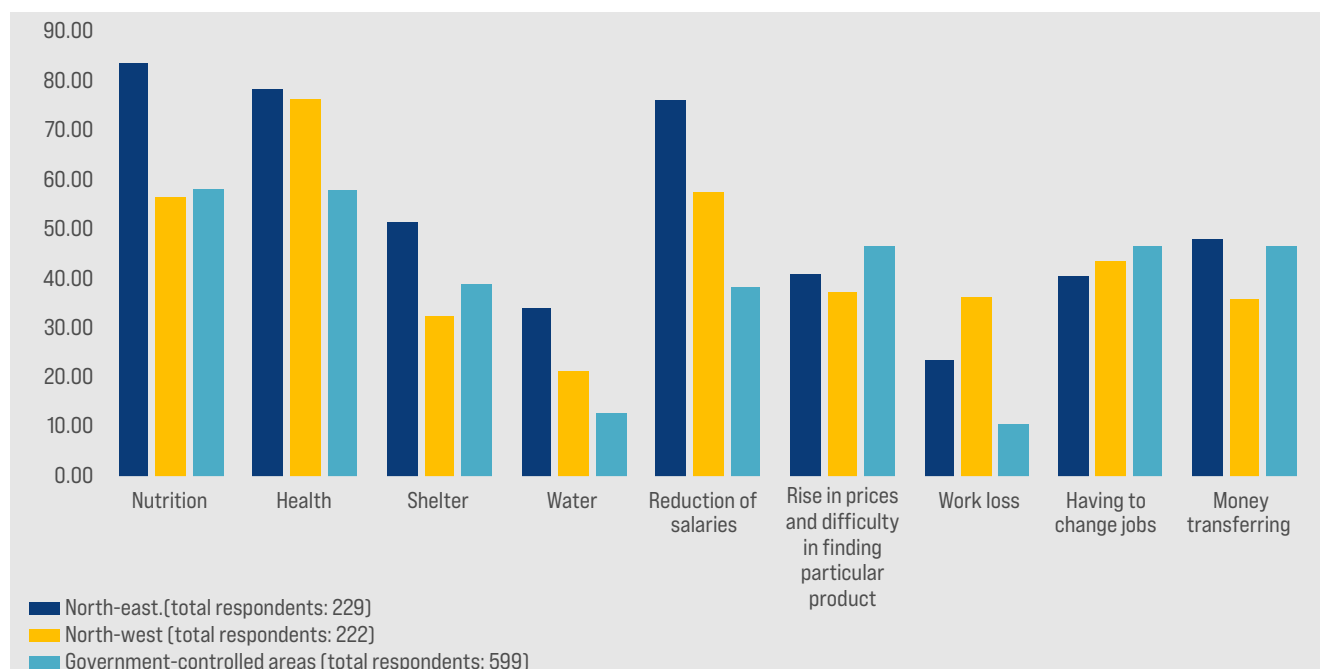
The last category of money transferring, which encompasses bank transfers and remittances, was mentioned by less than half of all respondents in each area. A high number of the Syrian population within the country receives remittances through informal means of transfer, while the proportion of citizens who have a bank account is low and amounts to around 20 per cent of the total adult population.⁴¹ Internally

displaced persons (IDPs), in particular, referred to the difficulty to receive remittances and/or to the high fees associated with such transactions.

The respondents believe that the majority of the main factors impacting their daily life in the three regions are driven by the UCMs (always by over 70 per cent). However, other elements and reasons than UCMs should be taken into consideration. For example, the devaluation of the SyP is not solely due to the UCMs, but also to the unfolding of the Lebanese financial crisis in October 2019 and to other economic factors.

This reveals an understanding among the surveyed population that there is a correlation between UCMs and the economic crisis in the country, hence the difficulty to distinguish between the different factors (war and destruction, economic mismanagement and policies, corruption, etc.) when explaining the roots and reasons of the current economic situation.

Figure 2. Perceived impacts of unilateral coercive measures on survey respondents (Percentage) [Total respondents: 1050]



Note: 137 respondents out of 1187 did not answer this question.

Table 5. Perceived impacts of UCMs, change compared to 2020

	Worse	Same	Less	Total	Don't know, no answers or other
North-east	179	50	6	235	19
North-west	124	121	15	260	1
Government-controlled areas	463	118	13	594	78
Total	766	289	34	1089	98
Percentage	70.3	26.6	3.1	100	

Note: 137 respondents out of 1187 did not answer this question.

The results indicate that the respondents face continuous and growing socio-economic difficulties and challenges, notably in finding food and accessing basic health services facilities and/or medications. They also see a reduction in their purchasing power, either because of the decrease in wages or the increase in prices (see next section for more details). This situation has pushed large segments of the population to develop survival strategies, such as consuming less food, selling fuel aid to purchase food commodities, burning old shoes to remain warm and skipping urgent medical procedures.⁴²

Passing the Caesar Act, which has expanded the United States sanctions, seems to have affected Syrian livelihoods, as per the people's perceptions. The large majority of respondents (70.3 per cent) indicated that due to the impact of UCMs, their daily life and livelihoods have become worse than two years earlier (table 5), a date which corresponds to the vote of the Caesar Act in December 2019 and its entry into force on 17 June 2020. While perceptions regarding the worsening effects of UCMs are clear in the north-east and in the Government-controlled areas (76.2 per cent and 78 per cent, respectively), responses in the north-west describing the impact of sanctions as similar or worse were nearly at the same level (46.5 per cent and 47.7 per cent, respectively). Only a small minority of respondents stated that the impacts of UCMs were less severe than two years earlier (3.1 per cent in total), regardless of their political affiliations and regions of residency.

C. Coping measures to improve the respondents' livelihoods

The measures taken by the respondents to try and mitigate the perceived effects of UCMs and improve their livelihood can be divided into three main elements, often combined.

First, the necessity to work more hours or take a second job, or even a third one in some cases. Many respondents, who were State employees, have explained that they needed to find a

second job to try and deal with the continuously increasing cost of living, because their salary was insufficient.

The second main element mentioned by respondents was the obligation to drastically reduce the level of daily consumption to secure the most basic needs. A number of respondents explained that they stopped purchasing non-essential and even basic goods, such as all forms of meat, and even most types of fruits, or sought cheaper alternatives, by using for example palm oil instead of sunflower oil.

Finally, a significant portion of respondents stated that they also depended on (informal) remittances sent by family members and/or close friends in order to cover various forms of expenses, including rent, food and others.

D. Conclusion

The survey shows that the majority of the surveyed Syrians, who lived within the country, held negative views regarding UCMs and their impact on the population and the different sectors of the economy. A large majority of respondents stated that UCMs negatively affected their daily life. This view was held regardless of gender, education and age, with surprisingly only minor differences between the Government-held areas, on the one hand, and the north-east and the north-west on the other. Notably, this view was even held by the majority of respondents who generally supported the sanctions imposed on the Syrian Arab Republic. This means that even Syrians who approved external pressure perceived the imposed sanctions as disproportionately harming their livelihoods and those of their fellow citizens.

By implication, sanctions do not seem to help drive change in the Government's behaviour and to strengthen antagonism to the Government's policies. The representative perception survey could therefore be interpreted as an empirically-based reference in relation to the nature and design of the current sanctions imposed against the Syrian Arab Republic.

Section 4.

The effects of sanctions on social sectors and humanitarian assistance: insights from semi-structured interviews and literature review

This section analyses the unintended effects of UCMs on vital social sectors, which are fundamentally related to the livelihoods and vulnerabilities of the Syrian population, and the potential for providing humanitarian assistance to Syrians. The following assessment is based on semi-structured interviews⁴³ and on existing studies. It provides empirical material for analysing the direct and indirect repercussions of UCMs on six key social sectors, namely healthcare and the pharmaceutical sector; education; water, sanitation and hygiene (WASH); protection of cultural heritage site; food security and agriculture; and humanitarian assistance.

A. Healthcare and the pharmaceutical sector

The health system suffered significantly throughout the conflict. Although the health sector is not directly targeted by sanctions, it has been indirectly affected in many ways:

1. The access to and availability of key medical supplies have been affected due to the following:

UCMs have prevented hospitals and health facilities in Government-held areas from importing specific medical items or purchasing materials and equipment for their repair. This has led to the need to search for alternative sources of imported technologies; but doing so faces great difficulties and would lead to higher costs, while funding for the health system is limited. Alternative equipment can be found in China and India. Nonetheless, its quality could be often questionable, and it has become more difficult to purchase due to the cost of raw

materials that has increased by 20 per cent and 70 per cent, respectively, and to the rise in the shipping costs. In addition, importing from these countries has been facing growing obstacles, including the threat of sanctions and a shortage of production following the COVID-19 pandemic,⁴⁴ moreover:

- Medical equipment and instruments in many hospitals are antiquated or hard to find. Besides, there is a severe drug shortage on the market, especially of cancer drugs and vaccines.
- Medical devices often require a compatible software, which in turn requires licensing from sanctioning countries, while licenses have been terminated by those companies.
- Most of the health facilities in the Syrian Arab Republic have been equipped with European products, and spare parts need to come from similar locations to guarantee good functioning.



Sanctions have created a black market for medicine, including forged medicine that I have witnessed as the cause of serious health problems for patients”.⁴⁵



In north-west Syria, sanctions have prevented the import of needed equipment and technology related to the basic needs in health, but also in education and hygiene.



Patients in the north-east who need chemotherapy, for example, have had to commute to different cities to receive their treatment and in some cases leave the country for medical treatment.”⁴⁶

2. The ability to produce pharmaceutical products has been affected in different ways

The conflict has severely affected the pharmaceutical sector, which was of crucial relevance for the functioning of the country’s healthcare system. The unintended impacts of UCMs included the following:⁴⁷

- Inability of manufacturers to produce, import and export particular materials due to the broad definition of dual-use goods, as it covers pipes, water pumps, spare parts for electrical generators and industrial machinery, and many types of essential construction equipment.
- Increased cost of production at pharmaceutical companies, and more generally in the manufacturing sector.
- Foreign clients are generally not interested in purchasing medicines produced in the Syrian Arab republic, contrary to prior to 2011. The number of countries importing medicines from the Syrian Arab Republic has dropped to about 10, compared with over 44 prior to 2011.
- The Syrian Arab Republic now relies on imports of vaccines, cancer drugs, blood derivatives and dialysis equipment. Prices are high and shortages are frequent. The coverage of market needs suffered a reduction of more than 70 per cent during the conflict.
- Despite some slow recovery, more than 50 per cent of factories have not resumed their operations which has led the prices of imported drugs, especially those classified as “food supplements”, to continuously increase, and caused severe shortages of drugs and medical supplies.
- Large international pharmaceutical companies, such as SANOFI, have also left the country following the outbreak of the conflict, while many others withdrew their licenses from local companies. The vast majority of the European and American laboratories cancelled their concessions in the Syrian Arab Republic, and Syrian laboratories were forced to search for alternatives from China, Iran and Russia.⁴⁸

3. These effects have been accentuated by other factors, such as:

- The fuel shortage in the local market, which is partially the result of UCMs, has affected health facilities, notably heating capabilities, cooking, ambulances and doctors’ ability to arrive to the hospitals.⁴⁹ Seventy-one per cent of all primary health care facilities do not have any backup generator. Eighty out of 87 public hospitals depend on generators to maintain continuous operations amid ongoing electricity shortages and cuts.
- Over-compliance measures by regional and international banks for each transaction connected to Syria has led to many delays and even cancellations, while the chilling effect around the UCMs on Syria has resulted in many private actors refusing to deal with anything connected to the country. Alternative import sources have therefore resulted in rising costs.

“As a coping measure, an educator explained that in order to overcome this problem, they asked a foreign client who owed them money to pay directly to a foreign supplier to whom they owed money. This was a complicated process, but it helped them obtain the needed material and settle the due amount”.⁵³

“Moreover, non-formal educational programmes have been strenuous to carry out, as some online learning platforms and websites have been unavailable as a result of the sanctions.⁵⁴ It has been reported that “all online learning platforms have blocked the access to their material from Syria”.⁵⁵

“Similarly, Syrian students are deprived from taking the TOEFL language exam and other international English certificates (e.g. IELTS)” from Syria, and from applying for the international professional certificates (e.g. CPA, CMA, etc.)”.

“Once, an educational institution wanted to organize a training programme on robotics, but the foreign provider (firm) refused to deliver us any machines for fear of sanctions”.⁵⁶

Many of the above-mentioned effects are due as well to overcompliance. Moreover, UCMs have impacted the programming of international non-governmental organizations (INGOs) and United Nations agencies, including those involved in health operations, through different ways. First, bureaucratic processes are too lengthy, and financial transactions for the purchase of particular items or the payment for the services of a vendor or a consultant face severe delays. Also, procurement operations are confronted with numerous difficulties. This leads more and more vendors to demand to be paid before implementing the contract/project, to delay their work/operations with their contractors or to impose penalties if they were not paid on time or in advance. The average time taken to process a bid prior to 2019 and in 2020 and afterwards increased, on average, from between four and five months to between 10 and 12 months, and sometimes more. Meanwhile, the number of bidders responding to a procurement call in 2019 compared with 2020 and afterwards diminished, on average, from eight to three, and sometimes less. Finally, 31 procurement processes or contracts had to be cancelled in 2020, 22 of them because of the sanctions and 9 due to the devaluation of the SyP.

A study analysing the causality of worsening socio-economic indicators under sanctions in the Syrian Arab Republic from 2011 to 2016 found that decreased life expectancy and reduced routine immunization coverage were, at least partly, due to sanctions.⁵⁰ Other factors have impeded the delivery of health assistance, including the Lebanese crisis, since Lebanon had served as a main intermediary for the import of multiple products and materials by Syrian merchants and traders. Other factors included the closure of the border crossing in early 2020, and the restrictions imposed on the transfer of medical assistance provided by international agencies to the north-east. In addition, the global pandemic and the Ukraine-Russia war have impacted and continue to impact imports.

B. The education sector

Over 2.4 million children in the Syrian Arab Republic did not attend school by the end of 2021; nearly 40 per cent of them were girls. One out of three schools inside the country can no longer be used because they were destroyed, damaged or used for military purposes. Children who have been able to attend school often learn in overcrowded classrooms, and in buildings with insufficient water and sanitation facilities, electricity, heating or ventilation.⁵¹

The education sector has suffered directly and indirectly from UCMs, despite the humanitarian exemption from sanctions granted for all legitimate aid operations, including educational interventions. These include:

1. Over-compliance and curtailed access to technical equipment, tools and teaching materials

Due to the challenging and complex UCM regulations, numerous service providers and equipment suppliers (both United States and non-United States entities) refuse to provide software and laptops to education institutions as well as to non-governmental organizations (NGOs) in the Syrian Arab Republic.⁵² The purchase of foreign educational equipment, tools or even books is made difficult.

This has not been the case in the Government-controlled areas only. Despite attempts by educational institutions in the AANES to encourage collaboration with international actors, limited has been provided by foreign international teams and trainers. In the north-east, in territories subject to the AANES control, the main challenge has been the absence of international recognition of the diplomas delivered by the AANES' education system. This has created fear among parents regarding the future of their children, and led some to try to send them to private schools where diplomas were recognized.⁵⁷

2. Fuel shortage

Fuel shortage has also affected the functioning of water systems and water availability in schools, while impacting the possibility to heat classrooms in winter. United Nations agencies, INGOs and NGOs supporting formal education have used generators or simply abstained from undertaking such kinds of initiatives. Humanitarian exemptions have gradually expanded NGOs' access to fuel for their activities, but supply levels continue to be limited. Electricity cuts and fuel shortages have prompted the Government to increase the number of holidays to decrease the public schools' operational costs. Some private universities have also adopted this practice, which has decreased the number of working days per week, in order to reduce operation costs and attendance days for teachers and students.⁵⁸

3. Repair and structural maintenance

UCMs have contributed to preventing the reconstruction of schools or the construction of new schools, as international funds and INGOs have only been able to perform little rehabilitation for damaged schools.⁵⁹

C. Water, sanitation and hygiene (WASH)

The widespread deterioration and destruction of water facilities throughout the country have reduced access to water by around 40 per cent compared with a decade ago. Wastewater has been discharged, untreated, into the natural environment, resulting in serious risks to public health and contaminating groundwater resources. UCMs affect the WASH sector through three main dynamics, although the sector as a whole has not been subject to any sanctions.

1. Curtailed access to and availability of equipment and products

The import of some WASH-related products and equipment has been difficult because of their designation as dual-use items. Such examples include chlorine products used for water disinfection (but also chemical weapons), alongside pumps, pipes, generators, membranes and filters. Moreover, as a consequence of the failure to import equipment and spare parts from Europe, there has been a shift within the Syrian Arab Republic towards the import of products, spare parts and machines of WASH infrastructures from European countries to Asian countries, especially China and India. Infrastructures in the Syrian Arab Republic are therefore increasingly composed of hybrid equipment made of European and Asian machines. This poses challenges to their functioning and is usually unaccompanied with after-sales support and services, which are crucial for many projects.

2. Over-compliance

The over-compliance measures taken by regional and international banks for each transaction connected to the Syrian Arab Republic has led to many delays and even cancellations. The chilling effect around UCMs has led to many private actors refusing to deal with anything connected to the country. There are difficulties to pay contractors and consultants with foreign bank accounts because of the banks' over-compliance measures.

At the same time, the importing of spare parts from initial suppliers, generally based in Europe, has been nearly made impossible or very difficult. Suppliers have been hesitant to take orders from the Syrian Arab Republic for fear of sanctions. Also, over-compliance by banks and shipping companies made the procurement of such goods in the Syrian Arab Republic difficult. Even in instances when suppliers accept to provide the needed spare parts or equipment (electrical equipment, medium voltage pumps and motors), imports suffer from severe delays that could exceed several years (between two and four years on average).

Alternative import sources have resulted in rising costs. Further causes include the difference between the official and underground economy exchange rates, higher costs of bank services and shipping costs due to the risk-averse actors that are hesitant to deal with the Syrian Arab Republic. As a result

of this situation, the prices of tenders by local companies more than doubled in the past few years. These effects of UCMs have worsened following the vote of Caesar Act in December 2019, including the prices and costs of services.

Finally, the implementation of humanitarian projects are delayed by long administrative processes caused by many factors, including over-compliance. Time estimated for the completion of each humanitarian project is between six months and more than a year, rather than around three months from the moment the partners receive the funds. Moreover, the impossibility to rebuild the necessary WASH infrastructures has impaired humanitarian services. A humanitarian expert explained that “clean water is not available for 47 per cent of the population who drink unclean water. Consequently, Cholera spread in many parts of the Syrian Arab Republic in September 2022 and the overall health conditions have been deteriorating. Many children in Damascus suburbs suffer from fluoride deficiency, which leads to dental caries and possibly osteoporosis. Treatment for these conditions is supposed to be easily accessible and cheap, yet it is unavailable due to the lack of necessary medicines and their high prices”.⁶⁰

3. Fuel shortage

The WASH sector is also affected by the repercussions of UCMs on the energy sector and availability of energy sources. For instance, fuel oil is required to operate water pumping stations in rural areas, and its unavailability affects access to water as well as its quantity and quality. Similarly, the transportation of international organisations’ and local organisations’ employees can be impacted by the poor availability of fuel oil, and their operations, including infrastructure repair and service provision, can be compromised.

D. Protection of cultural heritage sites

Just like other sectors, cultural heritage sites in the Syrian Arab Republic have suffered from the conflict. A study published in 2020 monitored 29 museums and places of worship that have sustained various damage due to military, aerial and ground bombardments. The study also dealt with the widespread looting of Syrian archaeological sites, noting that 40,635 artefacts have been stolen from museums, warehouses and places of worship since 2011.⁶¹ Since the

beginning of the conflict in March 2011, museums have been subject to vandalism, looting, bombing and destruction. Moreover, the UCMs affected this sector through:

- **Less rehabilitation and restoration projects for archaeological sites and buildings.** Many initiatives that were funded by the European Union and others were halted, except for the restoration of the Umayyad Mosque in Aleppo (funded by the Czech Republic) and the Aga Khan Network that operates at the local level.
- **Ceased scientific cooperation with international agencies,** including the organization of seminars and lectures, visits by foreign experts and academics, and scientific exchanges in the field. Similarly, all scientific exchanges between the universities, the Directorate of Antiquities and the concerned government authorities with similar foreign institutions outside the country have been suspended. Prior to the conflict, foreign experts used to work at some of these sites. However, these missions have been totally halted for a long period, and very few have resumed since 2019. The same applies to the exchange of information and new discoveries of buildings and sites. With very few exceptions, experts have been unable to work because they are forbidden to do so by their governments that are overcautious in light of the political situation and the UCMs. The required expertise to restore and manage buildings with correct techniques is missing, and foreign experts would have assisted in clearing passages and protecting heritage, especially following the earthquake.
- **Needed technical equipment and materials have been lacking in the local market,** as well as fuel oil, which affects field operations. Combined with the sanctions and the economic crisis, the cost of needed equipment and materials has increased in the local markets because of their scarcity and the difficulties of importing them.
- **Procurement processes and contracting of vendors and consultants have become marred with obstacles** and long bureaucratic processes to obtain vetting from donors. When the vetting is finally obtained, financial transactions become an additional problem due to lengthy delays in the payment in return for the contractors and consultants’ services.

Food security and the agriculture sector

Alongside the devaluation of the SyP and frequent droughts, UCMs impacted the agriculture sector, as follows:

a. Curtailed access to and availability of equipment and products

The broad definition of “dual-use goods” has prevented the import of particular equipment such as pipes, water pumps, power generators and spare parts, as well as a wide range of fertilizers, herbicides and pesticides needed for the cultivation of crops. The import of materials and equipment necessary to the recovery of the livestock sector has also been forbidden. Fodder production centres, breeding facilities and veterinary centres, vaccines and medicines, dairy processing centres, logistical needs and technical training have all been impacted. Such prohibitions have had repercussions on employment in the agriculture sector.⁶²

“UCMs have prevented the import of all types of machines (tractors, harvesters, threshers, water pumps, etc.), which resulted in a decline in the cultivated land”.⁶³

b. Increased price of agricultural inputs (pesticides, fertilizers, machinery, seeds)

The livestock sector has been affected by UCMs due to the dramatic increase in the prices of feed and medicines. Animal health deteriorated in general following the imposition of UCMs because of the significant obstacles and problems facing the import of medicines and vaccines. These goods have only been available in the black market and through smuggling, which has affected their quality as they do not go through any quality control procedures. The amounts of fertilizers and pesticides have for instance doubled and still are not fully effective, while herders have been forced to sell a large part of their livestock so the rest can survive.

In the north-east, the closure of Al-Yaroubiyeh border crossing in 2020 has led humanitarian actors, including both NGOs and INGOs, to purchase fertilizers, herbicides and pesticides and other related agricultural equipment for their programmes of assistance to farmers and peasants from traders who often smuggled these products, generally from Türkiye or Iraqi Kurdistan. The price of smuggled products is often inflated

and their quality is questionable.

c. Over-compliance

European firms have increasingly refused to export any type of equipment or production inputs, which are not forbidden, to the Syrian Arab Republic, for fear of sanctions violation, as revealed by an interviewee. Even if a European firm agreed to export to the Syrian Arab Republic, there would be significant challenges and problems in transferring the due amount because of UCMs.⁶⁴

d. Fuel shortage

Agriculture has suffered from the consequences of fuel shortages. Increased production costs have been compounded by the lack of electricity and water supply as well as intermittent gas shortages. The provision of fuel oil and gas oil by the State to farmers and peasants at a subsidized price is often delayed by days or weeks. In addition, they are insufficient for sustaining agricultural activities for a longer period of time. The rise in diesel and oil prices affects transport fees for farmers. Marketing silos are far away from farmers' land.⁶⁵ In this context, many small farmers have stopped producing, because they have been unable to cope with the rising prices of gasoline and other items.

“In particular, the shortage in electricity and in fuel (and the very high prices of the latter) have resulted in a decline in cultivated land, in addition to a large shift from irrigated crops to rainfed crops, which produce lower quantities”.⁶⁶

e. Limited rehabilitation of infrastructures connected to the agricultural sector

Donors do not always support the rehabilitation of irrigation systems. They might support privately-held local community canals and water control infrastructure. However, a similar rehabilitation activity would be forbidden if it benefits publicly-owned irrigation works. This results in significant problems, as local community irrigation is often dependent on larger-scale publicly-owned water infrastructure. This encompasses primary and secondary canals, pumping stations, reservoirs and water control mechanisms.⁶⁷

Finally, UCMs have affected the ability to import agriculture and farming research tools, equipment and material, which has, in turn, resulted in a large reduction in research and development activities. This situation has resulted in a

deteriorating output of produced crops, vegetables, fruits and livestock. It is expected that the retreat in agriculture and farming research and development will also lead to a deterioration in the quality of crops and bred animals.⁶⁸

Analysis (based on interviews with two key sector experts and one focus group meeting with farmers)

The thematic analysis with Syrian farmers and experts unanimously revealed that sanctions have impacted the farmers' livelihoods and productive capacities and assets. There was an unequivocal agreement among the key informants that sanctions have further impacted the agriculture sector and food security systems, which have already been fragmented by more than a decade of conflict. In parallel to this consensual discourse, there was a dichotomy in interpreting the role of existing policies in the deterioration of the sector and the livelihoods.

While the majority considered that the sanctions directly impeded production by hampering access to fuel, inputs, fertilizers, pesticides and veterinary products, others referred, implicitly, to the role of governance, accountability and illicit practices, using terms that lent to multiple interpretations, for security reasons. When asked whether the challenge was availability or cost, for example, both farmers and experts stressed that the black market and smuggling were counterbalancing the effects of sanctions on some commodities for the minority that could afford to pay. Combined with water scarcity, high prices and the poor quality of seeds and fertilizers forced some unprivileged farmers to abandon their land, sell their assets and move to the cities, as agriculture was no longer profitable enough to sustain their livelihoods, due to production costs. This has been a typical example of negative coping strategies.

During the meeting, the recurrence of words like “adds to” refers to factors other than sanctions that have been contributing to the agony of agricultural production and farmers' livelihoods. Access to subsidies and to more quantities of seeds and fertilizers has not been equitable. Probing questions indirectly revealed that among the causes was the abuse by “war-empowered individuals”. Thus, according to farmers, UCMs imposed against the Syrian Arab Republic with the purpose of accelerating change have mostly seriously impeded the ability of poor farmers to cope with the consequences of the conflict, which was compounded by COVID-19 and frequent droughts. UCMs even served and benefited those that they were supposed to impact, according to a Syrian expert. Noteworthy, according to the informants, is that UCMs have created another “class”, which will hamper the achievement of an equitable transition in the post-conflict context.

To understand how the impact of droughts compares to UCMs and factors of political economy, farmers have been considering drought from a fatalistic standpoint and tend to accept it. Meanwhile, UCMs and their effects are rather perceived as an intentional manmade decision by foreign countries, which is aggravated by “the practices of local powerful people”. Farmers also referred to the lack of any lasting impact of food aid, given the aid's size (far less than what farmers gave to the poor people in their communities during the harvest season before the conflict). The aid would be useful if it were invested in production assets restoration instead (water particularly).

Key informants stated that the repercussions of such a situation on food security and nutrition are direct. They consist of reducing the number of meals, eating less and eating cheap, consuming less diversified and affordable diet, which has visible health impacts, particularly on children and pregnant women. This has been another example of negative coping strategies. Farmers consider that such effects are the long-lasting impact of sanctions/food siege on the health and development of the young generation.

E. Humanitarian assistance

The UCMs have affected the effectiveness of the delivery of humanitarian assistance to Syrians in need. These shortcomings are, mainly, the result of dynamics connected to the “chilling effect” and over-compliance of foreign suppliers unwilling to deal with the Syrian Arab Republic, as well as the over-compliance of the banks, which has made the transfer of funds within the country more challenging.

A study conducted by the London School of Economics and Political Science in 2018 estimated that almost a third of all funds destined for the Syrian Arab Republic was held in a state of limbo because of obstructions in the correspondent banking system. The Financial Action Task Force’s stricter regulations on financial transactions did not lead to more transparency, but instead encouraged NGOs and some INGOs working in the country to use cash transfers or the informal Hawala⁶⁹ system. Similarly, an extensive study conducted by ESCWA/NAFS in 2016 found that “the combined effect of comprehensive, unilateral sanctions, terrorist concerns and the ongoing security environment have created immense hurdles for those engaged in delivering immediate humanitarian aid and wider stabilization programmes”.⁷⁰

Exceptions in the majority of sanctions regimes have not facilitated humanitarian operations on the ground. United States “general licenses” and European “exemptions” are only available under very particular conditions and follow a strict understanding of humanitarian assistance. Similarly, ad-hoc exceptions (known as “specific licenses” in the United States and “derogations” in the European Union) can authorize activities or the importation of particular goods only after approval on a case-by-case basis by a relevant United States or European Union authority.

According to this study, United Nations agencies, INGOs and NGOs found that the challenges in the Syrian Arab Republic resulting from the sanctions in place were related to four main areas:

1. Financial transactions.
2. Contracting and procurement.
3. Import of goods and equipment.
4. Humanitarian operations and projects.

1. The direct consequences of UCMs on humanitarian assistance

Financial transactions: There have been delays in and blockades of financial transactions and closure of European bank accounts of NGOs that are actively involved in the Syrian humanitarian crisis. Direct bank transfers to Syrian banks have become increasingly illegal or very difficult in many countries due to the multiple UCM regimes. This has also hampered transfers via the global correspondent bank network to neighbouring countries. Only few banks have therefore maintained their connections and branches in the Syrian Arab Republic. Financial transactions have also suffered long delays and are sometimes denied altogether. In addition, banks have tended to reject wire transfers to suppliers who are of Syrian origin or for materials that are being exported to the Syrian Arab Republic. United Nations agencies, INGOs and NGOs continue to face numerous obstacles to receiving their funds. The operations of more than 55 per cent of INGOs, which provided assistance to 4.1 million people throughout the country in the beginning of 2021, have been adversely affected.

Import of goods and equipment: Ability to import equipment, goods, spare parts and machines is diminished. The UCMs imposed on particular imported items (and certain exported goods) have created further obstacles in the local market in terms of supply, and even greater shortages and higher costs of these resources. In one case, a shipment of laptops from Dubai for an agency in the Syrian Arab Republic, which was loaded on the ship, was finally cancelled and unloaded, for fear of the Caesar Sanctions that entered into force on the same day. An interviewee explained that the purchase of a professional camera from Dubai (for communication activities) eventually took more than one year due to difficulties in its shipment. Moreover, a certain number of online platforms providing services essential to the management of their operation are not available and are blocked as a result of the sanctions imposed on the Syrian Arab Republic, including Workday, MIP Claims, the Cisco website, Webex Zoom, Adobe services, AutoCAD, Lenovo, HP website, and some ticketing platforms and banking applications. Some web-based services do not even include the Syrian Arab Republic as a country that can be selected, limiting access to learning and information, and restricting personal development and learning opportunities at large. Moreover, in any business via the internet, most European

Union and United States sites will block any connection from IP addresses from the Syrian Arab Republic.

Contracting and procurement: Ability to implement/complete development projects is reduced or severely delayed alongside these dynamics and similarly to other sectors, demands for no-cost extension (NCE) of projects since 2020 have become more and more frequent.

The procurement and contracting of vendors have become very difficult and obtaining vetting from donors now requires lengthy bureaucratic processes. This led to a decreased number of contractors and bidders submitting to tenders, and lower quality of bidders. Sometimes, procurement processes are cancelled altogether. In one instance, the procurement request for the supply of equipment for the electricity network was announced three times with no interested bidders, due to UCMs. No bidder could provide a bank guarantee to cover the requested warranty, given that no bank could offer this bond because of over-compliance with UCMs.

The difficulties in payment have led to a diminution of the average numbers of bidders in responding to procurement calls by United Nations agencies since 2020. Sometimes, procurement processes have to be repeated multiple times because of the lack or low number of applications.

In this context, many contractors and consultants are becoming less and less interested in working for and submitting offers to international organizations active on the ground, due to the severe payment delays and fluctuations of the SyP. These agencies often have to

renew procurements due to the lack or poor availability of applications.

2. Humanitarian operations and projects and other indirect consequences of UCMs

Overlapping sanctions regimes have created much uncertainty about how to comply with complex measures. Banks, exporters, transport companies and insurance companies have therefore nearly completely refused to conduct business in the Syrian Arab Republic, including with NGOs providing assistance to Syrian civilians. This has impacted the effectiveness of humanitarian operations.

Sanctions have contributed to shortages of basic goods, commodities and services. This has been partly due to the lack of clarity; risk-averse banks, insurance companies and shipping companies, and sellers of humanitarian goods that have, more often than not, preferred not to engage with anyone or anything related to the Syrian Arab Republic.

The UCMs have indirectly affected the daily operations of United Nations agencies, INGOs and NGOs in other ways, particularly through the “fuel and electricity channel”. As explained by an NGO project coordinator in Damascus, “due to the fuel and electricity shortage, we have considerably decreased the number of working hours, which has in turn resulted in a decline in our activities and services. This is coupled with the very high cost of fuel. Moreover, the shortage of fuel and its [high] price have forced us to limit the number of field visits/operations, resulting in a decline in our services in the areas surrounding Damascus”.

Conclusions and key policy recommendations

This study has provided a comprehensive analysis of the unintended impact of sanctions imposed against the Syrian Arab Republic, through an evidence-driven approach based on a mix of quantitative and qualitative methods. In addition to the literature review, the expert's views and qualitative analysis, the study offers rare insights into citizen perspectives in the Syrian Arab Republic. It is noticeable that the findings about Syrians' perceptions of sanctions apply to both government-held areas and beyond. Moreover, this paper tackles UCM issues encountered by those delivering humanitarian aid to this sanctioned country.

Based on the assessment and consultation, this study provides the following main recommendations for further engagement and analysis. They aim to help policymakers find innovative and sustainable ways to meet growing humanitarian needs despite the current sanctions in place.

The recommendations seek to recognize the cross-cutting nature of the different sectors (health, education, etc.) and make suggestions that would benefit all sectors. They can be divided into direct and indirect measures.

A. Continuously monitor citizen perceptions regarding the sanctions and their effects

Perceptions matter. To contribute to a change in policy and behaviour, sanctions must at least to some degree resonate with the population and/or members of the elite. It is clear from the representative survey that it is critical to carefully and continuously monitor how sanctions are seen among Syrian citizens and in the communities of target States more broadly. In a second step, these perceptions should be compared with the economic and social costs of the sanctions.

In particular, if the objectives of the sanctions were not met, sanctioning entities may consider not only opting for

more targeted measures, but also adjusting sanctions after conducting an ex post-impact assessment or a post-legislative scrutiny. The latter would assess whether the law, since its entry into effect, was implemented, and whether it achieved its intended objectives.

Further strengthening/broadening UCMs against the Syrian Arab Republic should be rethought because, in their current form, these measures will most probably continue to impact large sectors of the population and the economy, including basic services (education, health, WASH) and productive sectors (manufacturing and agriculture), as well as the work of humanitarian organizations and NGOs.

This resonates with the findings of prior studies conducted for NAFS⁷¹ and mainly addressed to sanctioning entities:

- Take measures to sharpen both the political objectives of the sanctions and their measures to minimize their adverse repercussions on the population and on the work of humanitarian organizations.
- Be more specific regarding the nature of “dual use” items, about the type of permitted or not permitted relief, and consider expanding exempted items to include medical and educational items, as well as agricultural raw materials, inputs and equipment.
- Create a positive incentive structure that clearly outlines the specific steps required to alleviate sanctions.

B. Limit over-compliance and chilling effects

Despite recent attempts to extend and clarify the nature of humanitarian exemptions (United States: general and specific licenses; European Union: exemptions and derogations), in some cases actors go beyond the actual restrictions and do not utilize humanitarian exemptions due to their complexity and the insecurity they create. Practitioners and academics alike describe these responses as “over-compliance” and “de-risking”,⁷² which create a general “chilling effect”. To counter these effects, the analysis recommends to:

- Allow the United Nations and its representatives to export humanitarian goods to the Syrian Arab Republic without a licence. The United States Government has set a list of items that meet “basic human needs” for which no licence is required under the export control regulations for qualifying exports to all countries, except Iran and the Syrian Arab Republic. The proposed United Nations-specific license exception should cover the full range of the pre-existing “basic human needs” list.
- Allow the export of medical devices, including software and related updates for those devices, to the Syrian Arab Republic without a licence.
- The United Nations, in conjunction with the United States, the European Union and other stakeholders, could lead the creation of a fast-tracked procurement/licenced channel for the required medicines, pharmaceutical products and essential medical equipment into the Syrian Arab Republic.
- Sanctioning entities may consider providing licenses for suppliers currently holding long-term agreements with United Nations agencies and INGOs. They could also develop a database of vendors who are cleared/pre-verified to conduct business in the Syrian Arab Republic. This could include making available a dedicated contact person in the capitals of the main sanctioning countries to swiftly provide clarification to current and potential suppliers willing to do business with humanitarian agencies in the Syrian Arab Republic.
- Clarify policies and provide additional guiding tools by the sanctioning authorities.⁷³ This would facilitate the humanitarian exemption system and make it more successful. Sanctioning parties should seek to standardize practices and develop common guidance on

exemptions, including clear regulations and information on what trade is permitted and what procedures humanitarian agencies need to undertake to engage in such trade.

- Sanctioning entities could consider revising or extending frequently asked questions (FAQs), including the questions and answers provided on regular basis for NGOs and private sector entities (particularly banks and suppliers), regarding enforcement actions arising from humanitarian transactions. This would increase confidence that fines will not be pursued for solely technical violations, provided there was no intent to break the law and no egregious neglect.⁷⁴
- Sanctioning entities could develop awareness campaigns and provide incentives for private actors to participate more actively in the humanitarian aid process. Moreover, both the United States Government and the European Union could reach out to NGOs operating in the Syrian Arab Republic and their associated banks, so that they understand the rules, regulations and whom to contact for questions.
- Sanctioning entities could consider making high-end regulatory technology (REGTECH) more readily available to small and medium-sized NGOs, to enable them to carry out proper risk assessments and establish their own sanctions and anti-money laundering and combating the financing of terrorism (AML/CFT) compliance programmes. Such an initiative would greatly reduce the reluctance of banks and financial institutions to deal with these vital civil sector organizations.

C. Support functioning banks/ financial institutions

The most pressing need is to manage the legal transactions of humanitarian agencies, NGOs and INGOs operating in conflict zones, without fear from the consequences of UCMs.

- Reduce the complexity and administrative burden associated with the restrictions placed on the financial transactions of financial institutions.
- Sanctioning entities could survey banks, with the aim to produce a list of major international banks willing to undertake properly authorised transactions involving the Syrian Arab Republic.⁷⁵

- Make better use of available technology to avoid risk aversion that impacts remittances and aid work.
- Establish a financial channel between a correspondent bank and a private bank in the Syrian Arab Republic for Damascus-based humanitarian organizations to transfer directly and access funds in the country.⁷⁶
- The Governments of the United States and the European Union, together with the United Nations, banks and NGOs could collaborate to identify appropriate informal payment channels into the Syrian Arab Republic. Given the vast sums channelled into this country via these networks, there is an urgent need for governments and regulators to become more engaged in a proactive dialogue on the realities of operating in the Syrian Arab Republic.

D. Sustain continuous dialogue and consultations

Communication needs to be strengthened between sanctioning entities, on one side, and United Nations agencies, INGOs and NGOs that are active in the Syrian Arab Republic, on the other, regarding the impact of UCMs on their operations. Similarly, sanctioning authorities could provide regular

information on the implementation of measures taken to facilitate financial transactions and procurement in the Syrian Arab Republic.⁷⁷ Additional targeted recommendations could be considered, such as:

- Provide humanitarian agencies, NGOs and INGOs free or at cost access to legal aid or services when navigating the various sanctions regimes. This will assist in determining how sanctions will affect the client's activities and, where appropriate, will develop and submit license applications on the client's behalf to obtain.
- Sanctioning entities could consider monitoring the impact whenever possible.⁷⁸
- Sanctioning entities, along with other actors, could work together to identify priority infrastructure and stabilization requirements and facilitate appropriate public-private dialogue with relevant suppliers to overcome sanctions concerns.
- Sanctioning entities could consider undertaking a strategic review of future priorities and licensing processes, to facilitate recovery related transactions and activities for resilience building and effective stabilization efforts, thereby enhancing sustainable livelihoods.

Endnotes

- 1 United Nations Office for the Coordination of Humanitarian Affairs (OCHA), “Syrian Arab Republic: 2024 Humanitarian Needs Overview (December 2023)”. 21 December 2023.
- 2 The Syria Report, Chart: top funders for the Syrian humanitarian crisis (2015–2021), 2022.
- 3 The terms “unilateral coercive measures” (UCMs) and “sanctions” are used interchangeably in this report.
- 4 Gary Clyde Hufbauer and others, *Economic Sanctions Reconsidered*, 3rd edition. Washington, D.C.: Peterson Institute of International Economics, 2007.
- 5 Joseph Daher and Erica Moret, *Invisible Sanctions: How Over-Compliance Limits Humanitarian Work on Syria. Challenges of Fund Transfer for Non-Profit Organizations Working on Syria*. Berlin: IMPACT – Civil Society Research and Development e.V., 2020, 15.
- 6 Alice Debarre, *Making Sanctions Smarter: Safeguarding Humanitarian Action*. New York, NY: International Peace Institute, 2019, 10.
- 7 By unintended impact of sanctions, the study means impacts falling outside of the stated objectives of the UCM measures as formally adopted.
- 8 The United States Department of State, *Syria Sanctions*.
- 9 ESCWA, *a Lifeline Under Threat? Syrian Household Remittances in Light of Sanctions, Financial Sector De-risking, COVID-19, and Regional Developments*, 2022.
- 10 Carter Center, *Effectiveness of Humanitarian Exceptions to Sanctions: Lessons from the Syria Earthquake*. 11 July 2023.
- 11 Congress.Gov, H.R.3202, *Assad Regime Anti-Normalization Act of 2023*. 16 May 2023.
- 12 As part of this research, various international, regional and national published and unpublished literature sources, websites and media material were reviewed. The literature review encompassed more than 30 documents shared by many United Nations agencies operating in the Syrian Arab Republic, key documents extracted from literature produced by the National Agenda for the Future of Syria (NAFS) on sanctions and more than 20 documents from other sources (including literature from major think tanks, academic institutions and other humanitarian organizations, including the Carter Center, the London School of Economics, the Danish Refugee Council, OXFAM, the Graduate Institute Geneva and others).
- 13 Gary Clyde Hufbauer, Jeffrey J. Schott and Kimberley Ann Elliott, *Economic Sanctions Reconsidered*, vol. 2nd edition. Washington, D.C.: Peterson Institute of International Economics, 1990.
- 14 Ibid.
- 15 Robert A. Pape, *Why economic sanctions do not work*, *International Security* 22, no. 2. 1 October 1997: 90–136.
- 16 Francesco Giumelli, *Coercing, Constraining and Signalling: Explaining and Understanding International Sanctions After the End of the Cold War*. Colchester: European Consortium for Political Research (ECPR), 2011.
- 17 John Mueller and Karl Mueller, *Sanctions of mass destruction*, *Foreign Affairs*, May 1, 1999; Thomas George Weiss, George A.

Lopez and Larry Minear, *Political Gain and Civilian Pain: Humanitarian Impacts of Economic Sanctions*. Rowman & Littlefield Publishers, 1997.

- 18 Dursun Peksen, Economic sanctions and human security: The public health effect of economic sanctions, *Foreign Policy Analysis* 7, no. 3 (2011): 237–51; Susan Hannah Allen and David J Lektzian, Economic sanctions: a blunt instrument?, *Journal of Peace Research* 50, no. 1. 1 January 2013: 121–35. no. 1 January 1, 2013.
- 19 Matthias Neuenkirch and Florian Neumeier, The impact of US sanctions on poverty, *Journal of Development Economics* 121. July 2016: 110–19.
- 20 Sylvanus Kwaku Afesorgbor and Renuka Mahadevan, The impact of economic sanctions on income inequality of target states, *World Development* 83. 1 July, 2016: 1–11; Jin Mun Jeong, Economic sanctions and income inequality: impacts of trade restrictions and foreign aid suspension on target countries, *Conflict Management and Peace Science* 37, no. 6. 2020: 674–693. 10 February 2020.
- 21 Sylvanus Kwaku Afesorgbor, Sanctioned to starve? The impact of economic sanctions on food security in targeted States, *Research Handbook on Economic Sanctions*. 10 December 2021.
- 22 Ryan Yu-Lin Liou, Amanda Murdie and Dursun Peksen, Revisiting the causal links between economic sanctions and human rights violations, *Political Research Quarterly*. 16 July 2020, Jerg Gutmann, Matthias Neuenkirch and Florian Neumeier, Precision-guided or blunt? The effects of US economic sanctions on human rights, *Public Choice* 185, no. 1–2 (2020); Reed M. Wood, *A hand upon the throat of the nation: economic sanctions and State repression*, 1976–2001, *International Studies Quarterly* 52, 2008: 489–513.
- 23 Jerg Gutmann, Matthias Neuenkirch and Florian Neumeier, Sanctioned to death? The impact of economic sanctions on life expectancy and its gender gap, *The Journal of Development Studies* 57, no. 1. 2 January 2021: 139–62.
- 24 Zoë Pelter, Camila Teixeira and Erica Moret, *Sanctions and their impact on children*, Discussion Paper. New York, NY: Office of Global Insight and Policy, United Nations Children's Fund (UNICEF), 2022.
- 25 Cristiane Lucena Carneiro and Laerte Apolinário Jr, Targeted versus conventional economic sanctions: what is at stake for human rights?, *International Interactions* 42, no. 4. 7 August 2016: 565–89; Bryan R Early and Marcus Schulzke, Still unjust, just in different ways: how targeted sanctions fall short of just war theory's principles, *International Studies Review* 21, no. 1. 1 March 2019: 57–80.
- 26 Joy Gordon, The hidden power of the new economic sanctions, *Current History* 118, no. 804. 1 January 2019: 3–10; Erica S. Moret, Humanitarian impacts of economic sanctions on Iran and Syria, *European Security* 24, no. 1. 2 January 2015: 120–40; Erica Moret, *Unilateral and extraterritorial sanctions in crisis: implications of their rising use and misuse in contemporary world politics*, in *research handbook on unilateral and extraterritorial sanctions*, ed. Beaucillon Charlotte (Cheltenham: Edward Elgar Publishing, 2021), 19–36.
- 27 Pape, Why economic sanctions do not work, *International Security*, vol. 22, issue 2, autumn 1997.
- 28 World Bank Group, *The Toll of War: The Economic and Social Consequences of the Conflict in Syria*. Washington, D.C.: World Bank, 2017.
- 29 The United Nations Economic and Social Commission for Western Asia (ESCWA) and the University of St Andrews, *Syria at War: Eight Years On*, 2020.
- 30 Gutmann, Neuenkirch and Neumeier, Sanctioned to death? The impact of economic sanctions on life expectancy and its gender gap.

- 31 Mian Dai and others, Timing the Impact of Sanctions on Trade, Research Handbook on Economic Sanctions, 10 December 2021, 411–37.
- 32 Jerg Gutmann, Matthias Neuenkirch and Florian Neumeier, Precision-guided or blunt? The effects of US economic sanctions on human rights; Christian von Soest and Michael Wahman, Are democratic sanctions really counterproductive? Democratization 22, no. 6. 19 September 2015: 957–80.
- 33 The increasingly complex regulatory environment creates a raft of bureaucratic challenges, reputational considerations and risks of penalties to banks and other private and not-for-profit sector organizations. This has led to a worldwide phenomenon of overcompliance with sanctions and wider regulations, also referred to as “de-risking” and the “chilling effect”. Even when certain activities, trade or financial transactions with a country such as the Syrian Arab Republic are permitted through sanctions’ licences that provide exemptions and exceptions, many will simply withdraw from a given jurisdiction, as the risks are simply deemed too great.
- 34 Dursun Peksen, When do imposed economic sanctions Work? A critical review of the sanctions effectiveness literature, Defence and Peace Economics 30, no. 6. 19 September 2019: 635–47.
- 35 Lee Jones, Societies Under Siege: Exploring How International Economic Sanctions (Do Not) Work. Oxford: Oxford University Press, 2015.
- 36 The survey included a range of questions. For the most part, these were ‘closed’ questions yielding structured data. For each question, respondents were provided with a range of answers they could choose from. The survey also included open-ended questions, in which respondents were asked to describe experiences and steps they have taken to try to overcome/mitigate the impact of the sanctions.
- 37 Eight respondents out of 1187 did not answer this question.
- 38 The survey was conducted between January and April 2022. This sample size is considered statistically significant for a general survey, with a 3 per cent margin of error and a 95 per cent confidence level.
- 39 A total of 1187 persons, namely 468 women and 719 men, were surveyed, as follows: 672 persons in the GoS-controlled areas (56.7 per cent of the total people surveyed); 254 persons in the north-east, in territories under the control of AANES (21.4 per cent); 261 persons in the north-west, in territories under the control of the Turkish authorities and Hay’at Tahrir al-Sham (HTS) (21.9 per cent).
- 40 Syria GL22 authorizes “activities in the following economic sectors in specified non-regime-held areas of the Syrian Arab Republic: agriculture; information and telecommunications; power grid infrastructure; construction; finance; clean energy; transportation and warehousing; water and waste management; health services; education; manufacturing and trade”. United States Department of State, Authorizing specified economic activities in non-regime held areas of Northeast and Northwest Syria in support of D-ISIS efforts, 2022.
- 41 The number of Syrians with bank accounts in 2011 was estimated to only 23 per cent of the adult population (aged over 15). Source: Joseph Daher, The Private Banking Sector in Syria: Between Survival and Opportunity, Research Project Report. Florence: European University Institute, Middle East Directions, Wartime and Post-Conflict in Syria, 2021.
- 42 Research conducted by the Norwegian Refugee Council (NRC) in the end of 2021 among over 400 people found that only 10 per cent of the surveyed population were “able to meet the \$206 needed each month to cover food, rent, education and other essentials. Food tops the list of needs and is among the most rationed items for the majority of people separately interviewed by NRC in 2022, with 87 per cent stating that they now have to skip meals to meet other living costs”. See NRC (2022), “How are we expected to survive this?”: The impact of Syria’s economic crisis on families, Relief Web.
- 43 36 semi-structured interviews were conducted between March 2022 and May 2023.
- 44 Interview with the director of a private hospital. May 2022.

- 45 Interview with an infectious disease doctor. 31 July 2022.
- 46 Interview with a clinical advisor for infectious diseases in north-east Syria. 17 April 2022.
- 47 Prior to the conflict, the domestic pharmaceutical industry covered around 90 per cent of national drug needs and exported drugs to between 45 and 60 countries. The number of pharmaceutical factories in the Syrian Arab Republic reached more than 60, producing nearly 7,000 types of medicinal products and offering jobs to between 17,000 and 26,000 employees. Following 2011, the pharmaceutical industry suffered massive destruction.
- 48 A director of a private hospital recounts how importing from Eastern countries such as China and India has become more difficult, due to the higher cost of raw materials by 20 per cent and 70 per cent, respectively, and to the rise in shipping costs.
- 49 Byron Andronik, An inhumane response – The humanitarian consequences of sanctions: a case study of Syria, UCL Global Governance Institute Working Paper Series, 2018.
- 50 Byron Andronik, An inhumane response – The humanitarian consequences of sanctions: a case study of Syria, UCL Global Governance Institute Working Paper Series, 2018.
- 51 UNICEF, Sanctions and their impact on children – discussion Paper, 2022.
- 52 UNICEF, Budget brief, the 2022 State budget in Syria, 2022.
- 53 Collected from a semi-structured interview with an expert on education in the Syrian Arab Republic. 4 August 2022.
- 54 Kinana Qaddour and Salman Husain, Syria's education crisis: a sustainable approach after 11 years of conflict, 2022.
- 55 "For example, Coursera (the United States online course provider) prevents the download of its material from any IP address in the Syrian Arab Republic and deprives residents in this country from obtaining its learning material". Interview with an expert on education in the Syrian Arab Republic. 17 August 2022.
- 56 Virtual semi-structured interview with an expert on education. 17 August 2022.
- 57 Salwa Ahmad, Education as an arena of political contestation: The case of Qamishli City in north-east Syria, research project report Florence: European University Institute, Middle East Directions, Syria Trajectories, June 2023.
- 58 Interview with an expert on education. 4 August 2022.
- 59 Interview with an education expert active in the north-east. 4 May 2023.
- 60 Interview with a humanitarian expert. 13 September 2022.
- 61 Al-Jazeera, Report documents severe damage to Syrian heritage and museums, 2020.
- 62 Jon Unruh, The priority dilemma of Western sanctions on Syria's agricultural reconstruction, Journal of Intervention and Statebuilding, 2 March 2021.
- 63 Interview with an expert in agriculture and higher education. 10 August 2022.
- 64 Ibid.
- 65 Interview with seven farmers and herders and one expert in the Syrian Arab Republic.
- 66 Interview with an expert in agriculture and higher education. 10 August 2022.
- 67 Jon Unruh, The priority dilemma of Western sanctions on Syria's agricultural reconstruction, Journal of Intervention and Statebuilding. 2 March 2021.
- 68 Interview with an expert in agriculture and higher education. 10 August 2022.
- 69 The Hawala system is one of the international financial transfer systems operated under different names in various regions

of the world. It is an informal channel for transferring funds from one location to another through service providers, known as Hawaladars. The vast majority of the Hawala transactions are remittances sent by migrant workers living in a developed country to their home country, generally a developing country. ESCWA, A lifeline under threat: Syrian household remittances in light of sanctions, financial sector de-risking, COVID-19, and regional development, 2022. See also: Stuart Gordon and others, The impact of bank de-risking on the humanitarian response to the Syrian crisis, Humanitarian Forum, HPG and the London School of Economics and Political Science (LSE), 2018.

- 70 ESCWA and Office of the United Nations resident coordinator in the Syrian Arab Republic, Humanitarian impact of Syria-related unilateral restrictive measures, 2016.
- 71 ESCWA and Office of the United Nations resident coordinator in the Syrian Arab Republic, Humanitarian impact of Syria-related unilateral restrictive measures, 2016; ESCWA, Examining viable banking and payment channels for the movement of international humanitarian funds into Syria, 2017.
- 72 De-risking is defined by the Financial Action Task Force (FATF) as “the phenomenon of financial institutions terminating or restricting business relationships with clients or categories of clients in order to avoid rather than manage risk in line with the FATF’s risk-based approach”. See FATF, 2014.
- 73 On mitigating financial access challenges, see Sue E. Eckert, Jacob Kurtzer and Sierra Ballard, Mitigating financial access challenges. Proposals from the CSIS Multi-Stakeholder Working Group on Financial Access. Washington, D.C.: CSIS Humanitarian Agenda, Center for Strategic and International Studies (CSIS), 2022.
- 74 ESCWA and the Office of the United Nations Resident Coordinator in the Syrian Arab Republic, Humanitarian impact of Syria-related unilateral restrictive measures, (2016).
- 75 Ibid.
- 76 Carter Center, Navigating humanitarian exceptions to sanctions against Syria: challenges and recommendations. Atlanta, GA: The Carter Center, 2020.
- 77 Ibid.
- 78 In May 2022, the OFAC issued updated General Licenses for most parts of the Syrian Arab Republic that are currently outside the control of the GoS. Nonetheless, aid practitioners and analysts have expressed scepticism that private investment will flow into areas covered by the waivers, in part due to the “sticky” legacy of sanctions and ambiguity concerning compliance risks that may fall outside their scope.



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