



# Compliance Communiqué

## Guidance on Authorized Transactions Related to Earthquake Relief Efforts in Syria

FEBRUARY 21, 2023

In response to the devastating earthquakes in Syria on February 6, 2023, the Department of the Treasury's Office of Foreign Assets Control (OFAC) authorized activity supporting emergency earthquake relief efforts in Syria that would otherwise be prohibited by U.S. sanctions in Syria. Specifically, OFAC issued a broad authorization in the form of a general license, General License [\(GL\) 23](#), to authorize for 180 days certain transactions related to earthquake relief efforts that would otherwise be prohibited by the Syrian Sanctions Regulations. This license supplements broad humanitarian authorizations already in effect under the Syrian Sanctions Regulations for nongovernmental organizations (NGOs), international organizations, and the U.S. government that authorize the provision of disaster relief to Syria.

Specifically, GL 23 expands upon existing humanitarian authorizations to enable foreign governments and private companies to provide support to earthquake relief efforts in Syria and provides additional assurances to financial institutions who process such transactions. This guidance responds to specific questions OFAC received related to earthquake relief efforts in Syria and explains how to provide legitimate humanitarian assistance to the Syrian people in compliance with U.S. sanctions. GL 23 reflects the United States' commitment to support the people of Syria through their ongoing humanitarian crisis—it is not a change in policy toward the Assad regime. While this authorization alone cannot remedy the many challenges of operating and providing aid in Syria, it can ensure that U.S. sanctions do not inhibit relief following the earthquake disaster.

### Important Considerations for Reviewing This Guidance

GL 23 only authorizes certain transactions prohibited by the Syrian Sanctions Regulations through **August 8, 2023, 12:01 a.m. eastern daylight time**.

Non-U.S. persons do not risk exposure to U.S. sanctions for engaging in activity that is authorized for U.S. persons under GL 23.

GL 23 contains two key conditions: First, GL 23 does not authorize transactions involving any person whose property and interests in property are blocked pursuant to the Syrian Sanctions Regulations other than the Government of Syria, as described in 31 CFR § [542.305\(a\)](#), unless separately authorized. Second, GL 23 does not authorize transactions prohibited by 31 CFR § [542.208](#) (prohibiting importation into the United States of petroleum or petroleum products of Syrian origin).

Nothing in GL 23 relieves any person from compliance with any other Federal laws or requirements of other Federal agencies.

## Donating Money and Raising Funds for Earthquake Relief Efforts in Syria

### May I donate money to NGOs in support of earthquake relief efforts in Syria?

**Yes.** U.S. persons may make monetary donations to and raise funds on behalf of NGOs, including non-U.S. NGOs, in support of earthquake relief efforts in Syria. Non-U.S. persons do not risk exposure to U.S. sanctions for engaging in activity that is authorized for U.S. persons under GL 23. For more information about authorized NGO activities involving Syria beyond the scope of GL 23, see 31 CFR § 542.516.

### May I raise funds for earthquake relief efforts in Syria through crowdfunding?

**Yes.** U.S. persons may raise funds for earthquake relief efforts in Syria authorized by GL 23 through crowdfunding.

### Are there any caps on fundraising for earthquake relief efforts in Syria?

**No.** GL 23 does not impose restrictions on the amount of funds raised for earthquake relief efforts in Syria.

### What are examples of earthquake relief efforts?

Examples of earthquake relief efforts include, among other things, the provision of assistance, food, medicine, water, health, sanitation, and emergency services to people displaced or injured by the earthquake; erecting temporary shelters; search and rescue operations; removing rubble from collapsed buildings; stabilizing damaged buildings; stabilizing or repairing roads and other critical infrastructure

damaged in the earthquake; remediation of pollution or environmental damage; repairing or rebuilding damaged hospitals and schools in earthquake-affected areas; and building safety inspections related to assessing the structural integrity of, and damage to, buildings from the earthquake.

## Sending Money to the People of Syria

### May I send money directly to Syrian friends and family for earthquake relief?

**Yes.** Specifically, U.S. persons may send funds to non-sanctioned Syrian individuals and entities for earthquake relief efforts. Moreover, in addition to activity authorized under GL 23, U.S. persons are also authorized to send noncommercial, personal remittances to Syria, subject to certain conditions. (See 31 CFR § 542.512.)

### May I send such authorized funds and remittances to friends, family, and NGOs for earthquake relief efforts in Syria through digital payments, instant payments, or online platforms or services?

**Yes.** For authorized activity under GL 23, such as sending funds to non-sanctioned Syrian individuals for earthquake relief, U.S. persons are not required to send funds through any specific mechanism (such as through a bank).

## Sending Goods to Syria

### May I export or reexport food or medicine to Syria for earthquake relief efforts?

The Department of Commerce, Bureau of Industry and Security (BIS) has jurisdiction over the export or reexport of most items to Syria. Most food and medicine do not require a BIS license for export to Syria. All questions regarding exporting goods to Syria should be directed to BIS by email [Foreign.Policy@bis.doc.gov](mailto:Foreign.Policy@bis.doc.gov) or by phone at 202-482-4252.

### May I export items other than food and medicine to Syria in connection with earthquake relief efforts?

**It depends.** For exports or reexports of items other than most food or medicine, a license from BIS is required. BIS has expedited the processing of export license applications for items needed to aid earthquake survivors in Syria. For more information and to apply for an export license, U.S. persons should consult the [BIS Syria web page](#) or contact BIS by email [Foreign.Policy@bis.doc.gov](mailto:Foreign.Policy@bis.doc.gov) or by phone at 202-482-4252.

## Providing Services to Syria

### May I provide services to Syria to support earthquake relief efforts?

**Yes.** Subject to certain conditions, GL 23 authorizes all transactions related to earthquake relief efforts in Syria, including the export, reexport, sale, or supply of services otherwise prohibited by the Syrian Sanctions Regulations.

### May I engage in or fund building safety inspections related to the earthquake in Syria?

**Yes.** GL 23 authorizes all transactions related to earthquake relief efforts in Syria that would otherwise be prohibited by the Syrian Sanctions Regulations, subject to certain conditions. Building safety inspections related to assessing damage from the earthquake and prevent further collapse would be authorized.

## Processing Earthquake Relief Financial Transactions

### Are U.S. financial institutions allowed to process transactions related to earthquake relief efforts in Syria?

**Yes.** Subject to the conditions described in GL 23, all transactions related to earthquake relief efforts in Syria are authorized. U.S. financial institutions and U.S.-registered money transmitters may rely on the originator of a funds transfer with regard to compliance with the terms of GL 23, provided that the financial institution does not know or have reason to know that the funds transfer is not in compliance with the terms of GL 23.

## Activity Involving the Government of Syria

### Are transactions related to earthquake relief efforts in Syria prohibited if they involve the Government of Syria?

**No.** Transactions related to earthquake relief efforts in Syria involving the Government of Syria, as defined in 31 CFR § [542.305\(a\)](#), that would otherwise be prohibited by the Syrian Sanctions Regulations are authorized by GL 23. Note that GL 23 does not authorize transactions involving other persons blocked pursuant to the Syrian Sanctions Regulations, including corporations, partnerships, associations, or other entities directly or indirectly owned or controlled by the Government of Syria. GL 23 applies only to transactions related to earthquake relief efforts.

### Am I allowed to pay taxes, tolls, and fees to the Government of Syria in connection with earthquake relief efforts?

**Yes.** The broad authorization in GL 23 includes transactions such as taxes, tolls, and fees paid to the Government of Syria, as defined in 31 CFR § [542.305\(a\)](#), related to earthquake relief efforts in Syria.

### Can NGOs fund earthquake relief efforts by search and rescue units affiliated with the Government of Syria?

**Yes.** Transactions related to earthquake relief efforts in Syria involving the Government of Syria, as defined in 31 CFR § [542.305\(a\)](#), that would otherwise be prohibited by the Syrian Sanctions Regulations are authorized by GL 23, subject to certain conditions.

The term “**Government of Syria**” in 31 CFR § [542.305\(a\)](#) includes “The state and the Government of the Syrian Arab Republic, as well as any political subdivision, agency, or instrumentality thereof, including the Central Bank of Syria.” GL 23 does not authorize transactions involving any entities owned 50 percent or more by the Government of Syria (such as state-owned entities), or any entity controlled by the Government of Syria. (See 31 CFR § [542.305.](#))

## NGOs Providing Humanitarian Aid to Syria

### May U.S. NGOs engage in activities to support humanitarian projects, including earthquake relief efforts, in Syria?

**Yes.** GL 23 authorizes all transactions related to earthquake relief efforts in Syria that would otherwise be prohibited by the Syrian Sanctions Regulations, subject to certain conditions. GL 23 supplements broad authorizations already in place regarding humanitarian activity by NGOs in Syria. For more information, please review 31 CFR § [542.516](#) and [FAQ 231](#).

### May U.S. NGOs export goods to Syria in support of humanitarian projects?

All questions regarding exporting goods to Syria should be directed to the Department of Commerce, BIS: [Foreign.Policy@bis.doc.gov](mailto:Foreign.Policy@bis.doc.gov) or 202-482-4252. Note *most* food and medicine do not require a BIS license for export to Syria.

## The earthquake affected some areas of Syria where sanctioned groups operate. Are NGOs permitted to provide humanitarian aid in these areas?

**Yes.** GL 23 authorizes all transactions related to earthquake relief efforts in Syria that would otherwise be prohibited by the Syrian Sanctions Regulations, subject to certain conditions. In addition, on December 21, 2022, OFAC added an NGO general license to the Global Terrorism Sanctions Regulations and to the Foreign Terrorist Organizations Sanctions Regulations. Pursuant to these general licenses, NGOs who are not blocked persons are authorized to engage in non-commercial activities in support of humanitarian projects to meet basic human needs, including disaster relief. These general licenses also permit the transfer of funds necessary to engage in these activities, as long as the intended beneficiary is not blocked under the relevant counterterrorism authority (with certain exceptions for taxes, fees, or import duties). For more information, see 31 CFR § § [594.520](#) and [597.516](#).

## May U.S. persons engage in humanitarian efforts in areas not affected by the earthquake and unrelated to earthquake relief?

**It depends.** The authorization in GL 23 is limited to transactions related to earthquake relief efforts in Syria (see above for examples of earthquake relief efforts). To learn more about providing humanitarian assistance to Syria unrelated to earthquake relief, please see 31 CFR § [542.516](#) and OFAC's [Guidance Related to the Provision of Humanitarian Assistance by Not-For-Profit Non-Government Organizations](#), or contact [OFAC's Compliance Hotline](#) for guidance.

## Does GL 23 authorize U.S. persons to engage in long-term reconstruction efforts in Syria?

**No.** The authorization in GL 23 is limited to a period of 180 days (through August 8, 2023, 12:01 a.m. eastern daylight time) and to transactions otherwise prohibited under the Syrian Sanctions Regulations that support earthquake relief efforts in Syria, such as erecting temporary shelter, removing rubble from collapsed buildings, stabilizing damaged buildings, repairing roads and other critical infrastructure damaged in the earthquake, and repairing or rebuilding of damaged hospitals and schools in earthquake-affected areas. Projects exceeding 180 days do not fall within the scope of GL 23.

## May U.S. persons continue to provide humanitarian assistance to Syria after GL 23 expires?

**It depends.** Subject to certain limitations, U.S. NGOs are authorized to engage in certain non-commercial activities in support of humanitarian projects in Syria. In addition, subject to certain narrow limitations, OFAC has also authorized transactions and activities that are for the conduct of the official business of the United Nations, including its specialized agencies, programmes, funds, and related organizations by employees, contractors, or grantees of those organizations. All transactions that are for the conduct of the official business of the United States Government by employees, grantees, or contractors thereof are also authorized. For more information, please review [FAQ 231](#), 31 CFR § § [542.513](#), [542.516](#), and [542.522](#).

## Activity by Foreign Governments in Syria

**Can foreign governments provide assistance to Syria for earthquake relief efforts without facing exposure to U.S. sanctions, including in Assad regime-held areas?**

**Yes.** As stated above, non-U.S. persons do not risk exposure to U.S. sanctions for engaging in activity that is authorized for U.S. persons under GL 23. We encourage our foreign government partners to reach out to OFAC if they have questions related to disaster-related assistance they wish to provide.

**Do foreign governments risk sanctions for exporting to Syria heating fuels and diesel for earthquake relief efforts?**

**No.** Foreign governments do not risk sanctions exposure for importing heating fuels and diesel into Syria, so long as (1) the transactions do not involve any blocked person other than the Government of Syria, as defined in 31 CFR § [542.305\(a\)](#), and (2) the activities are for the purpose of providing earthquake relief to the people of Syria.

## Caesar Syria Civilian Protection Act of 2019 (Caesar Act)

**Do non-U.S. persons, including NGOs and financial institutions, risk exposure to U.S. sanctions pursuant to the Caesar Act for activities that would be authorized under GL 23?**

**No.** With respect to non-U.S. persons, OFAC will not consider transactions to be “significant” for the purpose of a sanctions determination under the [Caesar Act](#) if U.S. persons would not require a specific license from OFAC to participate in such a transaction. Accordingly, non-U.S. persons, including NGOs and foreign financial institutions, would not risk exposure to sanctions under the Caesar Act for engaging in activity, or facilitating transactions and payments for such activity, that is authorized for U.S. persons under GL 23. For more information, please see [FAQ 884](#).

### Additional Information

OFAC prioritizes specific license applications and requests for guidance related to humanitarian activity. For transactions that are neither exempt nor generally authorized by OFAC, please see OFAC's [License Application Page](#) for information about the specific licensing process.

For more information regarding compliance with OFAC regulations by NGO and not-for-profit entities, we encourage you to review [OFAC guidance on this topic](#).

If you have information about activities that do not comply with OFAC sanctions, please contact the OFAC Compliance Hotline.

**OFAC Compliance Hotline**  
**[OFAC\\_Feedback@treasury.gov](mailto:OFAC_Feedback@treasury.gov)**

**1-202-622-2490**  
**1-800-540-6322**

