



Council of the  
European Union

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## LEGISLATIVE ACTS AND OTHER INSTRUMENTS

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Subject: COUNCIL IMPLEMENTING REGULATION implementing Regulation  
(EU) No 36/2012 concerning restrictive measures in view of the situation in  
Syria

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**COUNCIL IMPLEMENTING REGULATION (EU) 2024/...**

**of ...**

**implementing Regulation (EU) No 36/2012  
concerning restrictive measures in view of the situation in Syria**

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EU) No 36/2012 of 18 January 2012 concerning restrictive measures in view of the situation in Syria and repealing Regulation (EU) No 442/2011<sup>1</sup>, and in particular Article 32(1) thereof,

Having regard to the proposal from the High Representative of the Union for Foreign Affairs and Security Policy,

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<sup>1</sup> OJ L 16, 19.1.2012, p. 1.

Whereas:

- (1) On 18 January 2012, the Council adopted Regulation (EU) No 36/2012.
- (2) The Council remains deeply concerned about the situation in Syria. After more than a decade, the conflict in Syria is far from over and remains a source of suffering and instability.
- (3) The Council notes that the Syrian regime continues to pursue its policy of repression and considers it necessary to maintain and ensure the effectiveness of the restrictive measures in place, by further developing them while maintaining their targeted and differentiated approach and bearing in mind the humanitarian conditions of the Syrian population. The Council considers that certain categories of persons and entities are of particular relevance for the effectiveness of these restrictive measures, given the specific context prevailing in Syria.
- (4) In view of the gravity of the situation, the Council considers that six individuals and five entities should be added to the list of natural and legal persons, entities or bodies subject to restrictive measures set out in Annex II to Regulation (EU) No 36/2012.
- (5) Regulation (EU) No 36/2012 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

*Article 1*

Annex II to Regulation (EU) No 36/2012 is amended as set out in the Annex to this Regulation.

*Article 2*

This Regulation shall enter into force on the date of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at ...,

*For the Council*

*The President*

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## ANNEX

Annex II to Regulation (EU) No 36/2012 is amended as follows:

(1) the following entries are added to the list set out in section ‘A. Persons’ of Annex II to Regulation (EU) No 36/2012:

	Name	Identifying information	Reasons	Date of listing
‘353.	Mahmoud al-Dj	Date of birth: 26.7.1983; Place of birth: Tell Rifaat, Aleppo, Syria; Nationality: Syrian/Libyan; Gender: male	Mahmoud al-Dj is a leading businessperson operating in Syria, who owns several companies active in different sectors such as logistics and tourism. He facilitates illicit transactions between regime-affiliated persons and entities in Syria and Eastern Libya, including in relation to narcotics, and the shipments of arms and mercenaries. His position is enabled through his close ties with the Syrian regime, from which he and his businesses are benefitting. His activities, on the other hand, support the Syrian regime and enable it to access illicit revenues. He is therefore benefitting from, and providing support to, the Syrian regime.	+

+ OJ: please insert date of publication of this Regulation.

	Name	Identifying information	Reasons	Date of listing
354.	Yasser Hussein Ibrahim	Date of birth: 9.4.1983; Place of birth: Damascus, Syria; Nationality: Syrian; Gender: male	Yasser Ibrahim is an economic advisor to Bashar al-Assad and acts in the economic council run by Asma al-Assad. Together with Ali Najib Ibrahim he operates a number of shell companies, and acts as a front for business activities of Bashar Al-Assad and Asma Al-Assad. Therefore, Yasser Ibrahim is benefiting and supporting the Syrian regime.	+
355.	Bilal al-Naal (a.k.a. al-Na'al)	Date of birth: 14.4.1975; Place of birth: Damascus, Syria; Nationality: Syrian; Gender: male	Bilal al-Naal is a founder and partner of multiple trading and investment companies in Syria.  He is a member of the Syrian-Russian Business Council making him instrumental in the economic ties between Russia and the Syrian regime. Al-Naal is also a member of the Syrian parliament and former member of the Damascus governorate council. Therefore, Bilal al-Naal is a leading business person in Syria, who is in this capacity supporting and benefiting from the Syrian regime. He is also associated with Fadi Saqr, Cham Holding and Bishr Al-Sabban.	+

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	Name	Identifying information	Reasons	Date of listing
356.	Fahad Darwish (a.k.a. Fahd/ Fahed)	Date of birth: 1955; Place of birth: Damascus, Syria; Nationality: Syrian/Iranian; Gender: male	Fahd Darwish is President of the Joint Syrian-Iranian Chamber of Commerce. In addition, Darwish owns and runs multiple businesses in Syria active in different sectors such as trading and pharmaceuticals.  Therefore, Darwish is a leading businessperson operating in Syria, who is, in this capacity, supporting and benefitting from the Syrian regime.	+
357.	Mohannad al-Dabbagh	Date of birth: 6.3.1967; Nationality: Syrian/Iranian; Gender: male	Mohannad al-Dabbagh is a cousin of Asma al-Assad. He co-owns Takamol LLC, a company responsible for managing the electronic “smart card program” used since 2014 to distribute subsidised food and other products in Syria under the umbrella of the Ministry of Domestic Trade and Consumer Protection. In particular, Takamol LLC earns a fee for every transaction operated through the smart card.  Mohannad al-Dabbagh is therefore benefitting from and supporting the Syrian regime.	+

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	Name	Identifying information	Reasons	Date of listing
358.	Firas al-Akhras	Date of birth: 1.3.1978; Place of birth: London, United Kingdom; Nationality: Syrian; Gender: male	Firas al-Akhras is the brother of Asma al-Assad. He is co-owner of the Takamol LLC company responsible for managing the electronic “smart card program” used since 2014 to distribute subsidised food and other products in Syria, under the umbrella of the Ministry of Domestic Trade and Consumer Protection. In particular, Takamol LLC earns a fee for every transaction operated through the smart card.  Firas al-Akhras is therefore benefitting from and supporting the Syrian regime.	+

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(2) the following entries are added to the list set out in section ‘B. Entities’ of Annex II to Regulation (EU) No 36/2012:

	Name	Identifying information	Reasons	Date of listing
‘91.	Al-Dj Group (a.k.a ALDJ)	Place of registration: Damascus, Syria; Principal place of business: Syria	<p>Al-Dj Group is a Syrian business entity, owned and managed by Mahmoud al-Dj. As a holding company it owns and operates the Freebird Travel Agency, an agent for Cham Wings Airlines, which is conducting frequent flights between Syria and Libya, smuggling mercenaries, and narcotics. Al-Dj Group is further associated with Al-Tair Company, which is also owned by Mahmoud al-Dj.</p> <p>Through this scheme of business relations, in which Al-Dj Group plays a central role, cargo shipping and flights are used for illicit transactions between regime-affiliated persons and entities in Syria and Eastern Libya, including narcotics.</p> <p>Al-Dj Group’s activities benefit the Syrian regime and support it in accessing illicit revenues.</p>	+

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	Name	Identifying information	Reasons	Date of listing
92.	Cham Wings	Place of registration: Damascus, Syria; Principal place of business: Damascus, Syria	Cham Wings Airlines is a Syrian business entity which is owned by Muhammad Issam Shammout.  Also, Cham Wings uses its flights to engage in the transfer of Syrian mercenaries, arms trade, narcotics trafficking, and money laundering, which supports the activities of the Syrian regime. As the only private airline in Syria, Cham Wings is therefore benefiting from, and providing support to the Syrian regime.	+
93.	Freebird Travel Agency	Place of registration: Syria, Dubai; Principal place of business: Damascus, Syria	The Freebird Travel Agency is a Syrian business entity owned and operated by Al-Dj Group, which in turn is owned and managed by Mahmoud al-Dj.  Freebird serves as principal agent for Cham Wings Airlines. and, thereby benefits from and provides support to the regime.	+

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	Name	Identifying information	Reasons	Date of listing
94.	Iloma Investment Private JSC (a.k.a. Eloma)	Place of registration: Damascus, Syria; Date of registration: 2023; Principal place of business: Damascus, Syria	Iloma Investment Private JSC has been established at the beginning of 2023 to take over almost half of the ownership of Damascus airport.  Iloma is a front for the Assad family and part of the regime's efforts to personally gain from manipulation of the economy. Therefore, Iloma is supporting and benefiting from the Syrian regime.	+
95.	Al-Aqila Company (a.k.a. al-Akila/ Al-Aqeela Insurance Company)	Place of registration: Damascus, Syria; Date of registration: 2007; Principal place of business: Syria	Al-Aqila Company entered into a joint venture with the Iranian Alborz Insurance Company, in a move arranged between the two regimes to strengthen Iran's position in the Syrian economy.  In the current Syrian business environment, such a joint venture requires the support of the Syrian Regime. Therefore, the Al-Aqila Company is supporting and benefitting from the Syrian regime.	+

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