



Brussels, 20 February 2025  
(OR. en)

6224/25

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**Interinstitutional File:  
2025/0032(NLE)**

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**LIMITE**

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**LEGISLATIVE ACTS AND OTHER INSTRUMENTS**

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

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**COUNCIL REGULATION (EU) 2025/...**

**of ...**

**amending 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, and in particular Article 215 thereof,

Having regard to Council Decision (CFSP) 2025/... of ... amending Decision 2013/255/CFSP concerning restrictive measures in view of the situation in Syria<sup>1+</sup>,

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

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<sup>1</sup> OJ L, ..., ELI: ...

<sup>+</sup> OJ: please insert the reference number and date of adoption of the Decision set out in ST 6222/25 and complete the corresponding footnote.

Whereas:

- (1) On 31 May 2013, the Council adopted Decision 2013/255/CFSP<sup>2</sup> and on 18 January 2012 it adopted Regulation (EU) No 36/2012<sup>3</sup> concerning restrictive measures in view of the situation in Syria. This was following the adoption of Council conclusions in which the Council condemned the violence and widespread and systematic gross violations of human rights in Syria.
- (2) Following the fall of al-Assad's regime in Syria, in its conclusions of 19 December 2024 the European Council stressed the historic opportunity to reunite and rebuild the country and underlined the importance of an inclusive and Syrian-led political process that meets the legitimate aspirations of the Syrian people, in line with the core principles of United Nations Security Council Resolution 2254 (2015).

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<sup>2</sup> Council Decision 2013/255/CFSP of 31 May 2013 concerning restrictive measures in view of the situation in Syria (OJ L 147, 1.6.2013, p. 14, ELI: <http://data.europa.eu/eli/dec/2013/255/oj>).

<sup>3</sup> 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 (OJ L 16, 19.1.2012, p. 1, ELI: <http://data.europa.eu/eli/reg/2012/36/oj>).

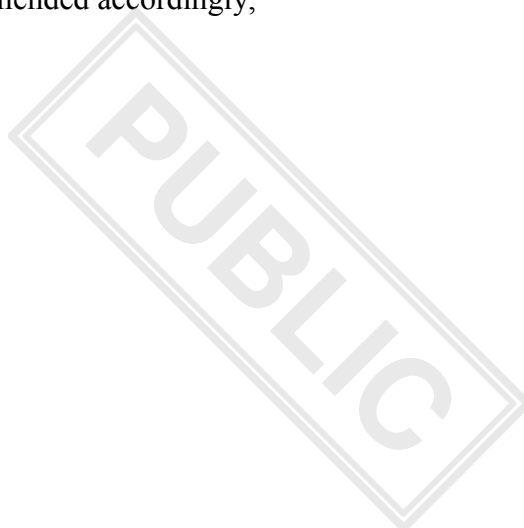
- (3) On the basis of a review of Decision 2013/255/CFSP, the Council assessed that, in order to encourage an inclusive transition in Syria and to support humanitarian aid delivery, economic recovery, reconstruction and stabilisation, as well as facilitating the return of Syrian nationals to Syria along with their belongings, it is appropriate to suspend a number of sectoral and individual measures, introduce certain exemptions, as well as to remove the expiry date of the current humanitarian exemption from asset freeze measures. To this end, on ... the Council adopted Decision (CFSP) 2025/...<sup>+</sup>.
- (4) The Council will closely follow the developments in Syria, particularly with as regards the concerns expressed in the European Council Conclusions of 19 December 2024, to examine the appropriateness of the continued suspension of and exemptions to the restrictive measures concerned.
- (5) In this context, the Council notes that the delimitation of maritime zones should be addressed through dialogue and negotiation in good faith, in full respect of international law and in accordance with the principle of good neighbourly relations. Any violation of neighbouring States' sovereign rights within their maritime zones in accordance with law of the sea, will be duly considered in the context of the constant review of the restrictive measures.
- (6) These measures fall within the scope of the Treaty on the Functioning of the European Union and therefore, in particular with a view to ensuring their uniform application in all Member States, regulatory action at the level of the Union is necessary.

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<sup>+</sup> OJ: please insert the date of adoption and reference number of the Decision set out in ST 6222/25.

(7) Regulation (EU) 36/2012 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:



*Article 1*

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

- (1) the following Article is inserted:

*‘Article 1a*

The application of the following provisions shall be suspended: Articles 6, 6a, 6b, 7, 7a, 8, 9, 9a, 10, 11, 12, 13, 13a, 21a, 21b and 26a.’;

- (2) in Article 6, the heading is replaced by the following:

*‘Article 6\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

- (3) in Article 6a, the heading is replaced by the following:

*‘Article 6a\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(4) in Article 6b, the heading is replaced by the following:

*‘Article 6b\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(5) in Article 7, the heading is replaced by the following:

*‘Article 7\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(6) in Article 7a, the heading is replaced by the following:

*‘Article 7a\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(7) in Article 8, the heading is replaced by the following:

*‘Article 8\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(8) in Article 9, the heading is replaced by the following:

*‘Article 9\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(9) in Article 9a, the heading is replaced by the following:

*‘Article 9a\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(10) in Article 10, the heading is replaced by the following:

*‘Article 10\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(11) in Article 11, the heading is replaced by the following:

*‘Article 11\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(12) in Article 11b, paragraph 2 is replaced by the following:

‘2. The prohibition referred to in paragraph 1 shall not apply to goods listed in Annex X provided that such sale, supply, transfer, or export is for personal use of natural persons travelling from the European Union or members of their immediate families travelling with them, and limited to personal effects, household effects or vehicles owned by those individuals and not intended for sale in Syria.’;

(13) in Article 12, the heading is replaced by the following:

*‘Article 12\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(14) in Article 13, the heading is replaced by the following:

*‘Article 13\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(15) in Article 13a, the heading is replaced by the following:

*‘Article 13a\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(16) Article 14 is amended as follows:

(a) the following paragraph is inserted:

‘2a. All funds and economic resources belonging to, owned, held or controlled by the entities listed in Annex IIb and located outside Syria as of 27 February 2012 shall remain frozen.’;

(b) paragraph 3 is replaced by the following:

‘3. The participation, knowingly and intentionally, in activities the object or effect of which is, directly or indirectly, to circumvent the measures referred to in paragraphs 1, 2 and 2a shall be prohibited.’;

(17) Article 15 is amended as follows:

(a) paragraph 1, point (b) is replaced by the following:

‘(b) Annex IIa and IIb shall consist of a list of entities which, in accordance with Article 19(1) of Decision 2011/782/CFSP, have been identified by the Council as being entities associated with the persons or entities responsible for the violent repression against the civilian population in Syria, or with persons and entities benefiting from or supporting the regime, and to which Article 21 of this Regulation shall apply.’;

(b) paragraph 2 is replaced by the following:

‘2. Annexes II, IIa and IIb shall include the grounds for the listing of listed persons, entities and bodies concerned.’;

(c) paragraph 3 is replaced by the following:

‘3. Annexes II, IIa and IIb shall also include, where available, information necessary to identify the natural or legal persons, entities and bodies concerned. With regard to natural persons, such information may include names including aliases, date and place of birth, nationality, passport and ID card numbers, gender, address, if known, and function or profession. With regard to legal persons, entities and bodies, such information may include names, place and date of registration, registration number and place of business.’;

(18) in Article 16a, paragraph 1 is replaced by the following:

‘1. The prohibitions set out in Article 14(1) and (2) shall not apply to the making available of funds or economic resources necessary to ensure the timely delivery of humanitarian assistance or to support other activities that support basic human needs where such assistance and other activities are carried out by:

(a) the United Nations, including its programmes, funds and other entities and bodies, as well as its specialised agencies and related organisations;

- (b) international organisations;
- (c) humanitarian organisations having observer status with the United Nations General Assembly and members of those humanitarian organisations;
- (d) bilaterally or multilaterally funded non-governmental organisations participating in United Nations Humanitarian Response Plans, United Nations Refugee Response Plans, other United Nations appeals or humanitarian clusters coordinated by the United Nations Office for the Coordination of Humanitarian Affairs;
- (e) organisations and agencies to which the Union has granted the Humanitarian Partnership Certificate or which are certified or recognised by a Member State in accordance with national procedures;
- (f) Member States' specialised agencies; or
- (g) the employees, grantees, subsidiaries or implementing partners of the entities referred to in points (a) to (f) while and to the extent that they are acting in those capacities.';

(19) Article 20 is replaced by the following:

*‘Article 20*

By way of derogation from Article 14 and provided that a payment by a person, entity or body listed in Annex II, IIa or IIb is due under a contract or agreement that was concluded by, or an obligation that arose for the person, entity or body concerned before, the date on which that person, entity or body had been designated, the competent authorities of the Member States, as indicated on the websites listed in Annex III, may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the payment is not directly or indirectly received by a person or entity referred to in Article 14.’;

(20) in Article 21a, the heading is replaced by the following:

*‘Article 21a\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(21) in Article 21b, the heading is replaced by the following:

*‘Article 21b\**

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\* The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(22) Article 25a is replaced by the following:

*Article 25a*

1. The prohibitions set out in Article 25 shall not apply to the activities therein provided that such activities, including ancillary activities, are performed for the purpose of providing assistance to the Syrian population, as regards the timely delivery of humanitarian assistance or to support other activities that support basic human needs, the provision of basic services, or other civilian purposes.
2. The prohibitions set out in Article 25 shall not apply to the activities therein provided that such activities, including ancillary activities, are performed for the purpose of providing assistance to the Syrian population, as regards reconstruction, stabilisation, restoring economic activity, institution-building, the provision of basic services, or other civilian purposes.
3. The prohibitions set out in Article 25 shall not apply to the activities therein provided that such activities are performed in connection with:
  - (a) the import of crude oil or petroleum products from Syria to the Union, the purchase of crude oil or petroleum products from Syria or the transport of crude oil or petroleum products from Syria;
  - (b) participation in the construction or installation of new power plants for electricity production in Syria;
  - (c) the creation of a joint venture with, granting of loans to, or extension of participation in any Syrian person, entity or body engaged in the exploration, production or refining of crude oil or the construction or installation of new power plants for electricity production in Syria;
  - (d) the sale, transfer, or export of jet fuel or jet fuel additives to any person in Syria or for use in Syria;

- (e) the provision of access to airports in the Union for exclusively cargo flights operated by Syrian carriers;
- (f) the export of new Syrian denominated banknotes and coinage to the Central Bank of Syria;

and all technical assistance, brokering services, financing and financial assistance associated with those activities.’;

(23) in Article 26a, the heading is replaced by the following:

*‘Article 26a’*<sup>\*</sup>

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<sup>\*</sup> The application of this provision is suspended pursuant to Article 1a of this Regulation’;

(24) in Article 27, paragraph 1, point (a) is replaced by the following:

‘(a) designated persons, entities or bodies listed in Annex II, IIa or IIb;’;

(25) Article 32 is amended as follows:

(a) paragraph 1 is replaced by the following:

‘1. Where the Council decides to subject a natural or legal person, entity or body to the measures referred to in Article 14, it shall amend Annex II, IIa or IIb accordingly.’;

(b) paragraph 4 is replaced by the following:

- ‘4. The lists in Annexes II, IIa and IIb shall be reviewed at regular intervals and at least every 12 months.’.

*Article 2*

This Regulation shall enter into force on the day following that 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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