

## **Syrian Organizations Respond to the UN Special Rapporteur on Unilateral Coercive Measures**

The undersigned organizations stress the need to strategically assess the prevailing argumentation surrounding a renewed debate about US sanctions policy in Syria. Neither the recent [criticisms](#) of US sanctions by the UN Special Rapporteur on unilateral coercive measures, nor the [response](#) by US officials, adequately consider the political and humanitarian realities on the ground in Syria. As such, both fail to recognize that while the policies of the Syrian government and its allies are the primary drivers of the public health and economic crises currently gripping the country, the latter have also been exacerbated by US sanctions that fail to achieve their goals and protect the rights of Syrians.

We continue to [object](#) to the blame placed by the Syrian government on sanctions to deflect responsibility for its human rights violations. At the same time, we recognize the need for greater clarity, multilateral coordination, and strategy in the sanctions regime, which does not necessarily have to entail such adverse humanitarian impacts. The goal should be to support forms of relief and rehabilitation that benefit all Syrians rather than enriching government loyalists, as has been the case with “reconstruction” efforts thus far. Here we explain our critiques of the sanctions debate and policies, and recommend steps to address relevant problems—including the possibility of a conditional, temporary lifting of certain sanctions.

The statement by the UN Special Rapporteur, Alena Douhan, fundamentally misattributed blame for the dire state of human rights in Syria. In her view, US financial sanctions and trade embargoes have violated human rights and worsened the COVID-19 situation by “depriving the Syrian people of the chance to rebuild their basic infrastructure.” This argument dangerously presumes that sanctions are the reason for the country’s broken health care system, for example, rather than the Syrian government’s systematic attacks on hospitals and medical workers; or that sanctions have rendered Syrians homeless, instead of the Syrian government’s long-standing campaign of expropriating civilian property. Beyond obviously destructive government policies, many processes have contributed to the situation in Syria that are hard to disaggregate, including the financial crisis in neighboring Lebanon.

More broadly, the Special Rapporteur’s statement fails to understand that official reconstruction efforts in Syria function to reengineer territory demographically and to enrich government elites economically. To simply release reconstruction funds without evidence of the government’s commitments to human rights, as the Special Rapporteur called for, would not make Syria safe for refugees to return. Rather, it ignores evidence that the Syrian government [channels relief aid](#) to loyalists and prioritizes FDI-driven luxury real estate projects, like Marota City, above general economic and social rehabilitation. US sanctions have halted progress on these projects, which if completed would further violate the human rights of the Syrian people.

We are also concerned about the US position on sanctions as put forth by the former Special Envoy to Syria, Joel Rayburn, in response to the UN Special Rapporteur’s statement. He claimed that all sanctions are targeted and “do not target humanitarian-related trade, assistance, or activities.” His statement does not fully capture the impact of sanctions on Syria, and ignores the fact that

“targeted” sanctions still [indirectly affect](#) entire economic sectors crucial to civilians’ basic needs. For example, the ban on shipping fuel has hindered the ability of Syrians to heat their homes and preserve medicine. While the individuals and entities targeted by sanctions are able to circumvent such policies through their access to the black market, the economic crisis has rendered it nearly impossible for ordinary Syrians to do the same. Moreover, the difficulty of acquiring waivers for aid organizations and general overcompliance has [severely hampered](#) the delivery of humanitarian aid amid the COVID-19 pandemic. Finally, it is [not clear](#) how certain individual designations made under the Caesar Act fit into a larger strategic policy on Syria.

We believe that sanctions are one of the few instruments available to the international community to help better protect the human rights of Syrians. Their ability to do so, however, is partly a function of changing political and humanitarian conditions. As international humanitarian organizations [have stressed](#) since the onset of COVID-19, sanctions must be continually reassessed with those conditions in mind. Today, the most important of these dynamics are the resilience of the government and its international backers, despite the unfolding humanitarian catastrophe in which 80% of Syrians now live below the poverty line and prices have risen by 200%. That some of the explicit goals of the Caesar Act are currently unattainable must bear on our reassessment of US sanctions, given that their role in contributing to the current crises in Syria is undeniable—even if it is difficult to precisely determine their impact.

Syrian human rights organizations have previously called for [specific improvements](#) to sanctions policy, which the undersigned organizations hope the Biden administration and the international community will work together to implement. We specifically call upon the United States to:

- Issue comfort letters that allow humanitarian organizations to access financial services;
- Facilitate the payment of remittances to civilians and humanitarian organizations in Syria, along the lines of the UK-Somalia Safer Corridor Initiative.
- Grant temporary exemptions on the importation of so-called “dual-use” goods, such as nitrous oxide (necessary for medical anesthesia, but also potentially for explosives);
- Consider temporarily waiving certain sectoral sanctions in exchange for concrete outcomes laid out in the Caesar Act, such as unimpeded humanitarian access.

Further, we call upon the international community to:

- Negotiate alternative trading channels similar to the Swiss Humanitarian Trade Agreement, which facilitated aid provision to Iran despite international sanctions;
- Conditionally support and monitor the WHO’s COVID-19 relief efforts in Syria.

Regardless of the specifics of any revision to US sanctions policy, it is imperative that the debate around this topic be grounded in a strategic assessment of goals and leverage as they pertain to human rights in Syria. Otherwise, as in the case of the UN Special Rapporteur and the US Special Envoy’s statements, it can amount to little more than a hollow political gesture.

**SIGNATORY ORGANIZATIONS:**

Syria Justice and Accountability Centre (SJAC)

Syrians for Truth and Justice (STJ)

Justice for Life Organization

Urnammu for Justice and Human Rights

The Syria Campaign

Life for Relief and Development

MedGlobal

Syria Faith Initiative