



SNAPSHOT

SYRIA SANCTIONS FRAMEWORK

Why are sanctions imposed?

Since 2011, Australia has imposed autonomous sanctions in relation to Syria to reflect Australia's grave concern at the Syrian regime's deeply disturbing and unacceptable use of violence against its people. Australia also gives effect to United Nations Security Council (UNSC) Resolution 2199, which prohibits the trade in cultural property that has been illegally removed from Syria.

What is prohibited by the Syria sanctions framework?

The Syria sanctions framework imposes the following sanctions measures:

Measure	UNSC	Autonomous
restrictions on the export or supply of certain goods	-	✓
restrictions on the import, purchase or transport of certain goods	-	✓
restrictions on certain commercial activities	-	✓
restrictions on the export or provision of certain services	-	✓
restrictions on providing assets to designated persons or entities	-	✓
restrictions on dealing with the assets of designated persons or entities	-	✓
travel bans on declared persons	-	✓
restrictions on dealing with cultural property illegally removed from Syria	✓	-

Restrictions on the export or supply of certain goods

It is prohibited to directly or indirectly supply, sell or transfer to Syria any of the following goods:

- arms or related matériel
- certain equipment and technology related to new electricity power plants or for the oil and gas or petrochemical industries
- certain equipment, technology or software to monitor or intercept internet or telephone communications
- newly printed or unissued Syrian bank notes or coinage
- certain luxury goods
- certain materials, chemicals, micro-organisms and toxins, and equipment for processing those items
- (only if the recipient is the Government of Syria or an entity or body controlled by it or acting on its behalf) gold, precious metals and diamonds.

Arms or related matériel includes, but is not limited to, weapons, ammunition, military vehicles and equipment, and spare parts and accessories for any of those things. It also includes paramilitary equipment. While each case will be considered individually, goods on the [Defence and Strategic Goods List](#) are likely to be considered arms or

related matériel. Depending on the context, end user and end use, other goods may also be considered arms or related matériel.

Restrictions on the import, purchase or transport of certain goods

It is prohibited to import, purchase or transport certain crude oil, petroleum and petrochemical products if they originate in or have been exported from Syria. It is also prohibited to import or purchase gold, precious metals or diamonds from the Government of Syria or an entity or body controlled by it or acting on its behalf.

Restrictions on certain commercial activities

The Syria sanctions framework prohibits a range of commercial activities which predominantly relate to the petrochemical and oil and gas industries and to the financial sector. For example, the following conduct is prohibited (not an exhaustive list):

- acquiring shares in, establishing a joint venture with or providing credit to a Syrian entity engaged in the petrochemical industry, certain sectors of the oil and gas industry or the construction or installation of new power plants for electricity production
- selling to a Syrian entity an interest in a commercial activity in Australia in certain sectors of the oil and gas industry
- Syrian financial institutions opening offices in Australia or purchasing shares in Australian banks
- Australian financial institutions establishing correspondent banking relationships with Syrian financial institutions or opening branches in Syria.

Restrictions on provision of certain services

To complement the restrictions on the export/import of goods and on some commercial activities, the provision of services which relate to those sanctioned goods or activities is also restricted. It is prohibited to provide:

- services related to the supply of export sanctioned goods to Syria (see 'Restrictions on the export or supply of goods' above)
- financial assistance or financial services which relate to the import of import sanctioned goods (See 'Restrictions on the import, purchase or transport of goods' above)
- investment services which relate to sanctioned commercial activities (see 'Restrictions on commercial activities' above)
- services which relate to:
 - a military activity, or
 - the manufacture, maintenance or use of export sanctioned goods
- (if provided to the Government of Syria or an entity or body controlled by it or acting on its behalf) services which relates to the supply, sale, transfer, import, purchase or transport of gold, precious metals or diamonds.

Restrictions on providing assets to designated persons or entities

The Minister for Foreign Affairs has designated persons and entities which have provided support to the Syrian regime or are responsible for human rights abuses in Syria. It is prohibited to directly or indirectly make an asset available to (or for the benefit of) a designated person or entity.

Restrictions on dealing with the assets of designated persons or entities (requirement to freeze assets)

It is prohibited to use or deal with an asset, or allow or facilitate another person to use or deal with an asset owned or controlled by a designated person or entity (the assets are 'frozen' and cannot be used or dealt with). The prohibition on 'dealing' with assets includes using, selling or moving assets. 'An 'asset' includes an asset or property of any kind, whether tangible or intangible, movable or immovable.

Go to the [Consolidated List](#) to search the names of designated persons and entities.

If you become aware that you are holding an asset of a designated person or entity, you are required to freeze (hold) that asset and notify the AFP as soon as possible.

Travel bans

All designated persons under the Syria sanctions framework are prohibited from transiting through or entering Australia.

Restrictions on dealing with cultural property illegally removed from Syria

The Syria sanctions framework implements UNSC Resolution 2199 which seeks to protect cultural property that has been illegally removed from Syria. An item will be protected if it was illegally removed from Syria on or after 15 March 2011 and it is either Syrian cultural property or it is otherwise of archaeological, historical, cultural, rare scientific or religious importance.

It is prohibited to give illegally removed cultural property to another person, to trade it or to transfer the ownership of it to another person. A person who suspects that an item in his or her possession or control is illegally removed cultural property must notify DFAT, the department responsible for the arts or Federal, State or Territory Police.

Who must comply with sanctions?

Australian sanction laws apply to activities in Australia and to activities undertaken overseas by Australian citizens and Australian-registered bodies corporate. In some circumstances, it may be possible to obtain a permit from the Minister for Foreign Affairs to engage in an activity that would otherwise be prohibited by a sanctions measure. Information on planning an activity and submitting an application for a sanctions permit is available on the DFAT website. It is a serious criminal offence to contravene a sanctions measure (or a condition of a sanctions permit). The penalties include up to ten years in prison and substantial fines.

Relevant legislation

The relevant legislation for the Syria sanctions framework includes the following:

- [Autonomous Sanctions Act 2011](#)
- [Autonomous Sanctions Regulations 2011](#)
- [Autonomous Sanctions \(Export Sanctioned Goods — Syria\) Specification 2012](#)
- [Autonomous Sanctions \(Import Sanctioned Goods — Syria\) Specification 2012](#)
- [Autonomous Sanctions \(Export Sanctioned Goods — Syria\) Designation 2012](#)
- [Autonomous Sanctions \(Designated and Declared Persons — Syria\) List 2012](#)
- [Customs \(Prohibited Exports\) Regulations 1958](#)
- [Charter of the United Nations \(Sanctions — Syria\) Regulation 2015](#)

Where can I get more information?

[Australia and sanctions](#) webpage.

Enquiries can be made to DFAT by emailing sanctions@dfat.gov.au

DFAT maintains a [mailing list](#) for people interested in receiving updates on Australian sanctions laws.

This document provides a summary only of relevant sanctions laws. It should not be relied upon as a substitute for legal advice. It is your responsibility to ensure you do not contravene sanctions law, including by obtaining your own legal advice.