

How Can Sanctions Affect Humanitarian Action?

Restrictions in sanctions can affect humanitarian action in a number of ways.

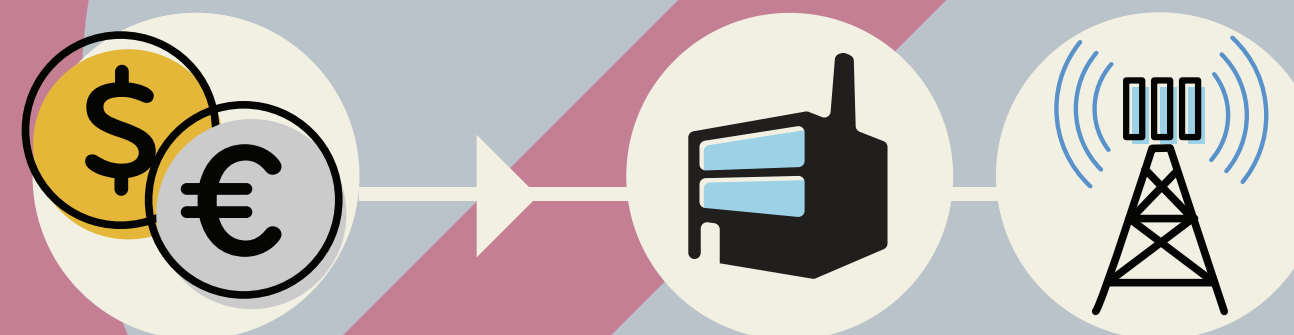
Dual Use Items

Restrictions on imports of dual-use items may cover items or materials that humanitarian actors need for their operations, in areas such as water purification, agriculture and even medical response.



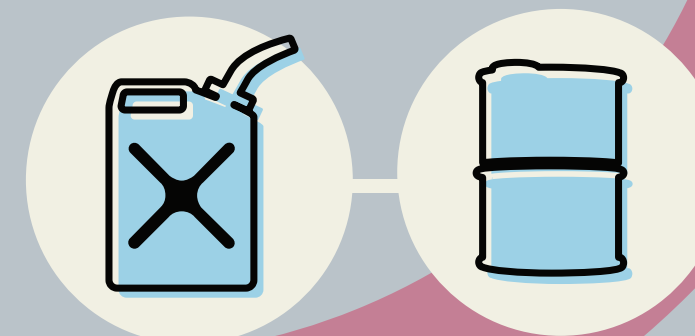
Payments to Designated Companies

Commercial companies whose services humanitarian actors may require for their operations – eg telecommunications providers - may be designated and payments may not be made to them.



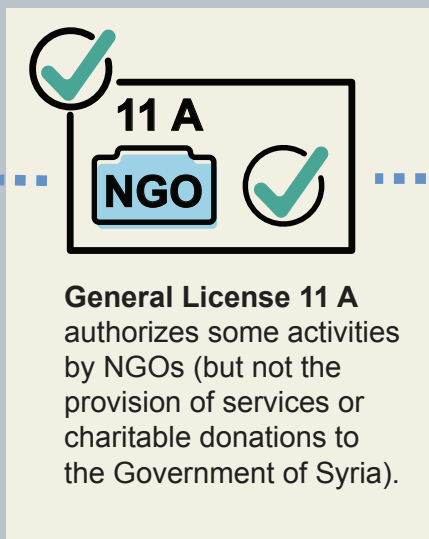
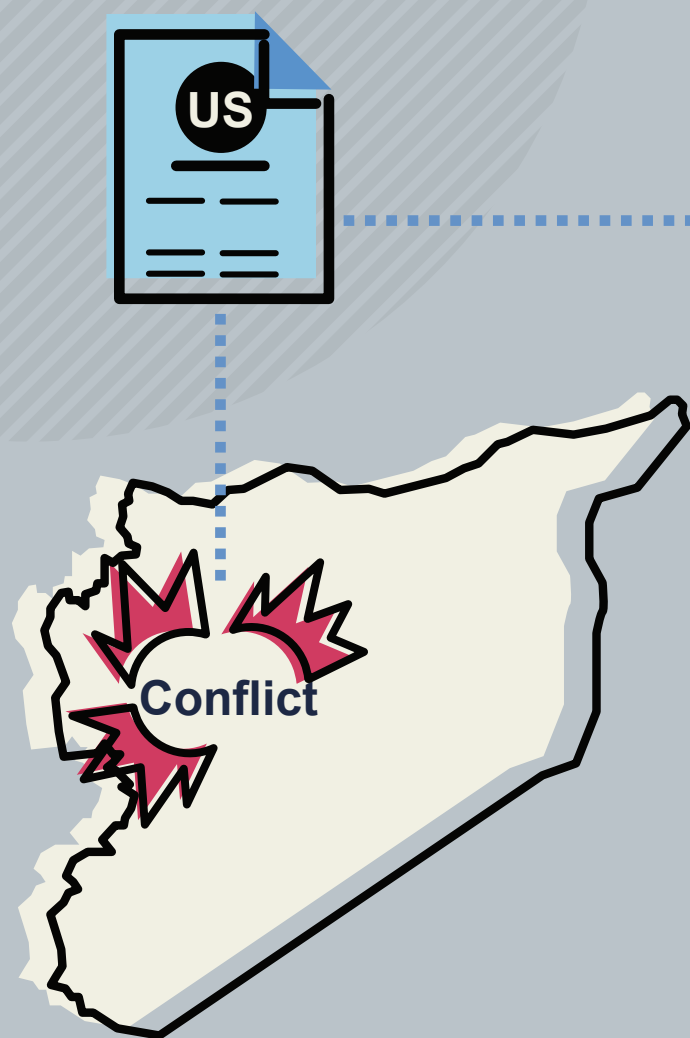
Petroleum Products

Sanctions may include other restrictions, for example a prohibition on purchase of petroleum products in Syria in EU Syria sanctions.

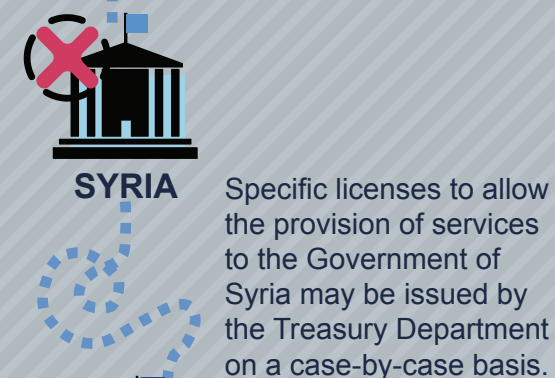


US Syria Conflict Sanctions: Safeguards for Humanitarian Action

Humanitarian activities are accommodated in different ways, depending on the actors and activities involved.



License 11A authorises these activities:



Export licences from the Department of Commerce are required for the export of goods other than food and medicine.



The application process for specific licenses and export licenses is notoriously slow and complex.



US Syria Conflict Sanctions: The Caesar Act

The US's Caesar Act aims to dissuade participation in Syrian Government-led reconstruction efforts by establishing the possibility of designating people and entities that provide certain types of support to the Government of Syria. It is simply an additional basis for imposing sanctions.



US sanctions already prohibit US nationals and INGOs registered in the US from carrying out a broad range of activities.



The Caesar Act builds upon this by threatening the imposition of sanctions on non-US nationals if they carry out activities that would violate some elements of the existing sanctions, even though these are not directly binding on them.

Activities that could lead to designation under the Caesar Act include:



Knowingly providing significant financial, material, or technological support to, or knowingly engaging in a significant transaction with the Government of Syria (including any entity owned or controlled by the Government of Syria) or a senior political figure of the Government of Syria.

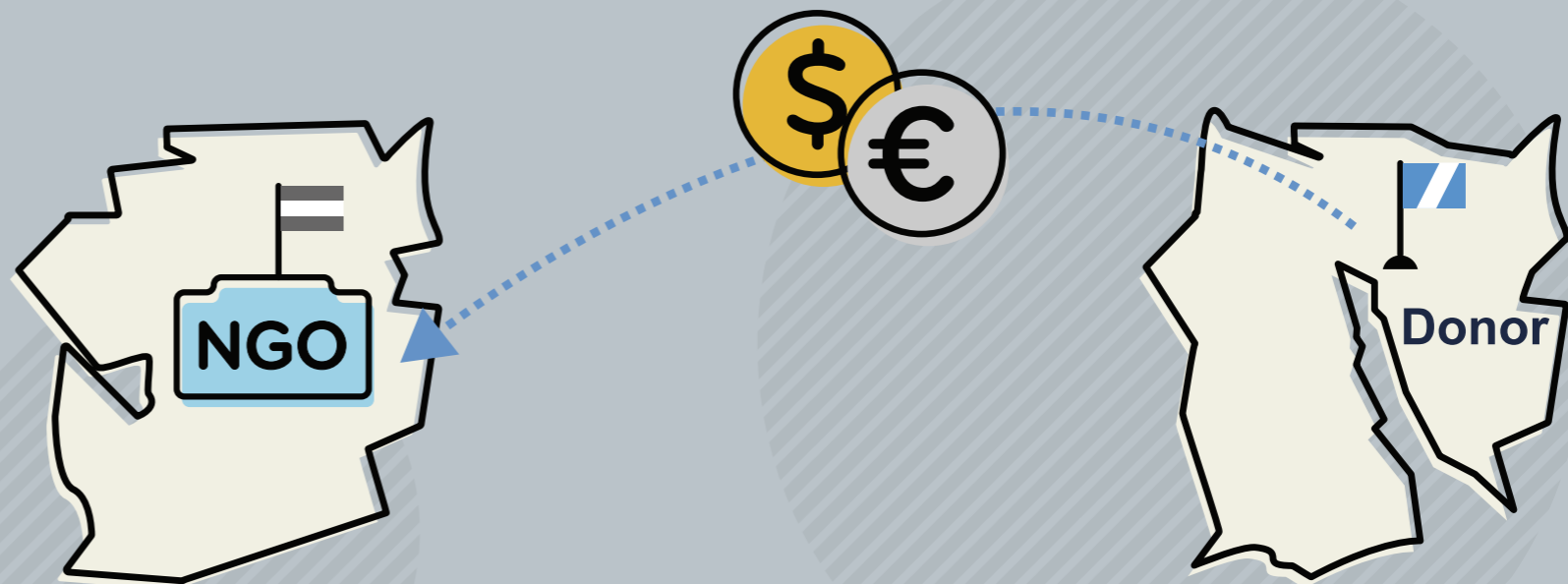


Knowingly, directly or indirectly, providing significant construction or engineering services to the Government of Syria.

The risk of INGOs being designated under the Caesar Act is low.

Which Sanctions Must An NGO Comply With?

NGOs and their staff must comply with sanctions adopted by a number of different states and international organisations.



Sanctions imposed by the NGO's state of nationality / registration.

Grant agreements with states and international organisations frequently require NGOs to comply with the sanctions they have adopted.



NGO staff must also comply with the measures adopted by their state of nationality.