

Regulations made by the Secretary of State, laid before Parliament under section 55(3) of the Sanctions and Anti-Money Laundering Act 2018 (c. 13), for approval by resolution of each House of Parliament within twenty-eight days beginning with the day on which the instrument was made, subject to extension for periods of dissolution, prorogation or adjournment of both Houses for more than four days.

STATUTORY INSTRUMENTS

2025 No. 507

SANCTIONS

The Syria (Sanctions) (EU Exit) (Amendment) Regulations 2025

<i>Made</i> - - - -	<i>23rd April 2025</i>
<i>Laid before Parliament</i>	<i>24th April 2025</i>
<i>Coming into force</i> - -	<i>25th April 2025</i>

The Secretary of State, considering that the condition in section 45(2) of the Sanctions and Anti-Money Laundering Act 2018(a) is met, makes the following Regulations in exercise of the powers conferred by section 1(1)(c) and (3)(b), 3(b)(iii), (c)(iii), (d)(iii) and (e)(iii), 5, 11(2) to (9), 15(2)(a), 45 and 54(2) of, and paragraphs 2(a)(iii), 3(c)(iii), 3(d)(iii), 4(a)(iii), 6(a)(iii), 7(a)(iii), 11(a)(iii), 12(a)(iii), 13(a), (d), (e), (g), (m), (p) and (w), and 14(a) and (c) of Schedule 1 to, that Act.

Citation, commencement and extent

- 1.—(1) These Regulations may be cited as the Syria (Sanctions) (EU Exit) (Amendment) Regulations 2025.
- (2) These Regulations come into force on 25th April 2025.
- (3) These Regulations extend to England and Wales, Scotland and Northern Ireland.

Amendments to the Syria (Sanctions) (EU Exit) Regulations 2019

2. The Syria (Sanctions) (EU Exit) Regulations 2019(b) are amended in accordance with the Regulations 3 to 24.

Amendments to regulation 2 (interpretation)

3. In regulation 2 (interpretation)—

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- (a) 2018 (c. 13). The power to make regulations under Part 1 of the Act is conferred on an appropriate Minister. Section 1(9)(a) of the Act defines an “appropriate Minister” as including the Secretary of State. Section 11 was amended by the Economic Crime (Transparency and Enforcement) Act 2022 (c. 10), section 58. Section 45 was also amended by the 2022 Act, sections 57(4) and 62(3).
 - (b) S.I. 2019/792. Amended by S.I. 2020/951, 2020/590, 2024/643, 2024/833 and 2025/394; there are other amending instruments but none is relevant.

- (a) omit the definitions of “aircraft licence” and “the Syrian regime”; and
- (b) after the definition of “arrangement”, insert—

““the Assad regime” means the regime in Syria from 9th May 2011 to 8th December 2024 led by Bashar Al-Assad and includes its public bodies, corporations or agencies, or any person(a) who acted on its behalf or at its direction;”.

Amendments to regulation 3 (application of prohibitions and requirements outside of the United Kingdom)

- 4. In regulation 3 (application of prohibitions and requirements outside of the United Kingdom)—
 - (a) in paragraph (2) omit “or a prohibition imposed by a condition of an aircraft licence;”;
 - (b) omit paragraph (3)(d); and
 - (c) in paragraph (5) omit “or a requirement imposed by a condition of an aircraft licence;”.

Amendment to regulation 4 (purposes)

- 5. For regulation 4 (purposes) substitute—

“Purposes

4. The purposes of the regulations contained in this instrument that are made under section 1 of the Act are—

- (a) to promote the peace, stability and security of Syria;
- (b) to promote respect for democracy, the rule of law and good governance in Syria, including in particular promoting the successful completion of Syria’s transition to a democratic country;
- (c) to discourage actions, policies or activities which repress the civilian population in Syria;
- (d) to promote compliance with international human rights law and respect for human rights in Syria, including in particular, respect for—
 - (i) the right to life of persons in Syria;
 - (ii) the right of persons in Syria not to be held in slavery or required to perform forced or compulsory labour;
 - (iii) the right of persons not to be subjected to torture or cruel, inhuman or degrading treatment or punishment in Syria;
 - (iv) the right to liberty and security of persons in Syria, including freedom from arbitrary arrest, detention or enforced disappearance;
 - (v) the right to a fair trial of persons charged with criminal offences in Syria;
 - (vi) the rights of journalists, human rights defenders, civil society activists, religious leaders, politicians and all other persons in Syria to freedom of expression, peaceful assembly and association with others;
 - (vii) the enjoyment of rights and freedoms in Syria without discrimination, including on the basis of a person’s sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status;

(a) Person is defined by section 9(5) of the Sanctions and Anti-Money Laundering Act 2018 to include (in addition to an individual and a body of persons corporate or unincorporate) any organisation and any association or combination of persons.

- (e) to provide accountability for gross violations of human rights carried out by or on behalf of the Assad regime.”.

Amendments to regulation 6 (designation criteria: meaning of “involved person”)

- 6. In regulation 6 (designation criteria)—
 - (a) for paragraph (2)(a)(ii) substitute “activities carried out on behalf of the Assad regime, implementing or connected to the repressive policies of that regime;”;
 - (b) after paragraph (2)(a)(ii) insert—
 - “(iii) supporting or benefitting from the Assad regime;
 - (iv) the commission of, or the obstruction of an independent investigation into, a serious human rights violation or abuse in Syria;
 - (v) the commission of a violation of international humanitarian law in Syria;
 - (vi) undermining democracy, the rule of law and good governance in Syria;
 - (vii) the obstruction of humanitarian assistance activity in Syria;
 - (viii) any other action, policy or activity which threatens the peace, stability or security of Syria,”;
 - (c) in paragraph (3)(a) after “Syria” insert “during the period of the Assad regime”;
 - (d) in paragraph (3)(b) for “Syrian regime” substitute “Assad regime”;
 - (e) in paragraph (3)(d) for “paragraph (2)(a)(i)” substitute “paragraphs 2(a)(i), (ii) or (iv) to (vii)”.

Amendments to regulation 19 (sale or purchase of bonds)

- 7. In regulation 19 (sale or purchase of bonds)—
 - (a) in paragraph (1)—
 - (i) for “Syrian bonds” substitute “Assad regime bonds”;
 - (ii) for “Syrian regime” substitute “Assad regime”;
 - (iii) for “after 19th January 2012” substitute “between 19th January 2012 and 8th December 2024”;
 - (b) in paragraph (2)—
 - (i) for “Syrian bonds” substitute “Assad regime bonds”;
 - (ii) for “Syrian regime” substitute “Assad regime”;
 - (iii) for “after 19th January 2012” substitute “between 19th January 2012 and 8th December 2024”;
 - (c) in paragraph (3)—
 - (i) for “issue Syrian bonds” substitute “sell or purchase Assad regime bonds”;
 - (ii) for “Syrian regime” substitute “Assad regime”;
 - (d) in paragraph (4)—
 - (i) omit sub-paragraph (a);
 - (ii) for sub-paragraph (b) substitute “a Syrian credit or financial institution”;
 - (iii) in sub-paragraph (c) omit “(a) or”;
 - (iv) in sub-paragraph (d) omit “(a),”;
 - (e) in paragraph (7)—

- (i) for ““Syrian bonds”” substitute ““Assad regime bonds””;
- (ii) for “Syrian regime” substitute “Assad regime”;
- (f) after paragraph (7) insert—
 - “(8) For the purposes of this regulation, “Syrian credit or financial institution” means—
 - (a) a credit or financial institution domiciled in Syria; or
 - (b) a branch or subsidiary, wherever located, of a credit or financial institution domiciled in Syria.”.

Amendment to regulation 22 (circumventing etc prohibitions)

- 8.** In regulation 22(1)(a) for “regulations 11 to 21” substitute “regulations 11 to 15 or 19”.

Amendments to regulation 23 (interpretation of Part 3)

- 9.** In regulation 23 (interpretation of Part 3)—
- (a) in paragraph (1)—
 - (i) in the definition of “branch” omit sub-paragraph (a);
 - (ii) omit the definition of “UK credit or financial institution”;
 - (b) in paragraph (2)—
 - (i) omit sub-paragraph (b) (and the “and” which precedes it); and
 - (ii) for “are to be read” substitute “is to be read”.

Amendments to regulation 27 (interpretation of other expressions used in Part 5)

- 10.** In regulation 27 (interpretation of other expressions used in Part 5), for paragraph (6), substitute—

- “(6) For the purposes of Chapter 4, “the Governing Authority of Syria” means—
- (a) the transitional Syrian authorities formed on 8 December 2024 and any successor authorities appointed thereto;
 - (b) the Central Bank of Syria;
 - (c) a person acting on behalf, or at the direction, of a person mentioned in sub-paragraph (a) or (b);
 - (d) a person who is not an individual and who is, or was, owned or controlled directly or indirectly (within the meaning of regulation 7) by a person mentioned in sub-paragraph (a) or (b).”.

Amendments to regulation 38 (transport of military goods, crude oil and petroleum products)

- 11.** In regulation 38 (transport of military goods, crude oil and petroleum products)—
- (a) in the heading, omit “, crude oil and petroleum products”;
 - (b) omit paragraph (2);
 - (c) omit paragraph (3)(a);
 - (d) in paragraph (4) for “Paragraphs (1) and (2) are” substitute “Paragraph (1) is”;
 - (e) in paragraph (5) omit “or (2)” in both places it occurs; and
 - (f) in paragraph (6) omit the definition of “non-UK country”.

Amendments to regulation 42 (goods prohibitions relating to gold, precious metals or diamonds)

12. In regulation 42 (goods prohibitions relating to gold, precious metals or diamonds)—

- (a) in paragraphs (1) to (3) for “a Syrian regime person”, in each place it occurs, substitute “the Governing Authority of Syria”; and
- (b) for paragraph (5) substitute—

“(5) A person who contravenes a prohibition in paragraph (3) commits an offence, but—

- (a) it is a defence for a person charged with an offence of contravening paragraph (3)(a) to show that the person did not know and had no reasonable cause to suspect that the supply or delivery of gold, precious metals or diamonds was to the Governing Authority of Syria;
- (b) it is a defence for a person charged with an offence of contravening paragraph (3)(b) to show that the person did not know and had no reasonable cause to suspect that the gold, precious metals or diamonds were being made available to the Governing Authority of Syria;
- (c) it is a defence for a person charged with an offence of contravening paragraph (3)(c) to show that the person did not know and had no reasonable cause to suspect that the supply or delivery of gold, precious metals or diamonds was from the Governing Authority of Syria;
- (d) it is a defence for a person charged with an offence of contravening paragraph (3)(d) to show that the person did not know and had no reasonable cause to suspect that the acquisition of gold, precious metals or diamonds was from the Governing Authority of Syria.”.

Amendments to regulation 43 (technical assistance relating to gold, precious metals or diamonds)

13. In regulation 43 (technical assistance relating to gold, precious metals or diamonds)—

- (a) in paragraph (1) for “a Syrian regime person” substitute “the Governing Authority of Syria”; and
- (b) in paragraph (3) for “the person was a Syrian regime person” substitute “the provision of technical assistance was to the Governing Authority of Syria”.

Amendments to regulation 44 (financial services and funds relating to gold, precious metals or diamonds)

14. In regulation 44 (financial services and funds relating to gold, precious metals or diamonds)—

- (a) in paragraphs (1) to (3) for “a Syrian regime person”, in each place it occurs, substitute “the Governing Authority of Syria”;
- (b) omit paragraph (5);
- (c) in paragraph (6)—
 - (i) for “paragraph (3)” substitute “paragraph (1), (2) or (3)”; and
 - (ii) for “that paragraph” substitute “paragraph (1), (2) or (3) (as the case may be)”.

Amendments to regulation 45 (brokering services: non-UK activity relating to gold, precious metals or diamonds)

15. In regulation 45 (brokering services: non-UK activity relating to gold, precious metals or diamonds)—

- (a) in paragraphs (1) and (2) for “a Syrian regime person”, in each place it occurs, substitute “the Governing Authority of Syria”;
- (b) omit paragraph (4);
- (c) in paragraph (5)—
 - (i) for “paragraph (2)” substitute “paragraph (1) or (2)”; and
 - (ii) for “that paragraph” substitute “paragraph (1) or (2) (as the case may be)”.

Amendments to regulation 48 (provision of interception and monitoring services)

16. In regulation 48 (provision of interception and monitoring services), in paragraph (1) and (3) for “the Syrian regime”, in both places it occurs, substitute “the Governing Authority of Syria”.

Amendments to regulation 58 (trade: exceptions from further provisions)

17. In regulation 58 (trade: exceptions from further prohibitions)—

- (a) Omit paragraphs (1) and (2);
- (b) in paragraph (4)—
 - (i) for “the chemical weapons programme of the Syrian regime”, substitute “chemical weapons in Syria”;
 - (ii) in sub-paragraph (b) omit “, insofar as it relates to military goods”; and
- (c) in paragraph (5) omit the definitions of “aviation fuel and aviation fuel additives” and “non-Syrian aircraft”.

Amendments to regulation 60 (exception for acts done for purposes of national security or prevention of serious crime)—

18. In regulation 60 (exception for acts done for purposes of national security or prevention of serious crime)—

- (a) in paragraph (1) for “, 5 (Trade) or 6 (Aircraft)” substitute “or 5 (Trade)”; and
- (b) in paragraph (2) omit “Part 6 (Aircraft)”.

Amendments to regulation 61 (Treasury licences)

19. In regulation 61 (Treasury licences)—

- (a) in paragraph (1) omit “, regulation 16 (UK credit or financial institutions) and regulation 21 (investments in relation to crude oil and electricity production)”; and
- (b) omit paragraph (2)(b) (and the “and” which precedes it).

Amendment to regulation 64 (licences: general provisions)

20. In regulation 64 (licences: general provisions), in paragraph (1), omit “aircraft licences”.

Amendment to regulation 77 (disclosure of information)

21. In regulation 77 (disclosure of information), in paragraph (1)(b)(i), for “, Part 5 (Trade) or Part 6 (Aircraft)” substitute “or Part 5 (Trade)”.

Amendments to regulation 79 (penalties for offences)

22. In regulation 79 (penalties for offences)—

- (a) in paragraph (1) omit “, regulation 53(1), (2) and (3) (aircraft: offences)”;
- (b) in paragraph (3) omit “67 (aircraft: licensing offences),”; and
- (c) in paragraph (4) omit “53(4) (aircraft: disclosure of information offence),”.

Amendment to regulation 81 (jurisdiction to try offences)

23. In regulation 81 (jurisdiction to try offences), in paragraph (1), omit “Part 6 (Aircraft),” and “67 (aircraft: licensing offences),”.

Omission of provisions in the Syria (Sanctions) (EU Exit) Regulations 2019

24. Omit—

- (a) regulation 16 (UK credit or financial institutions: accounts and correspondent banking relationships etc);
- (b) regulation 17 (opening of, or taking up of business by, a representative office, branch or subsidiary of Syrian credit or financial institution);
- (c) regulation 18 (acquisition or extension of ownership interest by Syrian credit or financial institution);
- (d) regulation 20 (insurance and reinsurance services);
- (e) regulation 21 (investments in relation to crude oil and electricity production);
- (f) in regulation 25(1) (definitions relating to goods and technology prohibited under Part 5), the definitions of “aviation fuel and aviation fuel additives”, “bank notes or coinage”, “crude oil and petroleum products”, “goods relating to crude oil and natural gas”, “goods relating to electricity production” and “technology relating to crude oil and natural gas”;
- (g) in regulation 28 (application of prohibitions in Chapter 2 of Part 5)—
 - (i) paragraphs (2)(a) and (c);
 - (ii) paragraph (3)(d);
- (h) in regulation 33 (prohibition relating to the associated provision of technical assistance), paragraph (4);
- (i) in regulation 34 (prohibitions relating to the associated provision of financial services and funds), paragraph (6);
- (j) in regulation 35 (prohibitions relating to the associated provision of brokering services: non-UK activity), paragraph (5);
- (k) in regulation 36 (import of arms and related material, crude oil and petroleum products)—
 - (i) in the heading, “, crude oil and petroleum products”;
 - (ii) paragraph (1)(b);
- (l) in regulation 37 (acquisition of military goods and technology, crude oil and petroleum products)—
 - (i) in the heading, “, crude oil and petroleum products”;

- (ii) paragraph (2)(a);
- (m) in regulation 40 (prohibitions relating to the associated provision of financial services and funds), paragraph (1)(d);
- (n) regulation 41 (bank notes or coinage);
- (o) regulation 47 (electricity production);
- (p) Part 6 (aircraft);
- (q) regulation 56 (exceptions relating to insurance and reinsurance services);
- (r) in regulation 57 (exceptions relating to petroleum products), paragraphs (3)(b) to (d) and (4);
- (s) regulation 59 (aircraft: exceptions from prohibitions);
- (t) in regulation 59A(2) (exception for authorised conduct in a relevant country), in the definition of “relevant prohibition”, sub-paragraphs (b), (c) and (e);
- (u) regulation 63 (aircraft licences);
- (v) regulation 67 (aircraft: licensing offences);
- (w) in regulation 84(3B) (trade enforcement: application of CEMA), sub-paragraphs (a) to (i) and (p);
- (x) in regulation 88(2) (exercise of maritime enforcement powers), sub-paragraphs (2)(c) and (f);
- (y) Regulation 94 (directions under Part 6);
- (z) in Schedule 2 (definitions of goods subject to certain trade prohibitions), paragraphs 2 to 5;
- (z1) in Schedule 6 (Treasury licences: purposes)—
 - (i) paragraph 13 (Chemical Weapons Convention);
 - (ii) paragraph 16 (Central and Commercial Banks of Syria); and
 - (iii) paragraph 17 (assisting the civilian population in Syria).

Amendment to the Trade, Aircraft and Shipping Sanctions (Civil Enforcement) Regulations 2024

25. In the Trade, Aircraft and Shipping Sanctions (Civil Enforcement) Regulations 2024(a), in regulation 30 (aircraft sanctions regulations and shipping sanctions regulations: application of Chapter 1 of Part 2 of Serious Organised Crime and Police Act 2005), omit paragraph (d).

23rd April 2025

Stephen Doughty
Minister of State
Foreign, Commonwealth and Development Office

(a) S.I. 2024/948.

EXPLANATORY NOTE

(This note is not part of the Regulations)

These Regulations amend the Syria (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/792) (the “original Regulations”) following the fall of the former regime led by Bashar Al-Assad in Syria.

Regulation 5 of these Regulations amends regulation 4 of the original Regulations to amend the statutory purposes of the original Regulations under section 1 of the Sanctions and Anti-Money Laundering Act 2018. Amongst other things, the revised purposes include the promotion of peace, stability and security in Syria and ensuring accountability for gross violations of human rights carried out by or on behalf of the Assad regime. Regulation 3 of these Regulations inserts a definition of the Assad regime in the original Regulations. Regulation 6 of these Regulations updates the designation criteria in regulation 6 of the original Regulations in light of the revised purposes. As a result, the original Regulations are amended to confer a power on the Secretary of State to designate persons who were, amongst other things, involved in supporting or benefitting from the Assad regime, or who are involved in repressing the civilian population in Syria or undermining democracy, the rule of law or good governance in Syria.

Regulation 7 amends regulation 19 of the original Regulations to apply prohibitions related to bonds issued by the Assad regime between 19th January 2012 and 8th December 2024.

Regulations 8, 9, 11 and 17 to 24 of these Regulations amend or revoke various provisions in the original Regulations to remove certain sectoral sanctions in order to support the recovery of the Syrian economy. This includes sectoral sanctions relating to investment, financial services and financial markets, aircraft, trade (including in relation to the export and import of crude oil and petroleum products), bank notes and coinage and the export of goods relating to electricity production. Regulation 25 makes a consequential amendment to the Trade, Aircraft and Shipping Sanctions (Civil Enforcement) Regulations 2024 as a result of the revocation of Part 6 of the original Regulations.

Regulation 10 inserts a new definition of “Governing Authority of Syria” into regulation 27 of the original Regulations. Regulations 12 to 16 of these Regulations removes existing references to a “Syrian regime person” in regulations 42 to 45 and 48 of the original Regulations and replaces these with references to the Governing Authority of Syria.

A full impact assessment has not been produced for this instrument as no, or no significant, impact on the private, voluntary or public sector is foreseen and these Regulations are designed to reduce the burden on businesses, charities and other non-governmental organisations. An impact assessment was, however, produced for the Sanctions and Anti-Money Laundering Act 2018 and is available from the Foreign, Commonwealth and Development Office, King Charles Street, London SW1A 2AH or at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/653271/Sanctions_and_Anti-Money_Laundering_Bill_Impact_Assessment_18102017.pdf.

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