

After 14 Years of Conflict, Can Barriers to Education in Syria Be Overcome?

Anna Cervi and Erica Moret

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About the Authors

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She is co-founder of the Italian Initiative for International Mediation, an associate of the School of Development, Innovation and Change, and a member of the Mediterranean Women Mediators Network. She has shared her mediation and research expertise with various entities, including international humanitarian organizations, universities, the Organization for Security and Cooperation in Europe, the Centre for Defense Higher Studies, the European Security and Defence College, the European Centre for Electoral Support, and Women in International Security Italy.

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List of Acronyms

AML	Anti-money laundering
BIS	Bureau of Industry and Security (U.S.)
Bln	Billion
CFR	Code of Federal Regulations
CFSP	EU Common Foreign and Security Policy
CT	Counterterrorism
CTF	Counterterrorist financing
DOC	Department of Commerce (U.S.)
EAR	Export Administration Regulations (U.S.)
EO	Executive order
EU	European Union
FATF	Financial Action Task Force
FTO	Foreign terrorist organization
GCPEA	Global Coalition to Protect Education from Attack
GDP	Gross domestic product
GL	General license
GoS	Government of Syria
HTS	Hay'at Tahrir al-Sham
ICRC	International Committee of the Red Cross
ICT	Information and communications technology
IHL	International humanitarian law
INGO(s)	International Nongovernmental Organization(s)
IT	Information technology
MSB(s)	Money service business(es)
NCA	National competent authority
NGO(s)	Nongovernmental organization(s)
OFAC	Office of Foreign Assets Control
SDF	Syrian Democratic Forces
SL	Specific license
SSR	U.S. Syrian sanctions regulations
SYP	Syrian pound
U.K.	United Kingdom
U.N.	United Nations
UNDP	United Nations Development Programme
UN OCHA	United Nations Office for the Coordination of Humanitarian Affairs
UNICEF	United Nations Children's Fund
UNSC	United Nations Security Council
UNSCR	United Nations Security Council Resolution
U.S.	United States
USB	Universal serial bus
USD	U.S. dollars
UXO(s)	Unexploded ordnance(s)
WASH	Water, sanitation, and hygiene

Executive Summary

Syria is now in a critical transition period that could shape its future. With Bashar al-Assad's 24-year rule ending in December 2024, Syria faces a significant political shift that presents a valuable opportunity to revitalize its universal education system.

This report aims to identify barriers to education in the country after 14 years of conflict. Based on a combination of primary and secondary sources, including consultations with practitioners and experts working in Syria, this report suggests a framework for streamlining greater support for the schooling of children and young people in the country. It outlines a series of challenges that include protracted political fragmentation, safety and security concerns, forced displacement, infrastructure destruction, restrictive donor agreements, insufficient investment, socioeconomic challenges, a mounting energy crisis, and regulatory complexity. It goes on to discuss these in relation to the availability of safe learning spaces, lack of qualified and experienced teachers, and barriers to access teaching and learning equipment, tools, and technology.

For over a decade, Syria was divided into three main areas of political control, each utilizing different curricula and demonstrating varying abilities to provide and safeguard educational services. This situation has also made it difficult for students to have their education formally recognized and certified. The safety and psychological well-being of students is a significant concern, also due to the continuation of instability in the country and extensive contamination of unexploded ordnances (UXOs). Large-scale forced displacement and destruction of infrastructure, including schools, have compounded challenges to education, including for those with disabilities. International political restrictions on reconstruction and development activities, made conditional on viable steps toward a negotiated conflict settlement, have hindered attempts to invest in universal education in Syria. Furthermore, despite the display of solidarity by the international community with the Syrian population, insufficient donor investments have gone into the sector, amounting to only 5% of the total funding committed. Inflation and the depreciation of the Syrian pound have forced many families to deprioritize education over other essential needs. The severe energy crisis impacts schooling, whether students are homeschooled or in classrooms, making learning spaces un conducive to education. A complex set of regulations, including sanctions and export controls, have knock-on effects on education, resulting in over-compliance and financial sector de-risking. Export controls are found to have an especially negative impact on the availability of teaching equipment and technologies.

While endeavoring to address multifaceted contextual challenges, the ongoing political transition in Syria is grappling with the challenges deriving from fragmented education curricula and diverse value systems within the country (e.g., cultural, religious, and political). This report offers a series of recommendations for donors, education responders, and sanctioning and export control authorities, aimed at complementing efforts owned and led by Syria to revitalize its education system. These include broadened financial and logistical support, clearer guidance on permissible activities in relation to education in Syria, and removal of barriers to essential teaching and learning tools and equipment. Furthermore, the report recommends harmonizing donor approaches to education programming across all parts of Syria, with an emphasis on long-term investments in equipping teachers and restoring conducive learning environments, including school rehabilitation. It concludes by underscoring the urgent need for decisive action from the international community to address the educational barriers facing children and young people in Syria, in line with global commitments to advancing education in the country.

Recommendations

The international community should work in tandem with Syrian initiatives, including those promoted by local actors, as they thoughtfully navigate and work toward harmonizing the complexities highlighted in this paper. In particular:

Donors and education aid responders¹

- Support the relaunch and the update of the Syrian regular schooling system for all children and youth across the country by coordinating with duty-bearers and civil society organizations.
- Leverage existing resources to harmonize the transition from emergency and non-formal education activities toward more sustainable solutions.
- Broaden the base of financial and logistical support to educational activities in the country, including through longer-term, multi-year engagement across all parts of Syria.
- Support, finance, and engage in international multistakeholder (public and private) dialogue to identify opportunities to support education in Syria and resolve current bottlenecks.
- Provide support for the scaling up of the rehabilitation and/or modernization of schools to create safe and inclusive learning spaces, which should include equipment, well-maintained water, sanitation, and hygiene facilities, electricity facilities, and distribution networks.
- Support longer-term investments to increase and stabilize the availability of qualified and experienced teachers in the Syrian schooling system.
- Remove digital education access barriers arising from lack of electricity, internet connectivity, and eroded purchasing power of families and teachers.

Sanctioning and export control authorities,with support from multistakeholder or tri-sector groups²

- Provide a more explicit and detailed reference to education, and related goods and services, in sanctions and export control regulations and exemptions.
- Provide clear guidance on the scope of permissible activities in relation to the access to equipment and technology required for education in Syria under the relevant sanctions and export controls.
- Identify education-related activities that can be conducted within the framework of existing humanitarian carve-outs and the associated guidelines of sanctions frameworks..³
- Consider expanding exemptions to enable access to necessary supplies, technologies, and software required to offer education in Syria —including computers, other ICT technologies, and generators.
- Expedite and prioritize licenses issued by the U.S. Department of Commerce to purchase equipment, technology, learning aids, and other goods for aid organizations supporting formal and nonformal education in Syria.
- Engage proactively in multistakeholder dialogue to regularly reassess whether existing humanitarian safeguards are providing enough to carry out education activities, deliver education supplies in Syria to meet priority needs, and resolve any bottlenecks.
- Engage in outreach with and offer clear reassurance to financial institutions to facilitate the processing of payments for educational purposes, as part of broader efforts to reduce bank de-risking.
- Engage with relevant actors involved in the supply chain and with private sector companies to encourage the release of online communication and educational and training modules that are currently unavailable in Syria due to overcompliance.

1. Introduction

Syria represents one of the largest and most complex humanitarian crises in recent history, with more than 16 million people requiring some form of humanitarian assistance in 2025.⁴ The country also suffers from a related and unprecedented education crisis,⁵ affecting 7.2 million people, most of them children and young people of schooling age as of 2024.⁶ In the words of UNICEF, “[t]he education system in Syria is overstretched, underfunded, fragmented, and unable to provide safe, equitable, and sustained services to millions of children.”⁷ Despite domestic and international consensus on the urgency surrounding the need for better support for education in Syria,⁸ interventions to date — including those carried out by local authorities, civil society groups, NGOs and the U.N. — have faced significant barriers and continue to encounter severe challenges, necessitating decisive action, including by the international community.

Syria is at a pivotal moment that could define its future. With the end of Bashar al-Assad's 24-year rule in December 2024, the country is undergoing a significant political transition, creating an opportunity to revitalize its education system that could also cater to the needs of refugees returning to the country.⁹ Prior to the onset of the conflict in 2011, Syrian children and youth were ranked among the most educated in the region, notwithstanding the need for sectoral reforms.¹⁰ In contrast, in 2024 there were more than 2.4 million children out of school across Syria and another million within the schooling system who were at risk of dropping out.¹¹ In today's Syria, available educational services are ill-equipped to cater to the needs of over a million children and youth with disabilities. In parallel, more than 230,000 teachers continue to teach in schools around the country under insurmountable pressure and constraints, according to the UN Office for the Coordination of Humanitarian Affairs (UN OCHA).¹² Since the onset of the conflict, children and young people have also been subjected directly to harrowing levels of trauma and violations of fundamental rights.¹³ Accountability for these acts is yet to come, in spite of rigorous reporting by civil society organizations and the U.N.¹⁴ Schools and other educational facilities have suffered from direct military attacks since the onset of the conflict,¹⁵ with UNICEF writing in 2021 that “[t]he UN is able to confirm nearly 700 attacks on education facilities and personnel in Syria since the verification of grave violations against children began.”¹⁶

Based on desk research, multistakeholder consultations, and analysis of legal texts and policy documents, this paper outlines the main friction points across Syria that are hindering the recovery of the education sector in the country. In doing so, it seeks to encourage the international community to take decisive action toward reducing education barriers facing Syrian children and young people, complementing Syrian-owned and led efforts, and aligning with global commitments to educational advancement in the country.¹⁷ It was outside the scope of this study to provide a comprehensive overview of the situation of education in Syria before or during the conflict,¹⁸ or challenges posed by the implementation of diverging curricula in the different areas of control in Syria, which has been extensively analyzed in literature.¹⁹ Furthermore, it solely explores European Union (EU) and U.S. sanctions and export controls, where relevant for this analysis,²⁰ as they are the most expansive —

and other countries have tended to align with these measures, to varying degrees.²¹

The report starts with a description of some of the principal challenges facing the provision of education in Syria today, before assessing the availability of safe learning spaces, qualified and experienced teachers, and teaching and learning equipment, tools, and technology. It uses an evidence-based approach to outline how these factors cumulatively limit the capacity of aid responders and local authorities to address barriers to education in Syria and implement a comprehensive education recovery framework. It argues that such an approach — backed by the international community — will be vital if young generations of

Syrians are to gain adequate access to educational services, per their basic human rights, so they are equipped to contribute meaningfully to the country's future.²²

2. Key drivers hindering education in Syria

As Syria undergoes significant transformation, including reforms in its education sector, it will be necessary to confront the complex challenges that have plagued education in the country for over a decade. The following summarizes these critical drivers:

- **Safety and security of students:** This represents a longstanding and marked concern, particularly in the north and south of Syria.²³ This is due to the continuation of the instability in the country, but also the extensive contamination of UXOs across the country.²⁴
- **Political fragmentation:** For over a decade, political fragmentation defined Syria, which remained divided into three main areas of control until the fall of the Assad government in early December 2024. These areas included a central region governed by the government of Syria (GoS), territory in the northeast largely held by the Syrian Democratic Forces (SDF), and regions in the northwest under the control of various armed opposition groups, including Hay'at Tahrir al-Sham (HTS), an entity that is subject to U.N. sanctions as well as additional sanctions imposed by various autonomous regimes. Humanitarian actors²⁵ and civil society organizations²⁶ have had to navigate a complex environment with multiple public and quasi-public education actors²⁷ showing varying levels of interest and capacity to deliver and safeguard education services. At times, the education response in Syria has also been subject to restrictions from ruling authorities, limiting the capacity of NGOs to accompany the education process beyond the emergency response phase.²⁸ Protracted political fragmentation within the country is also reflected in the number of education curricula that are used in parallel in different areas of Syria.²⁹ Formal education, which follows the curriculum of the Syrian government, remains the main and only form of certified education for millions of students across the country. Private accredited education, when present, remains broadly unsustainable and unaffordable for most.³⁰ The different education curricula will need to be sensibly reconciled as the country further progresses in its political transition.³¹
- **Large-scale forced displacement³² and destruction of infrastructure and basic services:³³** These serve as compounding factors in relation to education. The earthquake that wreaked havoc in parts of Syria in February 2023 rendered the situation even more critical, with further destruction of schools in various parts of the country.³⁴
- **Restrictive donor agreements, alongside political restrictions on reconstruction or development activities:** In Syria, these have served to hinder attempts by NGOs and the U.N. to adequately rehabilitate and equip schools and support education.³⁵ Despite numerous appeals by the U.N. and humanitarian agencies working in Syria in the education sector to support longer-term solutions,³⁶ education aid policies have continued to be subject to political red lines from donors.³⁷
- **Insufficient investment:** Despite the display of solidarity by the international community in support of the Syrian population, comparatively limited donor investments have gone into education. Between 2012 and 2023, international donors devoted between 1.2 to 1.4 billion USD to support education services in Syria, which is approximately 5% of the total funding committed and spent by donors.³⁸ According to UNICEF, "at the current rate of funding, UNICEF and education partners would need another 30 years to rehabilitate all damaged and destroyed schools, so creating another generation of children lost and left behind."³⁹
- **Diverging donor stances on education in Syria:** Donors have sometimes shown diverging and, at times, conflicting types of commitments across Syria in relation to education, including prioritization of activities,⁴⁰ geographical coverage,⁴¹ long-term objectives,⁴² and safeguards⁴³ — which has created

programming challenges.⁴⁴ This has caused confusion for aid responders, their local education counterparts, and communities.⁴⁵

- **Socioeconomic challenges:** Inflation in Syria has been marked by a 200-fold increase over the past 14 years,⁴⁶ and the Syrian pound has sharply depreciated, causing living standards to plummet, leading to a severe economic contraction since 2011.⁴⁷ According to the United Nations Development Programme, “nine out of ten Syrians live in poverty and face food insecurity.”⁴⁸ As a result, education has become intrinsically more dependent on the capacity of families and teachers to cover main costs, including those relating to transportation.⁴⁹ The plummeting purchasing power of Syrian families⁵⁰ has compelled many to deprioritize education over other essential needs⁵¹ and to have their children work in agriculture, hazardous labor (e.g., filtering crude oil or melting metal collected through rubble in basic foundries), or begging⁵² to supplement household incomes.⁵³
- **Energy crisis:** Quality learning is challenged by the severe energy crisis in the country. This applies to in-person structured education and homeschooling.⁵⁴ It impacts transportation costs and makes learning spaces in schools and at home un conducive to learning due to lack of heating in winter, cooling in summer, and insufficient electricity and water supplies.⁵⁵
- **Regulatory complexity:** A complex set of regulations apply to Syria and to targeted sectors and individuals in Syria. These regulations do not restrict education directly. However, they can still affect educational activities indirectly due to confusion over the nature of permissible activities and risk aversion stemming from the complex compliance landscape, including:
 - o Syria remains among the most heavily sanctioned countries in the world, with autonomous sanction measures imposed in various rounds by the U.S. and EU and other countries that include the U.K., Canada, and Switzerland.⁵⁶ They were imposed with a range of objectives,⁵⁷ including to support conflict cessation, address human rights abuses, and combat the use of chemical weapons against civilians. These sanctions contain relevant humanitarian carve-outs or provisions that safeguard education when falling under a humanitarian banner (See Box 1). Nevertheless, they result in a heavy compliance burden on private and not-for-profit actors operating in the country, which can have knock-on effects on education.
 - o Counterterrorism sanctions imposed by the United Nations Security Council (UNSC)⁵⁸ also apply to groups in Syria. Restrictions include an asset freeze, which ensures that funds, financial assets, or economic resources are not made available, either directly or indirectly, for the benefit of such persons.⁵⁹ These measures served to limit the ability of NGOs to engage in the provision of education with certain parts of the population living in areas controlled by these groups, counter to the humanitarian principles enshrined in international humanitarian law, relating to neutrality and impartiality of humanitarian assistance.⁶⁰ In 2022, these challenges were acknowledged by the UNSC that introduced a humanitarian exemption to asset freeze restrictions via UNSC Resolution 2664 (2022).⁶¹ HTS and its members are now in charge of large parts of the country and part of the transitional government in Damascus. This may challenge a meaningful engagement with post-Assad Syria by actors falling outside the scope of the UNSC Resolution 2664 (2022).⁶²
 - o Syria is also designated by the U.S. as a state sponsor of terrorism;⁶³ by the EU as a high-risk country for money laundering and terrorism financing;⁶⁴ and by the Financial Action Task Force as a jurisdiction placed on their gray list⁶⁵ of countries under increased monitoring⁶⁶ in relation to stringent international anti-money laundering/counterterrorist financing (AML and CFT) regulations. Cumulatively, these regulations impact the risk appetite of private sector actors to engage with Syria, even for permissible activities, such as those relating to education.⁶⁷
 - o U.S., EU, and other export control regimes relating to dual-use goods are applicable to Syria, which include equipment that could have either a military or civilian application. From 2022

onward, and more recently in response to political changes in the country in December 2024, U.S. and EU sanctions on Syria have seen the introduction of broad humanitarian carve-outs (Box 1), but the same does not apply to U.S. export controls administered by the U.S. Department of Commerce. Export controls, especially from the United States, present indirect constraints to access supplies needed for the delivery of educational materials. Consultations suggest that education is particularly impacted by difficulties accessing certain key technologies that fall under export controls.⁶⁸

- Criminal laws⁶⁹ also play a role in restricting humanitarian and related activities in Syria by introducing legal obligations to NGOs, preventing them from providing material support — such as training or goods— to designated terrorist actors.⁷⁰
- **Overcompliance/de-risking:** Syria represents one of the world’s most severe examples of the financial sector “de-risking”⁷¹ and wider private and not-for-profit sector “over-compliance”,⁷² whereby banks and other actors reduce or withdraw their presence from high-risk countries like Syria due to a combination of bureaucratic, legal, cost, and reputational considerations, alluded to above.⁷³ This “chilling effect” has been shown to negatively impact Syria in areas of humanitarian action,⁷⁴ remittances,⁷⁵ supply chains of essential goods and services,⁷⁶ and broader trade,⁷⁷ all of which potentially impact education in the country.
- **Financial isolation:** A particularly marked problem linked to de-risking, as well as sanctions and export control-related restrictions, is the highly limited availability of functioning payment channels to or from Syria. Syria faces a series of complex barriers to regulated cross-border fund transfers in light of de-risking,⁷⁸ especially among correspondent banks. Even in instances where certain types of trade or payments may be permitted under international regulations, many private sector actors prefer to err on the side of caution and avoid all forms of contact with countries like Syria.⁷⁹ This situation has financially isolated Syria, which counters Financial Aid Task Force and the EU Commission’s predicaments that instead encourage financial inclusion as a key measure in support of anti-money laundering and counterterrorism financing regulations.⁸⁰ It also poses risk to educational support in the country, according to several studies.⁸¹ This is a problem for humanitarian and private sector actors, but also in relation to the sending of personal remittances, which represent a significant economic lifeline for Syrian families, often contributing to education-related expenses.⁸² As a ratio of the country’s GDP, remittance inflows to Syria are estimated to have more than doubled since the start of the conflict.⁸³ As Syria’s remittance market is composed of an interwoven network of formal and informal payment systems,⁸⁴ de-risking, alongside anti-money laundering and counterterrorism financing regulations, can serve as barriers and increase associated costs.⁸⁵ These effects have been exacerbated also by the 2019/2020 Lebanese financial crisis⁸⁶ and restrictive Syrian national regulations and policies.⁸⁷

Box 1: Overview of main U.S. and EU sanctions, and export controls exceptions related to education in Syria

The U.S. and the EU introduced broader humanitarian exemptions beginning in 2022.⁸⁸ Their purpose was to facilitate the delivery of aid in response to the humanitarian crisis in Syria. More recently, these exemptions were further expanded following the political changes in December 2024,⁸⁹ when the Assad government was ousted and a transitional government was established in Damascus.⁹⁰

The U.S. offers specific exemptions, known as general licenses or GLs, and ad-hoc exceptions, known as specific licenses or SLs, that permit certain educational activities in Syria that would otherwise be prohibited under its Syrian sanctions regulations (SSR) and its counterterrorism regulations.⁹¹ These include provisions allowing for:

- Transactions for the official business of the U.N. and some other international organizations and entities — such as the International Committee of the Red Cross— and their employees, grantees, or contractors.⁹²

- Certain transactions in support of nongovernmental organizations' noncommercial activities,⁹³ comprising "activities to support education in Syria, including combating illiteracy, increasing access to education, and assisting education reform projects"⁹⁴ and "to support non-commercial development projects directly benefiting the Syrian people."⁹⁵
- During the six-month period of GL24, starting from Dec. 8, 2024, transactions otherwise prohibited with governing institutions in Syria that are run or led by designated persons, as well as certain transactions related to energy and personal remittances.⁹⁶ The guidance provided in the FAQs⁹⁷ clarifies that transactions with the Ministry of Education and government-run schools are permitted.⁹⁸ Additionally, the payment of salaries or wages to non-designated employees of governing institutions in Syria is also permitted.

Additionally, the following activities are permitted specifically under the SSR and may not be permitted under other regulations:

- Processing "transfers of funds on behalf of U.S. or third-country non-governmental organizations" for authorized activities outlined in the SSR by financial institutions under U.S. jurisdiction.⁹⁹
- From May 2022, activities outside the "not-for-profit/humanitarian umbrella" (i.e. noncommercial activities) in specific economic sectors of northeast and northwest Syria — including educational initiatives — provided they are conducted in non-regime-held areas and do not involve transactions with the Syrian government.¹⁰⁰
- From June 2024, the export of certain services that are an integral part of internet-based communications.¹⁰¹

Finally, the Caesar Act, legislation that allows the U.S. to impose extraterritorial or secondary sanctions against non-U.S. targets in relation to Syria, contains provisions that call for "continuously supporting Syrians to achieve peace, stability and development",¹⁰² which could be interpreted to refer to education.

These GLs do not cover the exports or re-exports of items to Syria that are subject to the U.S. Export Administration Regulations' guidelines and restrictions.¹⁰³ These apply not only if items are of U.S. origin, but also if the value of incorporated U.S.-origin controlled content in non-U.S. items exceed 10% of their total value.¹⁰⁴ Since 2004, the U.S. government maintains a general policy of denial for exports and re-exports to Syria. This means that the Bureau of Industry and Security (BIS)¹⁰⁵ is unlikely to consider and grant the required licenses related to end users in Syria.¹⁰⁶ However, BIS may review on a case-by-case basis¹⁰⁷ specific licensing requests for few codified exceptions, including for "telecommunications equipment and associated computers; software and technology; items in support of United Nations operations in Syria; items necessary for the support of the Syrian people, including, but not limited to, items related to water supply and sanitation, agricultural production and food processing, power generation, oil and gas production, construction and engineering, transportation, and educational infrastructure".¹⁰⁸

EU restrictive measures contain humanitarian exemptions and ad-hoc exceptions, known as derogations, that seek to permit the delivery of humanitarian aid to Syria.¹⁰⁹ Most notably, after the 2023 earthquake in Syria, the EU introduced a temporary humanitarian exemption,¹¹⁰ which was approved for an initial period of six months, renewed in various rounds since,¹¹¹ and in February 2025 it was extended indefinitely.¹¹² This exemption allows access to goods and services, and coverage of all types of humanitarian assistance or to support other activities, that provide basic human needs.¹¹³ The exemption benefits international organizations and certain defined categories of actors involved in humanitarian activities.¹¹⁴ The exemption of the EU referred more generally to "humanitarian assistance" or "activities that support basic human needs" and did not mention education outright. The EU's humanitarian carve-outs did not explicitly apply to the facilitation of education activities in Syria carried out by actors subject to the EU jurisdiction that are not explicitly listed in the EU regulation (e.g. EU-based financial institutions, private sector, and education institutions). Before the ongoing political transition in Syria, the EU considered education in the country a "gray area" closely linked to reconstruction efforts, which were dependent on a meaningful political transition.¹¹⁵ The only exception to this viewpoint was education in emergency activities, which fell under the humanitarian response framework.¹¹⁶

In February 2025, the EU amended its restrictive measures to facilitate engagement in crucial sectors in Syria, including energy, transport, and finance.¹¹⁷

For any activity not covered by the humanitarian carve-outs, a specific license (U.S.) or a derogation (EU) may be sought, if provided by the law under the various sanctions regimes. This process has been assessed by NGOs in Syria to be problematic.¹¹⁸ For instance, in the EU, a derogation should be obtained by the national competent

authority (NCA) at the member state level.¹¹⁹ In the experience of international organizations in Syria, this can take from between several months up to a year, and a significant amount of resources.¹²⁰ Ad-hoc derogations or specific licenses were widely critiqued by humanitarian and development actors in relation to the Syrian earthquake, including in relation to equipment needed for the rebuilding and refurbishing of schools, while the introduction of broad exemptions were celebrated as a positive step forward, marking effective stakeholder engagement and responsiveness from relevant sanctions authorities.¹²¹

3. Implications of cross-cutting challenges on education provision in Syria

Building on the complex set of challenges facing the provision of education in Syria, the following sections outline implications for safe learning spaces, availability of qualified and experienced teachers, and access to teaching and learning equipment, tools, and technology.

3.1. Lack of safe learning spaces

A key barrier observed across all areas of control is the scarcity of safe and inclusive learning spaces, particularly as a result of the conflict and 2023 earthquake in northwest Syria.¹²² Writing in 2021, UNICEF described how “[o]ne in three schools inside Syria can no longer be used because they were destroyed, damaged or are being used for military purposes. Children who are able to attend school often learn in overcrowded classrooms, and in buildings with insufficient water and sanitation facilities, electricity, heating or ventilation”.¹²³ As of 2024, 3,700 schools are in need of rehabilitation due to damage inflicted by the conflict, with 37% located in central Syria,¹²⁴ 44% in northwest Syria, and 19% in northeast Syria.¹²⁵ In northeast Syria, the need for improvements in school infrastructure remains one of the most commonly reported priority education needs.¹²⁶ In these areas, the most frequently reported difficulties in accessing education include overcrowded schools and an uncondusive learning environment.¹²⁷ As of mid-2023, 640 schools in northwest Syria were reported to be at least partially damaged by the earthquake that struck the country in February of that year.¹²⁸ In these areas, overcrowded schools have been consistently reported as a barrier for children and youth to access and stay into the education cycle.¹²⁹

Safe learning environments are even more challenging in camp settings for internally displaced persons, in the northeast and northwest of the country.¹³⁰ In 2022, the average number of students per classroom in areas formerly controlled by the government of Syria was approximately 38 and, at times, as high as 195 students per class.¹³¹ At least 50% of the facilities did not have running water due to lack of maintenance and repairs, and also suffered from a lack of electricity.¹³² Finally, across all areas of Syria, most of the schools are not equipped to receive children with disabilities.¹³³

Even if most types of new investments and reconstruction have been restricted, directly or indirectly under U.S. and EU sanctions, rehabilitation activities ancillary to education carried out by NGOs, the U.N. and other international organizations appear to be authorized under both sets of sanctions:

- Under U.S. sanctions on Syria, permissible noncommercial education activities include repairing of school buildings, rehabilitating basic utilities — such as electricity, water, and sewage networks - and removing debris and waste.¹³⁴ Since 2022, in areas that were outside the control of the Syrian government, these activities also appeared to be permissible in certain economic sectors that included education, so long as there were no transactions involved with sanctioned individuals or entities.¹³⁵ In 2023, the U.S. Office of Foreign Assets Control (OFAC) clarified that transactions related to humanitarian efforts in Syria were not prohibited if they involved the government.¹³⁶ More recently, transactions with governing education institutions in Syria, following Dec. 8, 2024, have also been authorized (see Box 1).¹³⁷

- EU restrictive measures on Syria do not explicitly forbid reconstruction efforts in Syria per se. Further, EU sanctions that target individuals linked to the Ministry of Education, including targeted measures against the Minister for Education, do not mean that the entire ministry is sanctioned, nor necessarily that activities in support of formal education in Syria, such as the rehabilitation of schools, are restricted.¹³⁸

Research conducted for this study suggests that constraints on rehabilitating learning environments in Syria seem to be more closely linked to the policies of donors. For years, donors remained reluctant to support education early-recovery programs, as they tied such projects to the contentious issue of reconstruction.¹³⁹ As a result, education-related early recovery, development, and reconstruction objectives have often been conflated. For example, in northern Syria, while communities have emphasized the need for long-term solutions, they have primarily received temporary support, such as tented schools and indefinite use of catch-up curricula.¹⁴⁰ Similarly, often across different areas of control, the rehabilitation of education facilities has been limited by donors to minor repairs, which, for example, proved to be problematic in the aftermath of the earthquake of February 2023 from a disaster risk reduction perspective.¹⁴¹

The European Commission identifies school infrastructure rehabilitation and improvement as a key action under its education in emergency programs.¹⁴² However, the EU has tied its funding for reconstruction efforts to genuine progress toward a political transition.¹⁴³ Traditionally, EU member state authorities have guided what distinguishes reconstruction from humanitarian activities in Syria, as the definitions often blur.¹⁴⁴ Experts and policy practitioners consulted for this study note that while recent EU statements may suggest a clearer operating framework for the future, it remains too early to determine how EU donor policies for education in Syria will adapt to the ongoing transition.

In sum, limitations to the rehabilitation of safe learning spaces in Syria appear to be more closely related to donors' policies on reconstruction than any direct or indirect impacts of EU and U.S. sanctions. It is important to note that large-scale investments in reconstruction in Syria could still lead actors to fall foul of U.S. primary and secondary sanctions due to the renewal of the Caesar Act for another five years in December 2024.¹⁴⁵

3.2. Lack of qualified and experienced teachers

The second major barrier observed across all parts of Syria relates to the insufficient numbers of qualified and experienced teachers available to meet the learning needs of Syria's children. Teachers of both formal and nonformal education have played a key role throughout the crisis in Syria, representing front-line responders in mitigating protection risks to children and youth. Nevertheless, an estimated 150,000 teachers have left the formal education system also due to displacement, injury, or death over the last 14 years.¹⁴⁶

Throughout Syria, but particularly in the northwest of the country, the lack of qualified teachers with knowledge of growth mindset — and social-emotional learning and teaching skills — is one of the main barriers that prevents children from enrolling regularly in school.¹⁴⁷ This is also due to teachers' frequent absences from schools, primarily due to economic factors such as low salaries or salaries not being paid to teachers for prolonged periods.¹⁴⁸ In 2022, in central areas of Syria, there were more than 130,000 teachers working in the formal education system, with approximately 20% of them being on temporary contracts.¹⁴⁹ According to the humanitarian initiative REACH in 2024, one of the most commonly reported education priority needs in the northeast of the country was to have better-skilled teachers.¹⁵⁰ The limited skills, capacity, and experience of teachers is a challenge reported consistently also in areas that were under the control of the former government of Syria,¹⁵¹ as well as in the northwest of the country.¹⁵² Furthermore, teachers often need to resolve very practical issues in schools to maintain proper standards

of facilities, such as organizing the provision of water or procuring basic teaching materials, which detracts time and energy from teaching.¹⁵³ Finally, studies suggest that teachers' "purchasing power has evaporated" from their salaries due to the macroeconomic situation in all parts of the country.¹⁵⁴ Low teacher salaries, lack of opportunities for professional development, and psychological distress associated with the crisis are contributing to a demoralized teaching workforce and resulting in an increasing absenteeism of teaching personnel in schools.¹⁵⁵

In the EU and U.S. sanctions related to Syria, there are no indications that humanitarian activities cannot support teachers in the Syrian education directorates, whether in formal or quasi-formal settings,¹⁵⁶ across different parts of the country.

Before the political transition in Syria, while U.S. sanctions targeted the government of Syria and EU sanctions focused on individuals associated with the Ministry of Education, these measures did not extend to sanctioning all staff within the ministry, including teachers. Similarly, in regions where designated terrorist organizations exercise de facto authority, NGO-led education activities continue to fall within permissible boundaries outlined in various U.S. sanctions regulations.¹⁵⁷ However, challenges arise from counterterrorism legislation and criminal laws that may impede organizations aiming to provide training for teachers, which could encompass teaching methods and capacity building.¹⁵⁸ A notable example is the material support statute in the U.S., administered by the Department of Justice.¹⁵⁹ This law empowers the U.S. government to prosecute individuals who are believed to be offering material support to a foreign terrorist organization (FTO), regardless of whether they intend to facilitate any terrorist acts, including activities related to training. In this context, complications may emerge regarding the definitions of individuals associated with designated organizations, including the potential inclusion of family members or those in educational roles who might also be active members of such groups.¹⁶⁰

The compensation of teachers has been challenging throughout the conflict, also due to bank de-risking and financial isolation of Syria.¹⁶¹ The payment channels used for compensating teachers by aid responders may still be subject to U.S. and EU sanctions and anti-money laundering and counterterrorism restrictions, particularly if they involve designated banks, money service businesses, including hawaladars, or the Central Bank of Syria. In February 2025, the EU amended its restrictive measures to facilitate engagement with the financial sector in Syria for humanitarian and reconstruction purposes.¹⁶² Further, U.S. General License 24 (GL24) explicitly permits transactions with governing institutions in Syria¹⁶³ and the payment of salaries or wages to employees of these institutions.¹⁶⁴ However, it is still too early to assess whether these changes will positively impact the ability of various actors to process payments in the country, given their recent implementation.

Increasing the number of qualified and experienced teachers across all areas of Syria entails longer-term and coordinated investments. However, most education interventions in Syria have been delivered within a relief context,¹⁶⁵ with most donors failing to commit to predictable, multiyear funding.¹⁶⁶ Comparatively fewer programs have focused on teaching and learning, further reinforcing education access barriers.¹⁶⁷ Furthermore, for the most part, learning outcomes have not been measured.¹⁶⁸ Similar to the problems described above, longer-term support for teachers has sometimes been misconstrued as "reconstruction" support, a concept that has been contentious in Syria throughout the crisis.¹⁶⁹ As a result, many donors look at public sector teachers as public servants and opt to avoid reputational risks of supporting formal or quasi-formal teachers, including through trainings,¹⁷⁰ for fear of being seen as legitimizing de facto authorities.¹⁷¹ For example, some donors put as a condition to aid responders the use of nongovernmental actors to conduct training for governmental teachers.¹⁷² Finally, donors have frequently employed diverging approaches to supporting teachers' compensation with their funding in Syria.¹⁷³ Some donors have provided monetary compensation for teachers only in certain parts of Syria, while others have limited support to in-kind materials to cover costs related to attending training, such as transportation and lost income from private teaching.¹⁷⁴ Navigating these discrepancies has overshadowed the essential

technical discussions needed to shift from emergency education responses to more sustainable approaches that support fragile communities,¹⁷⁵ building on the efforts of civil society organizations.¹⁷⁶

This analysis illustrates that regulatory complexities, short-term thinking, and conflicting donors' policies did not enable an optimum use of the already scarce resources allocated to the support of teachers in Syria. They also created confusion for aid responders, their local counterparts, and communities, slowing down progress in addressing the lack of qualified and experienced teachers across all areas of control. Addressing these issues and harmonizing donor policies is increasingly critical, especially given the significant cuts in global aid funding by many countries, including the U.S.

3.3. Insufficient teaching and learning equipment, tools and technology

A third consequence of the conflict in Syria is the lack of tools, technology, equipment, and learning aids needed for teachers and children to support education. In northeast Syria, one of the most commonly reported priority needs relates to insufficient teaching and learning materials,¹⁷⁷ also cited as a problem for schools in northwest Syria.¹⁷⁸ In 2022, in central areas, only 20% of schools were still equipped with tools for science-class laboratories and computers for developing information and communications technology (ICT) skills, while only 16% could count on functioning machineries for vocational and technical training.¹⁷⁹ These problems are further exacerbated by a lack of electricity in schools. There were only 30 minutes of electricity per school day at the end of 2022, and that has deteriorated since.¹⁸⁰ This limits development of technical skills for youth and further reduces their competency and employment prospects. Furthermore, teachers cannot instruct students through electronic means — using videos, audio, and digital presentations — due to lack of equipment.¹⁸¹

These barriers have emerged at a time when the need for digital education and remote learning have become an increasingly pressing need for students and teachers impacted by conflict, displacement, and political fragmentation — all of which was further compounded by the global COVID-19 pandemic.¹⁸² Proposals for ICT educational frameworks for Syria already exist, but have proved contextually challenging to implement.¹⁸³ For example, in central areas in 2022, 89% of families with students in formal education did not have the equipment or assets available at home — such as laptops, desktops, and tablets — to facilitate access to digital learning.¹⁸⁴ And 40% of families did not have internet subscriptions at home, while 53% had subscriptions with bundles of one megabit or less.¹⁸⁵ Access to online learning is further negatively impacted by scarce electricity supply, which for most families amounts to less than two hours of electricity a day.¹⁸⁶ The economic situation of the country makes solutions to the above out of reach for most families.¹⁸⁷ In line with efforts in several other war-torn countries and to support digital education services at scale for Syrians, UNICEF and other humanitarian responders are working with international ICT providers.¹⁸⁸ These operations also need to comply with international export control regulations and sanctions, which, in practice, can serve to block access or accounts for users from sanctioned countries like Syria.¹⁸⁹ It also prevents users from accessing education services online that require paid subscriptions.¹⁹⁰

Most forms of machinery and equipment that might be provided to educational facilities or teachers and students by, for example, by NGOs or the U.N. — such as laptops, other computing equipment, USB sticks, and software — can fall under U.S. export restrictions (see Box 1). Moreover, U.S. sanctions contain certain prohibitions that restrict NGOs from exporting, reexporting, selling or supplying services to Syria.¹⁹¹ Similarly, the U.S.' weapons of mass destruction -related sanctions on Syria¹⁹² include certain equipment, such as computers and USB sticks, as potential dual-use items, meaning they are goods that may have a civilian or military application. In principle, it is possible for education-related materials or content from the U.S. to reach Syria by obtaining a specific license from OFAC and/or BIS in the DOC.

However, this would require political will at the executive level and a rationale based on national security or humanitarian grounds through engagement with BIS.

In June 2024, the U.S. amended the SSR¹⁹³ and updated its FAQs aimed, in part, at facilitating humanitarian assistance and internet-based communication services for Syrian civilians.¹⁹⁴ While these amendments may address some of the outlined challenges, major communication platforms remain unavailable to Syrian students and teachers in the country due to compliance, and over-compliance, with U.S. sanctions and export controls by major tech companies.¹⁹⁵ This may suggest that further efforts are needed to continue addressing private sector avoidance of the Syrian educational deliveries through more proactive outreach and clearer guidance and reassurances. It is too early to assess if changes introduced in February 2025 in the EU, regarding restrictive measures on Syria, will have a positive impact on the availability of equipment, technology, and software for education purposes in the country.

Software and computer equipment that can be used for education may unwittingly fall under restrictions applied to items that can be used for tracking, surveillance or monitoring, and telecommunications interception. Similarly, technical assistance in connection with these items is restricted.¹⁹⁶ EU restrictions against the import of luxury goods to Syria¹⁹⁷ have also sometimes served to complicate the import of laptops and other ICT-related goods.¹⁹⁸ Meantime, Annex V of the Council Regulation 36/2012 notes that items on the annex shall not apply to “software which is in the public domain,” which could be relevant for the education-related equipment. It appears likely that items subject to the EU restrictions mentioned above may be exported to Syria if a competent authority of a member state grants a derogation on humanitarian grounds. NGOs consulted in May 2024 indicated that additional clarity is needed regarding the permissible activities related to the equipment and technology required for education in Syria.

Furthermore, U.S. and EU sanctions against some Syria-based telecommunications companies,¹⁹⁹ have restricted humanitarian organizations’ ability to provide internet-based support for educational purposes to children, young people, and teachers — particularly during the COVID-19 pandemic,²⁰⁰ when classes were forced out of the classrooms and onto online platforms. In 2023, the EU expanded its humanitarian exemptions, authorizing humanitarian organizations to carry out transactions with designated persons, entities or bodies (e.g., Syriatel), if necessary, to ensure the timely delivery of humanitarian assistance.²⁰¹ In the U.S., relevant parties could apply for an OFAC SL.

The aforementioned regulatory complexity, and associated risks to international providers engaging with Syria, encouraged practices of over-compliance, which represents a major concern in relation to access to education technology.²⁰² According to one humanitarian expert, “international service and equipment providers outright avoid servicing NGOs working in Syria due to the chilling effect generated by sanctions and controls over dual-use goods. This leads NGOs to change the type of support provided, or to cancel their programs altogether, feeling unable to comply with relevant regulations.”²⁰³ According to another expert working in Syria, “this has an amplifying negative effect on NGO capacity to support both formal and non-formal education; to help it modernize, or to allow the provision of more flexible and accessible educational services accessed remotely.”²⁰⁴

4. Conclusion

In Syria, children and young people seeking access to quality learning must navigate considerable barriers, including security issues, economic conditions, and energy poverty. They also face sector-specific challenges, such as a lack of safe learning spaces, qualified teachers, and educational resources. These obstacles are further compounded by donor policies, as well as regulatory complexities and risks in Syria, creating significant challenges for aid responders and education duty bearers.

This paper highlights that while donor policies and regulatory complexities are interconnected, they impose distinct limitations on educational delivery. On the one hand, donor policies have been characterized by "short-termism," unresolved issues regarding long-term programming, and conflicting approaches to geographical coverage and prioritization of activities. On the other, further efforts are necessary to resolve inconsistencies among different autonomous sanction programs and ensure timely access to educational tools and resources. Additionally, in line with Financial Aid Task Force and EU Commission predicaments,²⁰⁵ further steps should promote financial inclusion and counter bank de-risking in Syria.

Amid acute humanitarian needs, structural socioeconomic fragility, mass migration, and the devastating earthquake of February 2023, education in Syria has often been an overlooked priority. However, acting at scale to enable the relaunch and update of a fit-for-purpose Syrian schooling system is a shared priority, particularly among the Syrian population and education practitioners.²⁰⁶ The ongoing political transition in Syria poses a raft of new challenges but also creates new opportunities to revitalize its education system, including one that could also cater to the needs of refugees returning to the country.

It is still too early to assess the impact of recent changes in EU and U.S. donor policies and sanctions on support for Syria's education sector. However, the EU and the U.S. possess the potential to work with other donors and governments, and drive the response in a more sustainable direction by:

- Working in tandem with Syrian-owned and -led initiatives, including those promoted by duty bearers and local actors, as they grapple with the challenges deriving from fragmented education curricula and diverse value systems within the country.
- Taking stock of the experience gained by education responders and civil society stakeholders over the last 14 years.²⁰⁷
- Revitalizing a transparent, continuous, and constructive dialogue between all actors involved in the education response in Syria, including policy makers, donors to the Syria response, practitioners, duty bearers, the private sector, and scholars.
- Resolving the frictions highlighted in this paper between education priorities in Syria, funding policies, and restrictive measures.²⁰⁸
- Combining humanitarian programming with long-term objectives across all parts of the country.²⁰⁹

Endnotes

¹ These recommendations build on the work of: Kinana Qaddour and Salman Husain, “Syria’s Education Crisis: A Sustainable Approach After 11 Years of Conflict” (Middle East Institute, March 2022), 13–15, <https://www.mei.edu/publications/syrias-education-crisis-sustainable-approach-after-11-years-conflict>; UNICEF, “Every Day Counts: An Outlook on Education for the Most Vulnerable Children in Syria - Syrian Arab Republic” (New York: UNICEF, May 10, 2022), <https://reliefweb.int/report/syrian-arab-republic/every-day-counts-outlook-education-most-vulnerable-children-syria>; Omar Abdulaziz Hallaj, “Policy Paper: The Engagement of Civic Actors in the Education Sector in Syria: Lessons Learned and Recommendationse” (Duderi e. V. EuroMed Feminist Initiative, September 2024), <https://www.efi-ife.org/en/pdf/policy-paper-the-engagement-of-civic-actors-in-the-education-sector-in-syria-lessons-learned-and-recommendations>.

² Over the past decade or so, several national tri-sector groups have been established to enhance dialogue and solution oriented action between international non-governmental organisations (NGOs), financial institutions and governments. Tri-sector groups exist and regularly meet, for example, in the UK and the Netherlands.

³ This could result in joint clarification paper like the one issued jointly by the US and the United Kingdom in relation to Ukraine, available at: OFSI and OFAC, “Humanitarian Assistance and Food Security Fact Sheet: Understanding UK and U.S. Sanctions and Their Interconnection with Russia,” June 28, 2023, <https://ofac.treasury.gov/media/931946/download?inline>.

⁴ An increase of more than 50% if compared to the situation in 2020. For additional reference to level of needs in the country please see: UN OCHA, “Syrian Arab Republic: 2024 Humanitarian Needs Overview”, 3 March 2024, <https://www.unocha.org/publications/report/syrian-arab-republic/syrian-arab-republic-2024-humanitarian-needs-overview-february-2024>. The percentage has been calculated by the authors based on the information contained in the HNO 2024 for Syria.

⁵ UNICEF, “Education Crisis for Syrian Children,” December 13, 2013, <https://www.unicefusa.org/press/decline-education-syrian-children-worst-and-fastest-regions-history>.

⁶ UN OCHA, HNO (2024).

⁷ UNICEF, “After Almost Ten Years of War in Syria, More than Half of Children Continue to Be Deprived of Education,” January 24, 2021, <https://www.unicef.org/press-releases/after-almost-ten-years-war-syria-more-half-children-continue-be-deprived-education>.

⁸ This emerged during a number of behind closed doors technical consultations between 2023 and 2024. It is also reflected in Norwegian Refugee Council, “Private - The Future of Formal Education in Syria,” July 2022, Private; Numerous were the references to education and side events on education during the last Brussels Conference on Syria. See: EEAS, “Syria: Brussels VIII Conference 2024,” May 30, 2024, https://www.eeas.europa.eu/eeas/syria-brussels-viii-conference-2024_en.

⁹ Fateh Shaban, “Integrating Returning Refugees into Syria’s Education System: A Proposed Strategy Based on Post-Conflict Experiences” (Harmoon Center for Contemporary Studies, January 21, 2025), 3, <https://www.harmoon.org/en/researches/syria-refugees/>.

¹⁰ Mohammed Al Hessian, Stephanie Bengtsson, and Judith Kohlenberger, “Understanding the Syrian Educational System in a Context of Crisis,” Working Paper (Vienna Institute of Demography Working Papers, 2016), <https://doi.org/10.1553/0x003cd018>.

¹¹ The data in this section is from: UN OCHA, HNO (2024), 73–74.

¹² The data in this section is from: UN OCHA, 73–74.

¹³ Since 2011, grave violations of their fundamental rights by parties to the conflict, including the Syrian Government, have been a constant trait of the crisis, with over 22,000 children killed, maimed, abducted, forcibly recruited, detained or tortured. Calculation by the author based on the annual Children in armed conflict reports of the UN Secretary General to the General Assembly between 2012 and 2023.

¹⁴ Violations have been systematically reported in the Children in armed conflict reports of the UN Secretary General to the UN General Assembly on a yearly basis. Similarly, the Syria Education Cluster, in cooperation with Save the Children and UNICEF, have collected regular statistics on these violations from the beginning of the conflict in Syria in March 2011 until 2022. Similarly, attacks on education in Syria have been reported in the yearly reports of the Global Coalition to Protect Education from Attack (GCPEA).

¹⁵ Between 2011-2022, there were 689 registered and verified attacks on schools, and in over 1,700 instances, educational facilities were used for military purposes or as collective shelters. Calculation by the author based on the annual Children in armed conflict reports of the UN Secretary General to the General Assembly between 2012 and 2023.

¹⁶ UNICEF, (2021).

¹⁷ See for example: Qaddour and Husain, (2022); Norwegian Refugee Council, (2022); UNICEF, (2022); Aamer Almustafa, “Education System in Northwestern Syria: A Long Road Ahead,” The Tahrir Institute for Middle East Policy -, June 9, 2023, <https://timep.org/2023/06/09/education-system-in-northwestern-syria-a-long-road-ahead/>; Samer Yassin, “Education System in NE Syria Faces Challenges, Seeks Recognition,” *North Press Agency* (blog), February 6, 2024, <https://npasyria.com/en/110956/>; Kjetil Selvik and Tamar Groves, “‘The Generation That Will Inherit Syria’: Education as Citizen Aid and Political Opportunity,” *Third World Quarterly*, May 4, 2023, <https://www.tandfonline.com/doi/abs/10.1080/01436597.2023.2167705>; Raymon Al-Maaloli, “Education Under Exceptional Circumstances: What Can Be Done About Northern Syria?,” March 3, 2022, <https://www.washingtoninstitute.org/policy-analysis/education-under-exceptional-circumstances-what-can-be-done-about-northern-syria>.

¹⁸ Al Hessian, Bengtsson, and Kohlenberger, (2016); Norwegian Refugee Council, (2022).

¹⁹ See for example: Nisreen Al Sakbani and Juline Beaujouan, “Education in Syria: Hidden Victim of the Conflict of Weapon of War?,” *Journal of Peace Education*, March 9, 2024, <https://www.tandfonline.com/doi/abs/10.1080/17400201.2024.2325493>; Yassin, “(2024)”; Roual Al Taweel, “Conflict and Justice in Syria: The Paradoxical Role of Education,” *Education, Peace and Politics in the Middle East*, November 30, 2023, <https://educationpeaceandpolitics.org/conflict-and-justice-in-syria-the-paradoxical-role-of-education/>; Martin Benoitte, “Politics of Education in Northeast Syria – Complexities and Criticisms,” *The Education and Development Forum (UKFIET)*, November 27, 2023, <https://www.ukfiet.org/2023/politics-of-education-in-northeast-syria-complexities-and-criticisms/>; Almustafa, “(2023)”; James Denselow, “Educational Reform for Syrians Must Not Ignore the Country’s Children,” *The New Humanitarian*, August 18, 2016, <https://deeply.thenewhumanitarian.org/syria/community/2016/08/18/educational-reform-for-syrians-must-not-ignore-the-countrys-children.html>; Raymon Al-Maaloli, “The Ideology of Authority: 50 Years of Education in Syria,” *The Washington Institute*, April 28, 2016, <https://www.washingtoninstitute.org/policy-analysis/ideology-authority-50-years-education-syria>; Omar Abdulaziz Hallaj and Hala Haj Ali,

“Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain” (Duderi e. V. EuroMed Feminist Initiative, August 2024), <https://www.efi-ife.org/en/pdf/report-the-engagement-of-civic-actors-in-the-education-sector-in-syria-mapping-the-terrain>.

²⁰ It is beyond the scope of this section to analyse the reasons for the application of different sanctions programs on Syria and the effectiveness they have had thus far against their set objectives. For some reflections on these aspects see, for example, Francesco Giumelli, *The Effectiveness of EU Sanctions: An Analysis of Iran, Belarus, Syria and Myanmar (Burma)*, EPC Issue Paper (European Policy Centre, 2013); Peter Seeberg et al., “The Limits to the Sanctions Regime Against Syria,” *On Target?* (European Union Institute for Security Studies (EUISS), 2015), <https://www.jstor.org/stable/resrep07074.11>; Azaria Morgan, “Syria: Donor Conditionality, Sanctions, and the Question of Justice,” *Conflict Research Programme Blog* (blog), March 6, 2019, World, <https://blogs.lse.ac.uk/crp/2019/03/06/syria-donor-conditionality/>; ICG, “U.S. Sanctions on Syria: What Comes Next?,” International Crisis Group, July 13, 2020, <https://www.crisisgroup.org/middle-east-north-africa/eastern-mediterranean/syria/us-sanctions-syria-what-comes-next>; Abdulla M. Erfan, “The Dilemmas in the Debate on Syria Sanctions,” Text, ISPI, March 15, 2021, <https://www.ispionline.it/en/publicazione/dilemmas-debate-syria-sanctions-29626>; Paul James Cardwell and Erica Moret, “The EU, Sanctions and Regional Leadership,” *European Security*, June 21, 2022, 1–21, <https://doi.org/10.1080/09662839.2022.2085997>.

²¹ For example, a number of states, such as Norway, Switzerland and the UK, have adopted sanctions similar to those adopted by the EU.

²² Qaddour and Husain, (2022); UNICEF, (2022).

²³ Qaddour and Husain, (2022); UN OCHA, HNO (2024).

²⁴ See for example: Stall Hampton and Prasad Hari, “A Call for Action: Data on Unexploded Ordnance in Syria and Its Implications, December 2012–May 2021” (Carter Center, March 28, 2022), <https://storymaps.arcgis.com/stories/41d3dcd5c2b3451795d6c4bdf0ca46f6>. The Carter Center has led numerous other reports on the same issue, available at https://www.cartercenter.org/peace/conflict_resolution/syria-conflict-resolution.html.

²⁵ For further reference see: Qaddour and Husain, (2022).

²⁶ Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain,” 29–30.

²⁷ Omar Abdulaziz Hallaj and Hala Haj Ali, 17.

²⁸ For example, at times NGOs had to negotiate with authorities across all areas of control to support education beyond the mere rehabilitation of school buildings and the provision of equipment, and include in their interventions “soft-component” activities (trainings for teachers, activities with parents and children, psychosocial support, and so forth). Interviews with practitioners in Jan–April 2024.

²⁹ Rasmussen et al., (2022), 126–28.

³⁰ Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain,” 18–19.

³¹ Siraj Khan, “Restoring Classrooms, Inspiring Futures in Syria,” *Modern Diplomacy*, February 20, 2025, <https://moderndiplomacy.eu/2025/02/20/restoring-classrooms-inspiring-futures-in-syria/>; Fateh Shaban, “Integrating Returning Refugees into Syria’s Education System.”

³² UNHCR, “2024 Syria Situation Overview,” *Global Focus*, May 20, 2024, <https://reporting.unhcr.org/operational/situations/syria-situation>.

³³ The rebuild of Syria’s infrastructure was already exceeding hundreds of billions of US dollars (hereinafter USD) prior to the 2023 earthquake.

³⁴ UN Habitat, “Recovery of Services and Infrastructure in Syria. ‘Not If. But How?’” (Urban recovery framework, July 2022), 7, <https://unhabitat.org/urban-recovery-framework-publication-series>; World Bank, “Syria Earthquake 2023 : Rapid Damage and Needs Assessment,” Text/HTML, Rapid Damage and Needs Assessment (RDNA) (Washington, DC: World Bank Group, March 2023), <https://documents.worldbank.org/en/publication/documentsreports/documentdetail/099093003162314369/P1721710e2b4a60b40a5940f0793f8a0d24>.

³⁵ As a matter of example see the reflections in: Qaddour and Husain, (2022).

³⁶ As an example of these appeals, please see: UN News, “Syrians Suffer as Political Stalemate Persists: UN Special Envoy,” August 23, 2023, <https://news.un.org/en/story/2023/08/1140017>; Save the Children, “Reversing Gain: The Impact of COVID-19 on Education in Syria Brief,” December 2020, <https://resourcecentre.savethechildren.net/document/reversing-gain-impact-covid-19-education-syria-brief/>.

³⁷ Qaddour and Husain, “(2022)”; Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain.”

³⁸ The total funding committed and/or spent is equal to USD 27.6 Bln. Calculations by the authors based on the available information of the Financial Tracking Services of UN OCHA accessible here: <https://fts.unocha.org/>.

³⁹ UNICEF, (2022), 4.

⁴⁰ See: Qaddour and Husain, (2022), 10. For example, in northeast Syria, curricula and quality of teaching and learning is a priority for local authorities. However, donors prioritize reducing the number of children out of school and increase children and youth participation in catch-up programs for eventual transition to formal learning.

⁴¹ Some donors have decided to fund education projects only in parts of the country, while others have supported the education response across all areas of control according to dialogue between experts on Syria aid response, March 2024 and analysis by the authors of the UN OCHA FTS data publicly available.

⁴² In the North of the country, donors have limited their support to the education response to short-term education activities, while at the same time requesting aid responders “to articulate a strategy to combat armed influence on children and communities in Syria, to which education is crucial” according to Qaddour and Husain, (2022), 11.

⁴³ As COAR points out, “donor governments will understandably hesitate to engage in ways they fear risk violating red lines or compromising on political and human rights principles. Such principles need not be abandoned in order to do more good, better, in Syria”. COAR, “Syria in 2022: New Aid Approaches For an Evolving Crisis” (COAR, January 2022), 10, <https://coar-global.org/2022/01/06/syria-in-2022-new-aid-approaches-for-an-evolving-crisis/>. Proactively devising and implementing context-specific and robust safeguards can mitigate these dangers. However, according to the results of a dialogue between expert in March 2024, the safeguards requested to education responders have been inconsistent from donor to donor, often different according to the type of responder (i.e. NGO, UN and INGO) and the geographical areas where interventions were delivered.

⁴⁴ Qaddour and Husain, (2022), 10.

⁴⁵ COAR, (2022), 10.

- ⁴⁶ UNDP, “The Impact of the Conflict in Syria: A Devastated Economy, Pervasive Poverty and a Challenging Road Ahead to Social and Economic Recovery,” February 20, 2025, 19, <https://reliefweb.int/report/syrian-arab-republic/impact-conflict-syria-devastated-economy-pervasive-poverty-and-challenging-road-ahead-social-and-economic-recovery-enar>.
- ⁴⁷ UNDP, 17–19.
- ⁴⁸ UNDP, 4.
- ⁴⁹ European Commission, “Syria,” May 30, 2024, https://civil-protection-humanitarian-aid.ec.europa.eu/where/middle-east-and-northern-africa/syria_en.
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- ⁵⁹ UNSCR 2253 2(a), [https://docs.un.org/en/S/RES/2253%20\(2015\)](https://docs.un.org/en/S/RES/2253%20(2015)).
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- ⁶⁷ Anna Cervi et al., “Restrictive Measures and Humanitarian Exemptions. Operating in High Risk Countries.” (Verona: AWOS, July 2024), https://www.esteri.it/wp-content/uploads/2024/09/AWOS_Sanzioni_Siria.pdf.
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⁷³ Cervi et al., “(2024).”

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⁸² Joseph Daher, “Syrian Remittances: An Analysis from the Recipients’ Side,” June 2021, 33, Private.

⁸³ Moret, (2022).

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⁹² See: 31 CFR 594.519(a), [https://www.ecfr.gov/current/title-31/part-594/section-594.519#p-594.519\(a\)](https://www.ecfr.gov/current/title-31/part-594/section-594.519#p-594.519(a)); 31 CFR 597.515, <https://www.ecfr.gov/current/title-31/section-597.515>; 31 CFR 542.513, <https://www.ecfr.gov/current/title-31/section-542.513>.

⁹³ See: 31 CFR 542.516(b) (June 7, 2024), [https://www.ecfr.gov/on/2024-06-07/title-31/part-542/section-542.516#p-542.516\(b\)](https://www.ecfr.gov/on/2024-06-07/title-31/part-542/section-542.516#p-542.516(b)); 31 CFR 594.520(b), [https://www.ecfr.gov/current/title-31/part-594/section-594.520#p-594.520\(b\)](https://www.ecfr.gov/current/title-31/part-594/section-594.520#p-594.520(b)); 31 CFR 597.516(b), [https://www.ecfr.gov/current/title-31/part-597/section-597.516#p-597.516\(b\)](https://www.ecfr.gov/current/title-31/part-597/section-597.516#p-597.516(b)).

⁹⁴ See for example 31 CFR 542.516(b)(3). The same provision is contained in the 31 CFR 594 e 31 CFR 597.

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⁹⁶ OFAC, “Issuance of Syria General License and Frequently Asked Questions.”

⁹⁷ OFAC, “Frequently Asked Questions - Newly Added,” January 6, 2025, <https://ofac.treasury.gov/faqs/added/2025-01-06>.

⁹⁸ At federal, regional and local level, including with entities where HTS is involved.

⁹⁹ 31 CFR 542.516(c) (June 7, 2024), [https://www.ecfr.gov/on/2024-06-07/title-31/part-542/section-542.516#p-542.516\(c\)](https://www.ecfr.gov/on/2024-06-07/title-31/part-542/section-542.516#p-542.516(c)).

¹⁰⁰ 31 CFR 542.533 (June 7, 2024), <https://www.ecfr.gov/on/2024-06-07/title-31/section-542.533>.

¹⁰¹ 31 CFR 542.511, <https://www.ecfr.gov/current/title-31/section-542.511>.

¹⁰² Section 7432 of the Caesar Act also includes a humanitarian waiver for activities not otherwise covered by GL § 542.516 of the SySR. The Caesar Act is available at: <https://ofac.treasury.gov/media/57351/download?inline>.

¹⁰³ See 15 CFR 734.3, <https://www.ecfr.gov/current/title-15/section-734.3>.

¹⁰⁴ US origin products relate to materials/equipment, software and technology. See additional guidance in: US Bureau of Industry and Security, “De Minimis Rules and Guidelines. § 734.4 and Supplement No. 2 to Part 734 of the EAR (as Modified on 5 November 2019),” November 5, 2019, 1, <https://www.bis.doc.gov/index.php/documents/pdfs/1382-de-minimis-guidance/file>.

¹⁰⁵ BIS is under the US Department of Commerce, the authority responsible for US export controls.

¹⁰⁶ Interviews with experts, April 2023.

¹⁰⁷ See 15 CFR 746.9(c)(1).

¹⁰⁸ See 15 CFR 746.9 (c)(2).

¹⁰⁹ The EU states that prohibitions set out in Council Regulation 36/2012 (of 18 January 2012 concerning restrictive measures in view of the situation in Syria and repealing Regulation (EU) No 442/2011) “shall not give rise to any liability of any kind on the part of the natural or legal person, entity or body concerned if they did not know, and had no reasonable cause to suspect, that their actions would infringe the prohibition in question” (Chapter 27, Article 28).

¹¹⁰ Council Decision (CFSP) 2023/408 of 23 February 2023 amending Decision 2013/255/CFSP concerning restrictive measures in view of the situation in Syria, <https://eur-lex.europa.eu/eli/dec/2023/408/oj>.

¹¹¹ Council of the European Union, “Syria: Council Renews Restrictive Measures and Extends Humanitarian Exemption for Another Year,” Consilium, May 28, 2024, <https://www.consilium.europa.eu/en/press/press-releases/2024/05/28/syria-council-renews-restrictive-measures-and-extends-humanitarian-exemption-for-another-year/>.

¹¹² Council of the European Union, “Syria.”

¹¹³ Moret, “(2023).”

¹¹⁴ Art. 16a of Council Regulation (EU) No 36/2012 of 18 January 2012, available at: <http://data.europa.eu/eli/reg/2012/36/oj>. They include the following entities (and their employees, grantees, subsidiaries or implementing partners): the United Nations; international organisations; humanitarian organisations having observer status with the United Nations General Assembly; 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; 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; Member States’ specialised agencies.

¹¹⁵ Interview with expert, May 2024.

¹¹⁶ Referred to as “education in emergencies”, as detailed in: European Commission, “Education in Emergencies,” July 15, 2024, https://civil-protection-humanitarian-aid.ec.europa.eu/what/humanitarian-aid/education-emergencies_en.

¹¹⁷ Council of the European Union, “Syria.”

¹¹⁸ This is reflected in a number of private briefings issued by the Damascus Based INGOs between 2020-2023.

¹¹⁹ European Commission, “Factsheet on Member State Procedures to Grant Humanitarian Derogations from EU Restrictive Measures (Sanctions),” April 2022, 21.

¹²⁰ Interviews conducted with experts from International Organisations in 2024 and 2025. Additional reference is available the results of a survey conducted by the Damascus based INGOs in May 2022. For example, NGOs under EU jurisdiction are required to apply for derogations in as many EU countries (and non-EU countries aligning to EU sanctions) as those funding the specific organization in Syria for any given activity, that requires a derogation. Each EU country has a different NCA, and although there is a centralized EU information service to support applicants through the derogation process, derogations must still be sought separately in each country under question.

¹²¹ Moret, (2023); Rachel Alpert and Alyssa Bernstein, “Breaking Down Barriers to Emergency Earthquake Aid in Syria,” March 16, 2023, <https://www.justsecurity.org/85499/breaking-down-barriers-to-emergency-earthquake-aid-in-syria/>.

¹²² Save the Children, “The Impact of the Earthquake on Implementing Education Programmes in Northwest Syria,” June 15, 2023, <https://reliefweb.int/report/syrian-arab-republic/impact-earthquake-implementing-education-programmes-northwest-syria>; “Nearly 120 Schools Damaged in Northwest Syria by Floods, Thousands of Children Pushed out of Education | Syria,” Save the Children | Syria, February 1, 2021, <https://syria.savethechildren.net/news/nearly-120-schools-damaged-northwest-syria-floods-thousands-children-pushed-out-education>.

¹²³ UNICEF, (2021).

¹²⁴ Areas formerly under the control of the Government of Syria during the presidency of Bashar Al Assad.

¹²⁵ Calculation by the authors based on the analysis of the UN OCHA Humanitarian Needs Overviews 2020-2024 and other publicly available information published by UNICEF.

¹²⁶ REACH, (2024), 2.

¹²⁷ REACH, 3. Most commonly reported difficulties when accessing education (by % of assessed communities): 91% Unsuitable environment and 57% Overcrowding.

¹²⁸ INEE, “Joint Education and Child Protection Needs Assessment - North West Syria: Findings Following the Earthquake” (INEE, September 14, 2023), 3, <https://inee.org/resources/joint-education-and-child-protection-needs-assessment-north-west-syria-findings-following>.

¹²⁹ INEE, “North West Syria Joint Education and Child Protection Needs Assessment | INEE” (Global Education Cluster, June 1, 2023), <https://inee.org/resources/north-west-syria-joint-education-and-child-protection-needs-assessment>; ACU, “Schools in Northern Syria Camps – Edition 06 / 2022” (Assistance Coordination Unit, July 15, 2023), <https://reliefweb.int/report/syrian-arab-republic/schools-northern-syria-camps-edition-06-2022-2023-thematic-report-enar>.

¹³⁰ Qaddour and Husain, (2022).

¹³¹ Norwegian Refugee Council, “(2022)”; See also the area-specific reports for Afrin, Dara’a and Qamishly in: Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain.”

¹³² Norwegian Refugee Council, “(2022).”

¹³³ UN OCHA, HNO (2024), 49.

¹³⁴ OFAC, “FAQ 938,” June 5, 2024, <https://ofac.treasury.gov/faqs/938>; US Government, “U.S. Humanitarian Early Recovery Programming in the Syrian Context- Final Version,” November 2021, 2, Private.

¹³⁵ 31 CFR 542.533.

¹³⁶ Clarified in: OFAC, “Sanctions Compliance Guidance for the Provision of Humanitarian Assistance to Syria,” August 8, 2023, 5, <https://ofac.treasury.gov/recent-actions/20230808>.

¹³⁷ OFAC, “Frequently Asked Questions - Newly Added.”

¹³⁸ Gillard, provides the following guidance on “the prohibition on providing funds or other assets applies to the designated person. Issues would only arise if the designated minister appropriated funds provided to the ministry, either for their personal benefit or to undermine the policy objectives for which the sanctions were imposed. The effect of the misappropriation would not be to bring the ministry within the scope of the designation. Instead, the issue would have to be addressed from a prevention of diversion perspective [furthermore]. There was no suggestion that these designations, and the consequent prohibitions on making funds or other assets available to the ministers, meant that it was no longer possible to provide support to the ministries they headed.” Emanuela Gillard, “IHL and the Humanitarian Impact of Counterterrorism Measures and Sanctions,” Chatham House – International Affairs Think Tank, September 3, 2021, 44, <https://www.chathamhouse.org/2021/09/ihl-and-humanitarian-impact-counterterrorism-measures-and-sanctions>.

¹³⁹ COAR, (2022).

¹⁴⁰ Qaddour and Husain, (2022), 10.

¹⁴¹ Haley Schuler-McCoin, “Donor Policies and the next Steps for Disaster Risk Reduction in Syria,” The New Humanitarian, April 24, 2023, <https://www.thenewhumanitarian.org/analysis/2023/04/24/earthquakes-could-spark-progress-disaster-risk-reduction-syria>.

¹⁴² European Commission, EIE (2024).

¹⁴³ International Crisis Group, “Ways out of Europe’s Syria Reconstruction Conundrum,” November 25, 2019, <https://www.crisisgroup.org/middle-east-north-africa/eastern-mediterranean/syria/209-ways-out-europes-syria-reconstruction-conundrum>.

¹⁴⁴ Interviews with practitioners for this document, 2024.

¹⁴⁵ Fouad Gemayel, “Caesar Act Extended for 5 Years: What about Lebanon?,” L’Orient Today, December 29, 2024, <https://today.lorientjour.com/article/1441520/cesar-act-extended-for-5-years-what-about-lebanon.html>.

¹⁴⁶ Norwegian Refugee Council, (2022).

¹⁴⁷ International Rescue Committee, “Syria Multi-Sector Needs Assessment,” March 14, 2024, 33, <https://www.rescue.org/eu/report/syria-multi-sector-needs-assessment-march-2024> The other major factor impacting access to education are economic conditions in Syria.

¹⁴⁸ Global Education Cluster, ‘North West Syria Joint Education and Child Protection Needs Assessment’, June 2023, 78, https://inee.org/sites/default/files/resources/Full%20Report_NWS_Joint%20EiE-CP_Assessment.pdf; Qaddour and Husain, (2022), 8.

¹⁴⁹ Norwegian Refugee Council, (2022).

¹⁵⁰ REACH, (2024). For additional insight regarding the situation of teaching personnel in Northeast Syria see also: Mahmoud Rustam, “The Educational Process in North and East Syria,” Policy Papers (IMPACT, November 2020), 2, <https://impactres.org/the-educational-process-in-north-and-east-syria/>.

¹⁵¹ Norwegian Refugee Council, (2022).

¹⁵² At the time of the report hereby cited, 17% of teachers were unspecialized and practiced teaching as a response to lack of teaching staff. See: INEE, (June 2023), 78.

¹⁵³ Norwegian Refugee Council, (2022).

¹⁵⁴ Rasmussen et al., (2022), 26.

¹⁵⁵ Norwegian Refugee Council, (2022).

¹⁵⁶ For further analysis of the formal and semi-formal education structures in Syria please refer to: Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain.”

¹⁵⁷ See: 31 CFR 542.516(b) (June 7, 2024), [https://www.ecfr.gov/on/2024-06-07/title-31/part-542/section-542.516#p-542.516\(b\);](https://www.ecfr.gov/on/2024-06-07/title-31/part-542/section-542.516#p-542.516(b);) 31 CFR 594.520(b), [https://www.ecfr.gov/current/title-31/part-594/section-594.520#p-594.520\(b\);](https://www.ecfr.gov/current/title-31/part-594/section-594.520#p-594.520(b);) 31 CFR 597.516(b), [https://www.ecfr.gov/current/title-31/part-597/section-597.516#p-597.516\(b\);](https://www.ecfr.gov/current/title-31/part-597/section-597.516#p-597.516(b);)

¹⁵⁸ See Q&A n.6 in: Human Rights Watch, “Questions and Answers: How Sanctions Affect the Humanitarian Response in Syria,” June 22, 2023, <https://www.hrw.org/news/2023/06/22/questions-and-answers-how-sanctions-affect-humanitarian-response-syria>.

¹⁵⁹ 18 U.S.C. § 2339B.

¹⁶⁰ According to one law scholar: This law poses a problem for humanitarian aid groups that seek to provide much-needed assistance to those who often live amongst alleged “terrorists” or under a de facto FTO-led regime. Further exacerbating this problem, no appellate-level courts have ever defined how to determine whether an individual is part of an FTO under § 2339B. Without this definition, humanitarian organizations are often discouraged from providing aid widely for fear of inadvertently providing aid to an FTO, thereby risking prosecution under the statute”. Helton, Jordan E., (2018), 553.

¹⁶¹ For more details, see introductory chapters of this document. This is also based on interviews with practitioners for this document, March 2024.

¹⁶² Council of the European Union, “Syria.”

¹⁶³ According to OFAC FAQ 1206, “Syrian governing institutions include departments, agencies, and government-run public service providers (including public hospitals, schools, and utilities) at the federal, regional, or local level in Syria following December 8, 2024, including entities involved with Hay’at Tahrir al Sham (HTS) across all geographic areas of Syria”. Available at: <https://ofac.treasury.gov/faqs/1206>.

¹⁶⁴ OFAC FAQ 1207, available at: <https://ofac.treasury.gov/faqs/1207>.

¹⁶⁵ Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain,” 22–23.

¹⁶⁶ This has mostly taken the form of rehabilitating schools, providing school supplies, delivering psychosocial support to children and teachers, supporting different forms of non-formal education, such as self-learning or the setting up informal learning centers at the community level. See: USAID, “Brief on Education in Syria,” February 2017, https://www.edu-links.org/sites/default/files/media/file/R1-031_Syria_education_3-page_brief-1.pdf.

¹⁶⁷ Based on the analysis conducted by the author of publicly available project documents of UNICEF, UNESCO, and International NGOs such as Save the Children and the Norwegian Refugee Council.

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- ¹⁶⁸ USAID, “(2017)” ; Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain,” 26.
- ¹⁶⁹ Matthew Hemsley and Kathryn Achilles, “Aid in Limbo: Why Syrians Deserve Support to Rebuild Their Lives” (Oxford: Oxfam International, March 2019), 8, <https://www.oxfam.org/en/research/aid-limbo-why-syrians-deserve-support-rebuild-their-lives>.
- ¹⁷⁰ Hemsley and Achilles, 26.
- ¹⁷¹ Omar Abdulaziz Hallaj, “Policy Paper: The Engagement of Civic Actors in the Education Sector in Syria: Lessons Learned and Recommendationse,” 6.
- ¹⁷² Consultations with education practitioners, March 2024.
- ¹⁷³ Dialogue between experts on Syria aid response, March 2024.
- ¹⁷⁴ Dialogue between experts on Syria aid response, March 2024.
- ¹⁷⁵ Hemsley and Achilles, “(2019),” 3.
- ¹⁷⁶ Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain.”
- ¹⁷⁷ REACH, (2024).
- ¹⁷⁸ ACU, (2023).
- ¹⁷⁹ Machineries are for practicing tailoring, welding, carpentry, and so forth. See for example: Norwegian Refugee Council, “(2022).”
- ¹⁸⁰ Norwegian Refugee Council.
- ¹⁸¹ That may be key to increase the quality of learning. See: Rasmussen et al., (2022), 75.
- ¹⁸² Rasmussen et al., 87.
- ¹⁸³ Rasmussen et al., 87.
- ¹⁸⁴ The following paragraphs are informed by the findings in: Cervi, (2024); Norwegian Refugee Council, (2022).
- ¹⁸⁵ The remaining 7% had monthly bundles of two Mbps.
- ¹⁸⁶ Cervi, (2024).
- ¹⁸⁷ Save the Children, (2020); Norwegian Refugee Council, (2022).
- ¹⁸⁸ World Vision, “World Vision, Microsoft, Others Bring Tech Experts Together to Showcase, Innovate Education Solutions for Syrian Children,” World Vision, February 23, 2017, <https://www.worldvision.org/about-us/media-center/world-vision-microsoft-others-bring-tech-experts-together-showcase-innovate-education-solutions-syrian-children>; The Learning Passport, “About the Learning Passport,” May 30, 2024, <https://www.learningpassport.org/about-learning-passport>; Global Education Partnership, “Syria: A Digital Learning Program Ensures Education Is Not Interrupted,” February 7, 2024, <https://www.globalpartnership.org/blog/syria-digital-learning-program-ensures-education-not-interrupted>.
- ¹⁸⁹ Based on the research conducted by the Norwegian Refugee Council in 2022, examples of platforms inaccessible from Syria and relevant for remote learning are Zoom, Google Play, App Store, Google workspace, analytics and surveys, Adobe, Webex, Trello, Atlassian, Archive, Oracle, PayPal, Spotify, Slack. This finding remained unchanged at the end of June 2024.
- ¹⁹⁰ Based on the research conducted by the Norwegian Refugee Council in 2022, Coursera, Udacity, Udemy, Stanford online, GitHub platforms, while provide a variety of basic free courses, most can be taken up for a fee. However, payments generated from Syria are automatically blocked by service providers in order to comply with US sanctions and export control regulations. This finding remained unchanged at the end of June 2024.
- ¹⁹¹ For example, 31 CFR §542.207.
- ¹⁹² Under the authority of the EO 13382 of July 2005, that in 2005 listed the Scientific Studies and Research Center in Syria as a blocked entity.
- ¹⁹³ Codified in 31 CFR 542.511.
- ¹⁹⁴ <https://www.federalregister.gov/documents/2024/06/06/2024-12317/syrian-sanctions-regulations>
- ¹⁹⁵ Interviews with practitioners based in Syria, February 2025.
- ¹⁹⁶ Regulation (EU) No 36/2012 as amended and Council Decision 2013/255/CFSP as amended.
- ¹⁹⁷ As listed in Annex X of Council Regulation (EU) No 36/2012 to Syria.
- ¹⁹⁸ Interview with humanitarian actor working in Syria, early November 2021.
- ¹⁹⁹ Including the leading provider in formerly GoS-controlled areas, Syriatel.
- ²⁰⁰ Interviews with humanitarian practitioners, May 2024.
- ²⁰¹ Codified in Art. 16a of the Council Regulation (EU) No 36/2012 of 18 January.
- ²⁰² Interviews conducted between February and April 2024.
- ²⁰³ Consulted in May 2024.
- ²⁰⁴ Consulted in May 2024.
- ²⁰⁵ FATF, “High-Level Synopsis of the Stocktake of the Unintended Consequences of the FATF Standards,” October 2021, 1, <https://www.fatf-gafi.org/en/publications/Financialinclusionandnpoissues/Unintended-consequences-project.html>; European Commission, “Report from the Commission to the European Parliament and Council on the Assessment of the Risk of Money Laundering and Terrorist Financing Affecting the Internal Market and Relating to Cross-Border Activities” (2022), 12, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022DC0554>.
- ²⁰⁶ UNICEF, (2022).
- ²⁰⁷ Omar Abdulaziz Hallaj, “Policy Paper: The Engagement of Civic Actors in the Education Sector in Syria: Lessons Learned and Recommendationse”; Omar Abdulaziz Hallaj and Hala Haj Ali, “Report: The Engagement of Civic Actors in the Education Sector in Syria: Mapping the Terrain.”
- ²⁰⁸ Qaddour and Husain, (2022), 13.
- ²⁰⁹ Qaddour and Husain, 13–14.

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