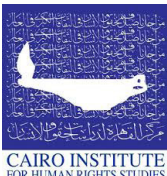


Sanctions & Financial Restrictions: Additional Challenges for a Limited Syrian Civic Space How Can the EU Better Support Syrian Civil Society?

Policy Brief & Recommendations
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OVERVIEW	4
BACKGROUND: SYRIAN CIVIL SOCIETY	5
ECONOMIC SANCTIONS AND THE NEW-OLD CHALLENGES	7
Bank Accounts, Exchange Rate and Transaction Fees	8
Shifting Governance Structures: Legalities and Exemptions	9
POLICY RECOMMENDATIONS for the EU, Member States & Donors with regards to:	10
Syrian Civil Society	10
Banks and Financial Institutions	11
The UN and INGOs	11
BIBLIOGRAPHY	12

- Total EU and its Member States' assistance during Syrian crisis has exceeded €17 billion since 2011.¹
- The funding level covered around 60% of the requested funds during the years 2013-2018, while in 2019 it only covered 28% as of 30 September 2019.²
- The UN provided \$1 billion in aid in 2018 to areas held by the Syrian regime while the actual spending of the regime in that same year was about \$4 billion.
- Civic space in Syria has become more restricted as a result of the continuous political repression by the Syrian regime, the protracted violent conflict, the political and military developments, the changing local governance structures and the multiple waves of forced displacement.
- Due to the economic sanctions and restrictive measures on Syria, Syrian civil society has been facing several challenges that severely impact their existence, work, sustainability and potential growth.

Recent political and economic developments in Lebanon, the impact of COVID-19, the measures imposed by the Syrian regime to criminalize anyone who is dealing with foreign currencies, and the activation of the sanctions' provisions of the US Caesar Act as well as EU sanctions and restrictive measures imposed - have all had direct and indirect impacts on Syrian civil society and aggravated the conditions in which Syrian civil society is operating. Although the international community has been attempting to engage with Syrian civil society, it has at the same time hindered its work and progress through the imposition of inconsistent policies and restrictive measures. This poses a serious question about whether the international community, particularly EU Member States, have a genuine political will to restructure their aid and financial systems in order to better support Syrian civil society.

This policy brief highlights and provides recommendations for some of the longstanding challenges that Syrian civil society organizations (CSOs) have been facing, with a particular focus on community-based organizations (CBOs) that operate in regime-held areas, which continue to evolve and have become increasingly difficult to overcome.

¹European Commission, Neighbourhood - Enlargement, Syria, available at: [link](#)

² UNHCR. (2020). UNHCR's 2020-2021 Financial Requirements. Retrieved from [link](#)
UNHCR & UNDP. (2019, June 30). 3RP Regional Strategic Overview 2019-2020. Retrieved from [link](#)

Syrian civil society³ has emerged in a very challenging, unsafe and ever-changing environment to meet the growing humanitarian and development needs on the ground since the Syrian uprising in 2011 and subsequent war. Despite the military, political and humanitarian developments and divergent local and regional dynamics, Syrian CSOs have grown, developed their organizational capacity, gained the trust of the international community and voiced their challenges, needs and priorities. They have worked in a variety of areas including emergency response and relief services, education, health, women and youth empowerment, human rights, and peacebuilding. IMPACT Civil Society Research and Development has conducted a series of studies to map Syrian civil society actors and identified more than 800 in 2015. In 2019, the number of active civil society actors decreased to slightly more than 500.⁴

Despite the boom in the number of civil society actors since 2011, civic space in Syria continues to be severely restricted as a result of the continuous political repression by the Syrian regime, the protracted violent conflict, the political and military developments, the changing local governance structures and the multiple waves of forced displacement. In addition, these challenges, along with restrictive donor policies and interrupted funding flows, lack of technical and logistical resources and the impact of economic sanctions on Syrian civil society have led to limitations on activities and the disappearance of many civil actors in Syria.

In non-regime held areas, Syrian CSOs have had to relocate their operations due to constant bombardment and forced displacement. The forced reduction of cross-border access to two access points instead of four has also negatively affected the work of CSOs and their funding. EU and its member states' counterterrorism legislation has affected humanitarian funding to regions that are outside the regime's control as donor governments and international organizations are reluctant to fund Syrian organizations in those areas. A 2015 Overseas Development Institute (ODI) report on UK humanitarian aid and counterterrorism legislation found that some aspects of UK legislation are too vague and open to wide interpretation and that the danger of humanitarian aid ending up in terrorist hands can be overstated⁵. This does not, however, mean that donor governments and organizations should not take the necessary measures and regulations to ensure that their funding is not financing terrorism.

Registration for Syrian CSOs is one of the most crucial challenges they face when taking into consideration the multifaceted restrictive measures against Syrian organizations and individuals. Registration, whether in Syria, the neighbouring countries or in Europe, provides CSOs with the required legal status to open bank accounts, access resources and funds, and protect their staff. The inconsistent rules and regulations inside Syria and neighbouring countries surrounding registration, coupled with inconsistent donor requirements and banking procedures in Europe, have significantly impacted Syrian civil society.

³ Syrian Civil Society is referred to as Civil Society Organizations (CSOs) and Community Based Organizations (CBOs). Distinction will be made throughout the Policy Brief as required.

⁴See: Ahmad, J. (2019). Changing Contexts and Trends in Syrian Civil Society. Berlin: IMPACT Civil Society Research and Development. Citizens for Syria. (2015). Citizens For Syria Mapping the Syrian civil Society actors Phase one. Berlin: Citizens for Syria e.V.

⁵Metcalfe-Hough, V., Keatinge, T. and Pantuliano, S. (2015), UK humanitarian aid in the age of counter-terrorism: perceptions and reality, Humanitarian Policy Group Working Paper, London: ODI.

In regime-held areas, Syrian civil society faces massive obstacles as the registration has to go through lengthy and perilous processes, various security checks, oppression and security threats directed at the individuals and volunteers. This has forced many organizations to deliberately choose not to register and to keep a low profile although doing so jeopardizes their work, their staff, and their beneficiaries. They believe that registration with the Syrian regime will hinder their work and limit their freedom. However, the lack of legal status has resulted in: a) depriving them of funding opportunities and the ability to expand; b) forcing them to accept small-scale grants; c) limiting their ability to promote their work; d) limiting opportunities for training to develop their organizational capacity or governance; e) denying them prospective collaboration with UN agencies operating in Damascus.

In addition, Syrian civil society has been vulnerable to the politics of aid and the divergent interests and strategic priorities of various governments and entities. Despite the significant role of the Syrian civil society in the humanitarian response, they received less than 1% of direct funding in 2014 while they delivered 75% of the humanitarian work inside Syria in that year⁶. In regime-held areas, several reports⁷ have been published in recent years to address humanitarian funding and the role of aid agencies. They concluded that the Syrian regime has successfully imposed a complex legal framework coupled with administrative measures and coercive policies to co-opt aid funding and finance its human rights violations.

The impact of these policies are compounded by the inability of aid agencies to access areas under the Syrian regime's control, to conduct independent monitoring and evaluation, and a lack of transparency both from the regime and aid agencies stemming from the restrictions imposed by the Syrian regime. The Syrian regime has used its control to give approval to select aid programmes and delay agreements on the modalities of UN-led operations, issue or withhold visas for international staff, prevent access to besieged areas, and deny crossline operations. Moreover, the diversion and channeling of aid into regime-held areas has threatened the existence of Syrian civil society actors and the scope of their work in the affected areas.

In 2018, the UN provided \$1 billion in aid to areas held by the Syrian regime while the actual spending of the regime in these areas in that same year was about \$4 billion. The Syrian government was able to funnel tens of millions of aid to regime cronies generating significant financial resources, procurement contracts, and business opportunities for them. Additionally, the Syrian regime demands that aid funding go through its central intermediaries including the Syrian Arab Red Crescent (SARC) and the Syria Trust for Development that is headed by Asma al-Assad, President Assad's wife. Around 60% of all UN aid operations in Syria are reportedly channelled through SARC. The Syrian regime also requires that local partners for international aid agencies are vetted and approved through its entities and security system.

The Syrian regime regained military control over most of the country, which has further impacted the landscape of Syrian civil society within Syria. In late 2016, there were 50 organizations actively working in Daraa and Qunaitera, but this number dropped to almost zero when the Syrian regime retook the areas from the opposition in 2018. As highlighted by some Syrian CBOs, the regime practices favoritism in this context by turning a blind eye to the work of unregistered organizations or initiatives in certain governorates or areas. Presumably, these areas did not explicitly support the Syrian uprising, or they consist of minority groups. Some of these organizations are subject to suspicion as they can be simply depicted as regime supporters or informants. In addition, they can be seen as corrupt with the war economy dynamics. The war economy in Syria has created new economic and business networks and practices such as looting or smuggling, which perpetuate the corruption across the country.

Against this backdrop and the mounting challenges presented below, several foundational questions remain about how to maintain a safe and expanded civic space for Syrian civil society regardless of the location of its activities

⁶ See: Christian Aid, Syrian Civil Society - A Closing Door, September 2019, available at: [link](#)

⁷ For more on this subject, see The Syria Campaign (2016), Taking Sides: The United Nations' Loss Of Impartiality, Independence And Neutrality In Syria; and Martínez, J. C. and Eng, B. (2016), 'The unintended consequences of emergency food aid: neutrality, sovereignty and politics in the Syrian civil war, 2012-15', *International Affairs*, 92 (1), pp. 153-73. Leender, R., & Mansour, K. (2018). Humanitarianism, State Sovereignty, and Authoritarian Regime Maintenance in the Syrian War. *Political Science Quarterly*, 133 (2), 225-257; HRW. (2019). Rigging the System Government Policies Co-Opt Aid and Reconstruction Funding in Syria. Human Rights Watch.

⁸ Reinoud Leenders and Kholoud Mansour, Humanitarianism, State Sovereignty, and Authoritarian Regime Maintenance in the Syrian War, 19 June 2018, *Political Science Quarterly*, available at: [link](#)

EU Sanctions

The EU introduced sanctions on Syria in 2011 in response to the violent repression by the Syrian regime of its civilian population. They target companies and business people benefitting from their ties with the regime and the war economy. Restrictive measures also include a ban on the import of oil, restrictions on certain investments, a freeze of the assets of the Syrian Central Bank held in the EU, and export restrictions on equipment and technology that might be used for internal repression, such as monitoring or interception of internet or telephone communications. In line with the EU strategy on Syria, the restrictive measures have been extended on a yearly basis until 1 June 2021.

Caesar Sanctions

The Caesar Syria Civilians Protection Act went into effect on 17 June 2020. It penalises any person or company that assists the Assad regime or contributes to the country's reconstruction. It targets individuals and businesses anywhere in the world who operate either directly or indirectly in Syria's economy. The law sanctions specific sectors in Syria, including oil and natural gas, military aircraft, construction and engineering. It also gives the US President wide powers to freeze assets of any individual dealing with Syria, regardless of their nationality.

The total assistance from the EU and its Member States during the Syrian crisis has exceeded €17 billion since 2011. The EU has committed to providing humanitarian assistance inside Syria with a budget of €340 million for 2019 and 2020. According to the Regional Refugee & Resilience Plan (Syria 3RP), the funding level covered around 60% of the requested funds from 2013 to 2018, while it only covered 28% as of 30 September 2019⁹. Although there has been no clear indication that the EU intends to decrease aid to Syria in 2020, there is donor fatigue after almost 10 years of the Syrian conflict. This must also be viewed within the context of increasing financial commitments by the donor community as a result of the COVID-19 pandemic, its health and economic ramifications and requirements at both domestic and regional levels. Additionally, the complex sanctions regime imposed on Syria including the counter-terrorism financing (CTF) legislation, the EU and US sanctions, such as the recent Caesar Act (Caesar Syria Civilians Protection Act), directly impact the work of aid agencies and civil society as well as the flow of funding to Syria.

⁹ UNHCR. (2020). UNHCR's 2020-2021 Financial Requirements. Retrieved from [Link](#)
UNHCR & UNDP. (2019, June 30). 3RP Regional Strategic Overview 2019-2020. Retrieved from [Link](#)

Bank Accounts, Exchange Rate and Transaction Fees

The complexity, ambiguity and arbitrariness of the sanctions on Syria has resulted in a “chilling effect”¹⁰ to avoid engagement with anything or anyone related to Syria. This has deprived Syrian CSOs access to formal and legal channels for transferring money and consequently forced them to resort to informal transfer systems and the black market. Due to the sanctions imposed on Syria, the international banking system has imposed further tight regulatory measures for bank de-risking. Bank de-risking has proved to contribute to war economies and the expansion of informal and potentially corrupt channels to access or transfer funds. As a result, Syrian CSOs, in Syria and abroad, encounter several challenges including the inability to open new bank accounts, or abruptly discovering that their bank accounts have been closed.

These measures also affect the expansion and development of Syrian CSOs as they continue to face difficulties when receiving money and additional complications when the grants or transactions are relatively large. Syrian CSOs must navigate different banking systems and informal procedures every time they receive or send money transfers. In many cases, they have to assume the burden of the exchange rate and transaction fees that are constantly and unpredictably increasing. There are also multiple losses in the exchange rate when the payments have to go through different currencies until the money reaches Syria. As a consequence, blocking and major delays to receive and send payments become unavoidable, and payments can take up to several months despite the submission of all required and supporting documents to the banks. The banks usually do not give the reasons for blocking or delaying the payments. One study by ODI concludes that bank de-risking has reduced the availability of cash for NGOs by at least 35% and that these funds remain unavailable for three to five months.¹¹

In addition, banks in neighboring countries set daily limits to withdraw cash, which causes CSOs to divide the withdrawal amount into smaller payments, which results in further losses. Some banks and money transfer agents prevent receiving several payments or large amounts by the same person, which forces CSOs to expend additional resources and personnel. The variances in the different exchange rates between banks and the black-market lead to the devaluation of grants as organizations need to pay their staff salaries, conduct their activities, and have procurements in the local currency. Syrian CSOs resort to paying additional fees to third parties or intermediaries to receive the transactions or use their personal resources, in some cases, to cover the gaps when donor organizations do not cover the additional costs of transaction fees and exchange rates.

All of this negatively affects the adaptability and relevance of CSOs and their programmes as Syrian organizations turn their programmes from cash to in-kind. It also pushes CSOs to work on what it is possible to deliver and limits their ability to work on what should be a priority. Further, these challenges make it very difficult to plan or meet their projects' objectives and timeframes, which in turn also affects the credibility and rapport of Syrian CSOs and CBOs with their beneficiaries and communities.

Lastly, the strong connection between several of the neighbouring countries and banks on the one hand, and the Syrian regime on the other hand, create security threats against Syrian civil society, particularly for those working inside regime-held areas. There is no consistency in the rules and regulations imposed by the banks, donor states and organizations, host governments and money transfer agents. Therefore, Syrian CSOs have to navigate various banking and financial systems, and different governance structures and legalities.

¹⁰ 'chilling effect': A combination of the "strict liability" nature of the sanctions regimes, combined with large fines levied by the U.S. against U.S. and non-U.S. banks for sanctions violations, have put banks in a position where they are so reluctant to deal with sanctioned countries, that dollar-denominated humanitarian transactions permitted by general licence are refused processing even though legal. The 'chilling effect' is not only associated with payments destined for Syria, but also on the provision of banking services to Syrian-related charities and non-Syrian destined payments. For more see Walker, J. (2016). Humanitarian Impact of Syria-Related Unilateral Restrictive Measures. SDC Swiss Agency for Development and Cooperation.

¹¹ The conclusion was within 60 of the organisations interviewed by ODI for the study, cautiously estimated to be responsible for some 50% of aid passing through Turkey, as much as 35% of donor money was held at any one time between correspondent and recipient banks for between four and six months. See thGordon, S., Robinson, A., Goulding, H., & Mahyub, R. (2018). The impact of bank de-risking on the humanitarian response to the Syrian crisis. Overseas Development Institute, Humanitarian Policy Group. London: ODI.

Shifting Governance Structures: Legalities and Exemptions

Due to the nature of the conflict, Syrian civil society has had to operate differently according to its geographic location and governing authority; inside Syria, in neighbouring countries and in Europe. In Syria, for example, Syrian civil society has to work within unusual structures and procedures based on the area of work or service delivery and based on the de-facto authority on the ground. The shifting governance structures determines the civic space and the disappearance or growth of new civil society actors. The Syrian regime determines and dominates the civic space in the areas under its control. In opposition-held areas, the de-facto authorities and local councils determine the space for CSOs. Syrian CSOs operate in an ever-changing and unpredictable environment inside Syria. What is legal in one area controlled by one local council is illegal in a neighbouring area controlled by another authority.

In neighboring countries, Syrian CSOs are also confronted by changing policies and challenges. In Turkey, for example, the government has tightened its measures and cracked down on Syrian organizations and staff since 2017. Lebanon and Jordan have also applied restrictive measures and made it very difficult for Syrian civil society to work. Currently, there are only 23 Syrian CSOs with headquarters in Lebanon and six in Jordan.¹² This small number is indicative of the restrictions Syrian civil society encounters in these two countries.

In contrast, UN agencies operating inside Syria do not face these same problems, because they are not subject to any sanction regimes, including the EU and US sanctions on Syria. Therefore, INGOs are able to partner with the UN agencies to ensure cash flow, avoid delays in money transfer, and skip the lengthy and uncertain processes. Additionally, there has been no clear or consistent distinctions among the frameworks of humanitarian, development, stabilization and reconstruction aid, which hampers the work of Syrian CSOs and CBOs that work on peacebuilding, community engagement, human rights or other non-humanitarian issues. This further affects the CBOs in the regime-held areas as they cannot have any form of partnership or agreement with the UN agencies and INGOs. At this rate, these CBOs will most likely disappear as they do not have the financial resources and administrative capacity to handle the restrictive sanctions and banking measures or to sustain and develop their work.

¹² Ahmad, J. (2019). *Changing Contexts and Trends in Syrian Civil Society*. Berlin: IMPACT Civil Society Research and Development.

The European Union, its Member States and the donor community should take the lead in supporting Syrian civil society and use their leverage to alleviate or mitigate the impact of the economic sanctions and restrictive measures on Syrian civil society and community-based organisations. Although these challenges have been exacerbated by sanctions, there have been no real changes or reforms to the financial system and donor policies to mitigate those.

Therefore, concrete steps must be taken to address the mounting challenges in which Syrian civil society is operating, including how to mitigate banking and financial hindrances, to ensure their sustainability and ability to conduct their work and projects, especially in such a restricted and difficult environment. Meanwhile, the international and donor communities must ensure that sanctions and restrictive measures are not further strengthening the Syrian regime in silencing civil society and obstructing its work, nor is it allowing it to manipulate aid to perpetuate its oppressive policies and practices. As such, concrete mechanisms need to be put in place to ensure that sanctions are not contributing to worsening the socioeconomic situation of Syrians and civil society actors. As such, the EU, its Members States and the donor community should work with:

1. The Syrian Civil Society and CBOs:

- Find alternative strategies to mitigate the impact of sanctions and restrictive measures on CSOs and CBOs, and facilitate their work, while ensuring that any regulatory measures do not undermine localization and do not obstruct the expansion and growth of Syrian civil society.
- Provide guidelines that are clear, practical and easy to understand in order to enable Syrian CSOs to fully assess how the economic sanctions practically impact their work in different regions across the country, and methods to mitigate and work with those impacts.
- Support and invest, effectively and strategically, in Syrian CSOs and CBOs that work on non-humanitarian issues, including peacebuilding and human rights, and develop flexible funding mechanisms that assist such organisations in conducting their activities inside Syria.
- Create a participatory and proactive space where CBOs that are not registered in the regime-held areas are an essential part of dialogue, funding mechanisms and operations.
- Reduce the bureaucracy and required documentation, and identify informal financial channels or intermediaries that could be eligible to process transactions to Syria within a regulated mechanism.
- Support Syrian CSOs where they work as incubators for CBOs by conducting the vetting, providing them with tailored theoretical and practical mentorship packages, and developing their financial policies and organizational capacity to handle small to medium grants.
- Include the fees of money transactions and exchange rates variances in the allocated budgets by taking into consideration the different contexts and financial systems where Syrian civil society is operating .
- Carry out an assessment of the impact of EU sanctions and restrictive measures imposed on Syrian civil society and CBOs in Syria, particularly those in regime-held areas, and their ability to conduct activities and maintain their independent presence.

2. Banks and Financial Institutions:

- Engage directly with banks and share a list of mapped, credible and trusted Syrian CSOs and CBOs, as well as a list of trusted programmes and projects to expedite payments to them.
- Use leverage to negotiate with banks to establish special operations departments to better understand humanitarian work in conflict zones and the work of civil society in such contexts.
- Use leverage to negotiate with banks, invest time and resources to better familiarize themselves with Syrian CSOs and CBOs.
- Collaborate and coordinate with banks and relevant financial institutions to allow for funds and resources for humanitarian and stabilization work in Syria while facilitating the work of CSOs.
- Provide banks and financial institutions with guidance, technical support in their investigations and other procedures to fulfill sanctions-related requirements in order to encourage them to deal with Syrian CSOs and CBOs and reaffirm that they are not included in the sanctions.

3. The United Nations and INGOs:

- Discuss the role of UN agencies in Damascus and how to ensure that UN agencies and INGOs are supporting and engaging with the Syrian CSOs and CBOs that are not registered in the regime-held areas.
- Rethink different innovative structures to channel aid, as the donor states usually see the UN as the default coordination structure for humanitarian and development response even if they (donors) doubt the ability of the UN agencies to perform the job sufficiently.
- Conduct a truly independent and transparent evaluation to assess the work and performance of the UN agencies in Damascus in response to the many reports and allegations regarding the work of the UN agencies, co-optation with the regime, their procurement contracts and corruption.

SELECTED BIBLIOGRAPHY

- Ahmad, J. (2019). *Changing Contexts and Trends in Syrian Civil Society*. Berlin: IMPACT Civil Society Research and Development.
- Citizens for Syria. (2015). *Citizens For Syria Mapping the Syrian civil Society actors Phase one*. Berlin: Citizens for Syria e.V.
- Dr. Joseph Daher (2020) [Invisible Sanctions: How over-compliance limits humanitarian work on Syria](#):IMPACT Civil Society Research and Development.
- Collins, M. (2019). *Syrian Civil Society: A closing door*. London: Christian Aid.
- Els, C., Mansour, K., & Carstensen, N. (2016). *Funding to national and local humanitarian actors in Syria: Between sub-contracting and partnerships*. L2GP Local to Global Protection.
- European Union . (2020, May 28). [Syria: Sanctions against the regime extended by one year. Retrieved from European Council Council of the European Union](#)
- (2013). *Getting aid to Syria: sanctions issues for banks and humanitarian agencies*. London: British Bankers' Association; the Disasters Emergency Committee; Freshfields Bruckhaus Deringer LLP.
- Gillard, E.-C. (2017). *Recommendations for Reducing Tensions in the Interplay Between Sanctions, Counterterrorism Measures and Humanitarian Action*. International Security Department & International Law Programme. London: Chatham House.
- Gordon, S., Robinson, A., Goulding, H., & Mahyub, R. (2018). *The impact of bank de-risking on the humanitarian response to the Syrian crisis*. Overseas Development Institute, Humanitarian Policy Group. London: ODI.
- HRW. (2019). *Rigging the System Government Policies Co-Opt Aid and Reconstruction Funding in Syria*. Human Rights Watch.
- Haid, H. (2019). *Principled Aid in Syria A Framework for International Agencies*. Middle East and North Africa Programme. London: Chatham House.
- Leender, R., & Mansour, K. (2018). *Humanitarianism, State Sovereignty, and Authoritarian Regime Maintenance in the Syrian War*. *Political Science Quarterly*, 133(2), 225-257
- Mattes, L. (2018). *Syrian Civil Society Organisations in Lebanon: Assessment and Analysis of Existing Organisations and the Conditions under which they Operate*. (Opuscula, 115). Berlin: Maecenata Institut für Philanthropie und Zivilgesellschaft.
- Mellen, R., & Lynch, C. (2017, August 3). *Inside Turkey's NGO Purge*. From *Foreign Policy*: <https://foreignpolicy.com/2017/08/03/inside-turkeys-ngo-purge/>
- Khalil, S. (2020, June 17). [What is the Caesar Act and how will new US sanctions impact Syria? Retrieved from The New ARab](#)
- Oweis, K. Y. (2019, July 15). *UNHCR on aid to Syria: what's important is to deliver*. Retrieved from *The National*: <https://www.thenational.ae/world/mena/unhcr-on-aid-to-syria-what-s-important-is-to-deliver-1.886179>
- Ruppert, S. (2019, October 22). *Aiding & Abetting. On the Limits of Humanitarian Work in Syria*. Retrieved from *IR International Review*: <https://international-review.org/aiding-abetting/>
- UNHCR. (2020). *UNHCR's 2020-2021 Financial Requirements*. Retrieved from http://reporting.unhcr.org/sites/default/files/ga2020/pdf/Chapter_Financial.pdf
- UNHCR & UNDP. (2019, June 30). *3RP Regional Strategic Overview 2019-2020*. Retrieved from <https://data2.unhcr.org/en/documents/download/67370>
- Walker, J. (2020). *Risk Management Principles Guide for Sending Humanitarian Funds into Syria and Similar High-Risk Jurisdictions*.
- Walker, J. (2016). *Humanitarian Impact of Syria-Related Unilateral Restrictive Measures*. SDC Swiss Agency for Development and Cooperation.

