

U.S. Government Expands Sanctions Relief for Syria and Suspends the Caesar Act

On November 10, 2025, following Syrian President Ahmed Al-Sharaa's visit to Washington, DC and meetings with President Trump, the U.S. Government issued a tri-seal advisory granting sanctions and export controls relief for Syria (the "Advisory").¹ The U.S. Secretary of State suspended in part the imposition of the Caesar Act, which sanctions foreign persons who knowingly provide significant financial, material, or technological support to the Government of Syria. The suspension, which is set for 180 days, replaces the waiver of Caesar Act sanctions issued by the Secretary of State on May 23, 2025.² The suspension halts the imposition of Caesar Act sanctions, with the exception of certain transactions involving the governments of Russia and Iran or the transfer of Russian-origin or Iranian-origin goods, technology, software, funds, financing or services.

The Advisory follows the issuance of General License 24 in January 2025, General License 25 in May 2025 and Executive Order 14312 in June 2025, removing U.S. sanctions and directing U.S. agencies to take additional measures to encourage U.S. private sector and foreign partner re-engagement in Syria. The transfer of most basic civilian-use U.S.-origin goods, software and technology to Syria is now permitted without a license. While the U.S. no longer imposes comprehensive sanctions on Syria, certain Syrian actors, including former President Bashar Al-Assad, Captagon traffickers and persons linked to ISIS and Al-Qa'ida, remain subject to sanctions.

On November 7, 2025, just days before the Advisory was issued, the U.S. removed Syrian President Ahmed Al-Sharaa³ and Syrian Interior Minister Anas Hasan Khattab from the Specially Designated Global Terrorist ("SDGT") List. Established by Executive Order 13224, SDGT designation provides a means by which to disrupt terrorist financial support networks by authorizing the U.S. government to designate and block the assets of foreign individuals and entities that commit acts of terrorism or pose a significant risk of committing such acts.

¹ "Publication of Tri-Seal Advisory: Sanctions and Export Controls Relief for Syria," Office of Foreign Assets Control (November 10, 2025), available at <https://ofac.treasury.gov/recent-actions/20251110>.

² "Caesar Act Waiver Certification," U.S. Department of State (May 23, 2025), available at <https://www.state.gov/caesar-act-waiver-certification>.

³ Previously known as "Abu Muhammad al-Jawlani."

While the Advisory represents an important step in the removal of sanctions, not all sanctions have been removed. Syria is still designated a State Sponsor of Terrorism (“SST”), sharing company with Cuba, Iran and North Korea. States having been designated as SST are subject to restrictions on U.S. foreign assistance; a ban on defense exports and sales; certain controls over exports of dual-use items; and miscellaneous financial and other restrictions. The U.S. Government is continuing to review Syria’s status as an SST.

The Advisory, restating the commitment of the U.S. Departments of State, Commerce and the Treasury to a stable, unified and peaceful Syria, was issued on the heels of the first visit by a Syrian president to the White House since Syria’s independence in 1946. The Advisory committed to give Syria a chance to “rebuild and thrive by lifting U.S. sanctions and ensuring accountability for harmful actors.”⁴

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⁴ “Sanctions and Export Controls Relief for Syria,” Office of Foreign Assets Control (November 10, 2025), available at <https://ofac.treasury.gov/media/934736/download?inline>.

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