



MARKET INTELLIGENCE · REGULATORY & INVESTMENT ADVISORY

Syria Sanctions, Export Controls & Market Re-Entry

Institutional Briefing — October 2026 Update · Aita Consulting

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Key Takeaways

1 · The legal landscape has changed.

Syria is no longer comprehensively sanctioned by the US, EU, UK or Canada; residual restrictions are now targeted.

2 · Execution is the binding constraint.

Counterparty screening, export classification, banking feasibility and site security now determine whether projects can proceed.

3 · Healthcare is among the clearest near-term entry sectors.

High unmet need and relatively favorable treatment for medicines and many devices create a practical route to market, subject to product classification, end-use controls and counterparty screening.

4 · Banking remains the principal commercial bottleneck.

Payment routes should be pre-cleared before signing, with enhanced diligence and structured settlement mechanisms.

5 · Regulatory change must be monitored continuously.

BIS rules, sanctions lists, FATF status and security conditions can materially change transaction risk.

1. Executive summary

As of October 2026, the US, EU, UK and Canada no longer maintain comprehensive country-wide sanctions against Syria. The principal constraints are now targeted sanctions lists, export controls, AML-related de-risking and security conditions on the ground.

Three events since our February 2026 edition change the investment picture materially:

- **Caesar Act repealed.** Congress repealed the Caesar Syria Civilian Protection Act through the FY2026 National Defense Authorization Act, signed on 18 December 2025, removing the main US secondary-sanctions threat to non-US companies.
- **State Sponsor of Terrorism designation rescinded.** The US State Department rescinded Syria's SST designation effective 24 August 2026 and revoked the SDGT designation of Hayat Tahrir al-Sham (HTS); OFAC removed HTS from the SDN List and revoked General License 25 the same day.
- **ITAR policy of denial lifted.** Effective 1 October 2026, Syria was removed from ITAR §126.1(d)(1); defense-article licenses are now reviewed case by case.

The practical conclusion of the February edition still holds and is now stronger: **risk is execution-driven, not prohibition-driven**. The remaining gating items for most civilian projects are (1) counterparty screening against the lists that remain, (2) export classification of anything subject to the US EAR or EU dual-use rules, (3) banking feasibility in a jurisdiction still on the FATF grey list, and (4) site-level security.

This update corrects and supersedes the February 2026 edition where they differ (see Section 11). It is a market-intelligence briefing, not legal advice.

2. Timeline of relief, December 2024 – October 2026

Twenty-two months after the fall of the Assad government, the US, EU, UK and Canada have dismantled their comprehensive Syria regimes. The timeline below presents the principal relief measures in reverse chronological order.

Date	Jurisdiction	Measure
1 Oct 2026	US (State/DDTC)	Syria removed from ITAR §126.1(d)(1) policy of denial; case-by-case review (Thompson Hine)
25 Sep 2026	US (OFAC)	Syria-specific general license in Terrorism List Governments Sanctions Regulations (31 CFR 596.505) removed as no longer needed (Federal Register)
24 Aug 2026	US (State/OFAC)	SST designation rescinded; HTS SDGT revoked and delisted; GL 25 revoked; updated Tri-Seal Advisory; Syria Accountability Act and CBW Act waivers (Baker McKenzie)
8 Jul 2026	US (President)	Congress notified of intent to rescind SST; 45-day period begins
18 May 2026	EU	Residual Assad-linked regime renewed to 1 June 2027; seven entities delisted, incl. Ministries of Defense and Interior (Thomson Reuters)
13 Feb 2026	Canada	SOR/2026-23 repeals broad sectoral prohibitions; 24 entities and one individual delisted (Canada Gazette)
18 Dec 2025	US (Congress)	FY2026 NDAA repeals the Caesar Act
10 Nov 2025	US (Tri-Seal)	First Tri-Seal Advisory on Syria relief (State, Commerce, Treasury)
6 Nov 2025	UN Security Council	Resolution 2799 delists

		President al-Sharaa and Interior Minister Khattab from the 1267 ISIL/Al-Qaida list (UN DPPA)
25 Sep 2025	US (OFAC)	31 CFR Part 569 renamed Promoting Accountability for Assad and Regional Stabilization Sanctions (PAARSS)
2 Sep 2025	US (BIS)	EAR rule: new License Exception SPP for EAR99 items; more favorable licensing policy (Fenwick)
Aug 2025	US (OFAC)	Syrian Sanctions Regulations (31 CFR Part 542) removed from the CFR
30 Jun 2025	US (President)	EO 14312 revokes the Syria sanctions program effective 1 July 2025; 518 persons delisted (Troutman)
28 May 2025	EU	Economic sanctions lifted except security-based measures; 24 entities delisted incl. Central Bank of Syria
23 May 2025	US (OFAC/FinCEN)	GL 25 issued; Caesar Act 180-day waiver; FinCEN relief for Commercial Bank of Syria correspondent accounts
25 Apr 2025	UK	Syria (Sanctions) (EU Exit) (Amendment) Regulations 2025 lift energy, transport and financial-services restrictions
6 Mar 2025	UK	24 entities delisted, incl. Central Bank, Commercial Bank of Syria and Syrian Arab Airlines
8 Dec 2024	—	Fall of the Assad government

REGULATORY LANDSCAPE

3. United States

US persons no longer need OFAC authorization for ordinary business in Syria, but the Commerce Control List, residual SDN listings and pre-July-2025 enforcement exposure all still apply.

3.1 Sanctions (Treasury/OFAC)

- **Comprehensive program terminated.** EO 14312 (30 June 2025) revoked the Syria sanctions executive orders; OFAC then removed the Syrian Sanctions Regulations (31 CFR Part 542) from the Code of Federal Regulations.
- **What replaced it.** The renamed PAARSS regulations (31 CFR Part 569) target Bashar al-Assad and associates, human-rights abusers, Captagon traffickers, persons linked to past proliferation, ISIS and al-Qaida affiliates, and Iran and its proxies. OFAC designated over 130 people under this authority when the program changed.
- **SST effects removed.** Since 24 August 2026 Syria is no longer subject to the Terrorism List Governments Sanctions Regulations (31 CFR Part 596) or 22 USC 7205(a)(1), which had restricted US financial transactions with the Government of Syria.
- **HTS.** US entities no longer need OFAC authorization to deal with HTS, provided no blocked person or other prohibited activity is involved. Two former HTS figures were re-designated the same day under EO 13224 on separate grounds, so screening still matters.
- **GL 25 revoked.** Firms that documented Syria activity under GL 25 should update internal authorizations and screening records; revocation does not authorize dealings with persons still on the SDN List.
- **Look-back exposure.** OFAC has stated that investigations of apparent violations of the old regulations occurring before 1 July 2025 may still proceed.

3.2 Statutes

- **Caesar Act:** repealed 18 December 2025 (FY2026 NDAA). The NDAA's accompanying expectations are largely security-focused, including that Syria refrain from unprovoked military action against neighbors.
- **Syria Accountability Act and CBW Act:** waived on 24 August 2026, including restrictions on USML exports, Arms Export Control Act sales, foreign military financing and Syrian-owned air transport to and from the US.
- **Litigation:** the SST rescission limits new terrorism-exception claims against the Government of Syria for events on or after 24 August 2026.

3.3 Export controls (Commerce/BIS – EAR)

The EAR has not yet caught up with the SST rescission. Under 15 CFR §746.9, items subject to the EAR generally require export authorization for Syria unless they are food or medicine classified EAR99 or qualify for an applicable license exception. The principal exceptions and licensing policies are summarized below ([§746.9](#)).

- **License Exception SPP** (Syria Peace and Prosperity, since 2 September 2025) authorizes export and re-export of EAR99 items, subject to end-use and end-user controls and prohibited-party screening. Exporters must cite SPP on the shipment.

- **Other exceptions now available for Syria** include TSU (software updates and operation technology), AVS (temporary sojourn of civil aircraft and vessels; EAR99/AT-only spare parts) and CCD (consumer communications devices, not limited to NGOs).
- **Licensing policy** for CCL items moved to a presumption of approval for commercial end uses supporting economic development, with case-by-case review for other dual-use items.
- Syria remains in Country Group E:1, Syria-specific anti-terrorism controls continue, and deemed-export licenses are required for CCL technology released to Syrian nationals. Some counsel expect BIS to move Syria out of E:1 and relax anti-terrorism controls and de minimis thresholds; **until a rule is published**, exporters should **apply the existing requirements**.

3.4 Defense trade (State/DDTC – ITAR)

Effective 1 October 2026, DDTC reviews defense-article and defense-service transfers to Syria case by case instead of under a policy of denial. This matters mainly to security, aviation and dual-use integrators; civilian projects should still confirm nothing in the bill of materials is ITAR-controlled.

4. EU, UK, Canada and UN

All four now run targeted regimes aimed at the former regime, human-rights abusers and security threats; none prohibits ordinary civilian trade or investment.

Jurisdiction	Current legal basis	What was lifted	What remains
European Union	Decision 2013/255/CFSP; Regulation (EU) 36/2012; dual-use Regulation (EU) 2021/821	All economic sanctions except security-based ones (28 May 2025); 24 entities incl. Central Bank of Syria delisted	Asset freezes and travel bans on Assad-linked persons, renewed to 1 June 2027; arms embargo and security-based measures; seven entities incl. Defense and Interior Ministries delisted May 2026 (Council review)
United Kingdom	Syria (Sanctions) (EU Exit) Regulations 2019, as amended 25 April 2025	Energy, transport and financial-services restrictions; Central Bank, Commercial Bank of Syria, ministries and state media delisted	Asset freezes on several hundred designated persons (mostly individuals); certain trade prohibitions retained; OFSI humanitarian general license still available (HSF Kramer)
Canada	Special Economic Measures (Syria)	Broad import/export, oil, investment and	Dealings ban on Schedule 1 persons (32

Jurisdiction	Current legal basis	What was lifted	What remains
	Regulations, amended by SOR/2026-23 (in force 13 Feb 2026)	financial services prohibitions; 24 entities incl. Central Bank and Commercial Bank delisted	entities and 229 individuals at announcement); new listing criteria for human-rights abuses and threats to stability; RCMP disclosure duties (Global Affairs Canada)
United Nations	1267/1989/2253 ISIL/Al-Qaida regime	President al-Sharaa and Interior Minister Khattab delisted by Resolution 2799 (14–0, China abstaining)	The regime itself and other listed individuals and entities remain; Resolution 2799 delisted two persons, not the HTS/Al-Nusrah entity entry — verify current entries before relying on them

Two practical points follow. First, the EU's dual-use regulation operates independently of sanctions relief, so EU-origin controlled items still need classification and, where listed, a license. Second, Canadian and UK persons should screen against their own national lists, which differ from OFAC's.

TRANSACTION INFRASTRUCTURE

5. Financial-system reintegration

Payment rails are reconnecting, but Syria remains on the FATF grey list and global banks still treat it as high-risk, so banking feasibility — not legality — is now the most common dealbreaker.

- **FATF status.** Syria was still on the list of jurisdictions under increased monitoring after the June 2026 plenary ([Shufti summary](#)). The IMF's August 2026 mission named AML/CFT reform and grey-list exit as conditions for deeper reintegration ([IMF](#)). The next plenary is scheduled for October 2026.
- **Correspondent banking and SWIFT.** Syrian banks regained SWIFT access in late 2025, and the Central Bank reports restored relationships with several European banks, including Austrian and French institutions ([Enab Baladi](#)).
- **Card networks.** The Central Bank signed an MoU with Mastercard (September 2025) and a roadmap with Visa (December 2025), and on 4 May 2026 authorized banks and payment firms to partner with international networks. The first international card transaction in over 15 years was processed in August 2026 ([Sovereign](#)).
- **Currency.** A redenominated Syrian pound, with two zeros removed, began circulating from late December 2025; the IMF judged the changeover successfully managed.

- **Banking system condition.** The IMF describes monetary policy as severely constrained by a dysfunctional banking system and lack of instruments, and calls for a new central bank and banking law ([Arab News](#)).

Implication for transactions: pre-clear the payment route with the paying and receiving banks before signing, prefer letters of credit or escrow with milestone release, and expect enhanced due diligence questionnaires from every bank in the chain.

6. Macroeconomic and investment climate

The opportunity is very large relative to the economy: the World Bank puts physical reconstruction needs at a best estimate of **US\$216 billion**, roughly ten times Syria's 2024 GDP ([World Bank, 21 Oct 2025](#)).

Indicator	Figure	Source
Reconstruction need (range)	US\$140–345 billion; best estimate US\$216 billion	World Bank Physical Damage and Reconstruction Assessment 2011–2024
Of which: infrastructure / residential / non-residential	US\$82 bn / US\$75 bn / US\$59 bn	World Bank
Hardest-hit governorates	Aleppo and Rif Dimashq	World Bank
Real GDP change 2010–2022	About –53%	World Bank, cited in IMF reporting
2026 growth outlook	IMF staff expects Syria's economy to record double-digit real GDP growth in 2026.	IMF, Aug 2026
Fiscal position	Small central-government surplus in 2025	IMF staff
Poverty	About 90% of the population, per UN estimates	AP reporting on World Bank release

Drivers cited by the IMF in July 2026 include recovering agriculture after better rainfall, rising hydrocarbon output, more electricity supply, refugee returns and growing visitor numbers. Price pressure rose in 2026 with higher fuel and food import costs tied to regional conflict.

Constraints. The IMF links access to development finance to resolving legacy debt, building a domestic securities market and improving economic data; Article IV consultations have not yet resumed.

Domestic investment law. Investment Law No. 18 of 2021, amended by Presidential Decree No. 114 of 2025, now permits 100% foreign ownership without a mandatory local partner, profit and capital repatriation under applicable rules, and up to 40% foreign staff ([SANA](#)). The Syrian Investment Agency is the executing body; its director-general changed on 5 August 2026. Analysts note the regime concentrates discretion over licenses and incentives in the executive, so incentive terms should be documented contractually ([MEI](#)).

RISK & SECTOR PRIORITIES

7. Residual risk map and updated sector scoring

With prohibitions largely gone, the four live risk families are listed parties, export classification, banking execution and physical security; the February scoring framework is retained but re-weighted to reflect that shift.

7.1 What still bites

- **Listed parties.** US PAARSS, counter-terrorism, narcotics and Iran-related designations; EU and UK Assad-linked asset freezes; Canadian Schedule 1; UN 1267 entries. Ownership tracing matters: under OFAC's 50% rule, entities majority-owned by blocked persons are themselves blocked.
- **Export controls.** EAR licence requirements for CCL items, Country Group E:1 status, deemed-export rules, EU dual-use licensing.
- **AML/de-risking.** FATF grey-listing, enhanced due diligence by correspondent banks, weak domestic banking intermediation.
- **Security and political stability.** Israeli strikes and incursions in the south; recurring unrest in Suwayda and the coast during 2025; a government–SDF integration agreement reached at the end of January 2026 after fighting earlier that month, described by analysts as fragile; a persistent ISIS threat ([Risk Advisory](#), [RANE](#)).
- **Snap-back.** US relief is tied to policy expectations; renewed instability or abuses could prompt new designations under the retained authorities.

7.2 Revised weighting

Metric	Feb 2026 weight	Oct 2026 weight	Reason for change
Legal exposure (sanctions prohibitions)	30%	15%	Comprehensive regimes gone in US, EU, UK, Canada; SST rescinded
Export-control sensitivity	20%	25%	Now the main legal gate for equipment-heavy projects
Banking execution	20%	25%	FATF grey list and de-risking now the most frequent blocker
Counterparty complexity (UBO, listed persons)	15%	15%	Unchanged; residual lists remain long
Political and security volatility	15%	20%	Site-level security now dominates project risk

7.3 Indicative sector classification

These are qualitative judgments by Aita Consulting for orientation only; transaction-specific review is always required.

LOW Routine controls	MODERATE Enhanced diligence	ELEVATED Specialist review	HIGH Board-level escalation
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Sector	Feb 2026	Oct 2026	Main remaining gate
Healthcare delivery, pharmaceuticals	Low–Moderate	Low	Device classification; pharma supply-chain integrity
FMCG and distribution	Low	Low	Payment rails; distributor screening
Civil construction, real estate	Moderate	Moderate	Land-title verification; contractor and UBO screening
Telecom and digital infrastructure	Elevated	Moderate–Elevated	Encryption and network-equipment ECCNs
Industrial manufacturing	Elevated	Moderate	CNC, sensors and controls classification
Financial services, fintech	Elevated	Elevated	FATF status; correspondent appetite
Energy and utilities	Elevated	Moderate–Elevated	Turbine and control-system ECCNs; regional exposure
Aviation and aerospace	High	Elevated	Avionics and parts licensing; AVS limits; insurer appetite

SECTOR DEEP-DIVE

8. Sector deep-dive: healthcare, medical devices and health IT

Healthcare appears to offer one of the lowest-friction, highest-need routes to market: medicines classified EAR99 can move without an EAR license, many medical devices may qualify for License Exception SPP, and the system's capacity gap is severe and well documented.

8.1 Need

- More than 15.9 million people need health assistance, and over 40% of health facilities are partially or fully non-functional, per UNDP in February 2026 ([UNDP](#)).
- WHO reported in November 2025 that only 58% of hospitals and 23% of primary-care centers were fully functional, after donor cuts affected more than 400 facilities ([UN News via GlobalSecurity](#)).
- WHO estimates up to 70% of the health workforce left during the conflict ([WHO EMRO](#)); about 1.4 million returnees since late 2024 are adding demand faster than services recover, per Relief International.
- Donor capital is shifting toward rebuilding: e.g., a EUR 30 million Germany/KfW–UNDP agreement with the Ministry of Health (February 2026) to rehabilitate five priority hospitals with an operations-and-maintenance focus.

8.2 Export classification by product type

Product	Typical EAR treatment for Syria	Action
Medicines (EAR99)	No license required under §746.9	Confirm EAR99 status; screen consignee
Most medical devices and consumables (EAR99)	License Exception SPP	Cite SPP; end-use/end-user screening
Imaging, radiotherapy, lab analyzers with controlled parts (lasers, detectors, high-performance computing)	May fall on the CCL; license needed if no exception applies	Obtain manufacturer ECCN; apply under favorable review policy
Health IT software and hardware with encryption	Often 5A992/5D992 (AT-controlled); not covered by SPP, which is EAR99-only	Check TSU/CCD eligibility or apply for a license; watch for E:1 changes
Cloud hosting or remote support involving controlled technology	Deemed-export rules apply to CCL technology released to Syrian nationals	Map who accesses source code and technical data

8.3 Health IT and data infrastructure

Syria's recovery creates a rare chance to build digital health infrastructure on modern standards rather than retrofit legacy systems. Investors and donors should require:

- **Patient identity first.** A unique national health identifier and master patient index underpin every downstream system: EMR, lab, pharmacy, immunization and claims.

- **Interoperability standards.** HL7 FHIR for exchange; ICD-10 for diagnoses; LOINC for lab; SNOMED CT for clinical terms (confirm licensing terms for a non-member territory); DHIS2 for aggregate public-health reporting.
- **Simple, high-yield data first.** Immunization, maternal health and essential-medicines tracking deliver measurable impact quickly and build data-quality habits.
- **Procurement hygiene.** Software and device contracts should carry sanctions representations, ECCN disclosure by the vendor, source-code access mapping and data-residency terms.

8.4 Healthcare compliance protocol (updated)

1. Product classification memo (ECCN or EAR99; EU dual-use status).
2. Counterparty and UBO screening of distributor, hospital operator and contractors across US, EU, UK, Canadian and UN lists.
3. End-use statement from the receiving facility.
4. Banking pre-clearance of the payment route.
5. Milestone or escrow payments for capital equipment.
6. Post-installation verification and service-access log (for deemed-export and diversion control).

9. Other sector notes

Outside healthcare, the same four gates apply; what differs is which one binds first.

- **Construction and real estate.** Legally open; the binding risks are land-title disputes after mass displacement and contractor ownership. Use tiered contractor onboarding, sanctions audit rights in EPC contracts and staged capital release. Aleppo and Rif Dimashq carry the largest reconstruction needs.
- **FMCG and distribution.** Lowest legal friction. Confirm EAR99 status for US-origin goods (cite SPP), screen distributors and use trade-finance instruments while retail banking remains thin.
- **Telecom and digital.** Network equipment and software routinely carry encryption ECCNs that sit outside SPP. Plan license timelines into rollout schedules; CCD may cover consumer handsets.
- **Industrial manufacturing.** 100% foreign ownership is now permitted under Decree 114/2025. CNC tools, precision sensors and industrial controls need classification; expect license applications for some lines.
- **Energy and utilities.** Power-sector investment is a stated priority, and electricity supply is improving per the IMF. Turbines, compressors and control systems need classification; upstream oil and gas carries higher reputational and regional-conflict exposure than downstream utilities.
- **Aviation.** AVS now allows temporary sojourn of civil aircraft and EAR99/AT-only spare parts; most avionics still need licenses. Leasing structures and insurer pre-approval remain advisable.
- **Financial services and fintech.** Card networks are reconnecting, but any payment business must be built to FATF standards from day one; grey-list exit will be the key re-rating event.

10. Compliance and transaction-execution protocol

A defensible Syria transaction in 2026 follows seven steps, run in this order because each one can stop the deal more cheaply than the next.

1. **Jurisdictional map.** Identify every nexus: US persons, US-origin content (including de minimis), EU/UK/Canadian persons, currencies and banks in the payment chain.
2. **Counterparty and UBO screening.** Screen all parties and their owners against OFAC SDN (incl. PAARSS and SDGT), BIS Entity and Denied Persons lists, EU, UK and Canadian lists, and UN 1267. Apply the OFAC 50% rule and record results.
3. **Product classification.** Obtain ECCN or EAR99 determinations from manufacturers; check EU Annex I dual-use status; select the exception (SPP, TSU, AVS, CCD) or file a license.
4. **Banking pre-clearance.** Confirm the route with correspondent banks before signing; prefer letters of credit, escrow and milestone payments.
5. **Contract safeguards.** Sanctions and export-control representations, change-in-law termination and suspension rights, audit rights, UBO disclosure and re-screening triggers.
6. **Security and operating plan.** Site-specific security assessment, insurer engagement and local partner vetting.
7. **Monitoring.** Re-screen on every payment and at least quarterly; track BIS (E:1 and AT-control changes), OFAC, EU annual review (next due before 1 June 2027) and FATF plenaries.

For institutional investors, governance should include a named sanctions officer, a board-approved threshold for Syria exposure and an escalation protocol for regulatory change events. These controls operationalize the document's core conclusion that transaction viability depends on screening, classification, banking execution and site-level security.

11. Corrections and updates to the February 2026 edition

Several statements in the February edition are now out of date or incomplete; this table records each change so readers of both versions can reconcile them.

February 2026 statement	October 2026 position
US comprehensive sanctions "revoked July 2025"	EO 14312 was signed 30 June 2025, effective 1 July 2025; Part 542 later removed from the CFR; GL 25 revoked 24 August 2026
US framework described only as IEEPA plus targeted statutes	Caesar Act repealed (18 Dec 2025); SST rescinded (24 Aug 2026); Syria Accountability Act and CBW Act waived; ITAR denial policy lifted (1 Oct 2026)
EAR "remains fully applicable"	Still applicable, but License Exception SPP covers EAR99 items and licensing policy is favorable since 2 Sep 2025; further easing expected
EU section	Add May 2026 renewal to 1 June 2027 and delisting of seven entities
United Kingdom not covered	UK lifted sectoral sanctions 25 April 2025 and delisted key state entities

February 2026 statement	October 2026 position
UN not covered	Resolution 2799 (6 Nov 2025) delisted the President and Interior Minister
Banking described generically	SWIFT reconnection, Visa/Mastercard authorization (May 2026) and first international card payment (Aug 2026); Syria still FATF grey-listed
Scoring weights	Re-weighted toward export controls, banking and security (Section 7.2)
Annex text repeated across sectors	Replaced with sector-specific gates (Sections 8 and 9)

12. About Aita Consulting

Aita Consulting helps investors, donors and health-sector operators convert Syria’s reopening into executable market-entry and health-system programs. Its approach combines regulatory and transaction analysis with clinical, standards and enterprise-software experience and first-hand knowledge of the Syrian health sector.

- **Leadership.** Founded by Sami Aita, MD, a physician educated in France who works in Arabic, French and English. Former Chair and CEO of MedcomSoft Inc. (Toronto), developer of MedcomSoft Record, an EMR/PHR with US and Canadian insurance plans built in and automated billing-code generation from encounter data.
- **Track record.** Developing PHR and EMR systems since 1995; first developer to deploy the MEDCIN vocabulary in an EMR for providers in Canada, the US and Australia (2000); testified before the US NCVHS Subcommittee on Standards and Security on patient medical record information standards (October 2001).
- **Syria engagement.** Senior advisor to the Syrian Ministry of Health, on health information systems, with a focus on national patient-identity infrastructure.
- **Standards depth.** HL7, FHIR, ICD-10, SNOMED CT, LOINC, RxNorm and DHIS2, including cross-mapping between terminologies.

How we support market entry: health-sector opportunity assessment; architecture for EMR, laboratory, pharmacy and utilization systems at facility, regional and national level; patient-identity and interoperability design; technical due diligence on health-IT and device procurements, including preparing the classification and end-use documentation that export-control counsel and banks require. Formal sanctions and export-control legal opinions are provided through qualified counsel.

Intended audience: institutional investors, donors, banks, exporters and operating partners assessing civilian market entry into Syria. Recommended use: apply this briefing as an initial screening framework, then obtain transaction-specific legal, tax, banking, export-control, security and other relevant professional advice before commitment.

13. Sources and disclaimer

Primary and official sources

- US Department of State, Commerce and Treasury — [Tri-Seal Advisory: Sanctions and Export Controls Relief for Syria, updated August 2026](#)
- Federal Register — [OFAC, Terrorism List Governments Sanctions Regulations amendment, 25 Sep 2026](#)
- eCFR text — [15 CFR §746.9 Syria](#)
- Canada Gazette — [SOR/2026-23](#); Global Affairs Canada — [announcement, 18 Feb 2026](#)
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- Enab Baladi — [Central Bank payments decision](#); Sovereign — [first international card payment](#); Shufti — [FATF grey list after June 2026](#)

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