

# ClientAlert

## International Trade

18 November 2011

## More amendments to the EU's Syrian sanctions measures

### I. Introduction

On 15 November 2011, two **Regulations (1150/2011 and 1151/2011)**<sup>1</sup> adopted by the Council of the European Union (EU) entered into effect, resulting in more amendments to the EU's original Syria Sanctions Regulation (i.e. Regulation 442/2011).<sup>2</sup> These amendments further expand the EU's Syria sanctions regime by restricting the Syrian government's access to European Investment Bank (EIB) funds and adding 18 persons considered responsible for recent human rights violations to the EU's asset freeze list. The new Regulations implement two **Council Decisions**<sup>3</sup> which were adopted on 14 November 2011.

### II. New features in the EU's Syria sanctions measures

The new features added to the EU's Syria sanctions measures framework as of 15 November 2011 are as follows:

- Regulation 1150/2011 **prohibits EIB disbursements or payments** connected to existing loan agreements with the Syrian government and **suspends related sovereign technical assistance service contracts** performed in Syria. It also updates the information on one natural person on the EU's assets freeze list.
- Implementing Regulation 1151/2011 adds **18 Syrian government officials and associated persons to the EU's asset freeze list**. Accordingly, parties subject to EU jurisdiction must not make funds or economic resources directly or indirectly available to these persons or for their benefit.



For more information, please contact:

James Killick  
Partner, Brussels  
+ 32 2 239 2552  
jkillick@whitecase.com

Sara Nordin  
Associate, Brussels & Hong Kong  
+ 852 2822 8789  
snordin@whitecase.com

Fabienne Vermeeren  
Regional Director Europe –  
International Trade Services, Brussels  
+ 32 2 239 2606  
fvermeeren@whitecase.com

This Client Alert is provided for your convenience and does not constitute legal advice. It is prepared for the general information of our clients and other interested persons. This Client Alert should not be acted upon in any specific situation without appropriate legal advice and it may include links to websites other than the White & Case website. White & Case has no responsibility for any websites other than its own and does not endorse the information, content, presentation or accuracy, or make any warranty, express or implied, regarding any other website.

This Client Alert is protected by copyright. Material appearing herein may be reproduced or translated with appropriate credit.

In this publication, White & Case means the international legal practice comprising White & Case LLP, a New York State registered limited liability partnership, White & Case LLP, a limited liability partnership incorporated under English law and all other affiliated partnerships, corporations and undertakings.  
© 2011 White & Case LLP

*Due to the general nature of its contents, this newsletter is not and should not be regarded as legal advice.*

<sup>1</sup> [Council Regulation \(EU\) No 1150/2011](#) of 14 November 2011 amending Regulation (EU) No 442/2011 concerning restrictive measures in view of the situation in Syria, [2011] OJ L 296/1 and [Council Implementing Regulation \(EU\) No 1151/2011](#) of 14 November 2011 implementing Regulation (EU) No 442/2011 concerning restrictive measures in view of the situation in Syria, [2011] OJ L 296/3.

<sup>2</sup> [Council Regulation \(EU\) No 442/2011](#) of 9 May 2011 concerning restrictive measures in view of the situation in Syria, [2011] OJ L 121/1. For a description of the main features of this Regulation and prior amendments to it, see our previous alerts from [5 September 2011](#), [27 September 2011](#) and [14 October 2011](#).

<sup>3</sup> [Council Decision 2011/735/CFSP](#) of 14 November 2011 amending [Decision 2011/273/CFSP](#) concerning restrictive measures against Syria, [2011] OJ L 296/53 and [Council Implementing Decision 2011/736/CFSP](#) of 14 November 2011 implementing Decision 2011/273/CFSP concerning restrictive measures against Syria, [2011] OJ L 296/55.