EXPLANATORY MEMORANDUM TO

THE SYRIA (SANCTIONS) (EU EXIT) (AMENDMENT) REGULATIONS 2026

2026 No. 436

1. Introduction

1.1 This Explanatory Memorandum has been prepared by the Foreign, Commonwealth and Development Office and is laid before Parliament by Command of His Majesty.

1.2 This memorandum contains information for the Joint Committee on Statutory Instruments.

2. Declaration

2.1 Stephen Doughty MP, Minister of State for Europe, North America and Overseas Territories at the Foreign Commonwealth and Development Office, confirms that this Explanatory Memorandum meets the required standard.

2.2 Abigail Culank, Deputy Director for Sanctions at the Foreign, Commonwealth and Development Office, confirms that this Explanatory Memorandum meets the required standard.

3. Contact

3.1 The Sanctions Directorate at the Foreign, Commonwealth and Development Office can be contacted by email at the following address with any queries regarding the instrument: fcdo.correspondence@fcdo.gov.uk. Alternatively, the department can be contacted by telephone: 0207 008 8553.

Part One: Explanation, and context, of the Instrument

4. Overview of the Instrument

What does the legislation do?

4.1 This instrument makes amendments to the Syria (Sanctions) (EU Exit) Regulations 2019 (S.I. 2019/792) ("the 2019 Regulations") to remove further Syria trade sanctions, covering luxury goods, gold, precious metals, and diamonds. This instrument will allow UK companies to trade in these sectors and brings the UK in line with the EU and the US.

4.2 The instrument does not remove trade restrictions in relation to Syria on arms and related material, chemical weapons, and interception and monitoring goods.

Where does the legislation extend to, and apply?

4.3 The extent of this instrument (that is, the jurisdiction(s) which the instrument forms part of the law of) is the whole of the United Kingdom.

4.4 The territorial application of this instrument (that is, where the instrument produces a practical effect) is also the same as the territorial application of the instrument that it amends. That is, it applies to the whole of the UK.

4.5 This instrument also applies to conduct by UK persons where that conduct is wholly or partly outside the UK, and some parts of it also apply to conduct by any person in the territorial sea adjacent to the UK. "UK person" is defined in section 21(2) of the Sanctions and Anti-Money Laundering Act 2018 ("Sanctions Act").

5. Policy Context

What is being done and why?

5.1 In April 2025, the Syria (Sanctions) (EU Exit) (Amendment) Regulations 2025 ("the 2025 Regulations") amended the 2019 Regulations to ensure the Syria sanctions regime remained fit for purpose in light of the fall of the Assad regime. Those amendments enabled designations related to human rights violations under that regime to be retained and removed certain trade sanctions in relation to Syria. At the same time, some existing designations of entities judged to no longer be under the control of the Assad regime were revoked.

5.2 This instrument amends the 2019 Regulations to remove specific trade restrictions on luxury goods, gold, precious metals, and diamonds, covered by regulations 42 – 46, which the 2025 Regulations had left in place. Regulations 42 and 46 prohibited the export of gold, precious metals or diamonds and luxury goods to the Governing Authority of Syria (GoS), as well as the import of gold, precious metals or diamonds and luxury goods from the GoS. Regulations 43, 44 and 45 prohibited associated ancillary services to trade in these sectors. Specifically, under Regulation 43 a person could not directly or indirectly provide technical assistance relating to gold, precious metals or diamonds to the GoS, Regulation 44 prohibited the provision of financial services to the GoS in relation to these activities and Regulation 45 stated that a person may not directly or indirectly provide brokering services to the GoS in relation to the import or export of gold, precious metals or diamonds.

5.3 Removing these restrictions furthers UK objectives to support Syria's economic recovery from the devastating impacts of the civil war, allows UK businesses to trade in these sectors and aligns the UK more closely with the EU and our partners.

5.4 The decision to remove these sanctions was taken following engagement with UK businesses to support trade and investment into Syria. Removing these trade measures sends a further positive signal that the UK supports such investment in sectors of interest, in response to the ongoing caution from the private sector.

5.5 The instrument also indicates continued UK support for trade and investment in Syria more generally, contributing to Growth objectives and helping to strengthen the UK's bilateral relationship with Syria.

What was the previous policy, how is this different?

5.6 This instrument builds on the decision to remove certain sanctions on Syria through the 2025 Regulations following the fall of Assad, in support of the UK's foreign policy objectives outlined above. Whilst there continue to be challenges, the situation in Syria has stabilised and progress made on the political transition. . In that context, it has become clear that removing additional sanctions could hasten the process of economic and political recovery. The policy aim of this instrument is to do so through the lifting of trade sanctions covering luxury goods, gold, precious metals and diamonds.

5.7 This instrument also aligns UK sanctions with the approach of the EU and US.

6. Legislative and Legal Context

How has the law changed?

6.1 As noted above, this instrument makes various amendments to the 2019 Regulations. The Sanctions Act establishes a legal framework which enables His Majesty's

Government to impose sanctions for a number of purposes, which include in the interests of international peace and security and for the promotion of democracy, the rule of law and good governance.

6.2 This instrument is made in exercise of the powers conferred by sections 1, 5, 15, 45, 54 and 62 of the Sanctions Act. It makes amendments to the 2019 Regulations, which were made under the Sanctions Act for discretionary purposes within section 1(2) of the Sanctions Act.

6.3 As noted above, this instrument revokes trade prohibitions relating to certain categories of goods (gold, precious metals and diamonds and other luxury goods) contained in regulations 42-46 of the 2019 Regulations. This instrument also makes consequential amendments as a result of the revocation of these prohibitions and removes the definition of "Governing Authority of Syria" in regulation 27(5), which is no longer required.

6.4 This instrument also makes two minor legal corrections to the 2019 Regulations:

6.5 Regulation 2(3)(b) amends the definition of "connected with Syria" in regulation 27(5) of the 2019 Regulations. Currently, regulation 27(5) provides that this definition applies for the purposes of Chapter 2 and 4 of Part 5 (Trade) of the 2019 Regulations. This instrument removes the remaining provisions in Chapter 4 of Part 5. However, the definition of "connected with" remains necessary for the purposes of Chapter 2 and also for Chapter 3 of Part 5. Regulation 2(3)(b) therefore amends the definition to make clear it applies for the whole of Part 5 of the 2019 Regulations.

6.6 Regulation 2(6)(a)(ii) inserts a definition of "petroleum products" into Regulation 57 of the 2019 Regulations (exceptions relating to petroleum products). Currently, regulation 57(7) provides that "petroleum products" has the meaning given to it in Schedule 2. However, the 2025 Regulations removed the definition of "petroleum products" from paragraph 4 of Schedule 2. This instrument therefore inserts the same definition for "petroleum products" into regulation 57, to ensure there is clarity on the meaning of that term for the purposes of the exceptions therein.

Why was this approach taken to change the law?

6.7 This is the only possible approach to make the necessary changes to the 2019 Regulations to remove the relevant trade prohibitions from the Syria sanctions regime.

7. Consultation

Summary of consultation outcome and methodology

7.1 No public consultation has been carried out on the Regulations, however public consultation was carried out in relation to the Sanctions Act.

7.2 There is neither a requirement in the Sanctions Act for public consultation on instruments made under the Sanctions Act, nor is there any other legal obligation to consult in respect of these Regulations. His Majesty's Government will continue engagement with stakeholders on the implementation of UK sanctions.

8. Applicable Guidance

8.1 In accordance with section 43 of the Sanctions Act, guidance has been published in relation to the prohibitions and requirements under the 2019 Regulations. This guidance will be updated to reflect the amendments to those Regulations made by this instrument.

Part Two: Impact and the Better Regulation Framework

9. Impact Assessment

9.1 A full Impact Assessment has not been prepared for this instrument as no, or no significant, impact on the private, voluntary or public sector is foreseen.

Impact on businesses, charities and voluntary bodies

9.2 The lifting of sanctions creates trade and investment opportunities for the UK. The impact on UK growth is expected to be positive but negligible due to the small size of the Syrian economy. Any such trade and investment with Syria will remain subject to other existing legal regulation including international sanctions.

9.3 The legislation does not impact small or micro businesses.

9.4 There is no, or no significant, impact on the public sector because this is an update to existing legislation.

10. Monitoring and review

What is the approach to monitoring and reviewing this legislation?

10.1 If His Majesty's Government determined that if it was no longer appropriate to maintain a sanctions regime or specific sanctions measures, that regime would be removed or amended accordingly. In the case of the 2019 Regulations, that would include the measures introduced by this instrument. As such, the Minister does not consider that a review clause in this instrument is appropriate.

Part Three: Statements and Matters of Particular Interest to Parliament

11. Matters of special interest to Parliament

11.1 This instrument contains "non-UN regulations" and does not contain any "UN regulations" (within the meaning of section 55(7) of the Sanctions Act), meaning that it is subject to the Made Affirmative Parliamentary procedure under section 55(3) of the Sanctions Act. It is laid before Parliament on 21 April 2026 and comes into force on 22 April 2026.

12. European Convention on Human Rights

12.1 Stephen Doughty MP, Minister of State for Europe, North America and the Overseas Territories at the Foreign, Commonwealth and Development Office, has made the following statement regarding Human Rights:

"In my view the provisions of the Syria (Sanctions) (EU Exit) (Amendment) Regulations 2026 are compatible with the Convention rights."

13. The Relevant European Union Acts

13.1 This instrument is not made under the European Union (Withdrawal) Act 2018, the European Union (Future Relationship) Act 2020 or the Retained EU Law (Revocation and Reform) Act 2023.