



Education, Audiovisual and Culture Executive Agency

Erasmus+ : Higher Education - International Capacity Building

Brussels, 29/01/2019

EACEA.A.4/RR/RMc

[Ares\(2019\)463823](#)

Subject: EU Financial Sanctions on Syria- Procedures to Follow for Erasmus+ CBHE Projects with Syrian Partners

Dear Project Coordinator,

Within your Capacity Building in Higher Education project you have included institutions from Syria.

The EU has extended restrictive measures against the Syrian regime and its supporters, in line with the EU's strategy on Syria. These restrictive measures include a sanctions list with approximately 250 Syrians and approximately 70 Syrian entities targeted by a travel ban and an asset freeze.

Therefore, we would underline the importance for Coordinators working on projects with Syrian partners to follow these steps during project implementation, as safeguard measures to exclude the possibility of any financial benefits accruing to persons or organisations/companies under EU sanctions.

Full Respect of the Sanctions List

The list of persons and organisations/institutions on the sanctions list can be found here in the first Pdf file after logging in with your ECAS password:

<https://webgate.ec.europa.eu/europeaid/fsd/fsf#!/files>

It is constantly updated and should therefore be checked periodically during the implementation of your project before incurring any expenses.

The Coordinator of the CBHE project is requested to ensure, during all stages of project implementation that:

- none of the higher education institutions or organisations or companies on the sanctions list are involved in any way or associated in any way with the project;
- none of the individuals involved in any project activities appear on the sanctions list (e.g. staff, students, sub-contracted experts, external evaluators etc.);

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- no equipment for the project is purchased from any of the companies on the sanctions list;
- none of the companies or individuals on the sanctions list are sub-contracted for any goods or services for the project (e.g. audit companies etc.).

Specific Measures for all Financial Transactions

1. **'Staff costs'** for participants from Syria, must be paid by cheque, written to the name of the person who has worked on the project activity and given directly to the person. (They should only be given upon presentation of the necessary supporting documentation). The participants from Syria should never be paid in cash. Under no circumstances, should the payment for staff costs be transferred to bank accounts of Syrian higher education institutions, even if these are outside Syria.

2. **'Travel costs'** and **'Costs of Stay'** should preferably be centralised and paid by the coordinator of the lead project partner and tickets/booking references sent via email to the participants travelling. In cases where this is not possible, a cheque for these costs incurred, written to the name of the person who has travelled, should be given directly to that person (upon receipt of the necessary supporting documentation).

3. **'Equipment'**. The tender procedure for equipment has to be carried out by Syrian universities where the equipment will be used for the project, in accordance with Syrian university rules. However, the ordering and payment to companies for the purchase of any equipment for Syrian universities must be centralised and carried out directly by the coordinator of the lead project partner. (Once the equipment has been delivered and installed in the Syria partner university, proof of this should be sent to the coordinator of the lead project partner). Under no circumstances, should the money for equipment be transferred to the bank accounts of Syrian higher education institutions, even if these are outside of Syria.

4. All **"subcontracting"** of project goods and services for Syrian universities must be centralised and carried out directly by the project coordinator, who must place the order and make the payments directly to these companies/individuals. (The Syrian partner should send all the necessary supporting documentation to the coordinator). Under no circumstances, should the money for subcontracted goods or services, be transferred to bank accounts of Syrian higher education institutions, even if these are outside Syria.

Should any of the above be unclear or should you have any questions, please do not hesitate to contact immediately Róisín Mc Cabe at EACEA (roisin.mc-cabe@ec.europa.eu), who will clarify these for you. We thank you for your cooperation in this matter.



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