



Security Council

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Letter dated 2 March 2020 from the Permanent Representative of the Syrian Arab Republic to the United Nations addressed to the President of the Security Council

On instructions from the Government of my country, the Syrian Arab Republic, the State concerned, allow me to convey to you the following observations regarding the twenty-fifth report of the Analytical Support and Sanctions Monitoring Team established pursuant to Security Council resolutions [1526 \(2004\)](#) and [2253 \(2015\)](#), which was annexed to the letter dated 20 January 2020 from the Chair of the Security Council Committee pursuant to resolutions [1267 \(1999\)](#), [1989 \(2011\)](#) and [2253 \(2015\)](#) concerning Islamic State in Iraq and the Levant (ISIL), Al-Qaida and associated individuals, groups, undertakings and entities addressed to the President of the Security Council ([S/2020/53](#)):

First, the Syrian Arab Republic wishes to express its appreciation for the professionalism of the Monitoring Team and the working relationship it maintains with the Syrian Government. The quality of the information contained in the Monitoring Team's reports continues to be a source of satisfaction and optimism for the Syrian Arab Republic, which is looking forward to the Team's upcoming scheduled visit to the country. By the same token, it is incumbent on all the other United Nations counter-terrorism bodies and agencies to review their approach to relations with the country and how they communicate with Member States, especially concerned States such as the Syrian Arab Republic, and providing them with technical and capacity-building support.

Second, turning to the section in the report entitled "Overview and evolution of the threat" and, in particular, paragraphs 1 and 2, my Government is wary of the use of the term "local authorities" and underlines that any administrative "arrangements" established by armed separatist groups, especially the Syrian Democratic Forces (SDF), in those areas are illegal and have no legal personality or capacity. As for the possible reappearance of ISIL as an underground network in the Syrian Arab Republic, that risk will persist until such time as a final and comprehensive solution is found to guarantee the withdrawal from the country of the forces of the illegal international coalition and the Turkish occupation forces, to disarm illegal non-State armed groups in north-east Syria and redeploy Syrian Government forces there, to allow the Syrian State to extend full sovereignty over its entire territory, and to begin to send foreign terrorist fighters and their families back to their own countries, the Governments of which bear the sole responsibility for bringing them to trial and holding them accountable, and for their rehabilitation and integration into their own societies. The situation in the Hawl camp, in particular, tragically epitomizes the terrible repercussions of foreign interference in Syria.



In that regard, the Syrian Government concurs with the assessment provided in paragraph 7 of the report and stresses that the Governments of all States of which foreign terrorist fighters and their families are nationals, or in which they are legally resident, must clearly take responsibility for them.

Third, with regard to the points raised in paragraph 14 on securing the border between Iraq and the Syrian Arab Republic, the Syrian Government wishes to underscore the following:

1. The Syrian and Iraqi Governments are working with their Russian and Iranian counterparts through a joint security coordination centre in Baghdad to secure a genuine and decisive victory over that terrorist organization. However, the forces of the so-called international coalition and Turkish military forces have hampered that process by directly attacking and occupying Syrian territory and by supporting and arming illegal armed militias.

2. If terrorism in the Syrian Arab Republic is to be eliminated, the United Nations must act in a forthright manner to implement the counter-terrorism resolutions; to end external interference in the political process in Syria, particularly as regards respect for the sovereignty, unity, integrity and independence of the Syrian Arab Republic; to bring an end to all forms of illegal foreign military presence, and indeed to all illegal armed presence, in the country; and to restore Government control over all Syrian territory.

3. The issue of how to secure the borders will continue to fester until a definitive and comprehensive solution is found to the situation in the Hawl camp that guarantees the return to Syrian Government control of all the country's territory.

Fourth, paragraph 15 of the report reflects the welcome professionalism of its authors, who fully recognize that north-west Syria has become the biggest haven for terrorists affiliated with Al-Qaida or ISIL. Unfortunately, the assessments made by the authors regarding the predominance of the terrorist Levant Liberation Organization, aka the Nusrah Front for the People of The Levant (QDe.137), in the north-west of the country have had no practical effect or significant impact on the conduct of certain Governments and Security Council members. Those States insist on using the situation in and around the city of Idlib to exert pressure on and to politically blackmail the Syrian Government and its allies in the war on terrorism. The Governments of those States deny that Syria has a right and a duty to liberate those areas and a duty to eliminate an armed organization designated by the Security Council as a terrorist entity. That duty is enshrined in the Constitution and laws of Syria, as well as in international law and Security Council resolutions on combating terrorism, some of which were adopted under Chapter VII.

The Syrian Arab Republic reaffirms that eliminating the terrorist organizations operating in the north-west of the country requires an immediate halt to the various flows of financial and military support that they continue to receive, directly or indirectly, from the Governments of certain States, foremost among them Qatar and Turkey.

The Security Council must now adopt a clear and decisive stance with regard to the irresponsible actions of the Turkish Government in north-west Syria. The Council must see to it that the Turkish Government ceases its military attacks on the Syrian Arab Republic and refrains from participating directly in the fighting there in support of the Levant Liberation Organization and other terrorist groups associated with it.

At the same time, the Syrian Government pledges to continue its campaign against those organizations undaunted. It will not submit to any pressure exerted against it by the Governments of certain States, some of them permanent members of the Security Council, that have no compunction about defending the reckless

behaviour of Turkey, which backs terrorism and poses a threat to international peace and security.

Fifth, with regard to the activities of Hurras al-Din, which are examined in paragraphs 16 and 17 of the report, the Syrian Arab Republic wishes to clarify the following points:

1. Syria welcomes the acknowledgement by the report's authors of the danger posed to regional and international peace and security by that organization, which is seeking to spread beyond the borders of the Syrian Arab Republic and across the globe, and the fact that they highlight in their report just how many foreign terrorist fighters are in its ranks.

2. The Syrian Arab Republic must take the authors to task for the paucity of information in their report about this terrorist organization. Syrian and Russian officials have repeatedly furnished the Monitoring Team with ample and reliable information on the risks associated with the organization, its structure and the number of local and foreign fighters in its ranks. That information has been conveyed during visits by Team representatives to Syria, by official correspondence and in a request submitted by the Permanent Mission of the Russian Federation to the relevant Committee of the Security Council to have the organization added to Security Council lists.

3. The authors also chose to ignore incontrovertible evidence provided by Syrian and Russian officials that Hurras al-Din counts among its members some of the most brutal foreign terrorist fighters, including Uighurs, Turkmen and nationals and members of other ethnic groups from Eastern European countries and republics of the former Soviet Union.

4. The authors therefore committed a grave professional error in paragraphs 16 and 17 by relying for their information about and assessment of Hurras al-Din on biased and politicized media reports and studies by the Washington Institute, while ignoring documented information provided by the Government of the country concerned and the Government of the Russian Federation, a permanent member of the Security Council.

5. The fact that the Monitoring Team has seen fit to highlight the danger posed by Hurras al-Din in its most recent reports raises justifiable doubts about the double standards applied by some permanent members of the Security Council with regard to counter-terrorism. The Government of the United States of America continues to obstruct consideration by the relevant Security Council Committee of the request made by the Permanent Mission of the Russian Federation to add that organization to the Council's lists of terrorist entities. This begs the question of how the United States Government can justify blocking the process of having this dangerous organization classified as a terrorist entity when the United States Department of the Treasury has itself classified it as a terrorist entity.

Sixth, the terrorist Levant Liberation Organization does not rely on its own sources alone for funding to continue its activities and those of groups associated with it. Those terrorist organizations are still receiving direct financial support from the Governments of certain States, in particular Qatar and Turkey. They also raise funds and collect contributions in many countries, particularly in the Arab Gulf region. Moreover, hundreds of so-called charitable associations and civil society groups located in the areas controlled by such terrorist organizations and supposedly engaged in humanitarian work are actually affiliated with the terrorists. Those entities receive funds from abroad, especially in the form of donations and other types of finance, with the tacit approval of or facilitated by the Governments of the above-mentioned countries, or simply ignored by them.

Seventh, in paragraph 75 it is noted that: “Analysis by national financial intelligence units of these transactions, in particular of the beneficiaries of such payments, may reveal important links between the formal and informal financial sector in the Syrian Arab Republic, as well as how funds linked with ISIL continue to flow in and out of the conflict zone.” In that regard, the Syrian Government wishes to clarify the following:

1. The Syrian Government categorically denies that there is any link whatsoever between the official financial sectors in the Syrian Arab Republic and the means by which funds linked with ISIL continue to flow in and out of the conflict zone. It requests that the authors of the report clarify on the basis of which criteria and information that they based this assessment.

2. The Syrian Arab Republic has implemented the action plan put in place by the Financial Action Task Force and the Middle East and North Africa Financial Action Task Force to address deficiencies in its anti-money laundering and combating the financing of terrorism (AML/CFT) systems. In June 2014, the Financial Action Task Force acknowledged that Syria had completed its plan at a technical level. Nonetheless, on the pretext that the Task Force had been unable to visit Syria for security reasons, some of its members have insisted on keeping Syria on the list of jurisdictions being monitored as part of the Task Force’s ongoing process for improving global AML/CFT compliance. Syria would welcome and is indeed looking forward to a visit soon by a Task Force team of experts to Damascus to verify that the Syrian Government has fully implemented the required reforms.

3. All money transfer and banking services companies in the Syrian Arab Republic must be duly registered with the Central Bank’s supervisory and monitoring authorities. No financial institutions or banks licensed to provide money transfer services, therefore, operate in the areas mentioned in paragraph 75 of the report, which are not under the control of the Syrian Government. Benefits reaching refugees in camps outside those areas are provided by international organizations and not by Syrian financial institutions. It is widely known that many money transfer institutions operate illegally in areas not under Syrian Government control, particularly in Idlib and east of the Euphrates, such as SDF-controlled institutions and financial institutions linked to persons and entities in Turkey.

4. Moreover, there are no links between duly licensed financial institutions in the Syrian Arab Republic and the above-mentioned illegal finance channels.

5. The Syrian national anti-money laundering and combating the financing of terrorism authority has previously contacted financial intelligence units via the Egmont Group to furnish them with all the information in its possession regarding the activities of unlicensed financial institutions in areas controlled by designated terrorist entities. Companies operating in those areas frequently change their names in order to avoid being tracked and monitored. Examples include:

- The Cham Bank, Idlib: the terrorist Levant Liberation Organization converted the Al-Wasit Money Transfer Company, an unlicensed and illegal company that it ran in Idlib, into a bank which it dubbed Cham Bank, in imitation of an Islamic bank of the same name that is duly licensed to operate in the Syrian Arab Republic. This illegal institution is responsible for transferring some of the funds needed by the terrorist organization. The licensed bank has denied any direct or indirect relationship with this unlicensed institution.
- Tawasul, Harim district, Idlib province: This company specializes in currency exchange and money transfers and has been included in a list maintained by the Office of Foreign Assets Control in the United States Department of Treasury. The unlicensed company also misappropriated the name and business logo of a

Syrian firm of the same name, which is duly licensed by the authorities, in order to mislead customers and carry out money transfer operations from abroad into Syria. The legitimate firm has denied any direct or indirect relationship with this unlicensed institution. Furthermore, it has stated that it receives money transfers through Western Union and pays them to customers in accordance with the law and regulations and only in Syrian pounds.

- Some illegal offices in Kafr Takharim, in the Idlib countryside, also facilitate the financing of armed terrorist groups. They are run by people who deal in foreign currency exchange, sending and receiving money transfers to and from various parts of the world, in particular Turkey, Lebanon, Qatar and Saudi Arabia. These illegal offices have branches in the Idlib country district of Sarmada. They deal mainly with an office in Istanbul, Turkey, and with the Al-Sabil Office in the Lebanese capital, Beirut. Unlicensed money transfer companies also send transfers illegally into areas of the Syrian Arab Republic controlled by Kurdish militias and armed terrorist groups. They include the Al-Ma'mun money transfer company in Gaziantep, Turkey, which is run by Salih Salah al-Hajj Ali. It uses paid couriers to send money transfers to a number of terrorists belonging to armed terrorist groups in Aleppo Governorate.

Eighth, at the same time, many cross-border humanitarian aid convoys, especially those entering from Turkey, are being used to channel arms, funds and logistical, food and medical aid to armed terrorist groups, above all the Levant Liberation Organization. That is made possible by the ineffectiveness of the United Nations Monitoring Mechanism for the Syrian Arab Republic in supervising the loading of convoys, inspecting them, taking inventories of their cargo and monitoring their route from the departure point in Turkey to their final destination inside Syria. Moreover, the food, medical and pharmaceutical supplies that they transport continue, in the end, to fall into the hands of the leaders of the armed terrorist groups. They use them as a source of funding, by blackmailing the civilians who genuinely need the aid, and as a means of guaranteeing their continued control over those parts of the country.

Ninth, my Government concurs with the report's authors on the subject of the looting of antiquities and cultural and religious artefacts in the Syrian Arab Republic by the armed terrorist groups, first and foremost ISIL and the Levant Liberation Organization, with a view to trafficking them and smuggling them abroad, principally for sale to foreign buyers. It is a matter of fact that the customs and security authorities entrusted with border control in certain neighbouring countries, in particular Turkey, continue to engage in or tolerate cross-border smuggling of Syrian antiquities and cultural heritage artefacts. The Syrian Arab Republic affirms its sovereign right under international law and the relevant resolutions of the Security Council to recover all looted artefacts, including the property of the Jawbar synagogue. It is ready and willing to cooperate with the Monitoring Team, the United Nations Educational, Scientific and Cultural Organization and INTERPOL to provide and exchange additional information in that regard.

Tenth, the growing risk of the spread and expansion of ISIL and Al-Qaida, in particular to the African continent and other parts of the world, and the risk of foreign terrorist fighters moving from the conflict zone in Syria and Iraq are raised in the report. It is especially important to study and analyse the changing face of terrorism and, in that regard, the Syrian Arab Republic wishes to set forth the following fundamental facts:

1. The battle against terrorism in which the Syrian Arab Republic is engaged provides a real-world example of the dangers arising from the changing face of terrorism. Syrian and foreign terrorists have switched allegiance on various

occasions, primarily in response to the directives and strategies drawn up for terrorist groups by the foreign intelligence services in the neighbouring State of Turkey and some Arab and Western countries. The situation on the ground and the extent of the damage inflicted on those terrorist groups by the Syrian Army and its allies have also played their part, as has the lure of money, influence and the ability to gain control of financial resources. Those latter factors have fuelled the rise and spread of certain terrorist groups as the fortunes of others have declined. A case in point is that of ISIL: as it disintegrated, the Levant Liberation Organization, supported and financed principally by the Governments of Turkey and Qatar, grew in strength and extended its control.

2. The ongoing presence of armed terrorist groups such as ISIL and Al-Qaida, or the emergence of new terrorist organizations, will continue to stoke extremism and sectarian tension. That is the real challenge facing the international community as a whole. It must act through the United Nations to resist violent extremism conducive to terrorism, monitor violent narratives on social media, satellite channels and the Internet and in sermons, religious institutions and political discourse, and hold to account Governments that support, finance or turn a blind eye to such dangerous conduct.

3. The role being played by the Turkish Government in transferring foreign terrorist fighters and Syrian terrorist mercenaries from Idlib to Libya to join in the military conflict raging in that country is emerging as another source of danger. Their transfer serves the interests of the Turkish Government, which is intent on interfering in that country's affairs, sowing greater discord between its political factions and spreading chaos and destruction there. The growing presence of those terrorist fighters and the spread of their activities will soon generate serious threats to global security and stability, in particular in Africa.

4. The United Nations does not lack the necessary legal instruments and practical tools to combat terrorism. It is vital that it develop them in order to respond to the new challenges posed by global terrorism. What is paramount, however, is the just implementation on the ground of its counter-terrorism resolutions, instruments and mechanisms. It is imperative that all Governments, without exception, demonstrate genuine political will to coordinate efforts to combat terrorism and to address the global threats it poses.

The Syrian Government sees the twenty-fifth report of the Monitoring Team as important and valuable. It is, however, concerned by the fact that the bulk of the recommendations and assessments made by the Team in its reports are not put into practice either by the Governments of certain Member States or by United Nations mechanisms engaged in combating terrorism and violent extremism conducive to terrorism. The Syrian Government trusts that the relevant United Nations agencies or international organizations, and the Governments of all Members States, without exception, will come to adopt a sophisticated and impartial approach to counter-terrorism efforts.

I should be grateful if the present letter could be issued as a document of the Security Council.

(Signed) **Bashar Ja'afari**
Ambassador
Permanent Representative