# Critical Crossroads

## KEY TRENDS IN THE CROSS-BORDER AID RESPONSE

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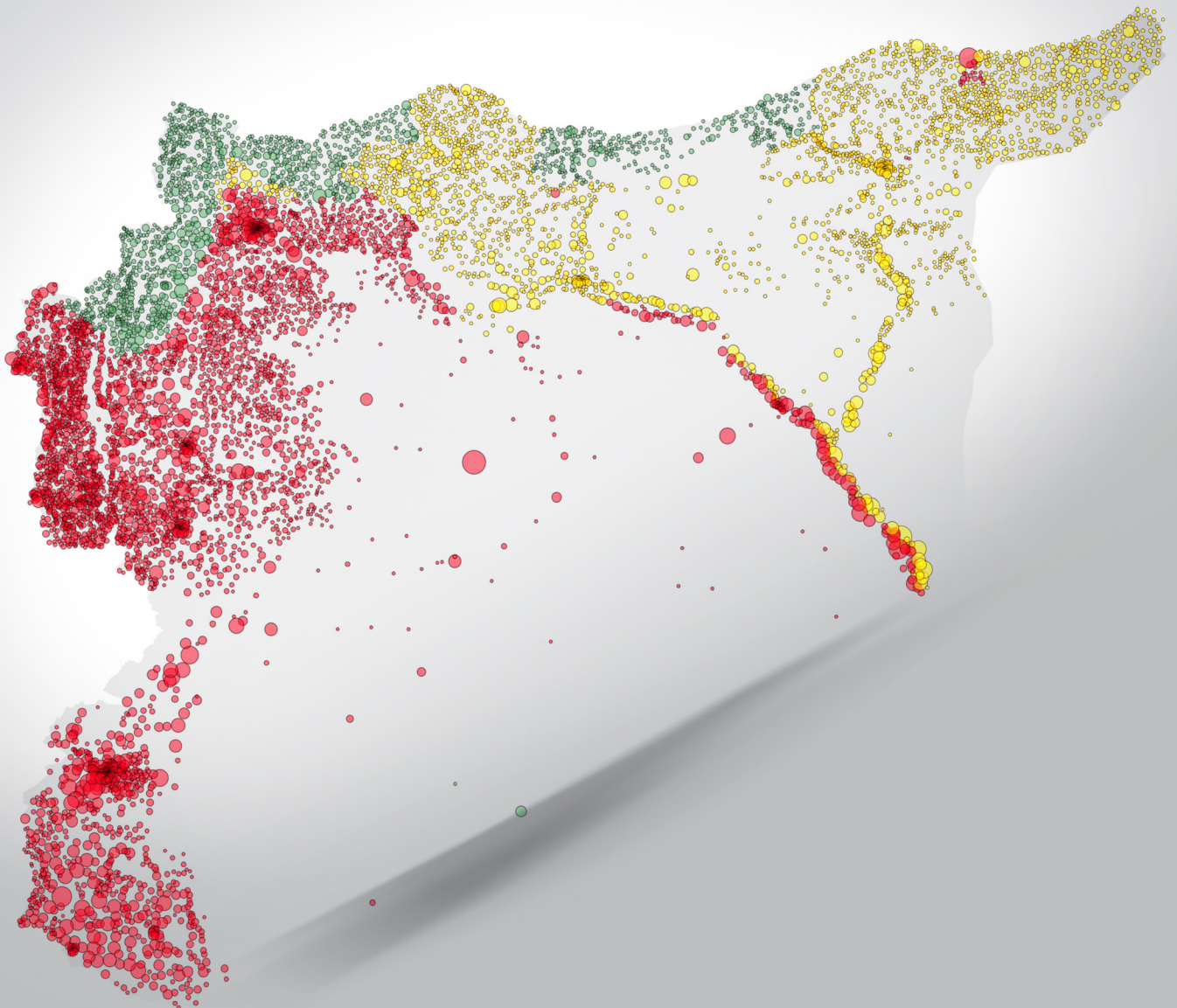
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ANALYSIS AND RESEARCH

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# Key Findings

**Funding**

– Smaller Syrian organisations are beginning to shut down in the face of diminishing funds. Even large Syrian NGOs are struggling to cope with shrinking funds, particularly if they encounter occasional delays in receiving funds.

– Reduced funding can weaken localisation. As funds diminish, local organisations are less willing to push donors towards new initiatives (even if they think they are necessary). They are more likely to simply accept the money as is and with any restrictions rather than push for the initiatives they think are really needed.

**Localisation**

– Localisation still lacks a widely-accepted definition, but is too often defined too narrowly as simply providing funds directly to local organisations. Its definition should ideally also involve the engagement of local communities via organised, membership-based groups in decision making processes, capacity-strengthening activities, international fora, and include a broader array of entities.

– This broader array of entities will naturally include fundable outfits that provide services, but efforts should be made to include local syndicates, unions, associations, leagues, etc. – all of the entities that might be capable of, or play a role in, taking ownership of the intervention.

**Triple Nexus:**

– Water resources can serve as a good entry point for triple nexus work. They support the local economy, health, and involve a broad array of people from the community. They have the added benefit of reducing water trucking - which will be necessary if funding trends continue as they are. Example projects are solar irrigation, rainwater harvesting, and greywater treatment and use in agriculture.

– The prospects for triple-nexus work regarding cross-line connections between northwest Syria and government-controlled areas is bleak, but there are a few possible areas to focus on:

  ■ More cross-line work between Menbij and Euphrates Shield zones. There is some trade between these areas already and there are some individuals who have the ability to move between Jarabalous and Menbij with Turkish permission.

  ■ Work in this area should look ahead to potential changes in northeast Syria. Should US policy towards Syria change, a withdrawal of forces could lead to renewed fighting or instability, with Tel Refaat and Menbij being areas of potential conflict.

– Within northwest Syria, persistent infighting between armed factions, particularly around lucrative trade or smuggling routes, highlights the need for continuous peacebuilding work within Idlib, Afrin, and northern Aleppo.

**Programming:**

– The success of work in the Health and Education sector in northwest Syria has proven to be a good model for programming that supports localisation. Long-term, hands-on programs with clear boundaries and parameters set on engagement (or non-engagement) with local actors have enabled much-needed work and service provision while simultaneously strengthening technical capacity and apolitical civil institutions within northwest Syria.

– There are still political and sanctions-related obstacles to greater engagement in infrastructure-heavy work (in contrast to the service-oriented sectors of health and education), but the cost saving factors

and great benefit to civilians in the forms of livelihoods and health would make greater engagement in this sector well worth the political risk.

**Sanctions:**

– US policymakers are increasingly concerned about the overuse of sanctions and overcompliance issues. Despite this, there is no political will to make meaningful reforms. Structural changes are therefore highly unlikely, but minor modifications for humanitarian purposes are still achievable.

– Area-based programming may allow for additional exemptions from sanctions if needed. Clear arguments could be made for the added benefit of more substantial early recovery programming in small, well-delineated sub-regions where the humanitarian impact is high and risk of aid diversion or capture is low.

– Long-term programming can help mitigate the impact of regulatory overcompliance by reducing the frequency of new, untested fund disbursements.

**Coordination**

– An increasing number of INGOs are conducting their own needs assessments. They do this because of the gap left behind by HNAP and because it is a potential source of funding. This is leading to diminished quality of needs assessments, duplication of efforts, and siloing of information.

# Recommendations

## Donors

– Commit to long-term engagements in the areas or sectors in which you are engaged (ideally 3+ years). This builds trust with the local community, and leverage with local authorities.

– Invest in strengthening functional governance structures. In particular, livelihoods, education, health, energy, and water. Where possible, use leverage to ensure these service sectors remain rooted in local communities and not tools for undemocratic local authorities.

– The successful engagement in the health and education sectors should be replicated with other sectors where possible. The water sector, in particular, shows great need and great demand from the people. A longer-term donor engagement in this sector would likely be welcomed by local actors who would be willing to give the space required to enable direct international support into these areas.

– Broad exemptions for sanctions exist, but overcompliance and regulatory issues persist. Donors should host regular coordination meetings between implementers, regulatory agencies, and financial institutions to reduce these impacts.

## AFNS

– Stress-test experimental early recovery projects. This can include paying teachers salaries and printing textbooks, or even establishing a small factory.

– Be bold in seeking exemptions from sanctions when needed or when it will facilitate work.

– Work with the donor community to support the health and education sectors, and look for ways to augment this existing programming by filling gaps.

– Utilise historical data to better define areas to engage with area-based programming.

– Support the formation of consortiums that align with planned area-based work. This will allow for the continued support of grassroots organisations while facilitating natural and community-rooted collaborations between organisations of different sizes.

– Provide direct capacity-strengthening to smaller and grassroots organisations in the form of technical training. This could be in agricultural practices, water management, environmental work, etc. but ideally something that can support livelihoods.

# Introduction

The Syrian conflict has been ongoing for more than 13 years, and while violent events have greatly diminished since its peak in 2016, there is still no end in sight. Conflict lines have hardened significantly (with no changes in territorial control since 2020), and local authorities and governance structures have increasingly solidified their presence in four distinct regions of the country – Government-held territory, which encompasses 52% of Syria's population centres, Autonomous Administration zones, which encompass approximately 31% of Syria's population centres, and Opposition-held territory, which covers 17% of Syria's population centres and is split between the Syrian Interim Government (SIG) in northern Aleppo and northeast Syria, and the Syrian Salvation Government (SSG) in Idlib.[1]

**Control of Population Centres Over Time**

■ Government   ■ Autonomous Administration of North and East Syria   ■ Islamic State   ■ Opposition
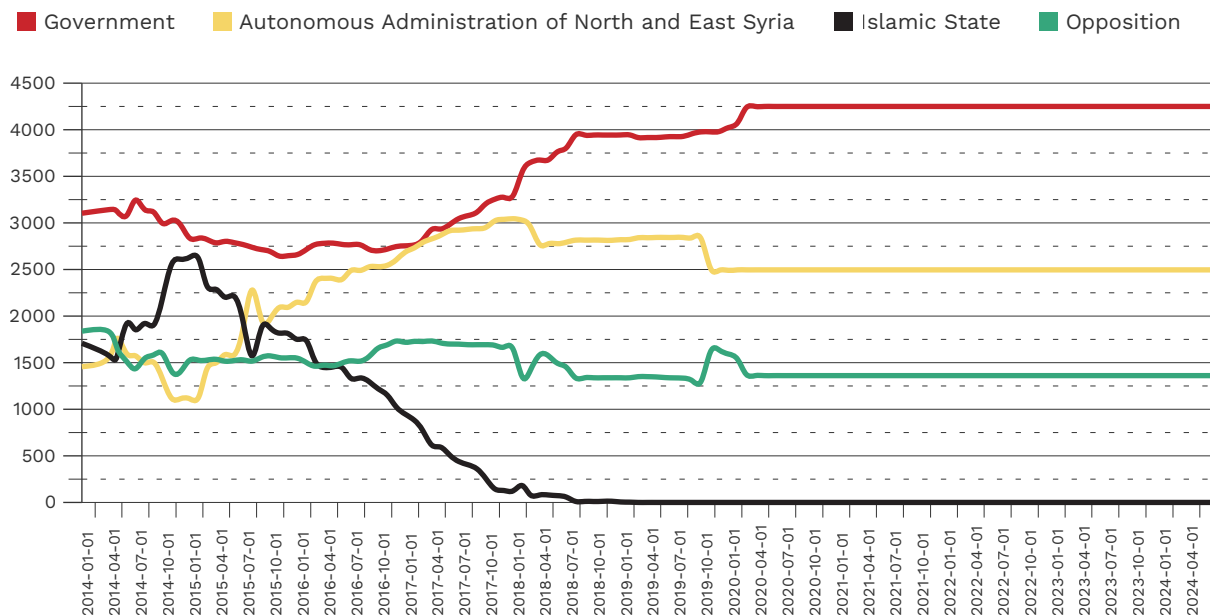


This current division of territory and power in Syria is highly unlikely to change in the foreseeable future as local powers have little desire or capacity to greatly alter the status quo. Though these regions remain distinct and continue to drift further from each other as their separation persists, several common factors remain. Namely, the economy in each zone is highly reliant upon remittances from abroad, local governance is largely unrepresentative, and humanitarian needs remain very high.

While the conflict within Syria remains locked in place, international politics with respect to Syria continue to shift. Regional actors, including the Arab League, have largely normalised relations with Syria. Among Syria's close neighbours, only Türkiye and Qatar have not normalised relations.

Further abroad, southern and eastern-European nations have continued to expand diplomatic representation inside Syria as the continent remains divided with respect to how to approach the conflict. The United States, for its part, remains engaged in Syria through its military presence in northeast Syria and al-Tanf, as well as by maintaining sanctions.

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1    Note: There is one additional minor pocket of territory left out of this list – the Tanf Border Crossing, held by an armed opposition group and populated largely by internally displaced persons.

Few of these international trends give rise to optimism with respect to Syria's future. Even if massive political shifts were to take place that allowed for full re-engagement and development support, Syria's human capital, physical infrastructure, and social cohesion have been so thoroughly degraded by more than a decade of crisis that large-scale positive developmental change will take generations. Add to these problems the issues of diminishing funds for the aid response, a potentially large increase in returnees from Lebanon and Türkiye, and an entirely deadlocked political process on the national level, and it is clear that while the conflict has slowed, the challenges the Syrian people are facing are not lessening but changing.

These changes will undoubtedly bring new challenges, but also opportunities. The arguments for a shift in aid programming from emergency relief to early recovery have never been clearer. Also, the importance of Syrian-owned and Syrian-led initiatives (with respect to humanitarian, development, and peacebuilding) has been clearly underscored by the diminishing availability of international resources. Both early recovery and localised programming are two commonly agreed upon goals within the aid response that have been slowly gaining momentum. The constraints facing the aid response today may provide new impetus for their widespread adoption.
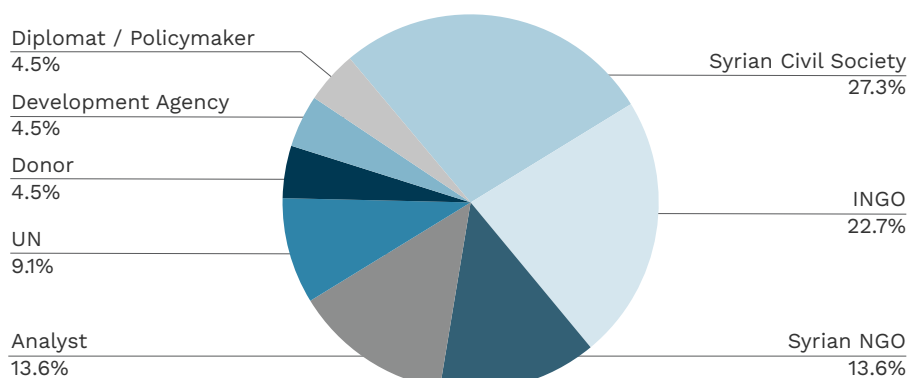
The challenges facing the aid response are clear. Diminished funds, growing needs, a high-risk political environment, and uncertainty about how these and other trends will impact coordination and cooperation between the key actors of the aid response. This paper seeks to provide an overview of key trends with respect to the aid response, including those related to coordination, localisation, aid program design, and resources. Potential opportunities for novel approaches to these four key trends will be highlighted where possible.

# Methodology

This report was prepared for the Aid Fund for Northern Syria (AFNS) by the Centre for Operational Analysis and Research (COAR) in order to provide evidence-based information on key trends within the cross-border aid response to northern Syria. An analytical framework was prepared in coordination with AFNS which defined four key trend areas, including humanitarian coordination, localisation, programming, and resources allocation and availability. Hypotheses regarding developments within each of these four thematic areas were developed, along with key indicators and questions to be answered.

The analysis and recommendations presented in this report are based upon research COAR conducted in June and July 2024. Research methods included an extensive desk review of relevant secondary data and 22 key informant interviews conducted with Syrian civil society members, Syrian NGOs, international experts, regional humanitarian responders, UN staff and governmental development agencies. Additionally, a roundtable workshop was also held to seek the input and feedback of Syrian civil society organisations.

**Key Informant Profiles**



Diplomat / Policymaker
4.5%

Development Agency
4.5%

Donor
4.5%

UN
9.1%

Analyst
13.6%

Syrian Civil Society
27.3%

INGO
22.7%

Syrian NGO
13.6%

# Resources

Contributions to the Syrian aid response have dropped precipitously over the past year and appear poised to drop further in the future. Further reductions could be even more extreme than the past year given upcoming elections and political trends in both the US and Germany.

While funds are diminishing, the needs of Syrians are still acute. The number of people in need has risen consistently for the past three years, and needs are expected to remain high, particularly if there is an increase in returnees from Türkiye and/or Lebanon.

The effect of these changes in Syria has been the shut-down of some smaller organisations and no small amount of stress for others. Larger organisations have proven more resilient, but even some of the largest have faced cash flow issues that have strained their operations. Some members of the aid response have suggested that some amount of "belt tightening" is healthy, as it will improve efficiency, facilitate larger collaborations, and disproportionately impact those organisations that were not deeply rooted in local society and thus more resilient.

The disproportionate impact on community-based local actors, including grassroots organisations, may have the effect of reducing specialisation in some areas or sectors. As one respondent pointed out, some of these organisations carry out focused activities in a single community (such as first response counselling to victims of gender-based violence). If they shut down, the aid response as a whole will continue, but more people will fall through the cracks and the connections between local communities and the response as a whole will be weakened. Consortiums or "anchor" organisations can help mitigate this, but highly-focused grassroots organisations may still need to close.

As donors have reduced funds, some have become increasingly interested in broader early recovery work. This shift is partly due to the sustainability and cost effectiveness of such programming over emergency humanitarian relief but is perhaps more due to shifting politics within Europe. Anti-immigrant sentiment is at an all-time high, and both left-wing and right-wing governments are reacting by taking a new look at old problems. In Syria, this involves a shift from traditional value-based programming to more of an interest-based agenda (as one development agency worker put it).

This shift could provide opportunities for the aid response in Syria, if donors and implementers both are willing to innovate and push boundaries in how they respond. The reduction in funds, however, could just as easily cause a "race to the bottom" as Syrian and international organisations cut costs and reduce risk as they compete and bid for diminishing funds.

# Coordination

The aid response to the Syrian crisis has, like many others around the world, been heavily politicised throughout. The Syrian government strongly objected to UN Security Council cross-border aid authorization early in the conflict and has been seeking to increase its control and influence over the system ever since. Allies of the Syrian government in the Security Council have aided in this process by increasing scrutiny of the response, pushing for more cross-line aid, withdrawing authorization for multiple border crossings, limiting the timeframe of authorization, and ultimately vetoing the approval for cross-border aid entirely in mid 2023. As cross-border aid has become more difficult, the Syrian government has steadily pushed for more programming to be run through Damascus.

# Needs Assessments

Beyond the closure of border crossings and the uncertainties of the current consent-based model, one of the greatest challenges facing the aid response is the lack of consistent, nation-wide needs assessments. The closure of the Humanitarian Needs Assessment Programme (HNAP) has inhibited response planning and coordination. To respond to this large gap, several INGOs have begun to produce their own needs assessments or innovate on pre-existing data sources to gain new insights.

The motivation to produce one's own needs assessment data is twofold. First and foremost, assessments are needed to target and evaluate programming. Secondly, with good data now a rarity, some have come to view assessments as a potential source of securing additional funding.

With more organisations conducting independent needs assessments focused on their own programming, the aid community as a whole is losing touch with the bigger picture trends in the crisis. Organisations that conduct this type of data gathering do so for a limited geographic region and a limited time period. The result is an up-close snapshot of one area and/or one sector.

Some more data-focused organisations have sought to expand operations and publish needs assessments of broader areas and timeframes, but coverage so far has been uneven. REACH, for example, has gathered valuable data but faces gaps in geographic coverage. As one analyst put it, "they tend to do analysis on places they can access, but can't consistently reach the same locations, so it's spotty." Others like the Assistance Coordination Unit (ACU) similarly produce valuable data and are amongst the few organisations to provide coverage on a par with REACH. Ultimately, however, no single actor is presently responsible for unifying available information or addressing data gaps as part of an integrated and coordinated response.

Absent consistent, reliable data, others have sought to innovate or focus on key indicators that might imply that needs are high in multiple sectors. For example, some analysts have suggested that the "affordability metric" is a good indicator (if you can get it) but that obtaining this data can sometimes be difficult. Similarly, the World Food Program has planned to roll-out a new "vulnerability" estimate for northwest Syria, but data collection towards this end has been repeatedly delayed.

Beyond the difficulties of obtaining a holistic picture of humanitarian needs nationwide, it is highly unlikely that every new organisation has the same degree of technical expertise to conduct a quality needs assessment or that they would use the same methodology. Furthermore, even if the methodology were uniform, and the data gathered were of high quality, a high degree of coordination would be required to ensure these efforts were not duplicative. Even if this coordination could be managed, multiple data gathering and needs-assessment teams in multiple organisations is an inefficiency that the aid response can ill afford given current funding trends.

Complicating matters further is the fact that if organisations are seeking to expand their own data-gathering capacity as a means of obtaining funding, then they will be disincentivized to share said data with the broader community. This has long been the case with other data-gathering initiatives in Syria related to conflict events, human rights violations, and even databases of key civil society figures – data is considered currency, and its sharing would only diminish the uniqueness (and fundability) of an organisation.

Repeated assessments of the same population has also led to assessment fatigue among targeted populations. Apart from the inefficiencies, these repeat assessments can also unrealistically raise expectations amongst the local population, who expect more assistance while overall funding decreases.

Moving beyond this fundamental coordination issue will require leadership from coordination mechanisms and from donors. Both should insist upon the formation of or support for a centralised needs assessment body, at very least for northwestern Syria. The existing Assessment Working Group run by OCHA is a start, enabling some coordination, but a unified body would greatly improve efficiency and quality of assessments.

# The UN's Cross-Border Response

The UN's role in the cross-border aid response has steadily declined over the last several years. Going from access over four borders, to one border, to one border crossing, it appeared that UN-led cross-border aid deliveries were moribund. The changes brought as a result of the 2023 earthquake and the subsequent failure of the Security Council's cross-border aid resolution appear to have halted this trajectory but have frozen it in an uncertain manner.

The resulting consent-based model, whereby the Syrian government grants the UN access to cross the border from Türkiye has left many uneasy as it gives yet more authority to Damascus. Damascus has the option of withdrawing consent whenever it feels like it, resulting in persistent, low-level stress among any who rely on this mechanism to conduct operations in northwest Syria.

Despite the stress, some have reported that constant low-level stress is preferable to the prior model of high stress and alarm every six months when the UNSC cross-border resolution was due to expire. Additionally, some INGOs have reported confidence that the status quo is unlikely to change anytime soon, believing that Damascus has achieved much of what it wants with the arrangement (more sovereignty over its borders, more influence over UN operations) and would have little to gain from disrupting aid operations in northwest Syria.

The question of whether or not Damascus will withdraw consent relates to multiple factors. A major disruption of the UN's efforts in northwest Syria could severely disrupt the humanitarian operations in a high-need area, pushing refugees towards Türkiye and straining relations. Additionally, further restrictions or uncertainty from Damascus could lead more donors to circumvent the UN altogether, reducing what influence Damascus has with respect to the aid response. In this sense, maintaining the AFNS and other alternatives to UN-led pooled funds is in itself a check on Damascus's ambitions and a strengthening factor for the response as a whole.

Beyond questions around the sustainability of the UN's cross-border response, it is clear that even if it were to remain, the fact that it operates on a consent-based model limits its engagement with local actors and reduces trust in a way that greatly inhibits significant localisation of the response. Independent cross-border aid funds do not face the same difficulties and are perceived much more positively by Syrian civil society and actors engaged in triple nexus operations. Additionally, with a persistently uncertain timeline for operations, the UN is less capable of conducting long-term early recovery programming as part of its cross-border response.

If AFNS were to focus more (or even exclusively) on early recovery work, localisation, and triple-nexus programming, it could fill gaps left by the UN's response while more clearly delineating the unique roles of each, reducing duplication, perceived competition, and improving the prospects for productive collaboration in the longer-term future.

There has been some fear among policymakers that if non-UN actors, such as the AFNS, fully shift from emergency response to early recovery and/or triple nexus work, then sudden changes to the UN's cross-border access could put Syrian civilians at risk. Multiple respondents within the aid community have disregarded this as unlikely, stating that as long as minimum coordination mechanisms are maintained and capacitated (namely the NWS NGO Forum), then the aid community as a whole will not face great obstacles when responding to urgent crises. One respondent in particular was hopeful that the NWS NGO Forum could, if needed, function like the NES Forum, saying that such a coordination mechanism is all that is needed as a contingency in case of sudden disaster.

# Localisation

Greater localisation in the Syrian aid response is a commonly agreed upon goal, but without a common approach or definition. Syrian NGOs have complained that the present definition of localisation is too thin, and that the response would benefit from the wider adoption of a broad definition of localisation. This expanded definition of localisation entails four key elements: direct funding of local organisations, non-financial support to local organisations, broader inclusion of local communities, and safeguards for post-intervention community ownership.

**Direct funding of local organisations.** This is often seen as the narrow definition of localisation and boils down to a "cut out the middleman" approach to program funding.

**Non-financial support.** Beyond funding, local organisations stated that localisation efforts should include training, capacity strengthening, inclusion in agenda-setting fora, and locally-based leadership.

**Broader inclusion.** Civil society representatives stated that true localisation cannot take place without a diversity of actors. This includes not just those organisations that are receiving funds, but other groups in society, including guilds, syndicates, local councils, unions, and local governing bodies.

**Post-intervention ownership.** This point is related to the necessity of broader inclusion. Respondents stated that a diverse array of local actors (including both local governance structures, civil society, and membership-based groups such as syndicates or unions) must be included in as many aspects of local programming as possible to ensure that they retain full ownership of the initiative when the involvement of international actors ceases.

## Funding

While all respondents interviewed for this study agreed that more direct funding is a primary and essential part of localisation, even this rather straightforward aspect of localisation is not without its challenges. Funding as a goal, Syrian organisations have pointed out, sets programs up for failure by establishing a poor indicator of success. Additionally, not all local organisations are capable of receiving funds because they are too small to absorb significant funds or take on new activities, lack the financial management capacity, or are not registered in Türkiye.

The registration process itself is the largest barrier for small, grassroots organisations, with some complaining that the process of localisation is more appropriately termed "internationalisation" as local entities must become international organisations (by registering in Türkiye) in order to receive support. This process is costly, time-consuming, often opaque, and simply unachievable for many of the smallest or most specialised grassroots organisations.

Several respondents also pointed out that the manner in which local organisations are funded needs improvement. Funds, even when provided directly to organisations, sometimes explicitly omit certain key line items, such as equipment funding, overheads, flexibility on transportation, and so on. Some donors are more comfortable with these line items (such as the US), but some ask for them to be removed, shifting a large burden onto small organisations.

A representative from a Syrian NGO shared their belief that the willingness and capacity for organisations to push back against these donor restrictions has diminished significantly in the current environment of diminished funds. While previously local organisations might have pushed back against such limiting and onerous restrictions, they now feel relatively powerless to do so. As local organisations are already struggling with reduced funds, further delays brought on by arguing for the inclusion of line items is deemed

less critical – especially if these items might be questioned by financial institutions during the compliance process. Furthermore, organisations are less likely to propose bolder, new initiatives that might touch upon previously sensitive matters (such as engagement with some local authorities, expanded early recovery programming, or engagement in new areas).

In this manner, the environment of diminishing funds is impacting both innovation and localisation by silencing local initiatives before they are even proposed and preventing organisations from confidently requesting what they feel they need to conduct effective operations.

One additional aspect of funding's impact of localisation efforts was brought up in multiple interviews with Syrian NGOs, civil society, and implementing INGOs – the duration of project funding. Local organisations must overcome numerous hurdles to receive funding from the international community. As mentioned, they must register in Türkiye, have the capacity to fulfil financial compliance obligations, and have sufficient funds on-hand to endure this process and absorb potential delays in cash-flow should they occur. But the most impactful aspect of these hurdles is the frequency with which local organisations must navigate them.

The relatively short-term engagement for many of these projects greatly increases a local organisation's overhead and reduces the scope of work it is capable of conducting. The impact on the scope of work is particularly significant in sectors such as education, where a local community that knows a project is short-term might be disinclined to engage if they don't have confidence that it will endure for a meaningful length of time. Longer-term funding (ideally between three to five years, according to respondents) is essential to ensuring that initiatives are truly locally-rooted, gain traction, and will be locally owned upon completion.

## Local Coordination

To address these issues with funding, some Syrian NGOs and civil society initiatives have suggested the formation of consortiums of local organisations to seek funding jointly. Funders would have to play a leading role in ensuring the formation of diverse consortiums, mandating the inclusion of grassroots, medium-sized, and larger NGOs as a means of protecting the smallest and most vulnerable civil society organisations. Smaller organisations who are included in such a consortium would thus gain access to more direct streams of funding, increased capacity for managing financial and other compliance-related administrative duties and would be more strongly connected to other civil society organisations.

Multiple respondents pointed out that many small, grassroots organisations have already been forced to shut down as a result of funding restrictions. Others have pointed out that even in the best of times, the smallest organisations have a "short half-life" making them ill-suited to receive the type of slow-moving support on offer by the international community. By the time a prospective donor has identified a wide array of potential recipients of support and mobilised such support, the landscape may have changed. The fast-evolving environment may also make building connections and coordinating between organisations difficult – whether horizontal or between organisations of different sizes within Syria. For this reason, and to support local buy-in, ownership, and sustainability, respondents consistently advocated for donors to eschew a broad approach of support to sectors or local organisations of a particular scale, but instead to engage deeply with multi-sector, small-scale, area-based approaches.

## Area-Based Approaches

Greater detail on programming and area-based approaches is included in the "Programming" section below, but it bears mentioning here as it directly relates to localisation efforts. Area-based approaches are widely seen as the best way of ensuring that localisation, as it is envisioned by Syrian NGOs, truly takes place. Respondents repeatedly pointed to area-based activities as being the ideal way to ensure coordination with all segments of a local society and across multiple sectors.

One key element that has been repeatedly stressed by Syrian NGO and civil society partners is the importance of engaging local governance structures. Some donors have red lines with respect to direct engagement with local authorities – for political reasons or because of affiliations with proscribed groups. Partners suggested that inclusive area-based programming may provide a good way of addressing this issue head-on.

By selecting and engaging in programming in a small geographic or otherwise well-defined region, exposure to and engagement with regional authorities will be more focused on local representatives, as opposed to more central administrative structures. Additionally, by facilitating the inclusion of as many segments of civil society as possible (unions, syndicates, etc.) the presence of local authorities in coordination and planning structures will be diluted. Thus, some donor concerns could be addressed.

Syrian partners repeatedly stressed that for post-intervention ownership to truly take place, all structures must be included in the process. But in order to prevent this "ownership" from becoming "government ownership" and opposed to the envisioned "community ownership," the presence of local administration must be balanced by as broad a community engagement as is possible.

This emphasis on community involvement over local government involvement also helps lay the foundation for broader Syrian unity when such a prospect becomes feasible. With Syrian territory having been divided between four different local governing bodies (at least) for such a long period of time, the prospects of territorial and societal unity become more distant every day. None of these local authorities is truly representative and all are steadily drifting further from one another.

External efforts at bridging the divides in local governance, through track two and track three dialogues have proven to be ineffective or impossible due to the political obstacles at play. For example, though many in northwest Syria have lengthy experience with local administration, most refuse to share their experiences and knowledge in meetings alongside those involved in local governance from Autonomous Administration or Government-controlled territory for fear of being blacklisted by Türkiye or local groups. Similar concerns and restrictions exist for civil society members and local council members in other parts of Syria as well. Donor-driven third-party efforts to convene such groups are in many ways more restrictive as potential participants face the same political obstacles plus a much higher profile setting.

By facilitating the maximum engagement of civil society structures in project planning, coordination, and implementation alongside local government representatives, it is hoped that a degree of commonality can be injected into local governance that can both prevent regions from drifting further apart and improve the prospects of eventual reintegration. Such an approach also builds the environment necessary for broader intra-Syrian dialogue to occur naturally, rather than as a third-party initiative.

## Sanctions

US and European sanctions on Syria greatly inhibit efforts towards localisation. There are many sanctions exemptions provided for humanitarian work, including broad authorization for northwest and northeast Syria, but their presence still limits work by increasing overhead for local organisations, slowing down the flow of cash into the country, complicating coordination with some local actors, and introducing a lot of hesitancy among donors. Financial institutions in particular are generally opaque with respect to their compliance reviews, making funders and implementers alike wary of unintentionally triggering additional scrutiny.

While EU sanctions (or "restrictive measures") were first imposed on Syria at the outset of the conflict in 2011, US sanctions date back to 1979. Along with being much more long standing, US sanctions are also much broader than EU sanctions and include secondary sanctions on those who do business with sanctioned entities. While US policymakers have long been worried about the overuse of sanctions, the chilling effect

they have on legitimate business, and the impact they have on humanitarian operations, there is little-to-no political will to alter Syrian sanctions. An interview for this report with a leading US-based sanctions policy advisor confirmed that the only movement on sanctions that might be possible from this current Democratic administration would be slight adjustments to the existing general licences to support humanitarian work or stabilisation efforts in northeast Syria. Under a Republican administration, it is more likely that sanctions would be increased with the passage of the "Assad Regime anti-Normalization Act."

While the US is unlikely to budge, Europe has shown itself to be much more progressive. European restrictive measures remain in place, but some actors have sought creative extensions of existing, approved work to enable a broader portfolio of activities without tripping alarm bells from regulatory agencies. Again, a policy advisor on sanctions recommended a similar approach in Syria when seeking greater engagement with local actors or new activities. The recommendation was to not be shy in seeking exemptions where they will support project goals, but to do so in a way that frames project activities as an expansion of pre-existing work – not a new initiative or novel innovation.

# Programming

## Early Recovery

Early recovery programming in Syria has long been sought but is still not fully adopted. The necessity of such programming is well understood and advocated for from the local level all the way through regional diplomatic missions. At the capital level, however, political obstacles persist and have stymied efforts at broader early recovery.

Obstacles to greater early recovery programming stem primarily from a desire to withhold reconstruction aid until political reforms have been made in Damascus. UNSCR 2254 is often cited as the goal, which if met will trigger broader reconstruction work. In addition to a desire to use potential reconstruction as leverage, some are wary of inadvertently supporting unrepresentative and/or corrupt local authorities or even proscribed groups.

The idea of using reconstruction as leverage has persisted for many years and is still the official line adhered to by US and European officials. Privately, such officials recognize that the political process is dead and that no one has any good alternatives. Furthermore, the vaunted "leverage" that Western countries maintain over Syria is rapidly eroding as an increasing number of countries seek to normalise diplomatic relations with Syria, reestablish trade relations, and generally return to business as usual.

The attempt to use reconstruction or early recovery aid as leverage against Damascus has clearly not worked. Given current trends towards normalisation, it is also unlikely to suddenly work in the future. It has, however, proven to be quite effective in areas outside of government control. In northwest Syria, the needs of the population are particularly acute and the capacities of the non-state armed groups to address said needs are minimal. Local authorities are also not as concerned about questions of sovereignty as is Damascus, and generally welcome international engagement.

Given these dynamics, it is not surprising that when the UK came with an offer of long-term support for the Idlib Health Directorate and stipulated that it must remain independent from Syrian Salvation Government interference, local authorities backed off. This model of hands-on, long-term engagement with clearly defined parameters has been highly praised by Syrian NGOs and international observers alike.

According to multiple respondents, including conflict analysts in close contact with top HTS leadership, the concern over space from local authorities is overstated. Yes, there are risks of aid diversion, corruption, or rent-seeking from local authorities, but many of these can be mitigated if clear parameters are communicated to local authorities and are maintained.

This positive example shows that large-scale projects can be conducted in northwest Syria with low risk and positive outcomes for the people, civil institution building, and the sustainability of the response. The fact that problematic actors can be incentivized to change should be a strong argument for expanded early recovery work throughout northwest and northeast Syria.

If this argument were not enough, current conflict dynamics and international developments provide multiple other arguments for broader early recovery work. A handful of key arguments highlighted by interviewees for this paper are as follows:

- **Cost-effectiveness.** Numerous respondents expressed extreme frustration at the fact that water-trucking is still being conducted in many parts of Syria. It is costly, unsustainable, inefficient, and representative of many aspects of the aid response. Building more sustainable solutions – even if it involves some new construction – would greatly save costs and reduce the need for emergency relief.

- **Resiliency.** The 2023 earthquake showed that a lack of internal capacity or key infrastructure made northwest Syria extremely vulnerable to natural or political disasters that disrupt the status quo. Future disruptions should be expected, and preparations should be made now to reduce their impact.

- **Refugees and returnees.** The internal politics of Syria's neighbours and much of Europe is now driven by questions of refugees and migration. If these nations are serious about addressing the causes of migration, they need to act quickly to provide a more stable foundation for civilians inside of Syria – particularly if some countries will start pushing refugees to return. Early recovery improves both the push and pull factors for refugees and returnees.

- **Early Recovery is safe.** Multiple respondents pointed out that despite what some politicians might think, no one is going to "accidentally" do reconstruction in Syria. Syria's human capital, physical infrastructure, and social cohesion are all so badly damaged as a result of the war that a handful of basic needs projects in a corner of the country will not cross any political red lines. Furthermore, estimates of the financial cost of physical reconstruction alone run well over $117 billion USD (according to a 2018 ESCWA study "Syria at War: Eight Years On"), well out of reach of any early recovery programming.

Some respondents have reported a change in donor approaches with respect to early recovery programming and the prospects of engagement with local actors. For example, Germany's Federal Ministry for Economic Cooperation and Development (BMZ) has, following the earthquake in 2023, removed prior restrictions on operations in some parts of Syria and is increasingly accepting of direct engagement with local authorities. One respondent reported that donors are fine with engagement "as long as you can show how engagement increases impact." Another contact reported that previously unthinkable programming, such as infrastructure work, is now being approved by European donors, in large part because of a recognition of the need, cost effectiveness, and, in no small part, due to domestic political considerations regarding flows of migration into Europe.

The positive example of the Idlib Health Directorate can provide a model for future engagement. This example, however, represents more service-oriented work that avoids many of the obstacles faced by other forms of early-recovery work (namely, rehabilitation or repair of infrastructure). Multiple respondents pointed out that more work with respect to water is direly needed and is of great enough interest to HTS and other actors that they would readily provide the space international organisations need to engage.

The problem, as noted above, is that even if this work manages to avoid dealing too closely with proscribed groups, any work on water infrastructure veers too close to the political red lines regarding reconstruction.

This does not mean such work would be impossible, only that it would require a significant amount of engagement with actors on the ground and carefully crafted proposals to donors and regulatory agencies that frame the work as an augmentation or synergy-building extension of pre-existing work. One suggestion for WASH sector work was to avoid framing such work as a "bold new initiative" but rather as a mundane "expansion of sanitation and hygiene resources" in coordination with a pre-existing, pre-vetted entity (such as the Idlib Health Directorate). This framing, according to humanitarian sanctions advisors, is much more palatable to conservative political or regulatory bodies, even when the project itself does involve some new construction or heavy rehabilitation.

## Area-Based Approaches

If careful wording is not enough, or sector-wide engagement is too much, then smaller, area-based approaches may be better suited to the current political environment. In this paper, the term "area-based approach" is used to refer to multi-sector programming that is designed to fit the needs and circumstances of distinct geographic areas with clearly delineated physical or social boundaries. As discussed briefly above, such an approach can have significant benefits for localisation and coordination among local actors but have the added benefit of allowing for interventions focused only on the most in-need locations, where arguments for expanded early recovery work can be easily made.

Germany in particular has shown greater willingness to conduct more substantial projects over longer periods in small areas of northwest Syria, with contacts reporting a new multi-sector project including some infrastructure work to take place over the next three years. Other contacts have reported that donors seem eager to hear good arguments for expanded early recovery work that they can use to convince stubborn politicians in European capitals.

Some donors and development agencies have expressed receptivity to data-based arguments for area-based interventions that allow them to select a scale of programming and degree of risk that they are comfortable with. Similar to how potential partners are mapped and analysed for potential risk and impact, specific areas in Syria can be easily mapped with regards to needs, risk, and potential rewards (in particular with respect to triple-nexus peacebuilding outcomes). For example, populated places in Syria can be analysed with respect to:

– the number of IDPs present

– how many returnees are coming

– the status of schools, hospitals, and other services

– the proximity to border crossings and/or frontlines

– the access to water resources, major roads, and other infrastructure

– the impact of the earthquake

– level of infighting between armed groups

– current controlling party

– ethno-religious makeup

– food production statistics

– what civil society organisations are present in the location

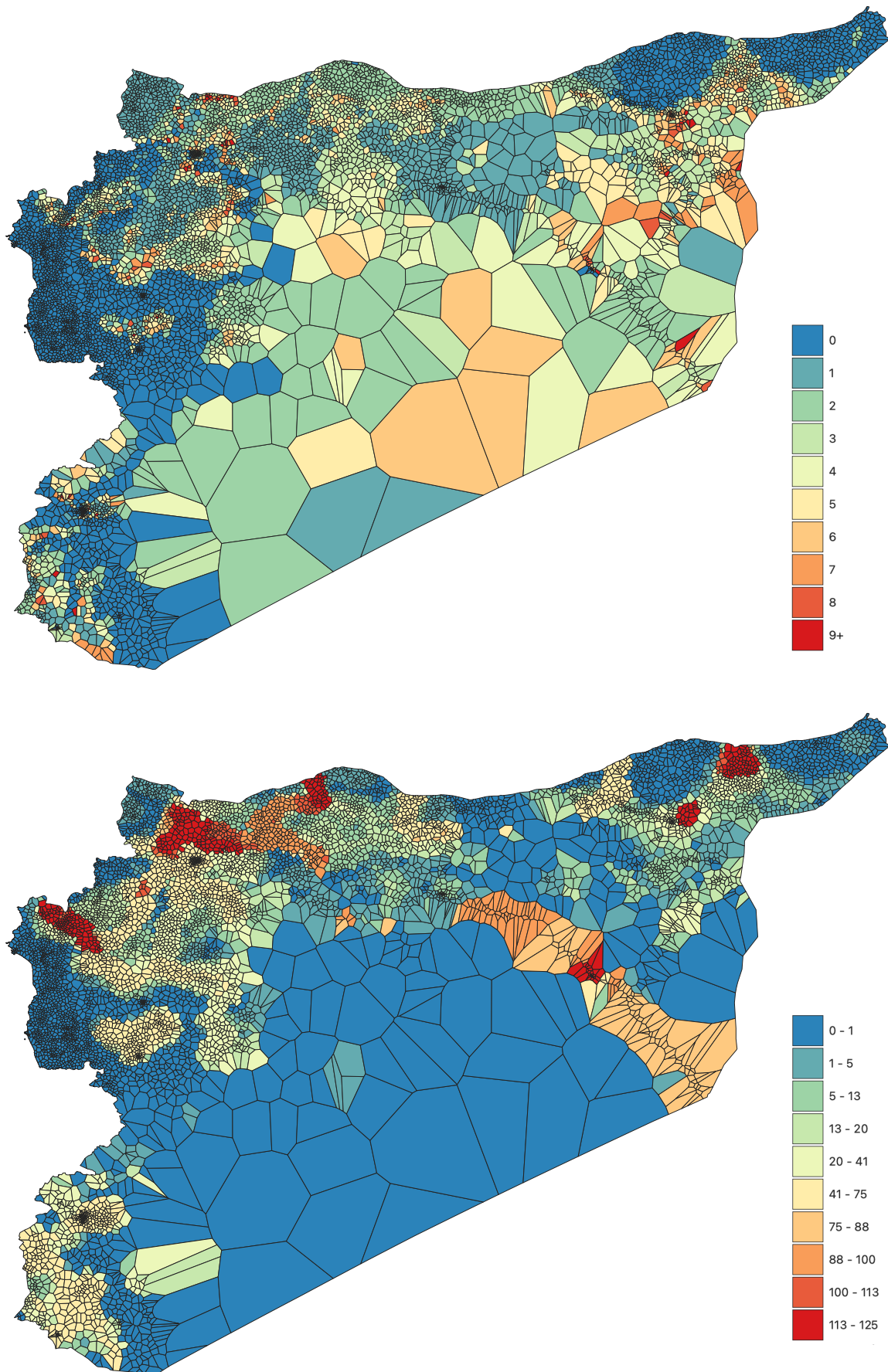– likelihood of it being fought over during the project period

– etc.

**Figure 1 & 2:** TOP - Population centres colour-coded by the number of times each community has changed control since January 1, 2014. BOTTOM - The time in months each population centre has spent within 10km of a front line. Historical control data from The Carter Center and Chris McNaboe. Analysis and visualisations by Chris McNaboe.

If, as a first step, a mapping of community-based actors, including grassroots organisations is done, then engagement with such organisations can help fill-in gaps with respect to other data regarding the area in question. Ideally, organisations that are selected for engagement as part of an area-based approach could sustain such data gathering during the project period, and thus help fill gaps left by inconsistent needs analysis throughout the response.

Once the data is gathered, population centres can be clustered according to these and other metrics to define distinct regions throughout the country and better identify areas for area-based programming. Based upon these parameters, areas can be selected for interventions and evidence-based arguments can be made for impactful, early recovery work within that area.

Selecting smaller to medium sized areas for intervention may also prove useful when seeking to program longer-term interventions. All Syrian respondents for this study expressed a desire for longer-term funding to help build durable relationships with the community and ensure local ownership. Appropriately-sized areas for intervention may also help ensure stability for longer project periods. For example, places far from frontlines or areas without a history of infighting between armed factions would have a higher chance of remaining stable throughout the project duration.

Longer-term interventions have the added benefit of facilitating payments. New payments to new partners for new initiatives run a higher risk of added scrutiny from regulatory agencies or correspondence bank compliance officers. If long-term relationships with partners and programs can be established, then delays in disbursements can be mitigated.

## Triple Nexus Programming

Building linkages between humanitarian, development (or early recovery), and peace initiatives in Syria has long been a tricky subject. For multiple reasons, development in Syria has been politicised and peace initiatives have been deadlocked. The development of strong, capable civil society organisations over the course of the conflict has been lauded as one of very few positive trends in Syria, but their inclusion in peace process dialogues often risks politicising them. Technocratic, service-oriented civil society organisations from all regions of Syria have much to share with one another, but few venues in which to do it.

Syrian NGOs and civil society organisations interviewed for this report recommended instead an indirect approach to achieving peacebuilding goals in Syria. Their recommendation was to focus on localisation, inclusiveness of decision-making and programming, and in doing so, set the stage for Syrian-led initiatives to take place. In particular, interlocutors argued that maximally inclusive programming, including civil society, syndicates, guilds, etc. alongside elements of local governance structures would pave the way for connections across front lines and diminish the power of spoilers throughout Syria.

Conflict analysts focusing on armed group relations had a similar take on the prospects for more direct peace programming, and in particular cross-line programming. Multiple respondents agreed that key armed groups are in favour of and would benefit from cross-line commerce and broader connectivity with other regions. Türkiye, HTS, the Autonomous Administration, civilians and the Syrian government would all benefit from such initiatives, but the politics are too difficult to manage, and spoilers abound. Any actor that does not benefit from an initiative has the ability to spoil it, and there are enough factions and smuggler networks in operation that accounting for all potential spoilers is practically impossible.

These analysts, as well as a representative from the UN Special Envoy's office all pointed to the very short-lived experiment of opening the Abu al-Zendin crossing near the city of al-Bab in northern Aleppo. This crossing was intended to allow for trade between government and opposition-controlled territories and its opening was pushed by both Russia and Türkiye. Despite the influence of each of these parties, the crossing did not remain open for more than a few hours due to popular protests. According to analysts, these

protests were not spontaneous, but were organised by factions within northern Aleppo who would lose out on lucrative smuggling networks should official trade take place.

Given these obstacles, an indirect or long-term approach to peace programming is likely all that is possible in the near to medium term future. That said, there are several sectors and geographic regions that could benefit from more attention with respect to triple nexus programming. All respondents pointed to the positive impacts of improving water infrastructure and services, stating that irrigation and water management networks span between regions and support food security and livelihoods in a way that also supports trade between regions. Additionally, work on water resources were noted for the fact that they are inclusive by nature and thus contribute to greater localisation of aid programming. For example, water reclamation for agricultural work requires engagement with farmers, engineers, health officials, local council members, and more.

Housing and shelter construction was also an area that was highlighted as being in high enough need (particularly in Idlib) that local authorities would be willing to give any space needed to make international organisations feel comfortable conducting their work. Such work can be more problematic for donors, especially building permanent housing, but given that housing development initiatives are already being conducted by some local organisations (such as Molham Volunteering Team), it is possible that donors could coordinate and support complementary initiatives alongside these projects (such as health, education, water, livelihoods, or solar/electrical rehabilitation).

Beyond sectors, multiple analysts stated that anything to encourage cross-line trade or connections between Operation Euphrates Shield zones and Menbij would be beneficial. The OSE reported that while Türkiye has numerous red lines when it comes to northeast Syria, there are enough existing trade and civilian connections between Menbij and Jarabalous to make the prospects for cross-line work in this area better than most other areas.

Exploration of triple nexus opportunities also came with a warning from analysts working on this issue – do not attempt anything with respect to fuel trade. According to multiple respondents, the trade in fuel is still one of the greatest sources of factional infighting in northern Aleppo and new programming that disrupts the current system risks sparking new rounds of fighting. General conflict trends throughout Syria also support this theory, showing that proximity to oil/gas fields or pipelines is a key factor in influencing the level of violence in a population centre.

Lastly, Syrian civil society representatives noted that sanctions, oddly, can provide a positive force towards triple nexus programming. Prohibitions on the export of many goods from Syria require local organisations to seek internal markets – sometimes across lines. While many regions are now seeking to diversify local production (particularly in agriculture) as a result of difficulties trading between zones of control, geographic conditions often mean that each region will naturally specialise, and thus pressure for trade and interconnectivity will remain high.