THE ISSUE

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  - These barriers to access have undercut humanitarians’ ability to serve people according to need in a cost-efficient and principled manner.
- The lack of access has also meant that Syrian aid workers and organizations have played an outsized role in the humanitarian response, from delivery and programming to monitoring and evaluation.
  - The victims of attacks on humanitarian workers and civilian infrastructure are overwhelmingly Syrian aid workers and health personnel.
- Donors must increase support for local aid organizations and workers in Syria and elsewhere by accelerating the localization of the aid response.
  - They should increase efforts to protect local humanitarian workers, mitigate the vulnerabilities associated with overreliance on the United Nations, and engage more with the private sector to alleviate the challenges of de-risking.

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AN UNPRECEDENTED CRISIS

*There was no medicine, there was no place to find any treatment. The operation to extract the bullet was done by a veterinary doctor, a nurse, and an anesthesia technician... I was awake the entire operation because the anesthesia was expired. It was horrible, and it was all because of the siege. I also lost 25 kilos during the siege. On one hand, I had my own health situation, and on the other hand, there was the food shortage.*

The story of Ibrahim from Madaya, a town near Damascus which was under siege from 2015 to 2017, has been all too typical in Syria. Even with an unprecedented international aid response, the crisis in Syria quickly became the greatest humanitarian emergency of the twenty-first century. The United States has spent more than $12.8 billion on humanitarian assistance for the Syria response since 2012, including at least $5.5 billion inside Syria. And yet, needs continue to rise. In just over one year, an additional 4.5 million Syrians have become food insecure, meaning that 60 percent of the population now struggles to access a basic meal. In northwest Syria, people live on the equivalent of 68 cents a day—far below any metric of poverty. Two-thirds of the population now require humanitarian assistance, and half the population is internally displaced or has fled the country. Despite these growing needs, the United Nations’ annual appeals are consistently underfunded. At the fifth international donor conference for Syria in Brussels in March 2021,
donors pledged more than a billion dollars less to the Syria response than they did the previous year.\(^5\)

In addition to funding requirements, Ibrahim’s experience points to other troubling obstacles for humanitarian operations in Syria. Since the outset of the crisis, parties to the conflict have instrumentalized aid by restricting, impeding, and diverting humanitarian assistance to their benefit. The Assad regime has repeatedly weaponized humanitarian access: laying siege to hundreds of thousands of civilians as a military tactic, destroying civilian infrastructure, and creating bureaucratic and operational hurdles to aid workers.\(^6\) While less systematized than the Assad regime’s interference, non-state armed groups have also hampered aid operations, at times detaining aid workers and imposing arbitrary taxes or regulations. Western states’ terrorism designations and sanctions have also inadvertently created hurdles for aid organizations. Together, these barriers to access have undercut humanitarians’ ability to serve people according to need in a cost-efficient and principled manner.

Partly as a result of these obstacles, Syrian aid workers and organizations have played an outsized role in the humanitarian response. Because access to many parts of Syria is highly restricted for foreign aid workers from the United Nations and international non-governmental organizations (NGOs), there has been an unprecedented surge in local NGOs. Syrians have also done the vast majority of implementation from delivery and programming to monitoring and evaluation. When humanitarian efforts become the target of military operations, Syrian aid workers and health personnel overwhelmingly bear the brunt of these attacks.

The Syrian conflict has demonstrated the need to increase support for local NGOs operating in complex humanitarian environments. The United States and other donors must do more to support local NGOs and aid workers in Syria and elsewhere. Donors should fulfill their commitment to accelerate the localization of the aid response, increase efforts to protect local humanitarian workers and critical civilian infrastructure, mitigate the vulnerabilities associated with overreliance on the United Nations, and engage more with the private sector to alleviate the challenges associated with de-risking.

**LOCALIZATION**

At the 2016 World Humanitarian Summit, donors pledged to bolster the localization of aid by increasing funding to local organizations around the world. The United Nations’ Syria Cross-border Humanitarian Fund (SCHF) has allowed local NGOs to expand their role in the humanitarian response. The majority of SCHF funds goes to local organizations, which not only boosts their capacity but also gives them credibility as a partner of the United Nations. Local Syrian organizations have built their capacity considerably over the course of the last decade and have improved their ability to accept, coordinate, and distribute international funding.

However, Syrian organizations continue to receive very limited direct funding from donor governments. As Hazem Rihawi notes, Syrian NGOs and local governance structures received only 0.7 percent of direct funding in the 2018 Syria Regional Resilience and Response Plan, despite their large and growing role in delivering and implementing aid programs.\(^7\)

Providing local Syrian organizations with such little direct support undermines the efficiency and efficacy of the aid response in various ways. Because UN agencies or international NGOs (INGOs) act as middlemen for most of the funds they receive, more money is spent on administrative costs, and donors’ funding is less cost-effective. Channeling funding through larger organizations also skews the balance of power away from Syrians in programming decision-making and squanders the benefits they bring to humanitarian planning, since local organizations often have more legitimacy—which is built on their relationships with local communities, their access and understanding of local dynamics, and their willingness to bear risks that international aid workers would not accept.\(^8\)

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In order to play a greater role in leading the humanitarian response, Syrian aid workers require more assistance from donor governments to negotiate their safety. The lack of protection for Syrians working in the aid and healthcare
sectors has been a particular problem. As a result of the violence and ongoing attacks on health facilities and personnel, over 70 percent of health workers have fled the country, adding an additional burden on those who remain. The lack of medical personnel and the limited ability to train and certify new doctors, nurses, midwives, and other medical professionals is a growing problem.

**PROTECTION OF LOCAL HUMANITARIAN ACTORS**

Aid workers are increasingly attacked, kidnapped, and killed in conflict settings around the world. In 2018, more aid workers were killed in a single year in Syria than in any other conflict over the previous 20 years, making it the deadliest country in the world for humanitarians. Aerial bombardment, such as attacks targeting hospitals and aid convoys, has caused most of the casualties. Syrian and Russian jets have also conducted “double tap” strikes, waiting for emergency responders to come to the rescue of victims of an initial attack before targeting them with a second strike. Syrian aid workers are overwhelmingly the victims of these attacks.

International aid workers have avoided parts of Syria because of security concerns and restrained access, leaving Syrians to negotiate humanitarian access and provide monitoring and evaluation in a treacherous environment with little to no safeguards. Donors require these aid workers to report on impediments to aid, diversion, and other potentially negative feedback from projects to ensure the principled delivery of humanitarian assistance. However, they expect Syrians to provide this information without any protection in regime-controlled areas, which are heavily monitored. Additionally, these same unprotected aid workers are expected to push back when armed actors interfere in aid operations. CSIS interviewed one aid worker who had been detained three times for refusing to allow a non-state armed group to interfere.

However, donors and the UN Office for the Coordination of Humanitarian Affairs (UN OCHA) have had some success in preventing such interference in the opposition-controlled northwest and Self Administration-controlled northeast when they have increased their involvement on the ground. For ethical reasons and operational efficacy, international donors and the United Nations must put themselves on the frontlines of negotiations for access and the protection of staff and operations. Syrian NGOs have increased their negotiating power with local authorities by cultivating NGO networks and forums, but these lack the clout of the United Nations. As one INGO country director put it, “we need UN OCHA to negotiate collectively on humanitarians’ behalf. Armed groups would love it if we each had to come to a different agreement with them.”

This highlights the importance of working to protect local aid workers in remote management environments and the need for the United Nations and individual donors to play an active role in access negotiations. Mainstreaming protection mechanisms, such as early warning systems and physical safeguarding of critical civilian infrastructure of health facilities, is also essential. From March 2011 through March 2021, there were 599 attacks on at least 350 separate facilities, and at least 930 medical personnel were killed, according to Physicians for Human Rights. Protecting vital

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**Aid is seen strewn across the floor in the town of Orum al-Kubra on the western outskirts of the northern Syrian city of Aleppo on September 20, 2016, the morning after a convoy delivering aid was hit by a deadly air strike.**

Photo: OMAR HAJ KADOUR/AFP via Getty Images
UN cross-border activities ended after a Security Council vote in 2020. Crossline aid shipments from Damascus were supposed to substitute cross-border operations, but they have been sporadic, inadequate, and completely disconnected to the needs on the ground. In some cases, UN shipments have been delayed so long that medicines have expired. The loss of UN cross-border access to the northeast also created a funding gap: NGOs in the area had previously accessed funding through the United Nations’ pooled funding mechanism, and this has not been fully replaced. The potential end of UN cross-border operations to northwest Syria clearly underscores the danger of over-reliance on the United Nations. Nothing can currently replace those modalities. Decreasing such dependencies in other environments should be considered.

DE-RISKING

The United States and other Western states have imposed sanctions on Syria and have proscribed several Syrian actors as terrorist groups. Although some Western states have included humanitarian exemptions in sanctions and promised to issue additional waivers for humanitarian operations, NGOs have to navigate a complicated legal environment to continue operating in many parts of Syria. The difficulties are especially acute for local NGOs.

Financial sector de-risking creates enduring challenges for NGOs. “De-risking” refers to the phenomenon of financial institutions terminating, restricting, or delaying business with NGOs to avoid the risk of breaking compliance with Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) regulations. In the Syrian context, where sanctions against both the Assad government and terrorist groups make any financial transaction subject to scrutiny, many banks and private sector actors are reluctant to engage with any but the most established organizations. As a result, NGOs struggle to get money into Syria.

Problems are especially acute for smaller and local NGOs with more limited administrative capacity. Syria Relief and Development, a U.S.-based Syrian-American organization, had 11 bank accounts closed between 2015 and 2020 due to de-risking and was forced to spend tens of thousands of dollars on legal fees to find a bank. As Emily Galloway of Global Communities observes, “increasing government restrictions and vetting requirements for implementing partners has put excessive burdens on local organizations, especially women’s organizations, which tend to be small, grassroots efforts that may not have the capacity or resources to navigate these requirements.” These bureaucratic hurdles
sometimes delay aid programs so long that they are no longer relevant. Local organizations are forced to rely on the hawala system, an informal channel of transferring funds through service providers known as hawaladars. These networks do not have a clear regulatory basis and many Western banks are unwilling to work through them.

**Syria Relief and Development . . . had 11 bank accounts closed between 2015 and 2020 due to de-risking and was forced to spend tens of thousands of dollars on legal fees to find a bank.**

Local organizations will be unable to fulfill the potential of their role in the humanitarian response as long as de-risking continues. Donors must increase their communications with financial institutions to assure them that NGOs’ humanitarian work is legitimate and does not violate AML/CFT regulations.

**CONCLUSIONS AND RECOMMENDATIONS**

The past 10 years in Syria have magnified the challenges of working in complex and long-running conflict settings with no acceptable political solution in sight. These challenges are especially acute for local NGOs, who often lack the funding, protection, and clout of larger humanitarian organizations. The humanitarian world must seriously reflect on how it can ensure that life-saving aid is not instrumentalized at the expense of civilian lives and to the benefit of warring parties. At the same time, humanitarian actors cannot be left on their own to negotiate. In order to protect civilians, humanitarian workers, and aid operations, donors who wish to save lives, do no harm, and prevent future drivers of conflict must prioritize humanitarian negotiations and support for local NGOs and aid workers. This is not an easy task. In Syria, a multitude of challenges—from getting money into areas with sanctioned or proscribed actors to the operational risks of dealing in such an environment—has severely hampered an effective humanitarian response based on need rather than access.

Ten years into the Syrian crisis and with no political solution in sight, an effective and principled aid response is more critical than ever. The crisis in Syria is not the first time many of these problems have arisen in humanitarian operations, but the scale of the challenges must finally motivate donors to act. The Syrian crisis demonstrates that donors must provide local organizations with more support so that they can operate more effectively and safely. Donors should increase their support to local organizations in four key areas.

**To bolster the localization of the aid response, the United States and other donors should:**

- Increase the proportion of direct funding provided to local NGOs
- Devote more resources to building the capacity of local organizations
- Create stronger mechanisms to train medical staff in remote management environments

**To increase the protection of local humanitarian workers, the United States and other donors should:**

- Be at the forefront of discussions on humanitarian access and aid worker protection
- Demand accountability for the harassment and harm done to aid workers and interference in aid operations by continuing to highlight these issues in the Security Council
- Make negotiations and trainings with armed groups and local authorities on international humanitarian law and the importance of non-interference in aid operations an integral component of work in conflict zones and in humanitarian emergencies
- Protect humanitarian and health workers through enhanced protection mechanisms of critical civilian infrastructure, such as health facilities

**To reduce overreliance on the United Nations, the United States and other donors should:**

- Support the development of alternative supply chains and coordination bodies, for cases where the United Nations is unable to respond
- Develop alternative pooled funding mechanisms for complex operating environments like Syria that could replace the United Nations if necessary

**To mitigate the challenges of de-risking, the United States and other donors should:**

- Work with the private sector to streamline reporting requirements for banks and to verify the legitimacy of humanitarian partners
• Create a list of acceptable organizations from which NGOs can purchase supplies
• Place hawala banking channels on a clearer regulatory basis and negotiate to minimize interference with hawala networks on behalf of NGOs
• Increase the coverage of local NGOs’ overhead costs in recognition of the challenges of working in Syria

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ENDNOTES


4 Author interview with international NGO working in Syria, March 24, 2021.


11 Author interview with Syrian aid worker with an INGO, February 24, 2021.

12 Author interview with INGO Syria country director, March 11, 2021.


17 Author interview with Amany Qaddour, regional director, Syria Relief and Development, March 25, 2021.
