



# "We can't sit back and wait"

Syria's transition through the eyes of civil society



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for Human Rights Studies  
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# Executive summary

**‘Our goal was never to simply topple the regime; it was to build a state inclusive of all Syrians’**

**Mostafa Saad**, a public affairs journalist from Latakia, Coastal Syria

The fall of the Assad regime on 8 December 2024 marked a decisive turning point in the people of Syria’s long struggle for democracy, dignity, and freedom, after decades of authoritarianism and repression. Yet prospects for sustainable recovery and social cohesion are being jeopardized by the exclusionary and nontransparent governance of the Syrian transitional government (STG), persistent internal conflicts, and the steady increase of sectarian rhetoric and violence, on top of foreign military interventions, most frequently by Israel and Turkey.

The STG initially promised meaningful inclusion for civil society in the transitional process, encompassing a national dialogue, free civic space, and engagement with governmental actors. But nine months later, independent voices including civil society organizations (CSOs) have been mostly excluded from the process, despite the critical value they bring, by the Hay’at Tahrir al Sham (HTS)-led government whose members, affiliates and loyalists hold the majority of governmental positions and the greatest sway over policymaking. Throughout the entirety of the fourteen-year conflict, the role of Syrian CSOs was indispensable to providing urgent humanitarian services, cultivating trust with local communities, documenting human rights abuses, advocating for accountability and justice, and proposing solutions to contemporary challenges in Syria. This role has afforded CSOs deeper knowledge of the conflict’s impact on communities, social fractures, and the reforms required for a successful transition.

To better understand the challenges and opportunities for Syrian civil society, the Cairo Institute for Human Rights Studies (CIHRS) interviewed thirty CSO members and activists from inside Syria and the diaspora. There was a consensus among interviewees that civic space has widened since the Assad regime's fall, allowing for a relatively larger margin in freedom of expression, association and movement. These opportunities remain extremely fragile, however, as civic action continues to be hindered by external challenges including security threats, restrictive laws, exclusionary policies, and nontransparent governance. Local CSOs also struggle with internal challenges such as structural weaknesses and a lack of long-term vision, after years of operating in emergency situations and under sanctions, repression, and limited funding. Now as priorities shift, CSOs struggle to navigate a new framework, adapt their strategies, and participate in the transition process.

Growing fears of an authoritarian trajectory were shared by interviewees, including those actively engaging with the STG, due to the government's problematic policies, notably the centralization of power in the hands of Hay'at Tahrir al Sham and affiliated groups and religious leaders. Interviewees held varied perspectives regarding the STG, with the majority expressing caution with respect to the government and concern about the trajectory of the transition process but indicating that they are either open to direct communication with the government or are currently engaging with it. This included interviewees from minority backgrounds, particularly on the coast and northeast Syria. Despite expressing frustration with some of the STG's policies, three interviewees viewed these policies as stemming from the STG's limited experience in governance, believing that it is doing the best it can with the available resources. Victim-centered and survivor-led groups felt particularly sidelined by the appointment to key positions of militants accused of severe abuses, and shared concerns about worsening social divisions. One group in particular noted their fear of freely conducting their operations as they document violations committed by those now in power. Women-led organizations shared the greatest concern about an authoritarian trajectory, with all members sharing this fear. They demonstrated the lowest level of engagement, with only two of the seven women-led organizations - one in northeast Syria and one in northern Syria - open to working with the STG.

The new political context in Syria has provided a relatively larger and freer civic space, fostering opportunities for CSO collaboration and engagement across different regions. Some CSOs have widened their partnerships or expanded into underserved areas that were held under the Assad regime or have supported new initiatives in other areas. Nevertheless, the existing internal and external challenges continue to deeply constrain these opportunities. Across Syria, interviewees reported that while technically a relatively free civic space exists,

security concerns encroach upon this freedom. Persistent violence and harassment at checkpoints in the coastal area and Suweida, often involving governmental forces, have obstructed civic action in affected regions, on top of sectarian rhetoric and incitement.

**“ Syrians must be at the forefront of shaping their own future; a successful transition that achieves sustainable peace and social reconstruction can only be ensured by their genuine participation. The exclusionary and authoritarian tendencies that led to failed transitions in other countries must not be replicated, otherwise Syria’s transition will likely lead to the re-entrenchment of repression.**

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At a time when a unified front among CSOs would critically support the objective of a successful transition, interviewees noted that differing approaches to engagement with the government have strained inter-organizational relations. Some organizations align closely with the government in pursuit of influence, resources, and protection, while others view this as a betrayal of civil society’s independence. CSOs in northeast Syria, northern Syria, the coast and Suweida reported frustration at double standards, particularly the prioritization of Assad’s victims by some CSOs, as well as reluctance to condemn violations by the STG. The rise in sectarian rhetoric and violence adds to these tensions, with interviewees in Suweida and the coast reporting the straining of relationships with partners following the sectarian violence in these areas. Additionally, tensions are rising between local CSOs and returning diaspora CSOs, as they compete for visibility and scant funding. Women’s rights CSOs reported a somewhat different dynamic, with fewer tensions and higher levels of cooperation compared to the broader civil society. Despite holding differing views on their respective approaches towards engagement with the STG, women’s rights CSOs shared a common vision for reforms and a shared skepticism towards the government, citing ongoing violations against women and the problematic backgrounds of those in power.

Restrictive legislation remains a key obstacle for civic work, with the laws on associations from Assad's era still in force. Although it is unclear how strictly the STG intends to apply these laws, interviewees expressed fear of state control. Interviewees called for the modernization of these laws in line with international human rights standards and the adoption of a 'notification system' for registering organizations without having to wait for governmental approval, in line with international standards. The current system of temporary licenses, lengthy registration procedures, and prior approval requirements for each activity indicate that the STG will sustain control over civic space. These policies have discouraged some CSOs from registering, particularly those in Suweida and those working on women's rights.

Governmental efforts in relation to transitional justice, social reconciliation, and accountability have been plagued by the dominance of HTS and its loyalists, the exclusion of non-Assad regime crimes, and the marginalized role of CSOs and experts. Interviewees expressed grave concerns over the legitimacy, inclusivity, and independence of the National Dialogue, the Constitutional Declaration, and transitional justice related governmental bodies. The STG's engagement with CSOs was largely described by interviewees as superficial with no genuine action or influence on policy. Local CSOs in particular felt excluded compared to international actors, with many concluding that meaningful participation would require international support. Some CSOs have even refused direct contact with the STG, citing deep mistrust due to its Islamist background and opaque governance.

Syrians must be at the forefront of shaping their own future; their genuine participation is crucial to a successful transition, and sustainable peace and social reconstruction. The paper concludes with measures that CSOs can adopt to strengthen their own inclusion; these measures should also be adopted by the Syrian transitional government, the international community, and international actors, with the aim of promoting the crucial role of CSOs. Even without government support, CSOs can strengthen their role by advancing peacebuilding, memorialization, awareness raising, grassroots mobilization, and policy advocacy in collaboration with both local communities and diaspora groups. International actors are equally vital: they can foster CSO participation by ensuring their inclusion in planning and decision-making, providing sustainable funding and capacity building support, and pressuring authorities to establish genuine participatory mechanisms.

For its part, the STG must repeal restrictive association laws, align legislation with human rights standards, and adopt a transparent reform roadmap consistent with UNSC Resolution 2254. It should also initiate a genuine and inclusive national dialogue. Such a dialogue is

fundamental to bringing together the full spectrum of Syrian society and ensuring that marginalized voices are represented and heard, inclusive of those from various ethnic, religious and cultural backgrounds, together with local communities, political groups, and civil society actors. Failing to implement these reforms risks repeating the mistakes of failed transitional processes in other countries, where exclusion and authoritarian tendencies led to renewed instability and entrenched repression.

## Methodology

This research paper presents the challenges of Syrian civil society navigating the new transitional process following the fall of the Assad regime, together with the required administrative, legislative, and governmental reforms. Opportunities are underscored for international support towards ensuring free, safe, and effective participation for Syrian CSOs during the transitional period.

Between May 2025 and October 2025, the Cairo Institute for Human Rights Studies (CIHRS) conducted interviews with thirty Syrian civil society actors. Some interviewees spoke in their personal capacity, others on behalf of organizations, and many offered both their personal and the organization's perspectives, as indicated prior to every reference. Some names have been shared, and some have been redacted to ensure anonymity, depending on the interviewee's request. All interviews were conducted one-on-one, in Arabic, via a secure online platform. The interviews seek to highlight the voices of Syrian civil society and are not meant to be representative of all Syrian civil society.

In addition to interviews, CIHRS reviewed national legislation, executive orders, policies, UN resolutions, international treaties, and general comments and relevant open-source material from credible sources, including media outlets and human rights organizations. The report reflects developments in Syria until September 2025.

In an effort to reflect the diversity of Syrian civil society, interviewees were selected to ensure a broad range of backgrounds and geographic regions. The interviewees are split between seventeen who work in regions across Syria; four who work in northwestern Syria, two in northern Syria, three in southern Syria, and four in coastal regions. CIHRS focused on human rights organizations and activists, particularly those working on CSO

empowerment, transitional justice, peacebuilding, and women's rights. Seven of those interviewed represent women-rights organizations, three work on civic and political rights, and six identified as victims or survivor-led organizations.

CIHRS wrote to the Syrian Ministry of Foreign Affairs and Expatriates on 24 September 2025 to share the findings of this report and to request comment. No response was received by the time of publication.<sup>1</sup>

## List of definitions

**Civil society organizations (CSOs):** Any formal or informal groups of individuals brought together in order to collectively act, express, promote, pursue or defend a set of common interests. These groups are non-governmental, non-profit, non-violent and self-governing 'pursuing common interests and values in various spheres of life including in political, social, cultural, religious, and scientific fields.'<sup>2</sup>

**Civic space:** The environment that enables individuals and groups to participate meaningfully in the political, economic, social and cultural life of their societies, through formal and informal efforts that allow them to contribute to policymaking, decision-making, and political and peacebuilding processes.<sup>3</sup>

**Hay'at Tahrir Al-Sham (HTS):** Formerly a transnational Salafi-Jihadi militant group mainly operating as a de-facto quasi-administrative authority in areas of northwestern Syria, HTS has increasingly sought a more moderate public position since the ouster it led of Assad's regime, rebranding itself as a more Syria-centric, Islamist group. It was preceded Jabhat al-Nusra, a group whose objective was the overthrow of the Assad regime and the creation of an Islamic state. Until 2025, it was widely listed as a terrorist group, including by the United States, the United Nations Security Council (Resolution 2179 of 2014), and the European Union.

**The Syrian Democratic Forces (SDF):** A Kurdish-led and American-backed coalition that serves as the main armed force of the Autonomous Administration of North and East of Syria (AANES). They control approximately 30 percent of Syrian territory. The SDF continues to be engaged in extrajudicial killings, arbitrary arrests, enforced disappearances, and torture in detention centers.<sup>4</sup>

**The Syrian National Army (SNA):** A loosely formed umbrella organization of militias backed by Turkey and several Gulf states, they control parts of northern Syria near the Turkish border. They have a key role in the affairs of areas under their control, including managing the security situation and the work of civil society and local governance institutions.<sup>5</sup>

# General context

## Fall of the regime

On 27 November 2024, armed clashes escalated northwestern Syria, leading to significant shifts in territorial control between opposition factions and government forces. The violent clashes had been preceded by the 'Deterring Aggression' operation carried out by a coalition of opposition forces led by Hay'at Tahrir Al-Sham (HTS).<sup>6</sup> By 8 December the collapse of the Assad regime was officially announced, as then-president Bashar Al Assad had reportedly fled the country and the coalition seized the majority of national government institutions.

Although the fall of the regime created a window of opportunity and hope for change across the country, Syria continues to grapple with the heavy legacy of Assad's rule in the nine months since the Syrian Transitional Government (STG) assumed leadership under HTS-leader Ahmad al-Sharaa. Decades of authoritarianism, systematic repression, and deliberate incitement of sectarian and ethnic divides have left deep scars that obstruct genuine reconciliation and reform.

Today, the STG faces a daunting environment that threatens Syria's fragile transition and prospects for recovery. Its leadership largely consists of figures affiliated with the HTS, especially politically inexperienced individuals, former militants, and Islamists who were actively involved in the fourteen-year conflict and are responsible themselves for horrifying human rights abuses against civilians. Their history, and the violence that has erupted in various parts of the country in recent months involving groups associated with the authorities, not only undermines the STG's credibility but further imperils the prospects for a sustainable recovery, especially for lasting peace, and the social reconstruction needed.

The country remains fragmented with various factions competing for power and influence. Although the STG is the main governing authority across large parts of Syria, it lacks full control: the Syrian Democratic Forces (SDF) continue to administer parts of the

northeast;<sup>7</sup> southern Syria operates under separate command structures with minimal STG interference; and, despite formal integration under the Ministry of Defense, the Syrian National Army (SNA)<sup>8</sup> still retains control over its daily operations. Further complicating Syria's stability is the occupation of Syrian territories by other countries. Upon the fall of the regime, Israel launched intensive airstrikes to destroy Syria's military capabilities and expanded its occupation of Syrian territories. In the north, several territories near the border remain under Turkey's de facto control, through thousands of Turkish troops, allied militias, military bases and observation outposts.

**“ The fall of the regime represented hope and opportunity for change across the country. Yet the troubling record of the politically inexperienced transitional government, the involvement of many of its leaders in past atrocities, as well as the violence that has erupted in various parts of the country in recent months involving groups associated with the authorities undermine the new government's credibility while hindering prospects for sustainable recovery and social reconstruction.**

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In March 2025, the STG and SDF announced an agreement to unify governance and security structures. By the end of 2025, all public institutions and military forces under SDF control would be incorporated into the STG framework. The agreement also recognized the Kurdish community as an integral part of Syria, guaranteeing full constitutional rights, and political representation and participation.<sup>9</sup> This is a promising sign given the Kurds' oppression under Assad's rule and his regime's systematic erasure of their rights and culture. As of September 2025, however, the agreement has yet to be implemented, with both sides struggling to fully adhere to its terms and their respective commitments.

Sporadic clashes continue in various areas, further exacerbating Syria's security situation. Attacks against minorities, particularly Alawites and Druzes, have significantly risen since 8 December, with cases of targeted killings, kidnappings and harassment especially at checkpoints, and mass arbitrary arrests.<sup>10</sup> On 6 March, clashes erupted on the Syrian coastal regions between remnants of the Assad regime and factions affiliated with the current regime, which led to the killing of over 1,500 people, the majority of whom are estimated to be civilians.<sup>11</sup> Reliable sources documented several cases of summary executions, sometimes of entire families, on apparent sectarian grounds. These crimes were concentrated in Tartus, Latakia and Hama governorates and were primarily committed by armed groups affiliated with the transitional government.<sup>12</sup>

On 28 April, a voice message insulting the Prophet Mohammad was attributed to a Druze leader, sparking protests. Anti-Druze hate speech, followed by armed Sunni attacks on Druze-majority neighborhoods in Rif Dimashq and Suweida, resulted in the killing and wounding of dozens of civilians and military personnel.<sup>13</sup> The unrest subsided on 30 April after the Druze representatives and the STG reached a truce.<sup>14</sup> The three Druze leaders in Suweida continue to be generally divided in their position towards the STG. Two are engaging with the government while the other, Sheikh Hikmat al Hijra, strictly rejects engagement and has called for foreign protection, including from Israel and the United States. On 13 July, clashes erupted between Druze and Bedouin armed groups, and the Syrian Armed Forces were deployed. Grave human rights violations, including extrajudicial killings of Druze and Bedouins, were reported by reliable sources. By 21 July, the clashes had reportedly killed more than 500 civilians, including at least 196 people – among them eight children and thirty women – who were reportedly extrajudicially executed. At least thirty-three villages were burned.<sup>15</sup>

Israel's involvement in Syria further undermines stability and security. During the clashes, Israel began striking government positions in Suweida from the air, as well as other targets, including the Ministry of Defense in Damascus.

## Ahead of regime change

The fourteen-year Syrian conflict began with the Syrian revolution in March 2011, where people took to the streets demanding greater freedoms and political reforms. Peaceful protests were met with brutal repression as the Assad regime responded with lethal force,

mass arbitrary arrests and enforced disappearances, and torture and sexual violence. Even before the 2011 uprising, Assad's government had long targeted dissidents and suppressed freedoms.<sup>16</sup>

After the uprising, the regime's crackdown intensified dramatically. State forces conducted large scale military assaults against the opposition and indiscriminate aerial bombardments on civilians, including with chemical weapons.<sup>17</sup> These acts were considered as war crimes and crimes against humanity, including by UN General Assembly Resolution in 2021,<sup>18</sup> the Independent International Commission of Inquiry on Syria (COI),<sup>19</sup> and the OPCW–UN Joint Investigative Mechanism.<sup>20</sup>

Fourteen years of conflict have left hundreds of thousands of civilians dead and thousands missing or disappeared.<sup>21</sup> By 24 July 2025, 90 percent of Syrians continue to live below the poverty line and 16.5 million, including 6.5 million children, need humanitarian assistance inside Syria.<sup>22</sup> Syria witnessed one of the world's largest displacement crises, where over thirteen million Syrians were refugees or IDPs by the end of Assad's rule,<sup>23</sup> of which more than 1.5 million IDPs and 600,000 refugees have returned to their places of origin since then.<sup>24</sup>

By 8 December 2024, violence and human rights violations were relentlessly rife across Syria, and political freedoms remained severely restricted. Regime forces continued launching attacks on densely populated civilian areas up until the final days of Assad's rule. In 2024, the Baath party and its allies had secured the majority of seats in the parliamentary elections amid widely shared expectations that the new parliament would pass a constitutional amendment to extend Assad's term beyond its scheduled end in 2028. Syria's economic and humanitarian crises had worsened, especially due to the sanctions imposed on the Syrian government under Assad's rule, as well as on banks and trade, by the United States, United Kingdom, and the European Union. Although imposed as a response to the regime's grave human rights violations, the sanctions indirectly and severely harmed civilian livelihood, limiting the importation of necessary supplies of fuel, medicine, food and other essentials, and restricting the humanitarian community's ability to respond to these massive needs.

Accountability and peace efforts in Syria were repeatedly obstructed by key players in the conflict, including Russia and its allies and the US and its allies, as well as Arab states, despite UN Security Council Resolution 2254 (2015) calling for a nationwide ceasefire and an inclusive political solution.<sup>25</sup> By 2025, states' normalization of relations with the Assad

regime had been increasing, as exemplified by Syria's re-admission to the Arab League in 2023<sup>26</sup> and EU member state diplomatic overtures,<sup>27</sup> including their efforts to designate Syria as a safe country of return for refugees.<sup>28</sup>

## Civil society's evolution in Syria

After the short-lasting union between Syria and Egypt, Syria adopted the Egyptian law issued by Nasser in 1958 to control associations. This law is still in effect today, and continues to limit the work of civil society organizations, placing them under tight government control and making it nearly impossible to function independently. By early 2011 and just before the revolution, civic space was closely monitored, and CSOs were only allowed to operate with the full patronage of the state.<sup>29</sup>

After the revolution, civic action entered a historic phase. CSOs assumed critical roles, from coordinating and delivering humanitarian aid to documenting human rights violations. Lacking prior experience or resources, they operated under conditions of active conflict, constant attacks, bombardment, and repeated sieges. Repressive state policies further constrained their work resulting in fragile organizational structures, limited funding, and restricted civic space with little transparency or freedom.

**“ Until 2011, just before the revolution, civil space was under strict surveillance and CSOs were only allowed to operate under full state supervision. However, after the revolution, these organizations took on pivotal roles. Despite their lack of experience and resources, they continued their work amid intense conflict, repeated attacks and shelling, and successive sieges.**

**”**

Local and international non-governmental organizations were active across all areas, though their roles differed geographically. In regime-controlled areas, CSOs were confined largely to humanitarian functions, as authorities barred them from engaging in political, governance, social or legal activities, and subjected them to close monitoring by the security services.<sup>30</sup> The Assad regime took measures to prevent the formation of independent organizations; for example, in Aleppo's regime-controlled areas, between 2011 and 2021, at least forty out of the total of eighty-three organizations were reportedly affiliated with the regime.<sup>31</sup> Conversely, in SDF-controlled areas in northeast Syria, CSO participation was more visible and benefited from a more permissive environment, with broader operational space that included some engagement on human rights issues, including women's rights. In areas under the HTS-led Syrian Salvation Government in northwest Syria, CSO activity existed but was more constrained. Political participation and human rights work were heavily restricted, while humanitarian functions had more space. In northern Syria, SNA and Turkish troops allowed limited freedom in humanitarian and some human rights activities. Nevertheless, CSO involvement in public and political affairs was significantly curtailed and further complicated by the absence of a clear administrative authority. Communication and partnerships between organizations across these different zones were limited due to varying regulatory frameworks and lack of freedom of movement.<sup>32</sup>

The sanctions imposed on Syria still heavily impacted civil society and aid groups, despite the exemption on humanitarian services. CSOs suffered from limited funding as many private donors and banks hesitated to engage with organizations inside Syria for fear of unwittingly violating sanctions regulations. Organizations also faced significant shortages of medicine and essential supplies and equipment. Furthermore, due to these sanctions, non-governmental organizations were hesitant to use donor money to include Syrians inside Syria for training, workshops, and conferences. This, coupled with severe restrictions on visas and travel, limited their opportunities for capacity-building and participation in international activities.

Meanwhile, Syrian diaspora organizations enjoyed greater freedom, access to funding, and capacity-building opportunities. This allowed them to gain expertise across multiple sectors, though their funding remained largely short-term and project-driven.<sup>33</sup> These organizations played a key role in large-scale humanitarian efforts - most notably cross-border aid mechanisms - as well as advocacy, research, and lobbying activities at the international level.<sup>34</sup> Diaspora groups also had avenues for strategic accountability litigation for atrocities committed during the Syrian conflict, particularly before European

courts, whether by supporting ongoing investigations by European prosecutors through evidence-sharing, or by initiating and leading full litigation efforts against the perpetrators.<sup>35</sup> They also utilized their connections, outreach, and aid channels inside Syria and in the diaspora and formed platforms for coordination, fundraising, information-sharing and joint advocacy.<sup>36</sup>

# Navigating a new CSO environment

The fall of the regime set off a groundswell of euphoria across Syria and the diaspora, as most Syrians worldwide took to the streets in celebration. After over half a century under a brutal dictatorship, nearly two and a half decades years of unrelenting conflict, and recent attempts by foreign governments to normalize relations with the Assad regime, many Syrians had regarded the regime's collapse as an unimaginable prospect.<sup>37</sup> Yet this moment of collective relief quickly gave way to the complex reality of regime change and transition.

**“ The new context created opportunities for cooperation among CSOs and provided a relatively broader and freer space. However, internal and external challenges- including flawed legislation, security concerns, and sectarianism- continue to severely restrict these opportunities and constrain civil society activity.**

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Civil society now operates in an environment that remains shaped by the remnants of authoritarian rule. Syrian civil society is struggling to adapt to a rapidly shifting and unpredictable landscape, with no clear direction or guidance from the state. CSOs are finding it challenging to reevaluate their structures, roles, and strategies for long-term engagement in the transitional phase. In order for CSOs to identify a shared vision and have a meaningful role in shaping Syria's future, communication methods must be reevaluated, coordination bolstered, and partnerships forged across local and diaspora organizations. Tension within civil society based on sectarian divides and differing approaches to the STG are further exacerbating these challenges. CSO work is also substantially hindered by external challenges such as restrictive and outdated legislation, repressive institutional practices, and a

deteriorating security situation across the country. While the fall of the regime has opened greater space for freedom of expression, association, and movement, organizations still face unclear policies and registration requirements and shrinking funding opportunities, all of which constrain their activities and their ability to effectively advance the transition in Syria.

# 1- Internal challenges

## 1.1. Re-strategizing in a shambolic state

Priorities have shifted drastically as civil society organizations operate in a volatile environment that is heavily in flux, effectively preempting their pursuit of planned objectives or development of new strategies. The fourteen-year conflict had forced inexperienced activists to create initiatives that later developed into organizations, often under conditions of insecurity, bombardment, unstable funding, and overwhelming demand for services. While these organizations gained significant expertise in humanitarian aid and service provision, in the absence of state support, CSOs remained structurally fragile and lacked long-term vision. Meanwhile, diaspora organizations enjoyed a safer and wider civic space, in addition to more funding opportunities, which allowed them to widen their capacities and activities.

Amid this drastic shift in priorities, a diaspora survivor-led initiative explains their struggle to reposition themselves in their advocacy work; *'Advocacy is like war: you need to understand yourself, your enemy, and the battlefield. At one point, we had it figured it out – today, we have to relearn it all. Tactics have changed and we no longer have international leverage. Today, international support is for the government, and we have to figure out new tactics for pressuring it'*.<sup>38</sup>

Advocacy campaigns on women's rights issues are facing an added layer of uncertainty, given the government's Islamist background and unclear future ideology, despite recurring promises to promote women's participation in public affairs. For instance, advocacy campaigns for the implementation of UN Resolution 1325 (2000), which aims to increase representation of women at all decision-making levels in national, regional, and international institutions in relation to conflict situations had been a key priority for CSOs working on women's issues. But today, organizations are split between those who

are reevaluating this priority, and others who plan on sustaining demands for implementing UN Resolution 1325, a 30 percent quota for women in state institutions, and modern laws that protect women's equal rights.<sup>39</sup>

These layers of complications only become further muddled in areas that remain active conflict zones. **Jozour**, a human rights organization in Suweida,<sup>40</sup> struggles to identify priorities and appropriate forms of engagement while their staff is working under recurring conflicts without clarity on which party or parties will exercise control. The founder of **Jozour**, **Ayham Azzam**, who was personally impacted by the conflict between Druze and Bedouin forces in July 2025, explained the current predicament: *'Before the regime's collapse, we were advocating for women's political participation and the implementation of UN Resolution 1325. Today, we're talking about the kidnapping of women and whether they will survive. It seems we have to start from zero on women's rights. What kind of strategy can I build when even the form of the new regime is unclear?'*<sup>41</sup>

Some organizations have found adaptive ways to navigate this foggy and uncertain transition. For instance, the **Syrian Network for Human Rights (SNHR)**<sup>42</sup> chose to develop two consecutive six-month strategies rather than a single annual plan, allowing it to remain flexible and responsive to rapid contextual changes. After fourteen years of operating in secrecy, **SNHR** reflects on how the transition has expanded its work. *'During the regime days, we had to collect data surreptitiously, relying mainly on witnesses and often without field access. We worked under constant fear with our staff exposed to serious risks and heavy security restrictions. Today, we have greater freedom to operate openly. Our field access has expanded and eased, we can collect data directly and we even coordinate with local and governmental authorities. We have so many new opportunities. We can finally meet our long-time partners face-to-face, and for the first time, we can engage on issues of accountability and transitional justice in the open.'*<sup>43</sup>

“ What kind of strategy can I build when even the form of the new regime is unclear? ”

”

The end of the Assad era has opened new opportunities for CSOs to collaborate across regions. During the conflict and due to fragmented control and varying legal frameworks, some areas had developed stronger civic spaces with better organization, funding, and experience, while others lagged behind. Regions tightly held under Assad's stranglehold, such as the Syrian coast, in particular lacked organized civil society mechanisms that operate beyond relief services, and thus faced a bigger crisis relative to other CSOs following the regime's collapse.<sup>44</sup> Although these areas now have greater opportunities for civic engagement, they still struggle with limited organizational and operational experience and capacities. Meanwhile, opposition areas often provided a larger space for expression and civic work, which in turn allowed for enhanced opportunities for capacity building, funding, and participation in public affairs.

Some of these CSOs are now leveraging the new geographical openness by expanding their mandate and geographical reach, particularly into underserved areas that had been under regime control. In doing so, these CSOs aspire to a more effective and organized civic space across Syria. **RDI**<sup>45</sup> is a human rights organization operating in northeast Syria, where it had access to greater opportunities for civic work. Once confined to the northeast, **RDI** is now one of several well-structured organizations at the forefront of assisting CSOs in bridging the gap between their differing capacities. It plans and implements dialogues across various Syrian regions, with the aim of developing a unified CSO position for the transitional period.<sup>46</sup> Similarly, at **Justice for Life**,<sup>47</sup> a human rights organization based in northeast Syria, Assad's ouster was seen as an opportunity to ensure 'non-repetition' of that period's atrocities. *'This stage demands real efforts to prevent the return of conflict and bloodshed; we try to do this through dialogue and a focus on transitional justice tools across Syria.'*<sup>48</sup> Other organizations like **Synergy Association for Victims**,<sup>49</sup> which operates in northeast Syria, have temporarily expanded into all parts of Syria, to provide capacity and organizational support for activists and new local initiatives.<sup>50</sup>

In Suweida, the opportunity for CSOs to collaborate with those in other parts of the country was short-lived due to renewed security concerns, sectarian tensions, and violence. Recurring clashes and attacks on Druze communities, harassment, and discrimination at checkpoints against the Druze have restricted their freedom of movement, thus curtailing these opportunities.

As CSOs struggle to acclimate to a new environment and to identify their approach to the government together with their priorities and vision, their relationships with other organizations have also been affected, compelling them to reassess partnerships and collaborations.

## 1.2. Divides within civil society

After the revolution began in 2011, CSOs were united in one clear position of opposition to the Assad regime, with no clear shared vision for governance beyond its fall. Civic space has now become increasingly fractured over differing CSO positions on the new regime's legitimacy and priorities for civil society on top of ongoing sectarian and social tensions.

### - Sectarian divides

In post-Assad Syria, sectarian violence, particularly attacks targeting Alawite and Druze communities, has deepened mistrust among civil society organizations working in different regions. CSOs working in affected areas describe how cooperation and solidarity has eroded as groups prioritized their own communities.

In Suweida, **Shorouk Abu Zeidan** is the executive director of **Peace Paths**,<sup>51</sup> an organization focusing on the participation of women and youth in political and social affairs. She shared her frustrations about shortcomings in collaboration and solidarity: *'We expected solidarity and efforts to counter hate speech, but we unfortunately didn't see that from many organizations'*. She further reflected on relations with some CSOs in other Syrian regions, which *'have reached the point of a complete rupture, due to their failure to issue positions condemning the violations and massacres that took place, as well as due to the fact that - whether as institutions or through their representatives and members - they adopted stances hostile to Suweida and promoted rhetoric of hatred and direct accusations of treason against all its people'*.<sup>52</sup>

In the coastal region, **Hanady Zahlout** is a human rights activist from Latakia who lost three of her brothers in the massacres on the Syrian coast in March 2025. She described the lack of empathy in both words and action from the civic community. *'Some organizations didn't even offer me their condolences. But I was especially surprised by those who refused to acknowledge the incidents or even feel sympathy*

*for the victims, even though the facts and the victims are there. As rights defenders, we must advocate for justice regardless of the victim's sect or identity.*<sup>53</sup> **Ali Yousef**, a social activist from Latakia who focuses on the impact of the general situation in Syria on communities and children, echoed similar feelings: *'It feels like they are hesitant to support us amid sectarian tensions and are prioritizing organizations and victims of their own background.'*<sup>54</sup>

**“ In post-Assad Syria, sectarian violence, particularly attacks targeting Alawite and Druze communities, has deepened mistrust among civil society organizations working in different regions. CSOs working in affected areas describe how cooperation and solidarity has eroded as groups prioritized their own communities.**

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Other interviewees highlighted the double standards of victims of detention and torture by opposition groups, such as those in Afrin (northern Syria), often receiving less attention than victims of Assad's prisons. As the director of the **Lelun Association for Victims in Afrin**<sup>55</sup> noted, *'All victims deserve support – have we forgotten that?'*<sup>56</sup>

## **- Approach towards the government**

Alongside sectarian divides, CSOs are increasingly in dispute over their approach towards engaging with the Syrian Transitional Government (STG). Some organizations have aligned themselves with the authorities, presumably with the intent (at least to some extent) of attaining greater influence, resources, and protection. Others view alignment with the STG as a betrayal of civil society's independence.

**Samir Alabdullah**, Director of **Policy Analysis Unit at the Arab Centre for Contemporary Studies**,<sup>57</sup> describes this change bluntly, *'Organizations are competing to align themselves with the authorities to secure influence and funding*

*that is expected to go to the governments. Everyone wants a piece of the cake.*<sup>58</sup>

**Bassam Al Ahmad**, executive director of **Syrians for Truth and Justice (STJ)**,<sup>59</sup> criticizes this stance by some CSOs, sharing, *‘There has been a terrifying politicization of the role of the Syrian civil society. I don't think it's our job to defend the government or any authorities; instead, we should not ignore violations committed by the government or other parties. Our mission as civil society is to remain independent, and defend the rights of the people.’*<sup>60</sup>

Some believe that the damage to the independence and legitimacy of civil society has already been done. **Ayham Azzam**, director at **Jozour** in Suweida, elaborated, *‘Those who excused or failed to criticize foundational decisions that they would have condemned under the Assad regime, cannot be expected to challenge future restrictive policies, and cannot be trusted in the struggle for a human right based transitional process. Silence is complicity. Now is the time for us to push to be included on all levels.’*<sup>61</sup>

Some CSOs find that engaging with the government is necessary to maximize their impact in the transition process. According to **Sana Khikha**, Executive Director of the **Syrian Legal Development Programme**,<sup>62</sup> *‘We have to engage with the government directly, even if they don't listen. Engaging with the government doesn't mean we support them; we just don't have the luxury of seeing things in black and white.’* Another CSO, which is also providing similar services to the government, elaborated, *‘We had never engaged with the Assad government. Today, we have an opportunity to put pressure on the new government, so we need to engage properly and strategically. Some organizations are limiting this engagement to the international community. While that's not wrong, it is only half engagement, and we have the opportunity to engage both internationally and domestically to ensure better results.’*<sup>63</sup>

“CSOs are increasingly in dispute over their approach towards engaging with the Syrian Transitional Government (STG). Some organizations have aligned themselves with the authorities, presumably with the intent (at least to some extent) of attaining greater influence, resources, and protection. Others view alignment with the STG as a betrayal of civil society’s independence.”

Women’s rights organizations reported fewer tensions and higher levels of cooperation among themselves, compared to the broader civil society. These organizations hold diverse views on the government and their planned approach for engagement, ranging from complete refusal to engage, to openness to engage with caution. However, they largely maintain a common vision for reforms that promotes the protection of women and their participation in public affairs, and share a unified stance of caution towards the government, due to the ongoing violations against women and exclusionary policies against them, as well as the problematic background of people in decision-making positions. For instance, while some of these CSOs refuse to directly engage the government, they aim to place pressure using indirect tools. One organization is using dialogue in cooperation and support of their partners,<sup>64</sup> while another is holding a series of activities in advocacy, media mobilization and communication with UN mechanisms.’ Other women-led CSOs, such as **Komela Şawîşka**,<sup>65</sup> expressed willingness to engage with the government, albeit still with caution. Elaborating on the extent of their stance impacting their relationships with other organizations, **Komela Şawîşka** shares that since the fall of the regime, there has been more openness and coordination with other organizations. Governorates have opened up to one another, and now we are able to work with organizations in the north-west, for example’.<sup>66</sup>

## - Divides between local and diaspora CSOs

Tensions between local and diaspora organizations have grown after over a decade of operating in very different environments with stark disparities in resources, knowledge, and funding. There is a perception that diaspora organizations operated in relatively stable environments with safer and wider civic space, as well as more sustainable funding and technical assistance, while local organizations were operating during complex conflicts, in fragmented territories, and under significant restrictions on freedom of movement and repressive policies. This division effectively created two civil societies: diaspora groups with stronger institutional capacity and international connections, and local groups with deep community ties but limited funding and freedom. Now, as diaspora organizations expand operations into Syria, both are competing over scarce resources, which has fueled mistrust.

Some interviewees in the diaspora acknowledged this tension, noting that locals perceive them as judgmental or condescending, especially toward women-led initiatives. According to **Dr. Rola al Baghdadi** from **Dawlaty**,<sup>67</sup> a diaspora organization now expanding into Syria: *'From their point of view, which is justified, local groups see that they have suffered from working under poverty and repressive policies. Their access to resources, knowledge, and even to international decision-makers has been very limited, for several reasons including sanctions and travel restrictions'*.<sup>68</sup> Sanctions imposed on Syria had significantly limited funding operations, forcing many local CSOs to operate on project-based initiatives under unstable short-term funding, with weak structure and capacities. However, their presence on the ground provided them with access to communities, victims, and field data, and contextual understanding of the challenges and needs of the population. This made local CSOs crucial in data collection and community and victim outreach.

**“ It is critical for Syrian civil society groups, based both inside and outside the country, to move beyond competition and preconceptions and work together to build a cohesive civil society. As they bring in complementary expertise, they must take advantage of this opportunity to come together to increase their influence over the transitional process.**

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As diaspora groups begin returning to Syria, some local groups feel underestimated while also fearing replacement by more strategic and internationally connected diaspora actors. At the same time, diaspora groups are realizing the strength of local CSOs with established community relations and access to information.<sup>69</sup> This has already begun affecting some organizations. A local women-led CSO operating in northern Syria shares that their organization is at risk of closure after over seven years of operations. *‘Our funding issues have worsened due to fewer funding opportunities, especially with diaspora organizations now returning to Syria. They have more funding and better fundraising skills. Even the diaspora groups that used to fund us are now planning to implement the work themselves, so this might be our last year operating.’*<sup>70</sup>

It is critical for Syrian civil society groups, based both inside and outside the country, to move beyond competition and preconceptions and work together to build a cohesive civil society. As they bring in complementary expertise, they must take advantage of this opportunity to come together to increase their influence over the transitional process.

## **2- External challenges for CSOs**

There was a consensus among all interviewees on the general widening of space for civil society operations after the fall of the Assad regime, allowing for a larger margin in freedom of expression, association, and movement. However, all interviewees listed security challenges, as well as registration and activity approval requirements, as key obstacles hindering their operations.

## 2.1. Security challenges

All interviewees reported the general security situation as a key obstacle for them in conducting their work safely and effectively. Turmoil and rising sectarian violence and hate speech, often with the involvement of governmental forces, have created an environment where free space is marginally available but further limited by security fears and an uncertain future.

Speaking on his experience working across Syria on social cohesion projects while based in Latakia, a **human rights defender** shares, *'The authorities don't yet have a full set of tools for repression. There's no intelligence apparatus like Assad's, for example. There are security challenges but we're still able to meet with CSOs in a space with some degree of freedom. But we don't know how long that will last.'*<sup>71</sup>

The security situation in various Syrian regions has further deteriorated due to attacks on civilians and informal restrictions on social life, often imposed by individuals or local authorities. As a result, interviewees expressed concern over exercising their freedom of expression and association, citing repeated incidents of kidnappings, harassment, torture, and extrajudicial killings, particularly targeting Alawite and Druze communities.

According to UN experts, thirty-eight Alawite women were abducted between March and July 2025, across Latakia, Tartous, Homs, Aleppo and Hama governorates by unidentified individuals; the STG failed to conduct 'timely and impartial investigations' in most cases, and in some instances, refused to register complaints or dismissed families' concerns.<sup>72</sup> The **Syrian Feminist Lobby** has also documented a similar pattern in the kidnapping of mainly Alawite women and women in Suweida, noting that authorities responded with denial, made no effort to protect these victims, and failed to follow up with those who have returned. Elaborating on their documentations, they explain\_: 'The abductions of women represent a grave violation. In the cases of Alawite women, there is negligence and a lack of seriousness in addressing them, and the violations continue\_.'

“ **Between March and July 2025, thirty-eight Alawite women were abducted, across Latakia, Tartous, Homs, Aleppo and Hama governorates by unidentified individuals; the STG failed to conduct ‘timely and impartial investigations’ in most cases, and in some instances, refused to register complaints or dismissed families’ concerns.**

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**An organization** documenting human rights violations across Syria, who wished to remain anonymous, said that they have been in direct communication with local authorities on these issues but that efforts by local and governmental authorities to address them have been minimal. In July 2025, and despite thorough documentation by reputable sources including UN experts who also stated they are in contact with the STG on these matters, the fact-finding committee formed by the government to investigate the Coastal Massacres denied the existence of sect-based targeted kidnappings. It claimed it had not received official reports of women being abducted in coastal regions and attributed these disappearances to societal issues or ordinary ‘criminal incidents’.<sup>73</sup>

Additionally, interviewees described inconsistent restrictions on lifestyle, including the enforcement of conservative dress codes and religious norms in various areas. These incidents are referred to by government officials as ‘isolated incidents’ and not governmental policy. Yet their frequency, combined with the lack of accountability by governmental authorities, have blurred the lines between isolated restrictions by locals, and government policy. According to **Hanady Zahlout** from Latakia, authorities claim to arrest individuals enforcing restrictions on freedoms but when such arrests occur, the perpetrators are released shortly after, and violations continue. To her, this suggests implicit approval by the government; *‘Maybe they don’t feel secure enough yet to officially adopt these policies, but their reluctance to put a real stop to restrictions on freedoms isn’t any different’*. **Rola Al Rukabi**, a women rights defender, holds a similar stance, saying, *‘These violations are labelled as isolated incidents. But when they*

*happen repeatedly, the government can no longer refuse responsibility. People file complaints to the authorities, who give empty promises with no real action. It feels like [the authorities] are mocking us’.*<sup>74</sup>

A **human rights defender** working in an initiative documenting human rights violations across Syria tells us that these security risks have discouraged civic activity: *‘Sure, the authorities are approving conferences and other activities by organizations. But I don’t feel safe enough to conduct them or even freely move around, because in general, there is no safety. While the authorities aren’t directly restricting our work, we feel restricted by the security situation\_.\_.’* Elaborating on the situation, she added: *‘Treatment of locals differs from one military faction to another – some are kind and respectful, and others are brutal. Violations are still happening, with calm days in between. Neighborhoods that are predominantly Alawite are getting attacked, homes raided, kidnappings of women are rampant, and people are forcibly disappeared, only for some to be found dead later. We avoid going out after sunset’.*<sup>75</sup>

Interviewees in Suweida also reported that the security situation is impacting their freedom of movement and their ability to collaborate with CSOs from outside Suweida. For example, human rights journalist **Rwad Ballan** noted that *‘The operational capacities of organizations in Suweida are significantly impacted by the conflicts between the different factions and by the rampant sectarian harassment and attacks, as well as theft at the checkpoints. It’s constraining our movement, especially to Damascus and those who go back and forth are facing these issues. This affects our ability to collaborate with organizations outside of Suweida, after we finally got that chance’.*<sup>76</sup>

Risks for CSOs in northern Syria are increasing due to the security situation and the appointment of SNA figures in key positions in the transitional government and military. **Lonjin Abdo** of survivor-led **Lelun Association for Victims in Afrin**, shares: *‘We don’t feel comfortable or safe. Arrests and violations are still ongoing by the Syrian National Army, prisons are still full, and victims of forced disappearance are still missing. We’re still under siege and fear for our safety. Nothing has changed for us. Our team is afraid to speak publicly or travel under the organization’s name because we document violations by opposition factions, who are now part of the government’.* When asked about measures taken by the transitional government, she said: *‘Authorities keep claiming that they’re “trying” but we have yet to see any change. Violations and attacks are labelled as “isolated incidents” and we’re told to “take it easy” while the reality remains unchanged’.*<sup>77</sup>

Meanwhile, interviewees based in northeast Syria reported that civic space has gotten wider in SDF-held areas in spite of security tensions, describing an easing in administrative procedures and operational civic space since the fall of the regime and encouragement of CSO work.<sup>78</sup> Interviewees in these areas shared that SDF authorities have become more welcoming and cooperative with CSOs. According to **Jalal AlHamad** from **Justice for Life**, the Autonomous Administration is trying to paint a better picture for its governance, amid rising calls for merging with the transitional government.<sup>79</sup>

## 2.2. Restrictive legislation

The laws regulating civil society after 2011 varied according to the controlling party. Despite the 2012 constitution enshrining freedom of association and participation, areas under Assad-government control still maintained the Law No. 93 on Associations (1958) and its amendments introduced by Legislative Decree No. 224 in 1969, in addition to administrative decisions. The Assad regime infamously used draconian laws and states of emergency to suppress freedoms and silence dissent. This included close state-control over organizations, and the use of vague 'anti-terrorism' laws to target dissidents,<sup>80</sup> and 'foreign-agent' laws to restrict CSO operations and access to foreign funding.<sup>81</sup> In northeast Syria, the Autonomous Administration adopted relatively modernized laws for civic work.<sup>82</sup> In northern Syria, the Turkish Associations Law No. 5253 (2004) was applied, while in northwestern Syria, directives from the Salvation Government constituted the legal framework for CSOs.<sup>83</sup>

After the formation of the caretaker government upon the fall of the Assad regime, the Ministry of Social Affairs and Labor (MoSAL) met with representatives from several Syrian CSOs and announced its intention to issue a new law for associations for the transitional period.<sup>84</sup> Developments in this file are not known, as Law No. 93 and its amendments remain valid and applicable today, although it is unclear to what extent the transitional government plans on implementing them.

All CSOs and activists that spoke with CIHRS listed the existing legislation as a key obstacle for their work and called instead for the adoption of a 'notification system' for registering organizations,<sup>85</sup> as well as the overall modernization of laws that protect freedom of association per international standards, inclusive of mechanisms for the participation of CSOs in public affairs.

## - Registration requirements and dissolution procedures

All interviewees criticized the registration requirements, describing them as obstructive and detrimental to their ability to operate and plan efficiently. Law No. 93 (1958) requires registration, with noncompliance punishable up to three months imprisonment and fines.<sup>86</sup> On 29 December 2024, the STG announced new registration conditions requiring all organizations to register with the MoSAL in order to operate, and for the already registered organizations to re-register.<sup>87</sup> If approved, organizations would receive a six-month provisional license, after which their operations would be 'evaluated' before receiving a permanent license;<sup>88</sup> However, the criteria for this evaluation are unclear. The registration procedures apply a form of a 'needs-based' system that limits organizations to up to three governorates in their scope of work, based on the 'existence of a real need for these services in the targeted governorates'.<sup>89</sup> According to Law No. 93, MoSAL is required to respond within sixty days of the registration application, otherwise the organization would be considered registered by default.<sup>90</sup> Currently, in practice, application processing is taking months, with no clear indication of whether it is due to bureaucratic issues or political motives. With that being said, the STG has engaged with unregistered organizations,<sup>91</sup> and all interviewees noted that the STG is being lenient in licensing for organizations and activities.

The requirement of re-registration was especially criticized by interviewees. According to **Eman Nasser** from **the Jawa initiative**,<sup>92</sup> which had been registered in Syria since 2022, has had their re-registration application 'under process' since shortly after the regime change. She explained: *'We're an already established initiative. I'm not sure what the authorities' strategy is, but it's delaying our ability to operate. We can't afford to sit back and wait, civil society needs to act now to ensure that a dictatorship does not form.'*<sup>93</sup> By keeping applications pending or requiring organizations to repeatedly justify their existence, authorities are effectively placing CSOs in a state of permanent precarity, where their legality can be withdrawn at any moment.

Interviewees largely considered these requirements a tool for state control.<sup>94</sup> Legal researcher **Dr. Ayman Menem**, Director of the **Legal Office at the Syrian Center for Media and Freedom of Expression**, criticized the nature of temporary validity of licenses for registration while acknowledging the official narrative that

restrictions are imposed due to security concerns, stressing that *'authorities cannot keep using security concerns as a tool to keep us under a constant test'*.<sup>95</sup> Several other CSOs echoed similar concerns and even chose to halt their plans to register in Syria while they await clearer policies and assess the risks.<sup>96</sup>

**“ By keeping applications pending or requiring organizations to repeatedly justify their existence, authorities are effectively placing CSOs in a state of permanent precarity, where their legality can be withdrawn at any moment**

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Interviewees in Suweida were especially hesitant of registration requirements, in fear of it eventually being used for state control. Speaking to a **CSO** from Suweida, they shared: *'We're hesitant to register, we worry it would put us under state surveillance. The legal framework is unclear; sometimes they apply the Law of Associations of 1958, and other times they rely on oral decisions and there's no clear judiciary to appeal to. Nothing is clear, neither our rights nor our obligations'*.<sup>97</sup>

Women's rights organizations struggle with additional concerns regarding state control due to the Islamist background of those in power, and widespread violations against women. A **feminist CSO** elaborated, *'How can we register as feminist organizations with a government that does not recognize our rights? We'd have to change the organization's name just to be accepted. And if we do register, will they restrict what type of activities we carry out?'*

International organizations seeking to register in Syria fall under a different framework. First, they are required to obtain a license from the Ministry of Foreign Affairs, rather than MoSAL; if approved, the license would be valid for one year, renewable for a similar period. International organizations are also required to obtain approval prior to every project and activity, which must be implemented in coordination with local authorities, relevant ministries, and a national partner.<sup>98</sup>

Law No. 93 gives the authorities undue powers to dissolve or suspend associations. It allows MoSAL to render 'null and void' or 'dissolve' any association that is created for 'any reason or purpose that is illegal or in violation of laws or public morals or with the purpose of harming the Republic or the form of the government', or that conducts activities that would have the same impact.<sup>99</sup> MoSAL can even dissolve an organization simply if it does not find its services necessary, without an opportunity for the organization to appeal.<sup>100</sup> It can reject applications that it deems 'not to be of the most pressing need' with written justification.<sup>101</sup> MoSAL can also 'merge' organizations that do similar work or 'modify their purpose',<sup>102</sup> and may also establish a union to coordinate the activities of organizations with similar purposes and geographic scope, unify their funding and manage its distribution across activities.<sup>103</sup>

## - Approvals for activities

In line with Law No. 93, the STG is requiring approval for each activity, including information on the location of the activity, the agenda, and participants. While interviewees reported a significant level of leniency in this regard that has allowed them to hold meetings and activities, they also cited instances where requests were denied to hold workshops or conferences, particularly on transitional justice or political issues, under the pretext of bureaucracy. In February 2025, Syrian authorities banned a Syrian civil society conference on transitional justice, without providing any official justification. According to **Anwar Bunni**, human rights lawyer and head of the **Syrian Centre for Legal Studies and Research (SCLSR)**,<sup>104</sup> the Ministry of Justice had given its approval for the conference only to withdraw it later with no explanation given. Since then, however, he shared that they have held seven workshops and three events with ease.<sup>105</sup>

For **Rawad Ballan** from Suweida, the requirement for approval on planned activities is one of the foundational decisions that the government has taken to prepare for the restriction of CSO space. *'The requirement to obtain approval for every activity doesn't align with the new chapter in a Free Syria that we were hoping for. This isn't what free civic space looks like.'*<sup>106</sup>

Prior to any activity, local organizations must obtain approval from MoSAL and the technical authority relevant for their type of activity. In addition to MoSAL, humanitarian organizations are required to coordinate with the relevant technical

authority for their activities, and the Humanitarian Action Coordination (HAC) Office, which is under the mandate of the Ministry of Interior Affairs.<sup>107</sup>

Previously responsible for aid coordination in northwestern Syria under the Syrian Salvation Government, HAC was designated by the STG as the primary national humanitarian aid coordinator with local and international humanitarian actors, across the country, with the exception of the northeast. On 29 December 2024, HAC issued a circular requiring all local humanitarian organizations to obtain licensing from MoSAL prior to any humanitarian operation and then obtain formal approval from HAC for every project or activity or otherwise face legal accountability.<sup>108</sup>

CSOs that spoke with CIHRS repeatedly mentioned confusion surrounding the requirements for registration and activity approval processes, and the mandate of different authorities and ministries. **Jalal AlHamad** from **Justice for Life** shared: *'We're still in the registration process and honestly, it's been confusing. We didn't fully grasp the requirements until we started our application. Conditions are vague, like the requirement to respect public morals without any clarity on what that even means. I don't understand the division of mandates between MoSAL and the Humanitarian action coordination office (HAC) or the relationship between the two.'*<sup>109</sup>

**“ The registration procedures and prior approval requirements that the transitional government has imposed on CSOs constitute a clear violation of international human rights law, which guarantees the right to free association and allows CSOs to operate freely regardless of their legal registration status, and indicate an intent to maintain state control over civil society activity.**

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The registration and activity approval process put in place by the STG is a clear violation of international human rights law, under which CSOs are entitled to freedom of association and must be allowed to carry out their activities freely, regardless of their registration status.<sup>110</sup> Article 22 of the ICCPR, which guarantees freedom of association, requires procedures to be 'transparent, accessible, non-discriminatory, expeditious and inexpensive, allow for the possibility to appeal and avoid requiring re-registration'. The UN Special Rapporteur on the rights to freedom of peaceful assembly and of association emphasized that previously registered organizations must not be requested to re-register under 'newly adopted laws, so that they are protected against arbitrary rejection or time gaps in the conduct of their activities'.<sup>111</sup>

The STG's intention to continue with state control over CSOs is apparent in their current policies, including the requirement for registration, approvals for activities or in restrictions such as limiting the geographical scope of local organizations to up to three governorates, contingent on establishing 'the existence of a real need for these services in the targeted governorates'.<sup>112</sup> Fears of state control have formed key obstacles in CSO operations, amid opacity and ambiguity in the STG's policies, and especially in light of CSOs generally reporting being sidelined in the transition process.

# Marginalization of Syrian civil society

The Syrian transitional government (STG) promised civil society organizations inclusion and active engagement in the transitional process, including a national dialogue, free civic space, and meetings with governmental actors. Nine months into the new governing era, CSOs continue to be sidelined from meaningful participation, as they are often met with empty promises or selective engagement with organizations. Their exclusion is particularly short-sighted given the strategic value civil society brings. In the years of conflict, Syrian CSOs gained crucial advantages for the transition process, including robust networks of trust within victim communities and experience in peacebuilding efforts, documenting human rights and humanitarian law violations, and providing solutions and proposals to overcome challenges. All of this has afforded them a better knowledge of the conflict's impact on the people and the social dynamics between communities, one that surpasses the understanding of authorities and international actors. In addition to being the primary providers for humanitarian services during the conflict across Syria, several CSOs were monitoring and documenting human rights and humanitarian law violations, some of which was used in prosecutions abroad, and many built platforms for engaging with victims and advocating for their concerns.

**“ The path towards an inclusive political transition in Syria is undermined by the ambiguity of constitutional provisions related to rights and freedoms, the concentration of power - without any accountability mechanisms- in the hands of an appointed president together with the dominance of Hay’at Tahrir al-Sham over the government and its committees and bodies. Without addressing these issues, the door will be left open for the resurgence of authoritarianism.**

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Syrian CSOs have been laying the groundwork for a transitional process for over a decade, with the support of the international community. Initial plans for the establishment of transitional justice instruments in Syria started back in 2012 through joint work among various international institutions, with close involvement of Syrian opposition members and civil society groups. Several platforms for Syrian voices were created in efforts towards a peace process, constitutional reforms, prosecutions, and truth and reconciliation mechanisms. Among those were the Civil Society Support Room (CSSR) in 2016, where local perspectives and insights are shared and recommendations provided to the Office of the UN Special Envoy for Syria on issues relevant to the political mediation process in Syria<sup>113</sup> and the Women Advisory Board (WAB) established by the same UN Office, which is meant to provide women’s perspectives throughout the political process, and with whom local CSOs have worked closely.<sup>114</sup> Syrian civil society also has critical experience with the UN-facilitated Syrian Constitutional Committee, established in 2019 and consisting of representatives of the previous Syrian Assad-led government, and the commission representing the opposition (which failed to achieve any results before it was *de facto* dissolved following the fall of the Assad regime).<sup>115</sup> Today, transitional justice continues to be a top priority for Syrian civil society. Despite unclear strategies, concerns over the government, and uncertainty about their role in the transition, many CSOs are already mobilizing. They are convening workshops, building coalitions, and engaging directly with victims to advance a victim-centered approach.

# 1- The National Dialogue

The promised National Dialogue presented a much awaited and rare opportunity for Syrians to come together and discuss the future of their country. Nevertheless, its rushed organization and the non-substantive nature of its discussions and outcomes failed to offer meaningful and concrete recommendations or a clear roadmap for the transitional period.

Initially promised to take place in January 2025, the dialogue was eventually held on 25 February and was organized and headed by a committee that largely consisted of HTS-affiliated figures.<sup>116</sup> The dialogue, which was expected to include all people of Syria in the shaping of the country, turned into a one-day-long discussion with non-binding results. While an online questionnaire was shared among Syrians and filled out by 10,000 individuals inside and outside of Syria, invitations to attend the discussion in Damascus were delayed and only sent out the day before, ultimately excluding key political, intellectual and civil society figures despite the estimated attendance of six hundred people of various backgrounds from across Syria.<sup>117</sup>

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The National Dialogue concluded with a closing statement outlining eighteen outcomes, referred to as a ‘national covenant and charter’. It included broad commitments to human rights, accountability, judicial reforms and national unity, as well as forceful condemnation

of Israel's invasion of southern Syria, demanding its immediate and unconditional withdrawal. The statement also proposed the adoption of a 'temporary constitutional declaration' to address the constitutional vacuum, alongside a prompt formation of an interim legislative council, and a constitutional committee to draft a permanent constitution – one that would uphold a balance of powers, and enshrine justice, freedom, and equality. However, these key next steps remained vague, undefined, and lacking concrete conditions, timelines or mechanisms for implementation.<sup>118</sup> National consultations that include meaningful public and diverse participation are critical to successful transitional justice, as they give people the opportunity to take ownership of the future of the country and have their voices heard, thus allowing for the state to adopt an outcome that reflects the people's interests.<sup>119</sup>

All interviewees expressed disappointment and worry about the National Dialogue's method and impact. According to **Mostafa Saad**, a public affairs journalist from the coast, *'After 14 years of sacrifice, it is unacceptable that a national dialogue produces such a disastrous outcome, especially when the majority of attendees do not truly represent the people. Our goal was never to simply topple the regime; it was to build a state inclusive of all Syrians'*. He adds that what Syria needs is another national dialogue, one that is reflective of the people and given sufficient time for serious preparation and genuine convening, even if it takes years.<sup>120</sup>

## 2- The Constitutional Declaration

On 2 March, Interim President Ahmad al-Sharaa announced the formation of a committee to draft the Constitutional Declaration. On 13 March, less than two weeks later, al-Sharaa ratified the declaration, valid for five years. While the move was initially welcomed, the declaration raises major concerns for the trajectory of the transitional process and its implications for Syria's future. *'Let's put aside the National Dialogue and its legitimacy; the Constitutional Declaration is not representative of the people, and it didn't even try to be. If we focus on the provisions, it's a step back in every way, especially for accountability, which is arguably the most crucial aspect of a political transition'*, says **Dr. Ayman Menem**, a legal expert and researcher.<sup>121</sup>

The Constitutional Declaration established a presidential system that, while claiming to adopt a system of separation of powers, provides no effective mechanisms to ensure a balance between the executive, legislative and judicial branches. Instead, it concentrates

extensive and unchecked powers in the hands of the President – with no mention of procedures or methods for electing him – creating a regime that is highly vulnerable to authoritarian control. This is especially worrying in light of the transitional government's repeated failure to uphold its prior commitments.

According to the Constitutional Declaration, the President serves as Head of State and Commander-in-Chief, with the exclusive authority to form the cabinet of ministers, and appoint and dismiss ministers without the approval of the People's Assembly. He appoints one-third of the People's Assembly and forms a committee overseeing electoral sub-committees that are responsible for electing the other two-thirds and subsequently enabling the President to establish control over the legislative authority. The President also holds exclusive power to appoint all members of the Supreme Constitutional Court and propose amendments to the Constitutional Declaration, effectively centralizing constitutional reform in his hands.

**“ The Constitutional Declaration proclaims a commitment to human rights and freedoms, including freedom of expression, association, and political participation, alongside women's political, social, and economic rights and protections against discrimination based on race, religion, gender, or lineage. Yet these guarantees are undermined by the declaration itself.**

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In an even more concerning move, the Declaration failed to provide any impeachment procedures or accountability measures for the President. The People's Assembly lacks any genuine oversight powers over the executive authority and is limited to merely posing questions to ministries. It has no authority to establish inquiries, initiate votes of no-confidence or dismiss representatives.

A human rights defender from Latakia shares a concern echoed by several interviewees, *'The constitutional declaration is the foundation of a monarchy, not a state. I wouldn't have minded a monarchy if it were even remotely democratic, at least it would give me some free space, but there is no accountability whatsoever. I wouldn't have an issue with any person in power, if I could hold them accountable. Let's assume these are temporary sacrifices required by a complex transitional period and that they can't hold democratic elections at this stage. I understand all of that, but that doesn't excuse not being able to hold the appointees accountable'*.<sup>122</sup>

The Constitutional Declaration proclaims a commitment to human rights and freedoms, including freedom of expression, association, and political participation, alongside women's political, social, and economic rights and protections against discrimination based on race, religion, gender, or lineage. Yet these guarantees are undermined by the declaration itself. By designating Islamic law as the primary source of legislation, when the previous constitution designated it as a 'major source', the declaration effectively undermined all other rights it claims to protect. This change not only makes Sharia law binding on non-Muslims but also subjects all citizens to a single state-dictated interpretation of Sharia. Additionally, the declaration disregards ethnic and religious minorities by requiring the President to be Muslim and declaring Arabic as the sole official language.

Commenting on the inclusion of women and minority rights in the declaration, **Komela Şawîşka**,<sup>123</sup> a women-led Kurdish organization in northeast Syria says: *'These provisions become irrelevant once you realize that the Constitutional Declaration doesn't reflect the expectations of women and the diverse communities in Syria.'* Referring to the presidency being restricted to Muslim men, and thereby excluding women and other religions, she adds *'as if they're beneath them and not equal partners in this country'*.<sup>124</sup>

The vagueness of the enshrined rights and freedoms, as well as the concentration of power in a self-appointed president with no accountability mechanisms, undermines the legitimate and inclusive political transition promised by al-Sharaa in the beginning of his reign. The door is thus left open for authoritarianism rather than the democratic transition needed for a successful state building in Syria.

### 3- HTS domination over authority

On 29 January, following a meeting by military faction leaders in Syria, the Military Operations Command appointed Ahmad al-Sharaa as President of the Republic for the transitional period, after which al-Sharaa committed to issuing a constitutional declaration. He announced the suspension of the 2012 Constitution of the Syrian Arab Republic, the dissolution of the parliament, the disbandment of the Assad regime's military and security forces and the dissolution of the Baath party, and the integration of all armed factions under a unified command.<sup>125</sup> The appointment of the president in an illegitimate manner and by a group of military factions, effectively ensuring de facto control over state institutions by HTS and its affiliates, was the first out of many problematic decisions that were to follow; indicating a different trajectory than the inclusive, legitimate, and free political transition initially promised to Syrians.

Soon after the takeover of the STG, a series of problematic appointments followed, worsening social tensions and threatening the need for accountability for all perpetrators and justice for all victims. After pledging a government of qualified representatives, and one that reflects the diversity of Syria, al-Sharaa abolished the prime minister position and appointed twenty-three ministers in the STG, ten of whom are HTS or HTS-affiliated figures, while thirteen are considered independent. The cabinet included four ministers belonging to a minority group: Yaarub Bader, an Alawite was appointed Minister of Transport; Amjad Badr, a Druze who was appointed Minister of Agriculture and Agrarian Reform, and Mohammed Abdul Rahman Turko, a Kurd, was appointed Minister of Education. Hind Kabawat, a Christian and the only woman in the cabinet, was appointed Minister of Social Affairs and Labor.

At the same time, the key positions were given to HTS or HTS-affiliated individuals. The head of the executive authority, Ahmad al-Sharaa, was the leader of HTS. The minister of foreign affairs was a founding member of the Nusra Front,<sup>126</sup> and the minister of interior, Anas Khattab, led HTS' internal security apparatus.<sup>127</sup> The Ministry of Defense was given to Murhaf Abu Qasra, who had also been a member of HTS since 2017, and was the head of its military wing. The newly appointed deputy to the minister of defense is Mohammad Kheir Hasan Sha'ib,<sup>128</sup> head of Jeish Abou Bakr within HTS, commander of the central operations room in Idlib and later deputy head of HTS' military wing.<sup>129</sup> HTS and its loyalists would later dominate key positions in all sectors including state administrations, security and armed forces and the judiciary. Two of al-Sharaa's brothers hold key positions; his brother Maher is serving as Secretary-General to the Presidency,<sup>130</sup> while his brother Hazem heads the High Committee for Investment, overseeing economic policy and foreign deals.<sup>131</sup>

The executive director of **Syrians for Truth and Justice (STJ)**<sup>132</sup> **Bassam Al Ahmad** reflected on these appointments: ‘HTS and its allies, mostly Islamists, control most important positions in Syria right now, in one way or another. While they try to sugarcoat it by adding a minority representative here and a woman there, they don’t view these appointments as a move towards an inclusive people-representative governance. They view them as tokens that support their objectives for legitimacy and international support’.<sup>133</sup>  
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The interviewees noted frustration with the centralization of power, with many fearing an authoritarian trajectory. **Faek Hwajeh** from the **Equal Citizenship Center**<sup>134</sup> finds the government’s policies exclusionary, with only symbolic participation of the people. ‘All the government’s decisions so far demonstrate that they do not care about legitimate policies or inclusion. The National Dialogue was merely symbolic; the Constitutional Declaration was setting up for an authoritarian regime. I don’t have delusions that there will be democracy, but I am against the mentality of “He who liberates, decides”. We’re heading down a difficult exclusionary road.’<sup>135</sup>  
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The new government currently lacks legitimacy and falls short in terms of transparent selection processes and people-representative decision-making. **Bakri Zeneldeen** from **Madaniya**<sup>136</sup> shares serious concerns on the manner in which they are taking these problematic decisions, beyond the appointees themselves: ‘Syrians might accept that this period requires difficult decisions, but what we need are transparent discussions and clear information. The way things are being handled does not indicate any intention for partnership; it simply shows that there is a leader, and everyone else is expected to fall in line’.<sup>137</sup>  
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Feminist interviewees have been vocal in critiquing the performative inclusion of women. **Rola Al Rukabi**, a women rights defender, expressed disappointment in the lack of meaningful female participation: ‘We find the presence of only one woman in the government unsatisfactory, it feels tokenistic. So far none of the institutions have an effective role for women. Women are present but mostly in symbolic or advisory roles. It all feels insincere’.<sup>138</sup>

**“ HTS and its allies, mostly Islamists, control most important positions in Syria right now, in one way or another. While they try to sugarcoat it by adding a minority representative here and a woman there, they don't view these appointments as a move towards an inclusive people-representative governance. They view them as tokens that support their objectives for legitimacy and international support**

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Institutional reform is the cornerstone of the transitional justice process and requires a comprehensive restructuring across all key state institutions, particularly the judiciary, security and military. The transitional government's commitment in the Constitutional Declaration for reforms and independence of powers,<sup>139</sup> was quickly undermined by the dominance of HTS and its allies in key state positions, including non-legal experts, and militants responsible for grave human rights abuses against Syrians. At the judiciary level, the Syrian Salvation Government (SSG) headed by HTS in northwestern Syria, temporarily filled positions previously held by Assad regime ministers, from December 2024 until the formation of the transitional government in March. The SSG's minister of justice, Shadi Muhammad Al Weisi, was acting as interim minister of justice of Syria, when videos surfaced of him ordering the execution of women in Idlib in 2015 during his time as a judge under the mandate of the SSG.<sup>140</sup> With the formation of the STG in March, several prominent HTS-affiliated individuals who served in the SSG were appointed in the STG. Al Weisi was replaced by Mazhar Abdelrahman Al Weis - a prominent jurist in HTS and the head of the Supreme Judiciary Council in Idlib.<sup>141</sup> Appointed Attorney General of Syria, Hassan Youssef Al Turbah<sup>142</sup> was a military prosecutor, then judicial inspector, and finally attorney general for the past five years in the SSG in Idlib.<sup>143</sup>

Interviewees shared their frustration over unqualified appointees in the judiciary and its impact on the independence and effective work of the judicial sector\*\*. Dr. Rola Al Baghdadi\*\*, a legal expert in constitutional law, shared *'A main obstacle for us now is that*

*very powerful positions are being given to people without legal expertise. The worst part is that these people aren't open to consulting independent experts; they're not interested in real cooperation'.<sup>144</sup>*

**Rawad Ballan**, a human rights defender in Suweida, spoke to the loss of trust in the judiciary, and how damaging these appointments have been for civic or legal work: *'The judicial system has been undermined by appointing unqualified individuals with Shari'a training placed in critical judicial positions - from the public prosecutor's office to the court of cassation. There is no legislative environment or judicial body capable of resolving disputes, nor a clear legal framework governing interactions with them. There is no protection for civil society's existence or its assets'.<sup>145</sup>* Today, sheikhs or individuals with Shari'a training heading state institutions, even as 'hidden observers' in ministries, have been widely reported in the media<sup>146</sup> and by interviewees. The interviewees also noted that the dominance of HTS-affiliated sheikhs in state institutions has deeply impacted institutional mentality, and subsequently their trust in state institutions.<sup>147</sup> **Rawad Ballan** explains, *'These days, you walk into a public institution, and they don't direct you to a legal officer, they tell you to go speak to a sheikh. There's no clarity about how decisions are made. No criteria, no legal methodology, and sometimes, not even laws'.<sup>148</sup>*

The appointment of loyalists to prominent positions, including those accused of grave human rights abuses, has gone beyond the judicial sector, extending even to the security and defense sector. During the appointment as President on 29 March, Ahmad al-Sharaa announced his intention to integrate all military factions under the mandate of the Ministry of Defense. This integration process is still ongoing, as some factions have not been integrated and others are still gradually integrating. While this step necessitates pleasing various factions to avoid internal conflicts, some key military divisions were handed to particularly problematic figures accused of grave human rights abuses, further fueling social divisions. To many, this constitutes yet another sign that transitional justice will only focus on Assad crimes, as the rights of the victims of crimes committed by opposition groups have been traded away for the interests and political power of those responsible for grave human rights abuses during the fourteen-year conflict.

*'Instead of holding perpetrators accountable, they've absorbed them into positions of power. We, as former detainees of the SNA, now see those who abducted and tortured us holding leadership positions, not just lower-level posts. It's deeply painful and infuriating. How can our organization safely and successfully advocate for justice for victims, when those responsible are now running the country?'<sup>149</sup>* Shares **Lonjin Abdo**, co-founder of

**Lelun Association for Victims**,<sup>150</sup> a survivor-led organization representing victims of arbitrary detention and human rights violations in Afrin. **Lonjin** was herself a victim of kidnapping, detention, and abuse at the hands of Sayf Boulad Abu Bakr and his faction.<sup>151</sup>

Sayf Boulad, commander of the Hamza division of the Syrian National Army (SNA), was appointed by the STG to lead a military unit in the transitional armed forces. Sayf Boulad and the Hamza division are notorious for grave human rights abuses, especially of women, and are sanctioned by the United States for kidnapping, torture and sexual violence against Syrian Kurdish women.<sup>152</sup> In May 2025, the EU sanctioned Sayf Boulad for his division's participation in the massacre of Syrian Alawites in the Coastal Massacres of 6 March.<sup>153</sup> Among the other commanders accused of past abuses – including kidnapping, and extortion, and sexual violence now hold key posts. Mohammad Hussein Al Jassem (known as Abu Amsha), head of the Turkey-backed and SNA-affiliated Sultan Suleiman Shah Brigade (Al Amshat) has been sanctioned by the US,<sup>154</sup> and the EU,<sup>155</sup> for the same crimes as Sayf Boulad, and is one of the most controversial figures. Today, he is the head of the 62nd Division in Hama governorate of the transitional armed forces. Ahmad Ihsan Fayyad al-Hayes (known as Abu Hatem Shaqra), previously the commander of Turkey-backed and SNA-affiliated Ahrar Al Sharqiya and implicated in the trafficking of Yazidi women and children,<sup>156</sup> is now the commander of the 86th Division in Syria's eastern region, a military division operating in Deir ez-Zor, Raqqa, and Al-Hasakah Governorates.<sup>157</sup>

**RDI**, a human rights organization operating in northeast Syria which was deeply impacted by violations and military operations from military factions who are now in power, tells us: *'This is one of the greatest challenges we'll face in advancing transitional justice and accountability, especially as the authorities are pushing for an exclusionary governance that only represents a small fraction of Syrians. We will fight for a place on the table and that will require international support, because they're not listening to the local CSOs and they're not going to hold themselves accountable.'*<sup>158</sup>

“ **Instead of holding perpetrators accountable, they’ve absorbed them into positions of power. We, as former detainees of the SNA, now see those who abducted and tortured us holding leadership positions, not just lower-level posts. It’s deeply painful and infuriating. How can our organization safely and successfully advocate for justice for victims, when those responsible are now running the country?**

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According to interviewees, local CSOs are particularly affected by this exclusion and reported feeling especially sidelined compared to international organizations, complicating prospects for local coalitions to pressure the government. Several interviewees found that forming a coalition of national organizations would increase local CSOs’ impact and success in engaging with the government, while others argued that these coalitions would still lack legitimacy before the government if they did not include international voices. **Tawfek Osman** from **Tayar Daleel**<sup>159</sup> believes that, *‘Any national advocacy coalition would have three times the chance of success if it was supported internationally, because the unfortunate truth is, the government is not recognizing local voices and expertise’*.<sup>160</sup>

HTS and its loyalists’ domination across all state institutions and functions have inherently limited prospects for CSO engagement. While many interviewees report meetings with officials, they often described these meetings as symbolic with no concrete follow-up.<sup>161</sup> **Justice for Life**<sup>162</sup> acknowledged having opportunities to meet with the government, submit their research products, and voice their demands and recommendations but found the government was not open to meaningful engagement. *‘Publicly, they talk about engaging with organizations, welcoming them, and admitting they lack experts and need support. Sometimes there are official consultations, other times unofficial ones. The real issue, however, is that there is no real policy, no democracy, and no genuine participation.’*<sup>163</sup> In the same context, several interviewees reported that the government lacks shared vision, treats those it engages with as individuals, not as civil society organizations, and differently from one person to another, one institution to another.

After meeting with several governmental representatives to provide advice and recommendations, **Sana Khikhia**, executive director of the **Syrian Legal Development Programme (SLDP)**,<sup>164</sup> believes that selective engagement is not due to non-recognition, but rather the government's lack of resources and a lack of trust from both sides. *'Maybe they don't see engagement with CSOs as a priority, they don't know us, and we need to take initiative ourselves if we want to build bridges. I also believe that CSOs are learning how to engage with their government, something we never did, and we need to learn as well. To be blunt, if you want to engage, you will find a way,'*<sup>165</sup> she adds.

Since taking leadership, the STG has repeatedly adopted new decisions only to amend, remove or 'clarify' them once they receive backlash. Notably, on 20 February, the Directorate of International Coordination and Cooperation, which is part of the Ministry of Social Affairs and Labour (MoSAL), issued Circular no. 28, organizing the mechanisms of NGO communication with international organizations, UN agencies and international and Arab partners, and the Ministry of Foreign Affairs.<sup>166</sup> On 16 March, a decision issued by the Directorate of Social Affairs and Labor in Damascus was shared widely on social media. Relying on Circular no. 28, it prohibited communication with international organizations, UN agencies, partner organizations, Arab federations or the Ministry of Foreign Affairs and Expatriates, except through the Directorate of International Coordination and Cooperation in MOSAL. Although it was unclear who the circular is addressed to, as it was addressed to 'Association or Organization' with no further explanation, it was widely speculated that the decision was targeting civil society organizations.

After a wave of criticism, MoSAL published a statement clarifying that the circular was an internal decision to the directorates and institutions affiliated with the ministry. Interviewees were skeptical of this explanation; while some people viewed it as a good sign that shows the government is paying attention to public opinion, others viewed it as a test. **Hwajeh** echoes this stance, explaining, *'The government's treatment of us feels like a test to see if people will stay silent and what they can get away with. Everything feels experimental in most ministries, even the way decisions are written shows the lack of expertise. But that's not an excuse, because they choose not to consult experts, this is purposeful.'*<sup>167</sup> **Dr. Rola Al Baghdadi** from **Dawlaty** finds the government's reception performative. According to **Al Baghdadi**: *'They adopt decisions and then backtrack, giving the illusion of listening to the people. But they only do this on small low-level issues, they don't backtrack on important decisions. They are controlling all foundational issues and*

there's no engagement there'. <sup>168</sup> **Al Baghdadi** notes the appointment of unqualified people to high-level positions, including criminals and other controversial figures, despite people's protest.

**“ They adopt decisions and then backtrack, giving the illusion of listening to the people. But they only do this on small low-level issues, they don't backtrack on important decisions. They are controlling all foundational issues and there's no engagement there**

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## **4- Government-mandated committees and commissions**

The STG has taken the welcome initiative to establish committees aiming to achieve accountability and social healing. These committees, however, have raised serious concerns over their legitimacy, independence, and inclusiveness, and are at risk of exacerbating social tensions. The Constitutional Declaration provided for a transitional justice commission to be established, <sup>169</sup> and for it to adopt 'effective, consultative, victim-centered mechanisms to determine accountability mechanisms, the right to know the truth, and justice for victims and survivors, in addition to honoring martyrs'. But in its second provision it excluded war crimes, crimes against humanity, genocide, and all crimes committed by the former regime from the principle of non-retroactivity of laws. It also criminalized the glorification of the former Assad regime and its symbols, the denial or praising of its crimes, justifying or downplaying them, all of which are crimes punishable by law, while it did not allow for retroactivity for non-Assad crimes. By limiting retroactivity to Assad regime crimes, the STG is politicizing transitional justice. It is entrenching impunity for crimes committed by other armed actors, including its own, and alienating victims of non-Assad crimes. This exclusionary trajectory risks starker social polarization and hampers genuine efforts for justice, social reconciliation and peacebuilding.

On 17 May, the National Commission for Transitional Justice was established through Presidential Decree No. 20. It was tasked with fact-finding regarding the human rights violations of the Assad regime and prosecuting those responsible, compensating the victims, and consolidating the principles of 'non-repetition' and 'national reconciliation'.<sup>170</sup> The commission was given thirty days to form its working group and internal bylaws; as of August 2025, there is no public information on its progress. The establishment of such a commission is a crucial step in the transitional period, and a long-awaited one. Unfortunately, the decree itself is flawed. It limits its mandate to crimes committed by the Assad regime and its affiliates and thereby excludes all other military factions responsible for civilian deaths, disappearances, kidnappings and summary killings.

**Synergy Association for Victims,**<sup>171</sup> an organization that specializes in advocacy and capacity building for all victims, refuses to give up the fight to ensure a transitional process that centralizes all victims, of all military factions, *'Even when demands for "accountability for all" seem nearly impossible, we believe a transitional process that includes all victims is non-negotiable. We have a responsibility towards all victims, and we will keep advocating for legal accountability, independent truth-seeking mechanisms and genuine efforts towards social healing.'*<sup>172</sup>

Some CSOs are engaging with the government and the commission to pressure for the inclusion of non-Assad regime crimes. Explaining their position, a survivor-led initiative for victim support working across Syria, who chose to remain anonymous, says: *'Let's be honest, this government is a party to the war and many of those in high military ranks are responsible for horrifying crimes against civilians. They will evade any accountability, but we'll still demand it. At least, recognition for the victims, compensation and memorialization.'*<sup>173</sup>

The STG had stated that the file of the detained and the missing is a key priority in the transitional period. In May 2025, al-Sharaa established a National Commission for the Missing,<sup>174</sup> primarily tasked with searching for, and identifying the fate of, the missing and the disappeared, together with documenting their cases, creating a national database, and providing legal and humanitarian support to their families. The commission, headed by Mohammad Rida Jalkhi, was criticized by civil society for its lack of necessary qualifications. The commission was supposed to publish its internal regulations by 17 June; at the time of writing, three months after the deadline, it had not published any information. The framework, activities and work of the commission remain unclear, with no transparency regarding its process.

In navigating the refusal of the government to backtrack on the appointees of the commission and committees, despite recurring backlash over some members' lack of expertise, **SLDP's** executive director suggests offering services to support these committees and fill the gaps in expertise. She adds, *'At first, we thought we should push for change, for the right people to be responsible. But after meeting with the members, we believe that they are a good fit. SLDP sees them engaging properly with CSOs and victims' groups. We have direct access to them, and we offer our experience, our services, and our advice'*.<sup>175</sup>

**“ There are several instances where the government needs the expertise of the organizations, but I am not seeing effective consultations. For example, in the committee for the detainees, they need access to victims, and the easiest way to secure this is through local organizations that have been working with victims for years and have their trust. We offered our services, they said the right words, but we haven't seen anything yet**

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Following the Coastal Massacres of 6 March, the STG established a fact-finding committee to investigate the incidents.<sup>176</sup> However, many interviewees criticized the committee's approach, describing it as either selective in its consultations with CSOs or limited to empty promises without meaningful action.<sup>177</sup> The committee also struggled to reach victims, largely due to widespread mistrust in the government. Although several victim-support organizations offered their assistance, they said the committee ultimately failed to make use of these services.<sup>178</sup> **Hanady Zahlout**, a human rights activist from Latakia who lost three siblings in the massacres, explains that many victims refused to engage with the committee out of fear of militants connected to the massacre, and lack of trust in the committee. *'People were scared, even to mourn. Some felt that meeting them meant*

*recognizing the authority that killed their families, while many refused to engage because they had no hope of getting any response. Even my family was too afraid to meet the committee.*<sup>179</sup>

**The Syrian Legal Development Programme (SLDP)** finds that although the committee on the Coastal Massacres had been engaging with them and sought their advice and expertise, including best practices; to them, it remains too soon to determine the efficacy of their engagement. They tell us that they recently attended a meeting for CSOs held by a member of the committee. Its director, **Sana Khikhia**, said: *‘I appreciate their openness in sharing why they didn't engage properly with CSOs. They also provided explanations on why the report is not published yet. I believe that with the time and resources they had, they did their best. I still believe that they must publish the full report. We publicly requested this and also asked for a plan by the government to implement the recommendations.’*

**Another CSO** that has also engaged with the committees but chose to remain anonymous, shared a different perspective. According to this survivor-led organization, *‘There are several instances where the government needs the expertise of the organizations, but I am not seeing effective consultations. For example, in the committee for the detainees, they need access to victims, and the easiest way to secure this is through local organizations that have been working with victims for years and have their trust. We offered our services, they said the right words, but we haven't seen anything yet’.*

**Synergy Association for Victims**, based in northeast Syria, has found a high level of engagement with these committees. The National Commission for Missing Persons in particular was commended; open for consultations and criticism, the committee submitted a joint proposal for their statute signed by thirty-eight organizations, stating that *‘We will keep communication channels open with all stakeholders in service of truth and justice for all victims. Our position in the transition process is to ensure the active and leading participation of victims, survivors, and their families in all stages of transitional justice, with the aim of guaranteeing inclusivity, recognition of victims, and achieving justice’.*<sup>180</sup>

## 5- Political participation

The space for political participation in Syria remains undefined. Although the Syrian Constitutional Declaration guarantees the right to political participation and the formation of political parties, it stipulates that this would be regulated under a new law. As of August 2025, no concrete steps have been taken toward the adoption of such a law, a gap that is particularly concerning ahead of the upcoming elections for the People's Assembly scheduled for October 2025. In June, the President of the State Council was appointed, and a presidential decree announced the formation of the Supreme Committee for Elections. This body was tasked with overseeing the creation of electoral sub-committees, which will in turn elect two-thirds of the members of the People's Assembly. The Assembly is expected to comprise 210 seats, where 140 members will be selected on a district-level by local committees composed of experts and community figures, and the remaining 70 are to be appointed directly by the president.<sup>181</sup>

After decades without political life, Syrians are eager to actively participate in this process. Interviewees noted that political activities or those with a political undertone are facing more significant restrictions than civic activities. **Hwajeh**, founder of **Equal Citizenship Center**,<sup>182</sup> recalls a dialogue session of thirty-five political and civic parties which resulted in the Syrian Equal Citizenship Alliance (*Tamasok*).<sup>183</sup> After the end of the conference, the authorities contacted the organizers to inform them that they cannot form such a coalition because there is no law for political participation.

Another interviewee, **Tawfek Osman** from Tartous, shares that as **Tayar Daleel**, they could not acquire approval to hold a conference in Homs on political participation. '*We want to participate in this process, help the government adopt better models and conduct internal reforms. But with every decision they make, we're slowly understanding that there's no space for that.*'<sup>184</sup>

The right to form and join organizations and associations concerned with political and public affairs is an essential aspect of the right to freedom of association stipulated by Article 25 of the ICCPR.<sup>185</sup> Political activity does not only include politicians and political parties; in its broad sense, it includes 'lobbying for or against specific laws, engaging in public advocacy, pursuing interest-oriented litigation, or engaging in policy debate on virtually any issue or campaigning for good governance reforms'.<sup>186</sup> The civil work of organizations that carry out these activities to promote issues or principles rather than seeking political power, is still political by nature, and these activities constitute a critical feature of a free and democratic society.<sup>187</sup> Restricting the ability to participate in political

affairs naturally restricts civil society space and CSOs' ability to impact, promote or pressure for needed reforms, and on specific issues, which is especially critical in a transitional period.

## 6- The impact of exclusion on civic space

Under its current policies, Syria risks repeating the same mistakes other Arab countries made by sidelining civil society, rather than learning from those experiences and recognizing the critical role that Syrian CSOs can play in providing the basis for stability and responsible governance. In Iraq for example, the early involvement of civil society in human rights documentation committed under Saddam Hussein's regime was quickly undermined by the government monopolizing justice mechanisms and outside actors' focus on de-Baathification rather than an inclusive justice process, further deepening societal rifts. In Egypt, state institutions such as the security and judiciary sectors are used to entrench authoritarian rule. In Tunisia, while civil society was closely involved in shaping, developing and overseeing the Truth and Dignity Commission, the transitional process was still undermined by a lack of security sector reform, and a hostile political environment.<sup>188</sup>

**Rawad Ballan** from Suweida shares pessimism and concern over the trajectory of the transitional period: *'There is no real state project today, let alone room for CSOs. The Syrian government is run based on loyalty to their own and the decision-making is in the hands of sheikhs and emirs, which eliminates the role of institutions, human rights, and freedoms'*.<sup>189</sup>

“ Syria risks repeating the same mistakes other Arab countries made by sidelining civil society, rather than learning from those experiences and recognizing the critical role that Syrian CSOs can play in providing the basis for stability and responsible governance.

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Sharing frustration over the government’s lack of action, many organizations in Syria have decided to take charge of transitional justice efforts, focusing on dialogues between civil society organizations across Syria, with the aim of identifying common core values and a unified approach for CSO participation and monitoring of the transitional process.<sup>190</sup>

Others are promoting social cohesion between different communities by bringing together individuals with opposing political views to share their perspectives of the conflict, and their experiences and needs, in the hope of increasing social acceptance and forgiveness.

Women’s rights organizations play a critical role throughout transitional periods in advancing reconciliation, peacebuilding, justice, and accountability, as emphasized by multiple UN Security Council resolutions<sup>191</sup> and human rights bodies, such as the Committee on the Elimination of Racial Discrimination,<sup>192</sup> and the Committee on the Elimination of Discrimination against Women.<sup>193</sup> Despite the STG’s early pledges to guarantee women’s participation in the transitional period, CIHRS interviews show that women remain largely excluded from decision making. Interviewees highlighted the government’s unrepresentative nature and its record of impunity. According to **Rola Al Rukabi**: *‘This isn’t a government, this is a mix of military factions and religious leaders with no real “state” mindset. What kind of role could women possibly have in this regime?’* While some women-led organizations attempted cautious engagement, they reported confusion and inconsistency. **Al Rukabi** noted: *‘Everything is happening through personal networks. Some officials were receptive, but others dismissed feminism as a “conspiracy to destroy social morals.”’*<sup>194</sup>

Although the STG has not explicitly adopted discriminatory laws against women, to many, the government’s current policies and decisions indicate the role the government has recognized for women, particularly due to the current representation of women in state

institutions, which was largely seen by interviewees as symbolic. *'In official delegations and visits, men overwhelmingly dominate. This indicates a clear political will to exclude women, even if this exclusion is not formalized in any official policy,'*<sup>195</sup> said **Rima Flihan**, founder of the **Syrian Feminist Lobby**.<sup>196</sup> Concerns have also arisen over the appointment of women who do not reflect the broader movement's values. The most cited case is Aisha Al Dibs, named head of the Women's Affairs office in December. Known for her traditionalist views, she stated *'Women should not surpass their essential God-created nature. They should take care of themselves, their families, and their husbands. I will not allow space for those who disagree with my views.'*<sup>197</sup> For **Komela Şawîşka** these statements *'have taken women a hundred steps backward.'*

# Opportunities for promoting CSO participation

Whether Syria moves toward sustainable peace and rights-based governance, or falls back into authoritarianism and armed conflict, will largely depend on the willingness and ability of all the actors to engage in a true national dialogue and allow space for citizen-led initiatives to overcome challenges. The challenges ahead are immense. Fourteen years of atrocities, the ongoing occupation of Syrian territories by Israel and Turkey, and the fragmentation of military groups have left a fractured political and social landscape. The policies and practices of the transitional government thus far show little sign of a sincere commitment to an inclusive process.

Civil society must play a central role in shaping any future model. Participation cannot be symbolic: it must extend across every stage of the process, from planning and design to implementation, monitoring and evaluation mechanisms.<sup>198</sup> To enable this, a safe, free and effective space must be provided for civil society.<sup>199</sup> International human rights instruments and mechanisms acknowledge the right of all people to be fully involved in, and to effectively influence public decision-making processes that affect them. Article 25 of the ICCPR requires the State to adopt positive measures to ensure the full, effective and equal enjoyment of participatory rights, including through inclusive, meaningful and non-discriminatory processes and mechanisms.<sup>200</sup>

While restrictions on this right are permissible, they must be objective, reasonable, non-discriminatory and provided for by law.<sup>201</sup> Importantly, the 'essence' of the right should never be undermined.<sup>202</sup> Several international human rights mechanisms have emphasized that limitations should remain the exception rather than the rule.<sup>203</sup>

Civil society's participation in decision-making processes includes access to information, opportunities for consultations, dialogue, and partnerships.<sup>204</sup> More broadly, it requires a meaningful space to be consulted at legislative and policymaking levels; freedom to voice opinions, criticism, and advocate on concerns and needs,<sup>205</sup> engagement in public service provisions, and the ability to freely observe and monitor governance.<sup>206</sup> This space is

especially crucial in transitional processes, as it strengthens civil society to play a vital role in reforms, challenging authoritarian policies, identifying priorities and advocating for them, and providing services and expertise.

**“ Civil society must play a central role in shaping any future model. Participation cannot be symbolic: it must extend across every stage of the process, from planning and design to implementation, monitoring and evaluation mechanisms. To enable this, a safe, free and effective space must be provided for civil society**

**”**

Experiences from other countries show that the initial period of a post-conflict situation is critical for reform. If a reform agenda is not established promptly, the opportunity for establishing a rights-based governance system capable of institutionalizing peaceful means of political adjudication is likely to be lost.<sup>207</sup> This period requires the international community, UN bodies and mechanisms, international nongovernmental actors, including donors, and most importantly the Syrian transitional government, to approach Syrian civil society as critical partners. They must treat the ability of civil society to freely and openly engage as a fundamental pillar of any successful transitional process. To this end, there are various steps and measures that can be taken by Syrian civil society themselves.

## **1- For Syrian civil society organizations**

Decades of repressive authoritarian rule in Syria have left the population and society fractured. The STG, with its current exclusive composition, is unlikely to be able to address this crisis alone. Ethnic violence, whether supported by the STG or not, will only exacerbate the situation, putting Syria's sovereignty and territorial integrity at risk. This is further aggravated with the continuous occupation of parts of the country by foreign powers and the presence of foreign troops on the ground.

Syrian civil society has a historical role to play in promoting human rights and democratic practices at both the local and national levels. Amid ongoing restructuring, CSOs must embrace their essential function as watchdogs and independent critics of the state, while also serving as advisors and innovators of creative solutions whenever possible, advocating for communities' needs and contributing expertise. Syrian CSOs must find common ground and develop a common vision that ensures rights-based solutions grounded in the particular needs and challenges facing the Syrian people.

CSOs possess both the right and responsibility to proactively shape an inclusive, representative state, ensure a victim-centered approach, and press for accountability for all perpetrators of human rights violations. Given the exclusionary approach of transitional authorities thus far, civil society initiatives cannot afford to wait for the transitional government to articulate its policies or governance models. Where the authorities fail to act or act in a manner that revives authoritarian practices, civil society has and can implement independent initiatives and unite both national and international actors in order to pressure authorities to adopt essential human rights and democratic reforms. As **Eman Nasser**, co-founder of **Jawa Initiative**,<sup>208</sup> noted, *'A root cause hampering transitional justice in Syria is the lack of serious efforts to understand the social complexities of Syria. Civil society can lead these efforts. It has the trust of the communities, and a deep understanding of the country's complex social context'*.<sup>209</sup>

**“ A root cause hampering transitional justice in Syria is the lack of serious efforts to understand the social complexities of Syria. Civil society can lead these efforts. It has the trust of the communities and a deep understanding of the country's complex social context**

**”**

Successful practices of CSO initiatives in different countries when governments were inactive or abusive may serve as examples. For instance, in Argentina, CSOs created truth-seeking and memorialization initiatives and were central to developing and implementing 'truth trials' and a truth commission. As a result and under CSO pressure, amnesty laws in the country were revoked in 2003 and criminal trials against perpetrators were

launched.<sup>210</sup> Following the abolition of Apartheid in South Africa, CSOs played a key role in drafting the legislation for the Truth and Reconciliation Commission in 1995, preparing and designing a reparation and rehabilitation program, selecting commissioners, and implementing initiatives to promote reconciliation and social healing.

In the context of Syria and in accordance with CIHRS interviews with Syrian CSOs, as well as the best practices determined by the OHCHR for the promotion of meaningful CSO participation in the transition process,<sup>211</sup> recommendations include:

- ◆ Adopt a victim-centered approach, inclusive of all victims of the various perpetrators of human rights atrocities during the Syrian conflict. This includes promoting the perspectives and rights of all victims through independent fact-finding and truth-seeking initiatives, as well as rehabilitation programs for survivors of human rights violations committed by all parties, including those in power.
- ◆ Foster social reconciliation and community healing through peacebuilding efforts, including through the dissemination of human rights and peace cultures, and dialogues that bring together Syrians from various backgrounds and communities.
- ◆ Support the rehabilitation and reintegration of traumatized populations due to decades of displacement, arbitrary detention, and enforced disappearance.
- ◆ Establish stronger CSO coalitions for advocacy and policy engagement. While many coalitions emerged during the conflict, their impact was limited by the lack of a shared vision and limited financial resources. Future coalitions should bring together local and diaspora organizations, including grassroots initiatives, to leverage complementary strengths: the local reach of community-based actors with the international access of diaspora groups. Such collaborations can enhance advocacy impact at both national and international levels.

◆ Leverage the current need of the government for national and international support and legitimacy by ensuring strong, unified national campaigns on strategic topics, including the need to safeguard civic space and freedom of association. This should include media mobilization campaigns and unified national advocacy coalitions. As **one interviewee** noted, *‘Social media may be a powerful tool right now that we should pursue and use to our advantage. The STG seems to follow up on violations when they gather attention on these platforms, and that may be a tool we can use, at least for now’.*<sup>212</sup>

## 2- For international actors and the UN

The role of governments and multilateral institutions, including the United Nations, is crucial to protect and empower Syrian civil society within the transitional process and beyond. The Syrian transitional authorities, UN member states and UN bodies and mechanisms should ensure that any transitional process in Syria is inclusive and respects freedom of association and assembly, as recognized and required by UN Security Council (UNSC) resolution 2254 (2015) and the UN Geneva Communiqué of 30 June 2012, which was endorsed by UNSC Resolution 2118 (2013).

As Syrian civil society adapts to the new reality, so must the UN. All relevant UN mechanisms, especially those specifically dedicated to Syria, should adopt methods of work and specific priorities that are designed to strengthen and uphold the capacities and ability of civil society to freely engage within the transitional process without being subject to restrictions or reprisals, including in the area of transitional justice. In March 2025, an international dialogue held on the sidelines of the Human Rights Council brought together the UN Commission of Inquiry on Syria (COI), the International, Impartial and Independent Mechanism (IIIM) on Syria, the Independent Institution on Missing Persons (IIMD) and Syrian human rights activists. The IIIM pledged to explore the ability to provide capacity building for Syrian CSOs in advancing justice-related initiatives, while the COI committed to monitoring and safeguarding the space for CSOs to engage freely in the transitional process. These pledges must be turned into action. Only by ensuring that Syrian civil society can play a leading role within the transitional process will they be able to

effectively fulfill their mandates to pursue accountability for human rights violations, promote the rule of law, and assist victims. Failure to do so would be self-defeating and contradict relevant UNSC Resolutions.

**“ For Syria to successfully transition away from civil war and towards the rule of law, international actors must amplify and protect the voices of Syrian citizens and their ability to promote accountable, rights-based governance, not replace or displace them.**

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For Syria to successfully transition away from civil war and towards the rule of law, international actors must amplify and protect the voices of Syrian citizens and their ability to promote accountable, rights-based governance, not replace or displace them. They must listen, support and empower the voices of local CSOs, rather than dictate the agenda or exclude them from planning, implementing and decision-making. At times, international actors in post-conflict transitions have disregarded the important contribution that local CSOs can make and have subsequently suffered from a limited understanding of local context, needs, and concerns.<sup>213</sup>

The majority view among interviewees was that local CSOs should lead the transition process, with international actors acting as advocacy partners, capacity-builders, and observers but not as the primary decision makers. Some find that Syrian CSOs have limited capacities to lead the transition process and emphasize the role of international actors. According to **Ayham Azzam**, executive director of **Jozour**<sup>214</sup> and lawyer from Suweida, *‘Syria needs experts and oversight because we don’t have meaningful CSO spaces. We don’t have laws for political affairs and we don’t have free media, and the government doesn’t have working mechanisms. I don’t think we are ready to take on this role right now. We need experts to show us the way and to train us. It should be within a partnership framework, with international actors as advisors, supervisors and capacity builders’.*<sup>215</sup>

Similarly, **Sana Khikha** from the **Syrian Legal Development Programme (SLDP)**, a UK-based organization, says, *'We need international support, but the efforts should be carried out by Syrian civil society experts'*. She elaborated on the preferred role of international actors, *'Local organizations should lead this process, in cooperation with international actors who would fund and oversee the process. But the decision making should be in the hands of the Syrian people, and funding shouldn't be directed at international organizations and UN agencies if a local organization has the needed capacities'*.<sup>216</sup>

According to an interviewee from northeast Syria, it is the government who cannot be trusted. He says, *'For those who say we don't need international actors; you are enabling the transitional government to continue with its exclusionary policies. It means you forgot the tens of thousands of victims of non-Assad crimes, including victims of HTS and SNA. How do you expect to ensure the rights of these victims without international involvement?'*

Women-led organizations were especially open to international partnerships, all in agreement of the need for international support and assistance, stemming from a lack of trust in those in power, and deep fears of authoritarianism.

For now, the STG has shown willingness to cooperate with international actors to a certain extent and has communicated and cooperated with UN mechanisms. After the fall of the regime, the COI was granted access to Syria for the first time since it began its work in September 2011, and was able to engage with the new authorities, civil society and conduct on-site visits to detention facilities and mass graves.<sup>217</sup> The Prosecutor of the International Criminal Court was also invited by the new government to visit Syria.<sup>218</sup>

To ensure meaningful support to civil society, international actors must adopt a collaborative, context-sensitive approach. This may include:

- ◆ Provide flexible, long-term financial assistance for local CSOs, especially grassroots initiatives and women-led initiatives. Flexibility in funding also includes providing funding to non-registered organizations.
- ◆ Support capacity building and technical assistance for local CSOs, especially in project design and management, fundraising and legal tools.

- ◆ Mainstream women's participation in all programming by dedicating resources for women-led organizations and initiatives.
  - ◆ Support community-based initiatives that promote social cohesion and peacebuilding, as well as CSO advocacy and campaigning coalitions.
  - ◆ Ensure that civil society has access to international decision-making by establishing clear, participatory mechanisms for Syrian CSOs.
- Urge the STG to develop a clear bottom-up roadmap for CSO inclusion throughout the transitional process, ensuring the process is Syrian-led but with the support of international actors, primarily in financial and technical assistance, as well as oversight.
- ◆ Take serious and concrete measures to pressure Israel and Turkey to end their respective occupations of Syrian territories.
- Closely monitor restrictions and attacks against Syrian CSOs and take action to protect their ability to play an active role within the transitional process, including within government policymaking and efforts to secure accountability for past and ongoing violations of human rights and humanitarian law.

## 3- For the Syrian transitional government

The governance environment under the Syrian transitional government remains deeply unstable and ill-equipped to lead a free and inclusive transition, due to the government's lack of experience, attempts to monopolize decision-making positions, and exclusion of critics and non-loyalist actors, including civil society. Additionally, fragmentation of Syrian territories as well as social and sectarian divisions across Syria further complicate the situation. Without substantial changes in policies and approach, the Syria authorities risk prolonging instability and failing to secure a sustainable transition responsive to the needs of the Syrian people, including ensuring justice for all victims. The Syrian transitional government must genuinely engage with both local and international actors, while prioritizing inclusive, participatory governance.

To this end, the Syrian transitional government must:

## Governance reforms:

◆ Take immediate measures to hold a genuine national dialogue, which is representative of all Syrian regions, ethnicities, sects and communities, and ensures meaningful participation of CSOs, experts and political parties.

◆ Ratify the Rome Statute of the International Criminal Court, to ensure that victims have access to avenues for justice.

◆ Adopt a clear and transparent roadmap for the political process and reform agenda with unconditional commitments to the UNSC Resolution 2254, democracy, human rights and freedoms. This process must allow for the meaningful participation of Syrians from diverse ethnic, political and religious groups across the country and in the diaspora.<sup>219</sup>

◆ Develop clear, participatory, transitional justice policies through close and genuine engagement with civil society and affected communities and victim groups, from the earliest stages of planning, and ensure their active collaboration in the implementation of resulting mechanisms.

◆ Fully cooperate with international mechanisms, including the IIIM and IICMP in Syria and the COI, and facilitate unhindered access for UN agencies to operate across Syria.

◆ Ensure a free and independent civic space by removing bureaucratic obstacles, such as restrictive registration and activity approval processes, and oversight of communications and operations.

Leverage the expertise of civil society by establishing formal consultative bodies or working groups to governmental bodies.<sup>220</sup> These groups must be representative of the diverse communities in Syria, and must consist of relevant CSOs, to be consulted on issues within their field of expertise, particularly in the development of legislation and policies, and bodies relevant to transitional justice. Committees of survivor-led organizations or organizations working with victims could be invited to provide the perspectives of victims, where relevant. Similarly, committees of women-led organizations, or committees representing marginalized groups could be established to promote their voices in these decisions.

Establish a participatory platform for civil society commentary and suggestions, allowing CSOs to propose amendments and voice concerns on draft legislation and government policies. This could take the form of an online petitions system and would allow any civil society organization to voice their concerns, not only those who are members of advisory committees to governmental bodies. If the STG continues to be reluctant, this platform could be hosted or facilitated by non-governmental actors.<sup>221</sup>

Ensure adequate representation of underrepresented groups, including women, minorities and victims of human rights abuses by all perpetrators, in all governmental bodies and committees.

## Legislative reforms for laws on associations:

The participation of civil society in the political and public affairs of the country must be clearly recognized in legislation and combined with the right to equality and non-discrimination. Restrictive laws governing freedom of expression and of association must be immediately repealed or amended or their implementation halted and a temporary draft law must be adopted for the transitional period, before a full permanent law is adopted by the post-transitional government. The law must be representative of the people; based on open and inclusive consultations with independent experts, local communities, and civil society. The key priorities for legislative amendments in Syria, in accordance with best practices,<sup>222</sup> within the relevant needs for the Syria specific context, include:

## On the registration level:

The adoption of a system that legalizes organizations by simplifying their establishment and procedures through a 'notification system', whereby an organization is considered a legal entity as soon as it has notified its existence

- ◆ to the relevant administration by providing basic information, including the names and addresses of the founders and the name, address, statutes and purpose of the organization. This facilitates operations, which is crucial during the current period of heightened humanitarian and security needs.

CSOs should be presumed to be operating legally until proven otherwise, in particular during the entire registration process. The legality of an organization's purposes and its conformity with the law should only be

- ◆ reviewed after an official complaint has been lodged against it and should be reviewed by an independent civil judicial body, through proceedings that are transparent, conducted in accordance with the principles of due process, and open to public and international scrutiny. The decision to close or fine an organization must be fully explained, clearly and transparently, and must be appealable before an independent judicial body.

All CSOs previously registered in the Assad-era should be considered as operating legally and provided with an accelerated process in updating their

- ◆ registration. All organizations whose applications have been denied by the registering body should have an opportunity to challenge this decision before an independent judicial body.

## On the governmental oversight level:

- ◆ State authorities, and particularly the security sector, should be legally barred from interfering with the management structure and activities of NGOs.

◆ The authorities should refrain from imposing unnecessary or undue administrative requirements on CSOs to allow them to register and operate, and to receive foreign funding or to communicate or collaborate with foreign or international organizations.

◆ Organizations should be protected even if they are not registered. In case of regulatory violations, the authorities should not impose fines or closures until clear and transparent investigations have been conducted and all possibilities of appeal have been exhausted.

◆ Any restriction on the grounds of 'public order/morals/ethics' and any criteria meant to limit the right to freely associate must be clearly defined. Any human rights-related activity must be clearly excluded from these restrictions.

# Conclusion

Nine months into the post-Assad era, civil society in Syria is increasingly facing constrained, politicized, and precarious space for civic work. The state's policies and decision-making continue to be centralized in the hands of Hay'at Tahrir al Sham (HTS) and its affiliated factions and loyalists, including religious leaders, while presenting a façade of institutional reform and commitment to inclusive transitional justice. Syrian civil society continues to struggle to adapt to a new environment, amid uncertainty over their potential role in the transitional process. Many CSOs have become increasingly fearful and despairing, particularly women-led organizations. They are taking the initiative to advance transitional justice by implementing peacebuilding and social cohesion projects without waiting for government action. Other CSOs, despite their concerns, continue to await more clarity in the government's approach, or attempt to engage with the government to call for their demands. CSO operations continue to be hindered by increasing security risks, bureaucratic barriers, and restrictive legislation. Despite the lack of meaningful engagement by the transitional government, CSOs may still find opportunities to participate in the process through non-governmental approaches, or through partnerships with UN and international actors. The latter must increase their support to CSOs, especially local grassroots organizations, and promote their voices and center their priorities in policymaking toward Syria while leveraging the government's prioritization of international legitimacy. If CSOs continue to be sidelined, Syria's transitional process may fail to deliver inclusive and sustainable outcomes.

# Annex

Letter sent to the Syrian Ministry of Foreign Affairs and Expatriates for comments.

The Cairo Institute for Human Rights Studies  
21 Rue El-Hijaz, 1002 Tunis Belvédère, Tunisia  
[abdeltawab@cihrs.org](mailto:abdeltawab@cihrs.org)

His Excellency, Assad Al-Shaibani  
Minister of Foreign Affairs and Expatriates  
Ministry of Foreign Affairs and Expatriates of the Syrian Arab Republic  
Prime Minister's Complex, 17 April Street  
Damascus, Syria

22 September 2025

**RE: Invitation to respond to research findings on the role of civil society in Syria's transition**

Your excellency,

Please accept my regards on behalf of the Cairo Institute for Human Rights Studies, an independent regional human rights organization established in 1994, aiming to spread the culture of human rights in Arab societies. CIHRS enjoys special consultative status at the United Nations Economic and Social Council.

We are preparing a report on the challenges and opportunities facing civil society during Syria's transitional process, and we would like to share our preliminary findings with you. We highly value your perspective and invite any comments, input, or an official response to the report's conclusions, to ensure a balanced and comprehensive report.

Our report emphasizes that active and meaningful participation of civil society is critical for stability, reconciliation, and sustainable recovery. It identifies key challenges facing civil society organizations in Syria's transition, while also outlining opportunities to strengthen their engagement. Although the transitional government has taken steps to expand civic space, interviewees largely viewed these opportunities as fragile, due to continued concerns over exclusionary governance and outdated legislation.

Based on 28 interviews with civil society organizations and activists from inside Syria and the diaspora, the report identified the following:

- **Governance:** interviewees expressed concern that decision-making is highly centralized in the hands of Hay'at Tahrir al Sham affiliates, especially with those involved in grave human rights violations, and shared frustration over the appointment of unqualified individuals across state institutions, particularly the judiciary sector and government-mandated commissions.
- **The legal framework** was identified as a key obstacle for civic space, particularly, the current registration requirements (the temporary nature of licenses and long bureaucratic procedures), approval requirement prior to any activity and the overly restrictive provisions of Law No. 93. All interviewees considered the adoption of a legislation aligned with international law standards as a top priority.

- **Security concerns:** Ongoing instability, sectarian tensions, checkpoint harassment, and kidnappings, especially targeting minorities has restricted free and safe civic space. Interviewees also reported limited government follow-up, despite them sharing documentations on human rights violations with governmental bodies, reinforcing a sense of impunity and lack of serious accountability efforts.
- **The government's engagement with civil society** was largely perceived as selective, symbolic, and limited to organizations closely aligned with government officials.

The report recommends that the Syrian government strengthens the participation of civil society, by:

- Holding a new national dialogue, one that is inclusive of all Syrian communities and that produces tangible and concrete next steps.
- Ratifying the Rome Statute, repeal outdated association laws and adopting modern legislation aligned with international human rights standards.
- Simplifying registration through a notification system which presumes organizations legal until proven otherwise, while ensuring that state authorities do not interfere in their management structures or activities.
- Developing transitional justice policies with civil society and victims, while cooperating with international mechanisms.
- Forming advisory committees and participatory platform for civil society commentary and suggestions on draft legislation and policies, from the earliest stages of planning, and ensuring their active collaboration in the implementation of resulting mechanisms.

**In order to include the Syrian government's perspective, we seek your response to the following questions:**

- What measures is the government taking to promote the participation of civil society, victim groups and independent experts in the transitional period?
- How does the government ensure meaningful collaboration and coordination with civil society?
- what progress has been made to update laws on associations and how will it align with international human rights standards?
- How does the government address concerns about the monopolization of decision-making power in the hands of Hay'at Tahrir al Sham and its affiliates.
- According to what criteria is the ministry of social affairs evaluating registration applications and renewals?

We plan to publish the report on 27 October 2025 and would be grateful to receive your response before 9 October 2025. We remain at your disposal for any additional clarifications or commentary.

Thank you in advance for your time and cooperation.

Sincerely,  
Ziad ABDELTAWAB  
Executive Director



# Footnotes

1. For more information, see Annex at the end of the report. ↗
2. United Nations, *Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association, General Principles and guidelines on ensuring the right of civil society organizations to have access to resources*, A/HRC/53/38/Add.4, 23 June 2023: <https://docs.un.org/en/A/HRC/53/38/Add.4> ↗
3. United Nations, *Guidance Note*: Protection and Promotion of Civic Space, September 2020: [https://www.ohchr.org/sites/default/files/Documents/Issues/CivicSpace/UN\\_Guidance\\_Note](https://www.ohchr.org/sites/default/files/Documents/Issues/CivicSpace/UN_Guidance_Note) ↗
4. European Union Agency for Asylum (EUAA), EUAA, '3.3. *Syrian Democratic Forces and Asayis ((Kurdish Internal Security Forces) in Country Guidance: Syria*, April 2024. For more information, see: <https://euaa.europa.eu/country-guidance-syria/33-syrian-democratic-forces-and-asayish> ↗
5. EUAA, *Country of origin information: Syria - Security Situation*, October 2023. See: [https://coi.euaa.europa.eu/administration/easo/PLib/2023\\_10\\_EUAA\\_COI\\_Report\\_Syria\\_Ser](https://coi.euaa.europa.eu/administration/easo/PLib/2023_10_EUAA_COI_Report_Syria_Ser) ↗
6. Formerly a transnational Salafi-Jihadi militant group mainly operating as a de-facto quasi-administrative authority in areas of northwestern Syria, HTS has increasingly sought a more moderate public position since the ouster it led of Assad's regime, rebranding itself as a more Syria-centric, Islamist group. It was preceded Jabhat al-Nusra, a group whose objective was the overthrow of the Assad regime and the creation of an Islamic state. Until 2025, it was widely listed as a terrorist group, including by the United States, the United Nations Security Council (Resolution 2179 of 2014), and the European Union. ↗
7. A Kurdish-led and American-backed coalition that serves as the main armed force of the Autonomous Administration of North and East of Syria (AANES). They control approximately 30 percent of Syrian territory. The SDF continues to be engaged in extrajudicial killings, arbitrary arrests, enforced disappearances, and torture in detention centers. ↗
8. A loosely formed umbrella organization of militias backed by Turkey and several Gulf states, they control parts of northern Syria near the Turkish border. They have a key role in the affairs of areas under their control, including managing the security situation and the work of civil society and local governance institutions. ↗
9. Ian Black, "Syrian human rights record unchanged under Assad, report, *the Guardian*, 16 July 2010: <https://www.theguardian.com/world/2010/jul/16/syrian-human-rights-unchanged-assad> ↗
10. Global Protection Cluster, *Protection Sector Syria Response, Protection landscape in Syria: a snapshot*, March 2025: <https://shorturl.at/hCZcj> ↗

11. Organizations were unable to accurately determine the number of civilians due to many fighters wearing civilian clothing. See: Syrian Network for Human Rights (SNHR), *Daily update extrajudicial killings in the wake of events in the coastal region from March 6 to March 17, 17 March 2025*: <https://shorturl.at/hPhBS> ↗
12. See: OHCHR, *Syria: Distressing scale of violence in coastal areas*, 11 March 2025: <https://shorturl.at/PySYi>; Maggie Michael, "Syrian forces massacred 1,500 Alawites. The chain of command led to Damascus", *Reuters*, 30 June 2025: <https://www.reuters.com/investigations/syrian-forces-massacred-1500-alawites-chain-command-led-damascus-2025-06-30/> ↗
13. "More than 10 dead in clashes near Syrian capital Damascus", *Al Jazeera*, 29 April 2025: <https://www.aljazeera.com/news/2025/4/29/sectarian-clashes-kill-13-near-syrian-capital-damascus> ↗
14. "Preliminary agreement has been reached for a ceasefire in Jaramana and Ashrafiyah Sahnaya", *Syrian Arab News Agency (SANA)*, 30 April 2025: <https://sana.sy/en/?p=354043> ↗
15. OHCHR, *Syria: UN experts alarmed by attacks on Druze communities, including sexual violence against women and girls*, 21 August 2025. ↗
16. OHCHR, Report of the Independent International Commission of Inquiry on the Syrian Arab Republic (COI), "No End in Sight: \_\_" *Torture and ill-treatment in the Syrian Arab Republic 2020-2023*, UN Doc. A/HRC/53/CRP.5, 10 July 2023: <https://shorturl.at/CC8SD> ↗
17. United Nations Security Council (UNSC), Resolution 2118, *on use of chemical weapons in the Syrian Arab Republic*, UN Doc. S/RES/2118 (2013): <https://shorturl.at/GkFAc> ↗
18. UN Human Rights Council Resolution, "46/22: Situation of human rights in the Syrian Arab Republic", UN Doc. A/HRC/RES/46/22, 30 March 2021: <https://docs.un.org/en/A/HRC/res/46/22> ↗
19. Report of the Independent International Commission of Inquiry on the Syrian Arab Republic, UN Doc. A/HRC/36/55, 8 August 2017: <https://docs.un.org/en/A/HRC/36/55> ↗
20. Organisation for the Prohibition of Chemical Weapons (OPCW), *Investigation and Identification Team (IIT)*, accessed 16 September 2025: <https://shorturl.at/1WpAR> ↗
21. OHCHR, *Report of the Independent International Commission of Inquiry on the Syrian Arab Republic*, UN doc. A/HRC/58/66, 19 March 2025: <https://docs.un.org/A/HRC/58/66> ↗
22. Humanitarian Action, *Syrian Arab Republic: Humanitarian Needs*, 25 March 2025. Accessed: 16 September 2025: <https://shorturl.at/97reF> ↗
23. UN Refugee Agency (UNHCR), *Stories: In Syria, UNHCR's Grandi urges more support for refugees returning home*, 20 June 2025: <https://shorturl.at/NmkNh> ↗
24. UNHRC, *Syria Governorates IDPs and IDP Returnees Overview*, 3 September 2025: <https://data.unhcr.org/en/documents/details/118466> ↗
25. UNSC Resolution 2254, UN Doc. S/RES/2254 (2015): [https://docs.un.org/S/RES/2254\(2015\)](https://docs.un.org/S/RES/2254(2015)) ↗
26. Aidan Lewis, Sarah El Safty. "Arab League readmits Syria as relations with Assad normalise", *Reuters*, 8 May 2023: <https://shorturl.at/DGZZU> ↗

27. Refik Hodžić, “Normalising al-Assad’s regime is against Europe’s interests”, *Euronews*, 10 September 2024: <https://shorturl.at/Sj5My> ↗
28. Nicholas Vinocur, Barbara Moens. “The EU wants to deport migrants. It needs the help of Syria’s Assad”, *Politico*, 16 October 2024: <https://shorturl.at/DRaVp> ↗
29. European Union, *Syria - Roadmap for the EU engagement with civil society*, 16 June 2023: [https://capacity4dev.europa.eu/library/syria-roadmap-eu-engagement-civil-society-en\\_en](https://capacity4dev.europa.eu/library/syria-roadmap-eu-engagement-civil-society-en_en) ↗
30. The Arab Center for Contemporary Syria Studies (Previously Harmoon Center), *Rebuilding Syrian Civil Society After Change*, 5 July 2021: <https://shorturl.at/E12BV> ↗
31. Ziad Awad, “Non-Governmental organizations in Aleppo: Under Regime Control and at its Service”, *Middle East Directions (MEUI)*, 14 June 2022: <https://shorturl.at/BEfHd> ↗
32. Dawlaty, *Syrian Civil Society Booklet.... Status and Best Practices*, 2 February 2022: <https://shorturl.at/AvMLf> ↗
33. Friedrich Ebert Stiftung (FES), *Peace and security: Strategies for European Engagement with Syrian Diaspora Civil Society Organisations*, September 2021: <https://library.fes.de/pdf-files/bueros/beirut/18306.pdf> ↗
34. Amnesty International, *Syria: UN General Assembly must back cross-border humanitarian aid mechanism into north-west*, 19 July 2023: <https://shorturl.at/A0BnH> ↗
35. Federica D’Alessandra, “International Crimes Accountability Matters in Post-Assad Syria”, *Carnegie Endowment for International Peace*, 28 January 2025. ↗
36. Friedrich Ebert Stiftung, *Peace and Security*, 2021. ↗
37. See subsection ‘Fall of the Regime’ under section ‘General Context’. ↗
38. Interview with an initiative (which preferred not to be named) led by survivors of arbitrary arrest in Syria on 2 June 2025; information updated via follow-up communication on 4 September 2025. This initiative aims to provide support and protection for other victims through rehabilitation, advocacy and capacity building. ↗
39. Several interviews, including interviews with Syrian Feminist Lobby, Women Now for Development Lebanon, and Komela Şawîşka. ↗
40. Jozour is a human rights organization founded in Suweida in 2014. Jozour aims to promote an active and organized society through development and educational projects. ↗
41. Interview with Ayham Azzam, lawyer and founder of Jozour, on 15 June 2025; Information updated via follow-up communication on 25 August 2025. ↗
42. The Syrian Network for Human Rights (SNHR) is an independent human rights organization that monitors and documents human rights violations in Syria, with extensive databases and catalogue incidents of violations since 2011. SNHR also supports advocacy efforts, accountability and transitional justice. ↗
43. Interview on 6 October 2025 with Mohammad Essam, Program Coordinator at the Syrian Network for Human Rights (SNHR). ↗
44. Several interviewees including Synergy Association for Victims, and RDI. ↗

45. RDI is a human rights organization founded in 2019, and operating mainly in Northeast Syria. RDI focuses on documenting human rights violations and atrocities of war, preparing research, advocacy for victims, promoting justice and peaceful coexistence in Syria. [↗](#)
46. Interview with RDI on 17 June 2025; Information updated via follow-up communication on 3 September 2025. [↗](#)
47. Justice for Life (JFL) is a non-governmental human rights organization established in 2015 and mainly operates in Northeast Syria. It focuses on advocating for survivors' cases and the promotion of political and civil participation by local civil society. [↗](#)
48. Interview with researcher Jalal AlHamad, Justice for Life (JFL) on 12 June 2025; Information updated via follow-up communication on 26 August 2025. [↗](#)
49. Synergy Association for Victims is a victim-led non-governmental human rights organization based in Northeast Syria. Adopting a community-based approach, it aims to organize victims to enhance their empowerment and public affairs engagement. Synergy is part of the Truth and Justice Charter, a member of the Human Rights Reference Group (HRRG) of the UNHCR and a member of the International Network of Victims and Survivors of Serious Human Rights Abuses (INOVAS). [↗](#)
50. Interview with a representative of Synergy Association for Victims on 18 June 2025; Information updated via follow-up communication on 1 September 2025. [↗](#)
51. Peace Paths works on peacebuilding and social cohesion in Suweida, with a focus on women's and youth participation in social and political affairs. [↗](#)
52. Interview with Shorouk Abou Zeidan on 23 June 2025; Information updated via follow-up communication, 2 September 2025. Abou Zeidan is a lawyer, activist, and Director of Peace Paths in Suweida. [↗](#)
53. Interview with Hanady Zahlout on 30 June 2025; Information updated via follow-up communication on 26 August 2025. Zahlout is a prominent Syrian activist from Latakia, now based in France. [↗](#)
54. Interview with Ali Youssef on 22 July 2027; information updated via follow-up communication on 4 September 2025. [↗](#)
55. Lelun is a survivor-led human rights group, focusing on justice and restoration of rights for victims of human rights abuses in Afrin. [↗](#)
56. Interview with Lonjin Abdo, executive Director at Lelun Association for Victims, on 1 July 2025; Information updated via follow-up communication on 4 September 2025. [↗](#)
57. Previously known as Harmoon Center for Contemporary Studies, it is an independent nonprofit research institution, focusing on the production of political, societal and intellectual studies and research related particularly to the Syrian issue, and the possible outcomes of ongoing conflict in Syria. It also works on Arab issues and related conflicts, as well as Arab regional and international relations. [↗](#)
58. Interview with Samir Alabdullah on 20 May 2025; Information updated via follow-up communication on 1 September. Alabdullah is a researcher and Director of Policy Analysis Unit at The Arab Centre for Contemporary Studies. [↗](#)

59. STJ works on documenting human rights violations against Syrians and disseminating a human rights culture with the aim of expanding access to justice, and accountability systems. [↗](#)
60. Interview with Bassam Al Ahmad, co-founder and Executive Director at Syrians for Truth and Justice, on 26 May 2025; Information updated via follow-up communication on 27 August 2025. [↗](#)
61. Interview with lawyer Ayham Azzam, Jozour Organization, June 15, 2025 – previously cited reference. [↗](#)
62. SLDP is a survivor-led initiative based in the United Kingdom that supports Syrian NGOs and communities through international law, promoting human rights justice, and addressing corporate-related human rights abuses in the conflict. They have Special Consultative Status with the UN Economic and Social Council (ECOSOC) and is currently providing legal advice to several governmental committees involved in transitional justice in Syria. [↗](#)
63. Interview with Sana Khikha, executive director of Syrian Legal Development Programme, 22 May 2025; Information updated via follow-up communication, 27 August 2025. [↗](#)
64. Interview on 14 May 2025, with a women-led non-governmental organization dedicated to defending women's rights, empowering them, and ensuring their full participation in all aspects of political, economic, social, and cultural life. [↗](#)
65. Komela Şawîşka is a women-led organization based in Northeast Syria and established in 2012, focusing on advocacy and capacity building of women on all levels, including economic social and legal. [↗](#)
66. Interview with a representative of Komela Şawîşka on 1 July 2025, Information updated via follow-up communication on 27 August 2025. [↗](#)
67. Dawlaty is a nonprofit foundation working on the ground and remotely, documenting, advocating and building CSO capacity, towards achieving a democratic and peaceful transition in a state that upholds human rights, equality, tolerance and diversity. [↗](#)
68. Interview with Dr. Rola Al Baghdadi on 20 May 2025; Information updated via follow-up communication on 26 August 2025. Al Baghdadi is the executive Director of Dawlaty and a lawyer specialized in constitutional law, having worked extensively on electoral law, political detention and gender issues.. [↗](#)
69. Interview with Eman Nasser, co-founder of Jawa Initiative on 14 June 2025; Information updated via follow-up communication on 6 September 2025. Jawa is based in Hama and works on social cohesion and developing the education sector across Syria. [↗](#)
70. Interview on 18 June 2025 with a women-led organization (which preferred not to be named), based in Northern Syria, working on empowering women and youth for social, political and decision-making participation. Information updated via follow-up communication on 4 September 2025. [↗](#)
71. Interview with a human rights defender (based in Latakia), working on peacebuilding and community cohesion projects across Syria, on June 12, 2025; the information was updated during a follow-up communication on September 1, 2025. [↗](#)
72. OHCHR, *Syria: UN experts alarmed by targeted abductions and disappearances of Alawite women and girls*, 23 July 2025: <https://shorturl.at/Q3HzJ> [↗](#)

73. Briefing: Fact-finding committee presents findings on Syrian coastal violence, *BBC*, 22 July 2025: <https://shorturl.at/uzhUg> ↗
74. Interview with Rola Al Rukabi on 30 June 2025; Information updated via follow-up communication on 6 September 2025. Al Rukabi is a prominent Syrian feminist and human rights defender. She is the head of Women Now for Development – Lebanon, as well as a founding member of the Syrian Women’s Network, the Syrian Feminist Lobby, and the Syrian Feminist Political Movement. ↗
75. Interview on 26 June 2025 with an initiative (which preferred not to be named), established after the fall of the regime to promote civil peace. Information updated via follow-up communication on 1 September 2025. The group documents human rights violations on the ground, across Syria, for awareness and advocacy with local governance. ↗
76. Interview with Rawad Ballan on 13 July 2025; Information updated via follow-up communication on 6 September 2025. Ballan is a human rights defender and journalist in Suweida, working with a human rights organization specialized in peacebuilding and women and youth empowerment for participation in public affairs. ↗
77. Interview with Lonjin Abdo, Lelon Association for Victims, July 1, 2025 – previously cited reference. ↗
78. Interviewees with Justice for Life, RDI, Synergy Association for Victims. ↗
79. Interview with Jalal AlHamad, Director of Justice for life and a Syrian Human Rights Researcher previously cited reference. ↗
80. UN General Assembly, Importance of the rights to freedom of peaceful assembly and of association in advancing sustainable peace and democratic transitions, UN Doc. A/78/246, 27 July 2023: <https://docs.un.org/en/A/78/246> ↗
81. Ibid. ↗
82. See for example: Rojava Information Center (RIC), *DAANES’ Social Contract, 2023 Edition*, 14 December 2023. Accessed: 16 September 2025: <https://shorturl.at/PR6QV> ↗
83. The Arab Centre for Contemporary Syria Studies (Previously Harmoon Center), *Syrian Organisations and Associations: Building a National Strategy from the Legacy of Tyranny*, 28 February 2025: <https://shorturl.at/DCsWN> ↗
84. The Ministry of Social Affairs holds a dialogue workshop on the preliminary steps for developing the NGO law, SANA, 23 April 2025: <https://sana.sy/locals/2210975/> ↗
85. A system where an organization is considered a legal entity as soon as it has notified its existence to the relevant administration by providing basic information, including the names and addresses of the founder(s) and the name, address, statutes and purpose of the organization. ↗
86. Law on Associations, No. 93 (1958), amended by Decree No. 224/1969, Art. 71. See: [https://www.icnl.org/wp-content/uploads/Syria\\_93-1958-En.pdf](https://www.icnl.org/wp-content/uploads/Syria_93-1958-En.pdf) ↗
87. Ministry of Social Affairs and Labor, Circular no. 5201 of 29 December 2024: <https://www.sana.sy/?p=2179662> ↗
88. Ibid. ↗

89. Ministry of Social Affairs and Labor, Tasharok Platform, Steps to establish an organization, Accessed 16 September 2025: <http://www.ngo.gov.sy/ngo-create-steps> ↗
90. Associations Law No. 93 of 1958, Article 10. ↗
91. Multiple interviews including with SLDP, Synergy, Dawlaty and Madaniya. ↗
92. The Jawa Initiative; based in Hama, works to promote social cohesion and develop the education sector across Syria. ↗
93. Interview with human rights defender Eman Nasser, Jawa Initiative, June 14, 2025 – previously cited reference. ↗
94. Multiple interviews with Jawa initiative and Arab Centre for Contemporary Syria Studies. ↗
95. Interview with Dr. Ayman Menem on 22 May 2025; Information updated via follow-up communication on 1 September 2025. Dr. Menem is a legal expert and researcher, as well as the Legal Office Director at the Syrian Center for Media and Freedom of Expression. ↗
96. Multiple interviews including with Lelun Association for Victims and Peace Paths. ↗
97. Interview with an organization in Suweida, anonymous, 31 July 2025. Information updated via follow-up communication on 1 September 2025. ↗
98. ZD General Consultation, *Licensing International NGOs in Syria: Updated Requirements and Procedures*, Accessed: 16 September 2025: <https://zd-consultation.com/en/licensing-international-ngos-syria-requirements/> ↗
99. Associations Law No. 93 of 1958, Article 2. ↗
100. Ibid., Article 36. ↗
101. Ibid., Article 11. ↗
102. Ibid., Article 24. ↗
103. Ibid., Article 45. ↗
104. It is an independent, non-government rights organization that works on research and legal studies, provides legal support to victims of human rights violations and pursues accountability for human rights violators. ↗
105. Interview on 22 September 2025 with Anwar Bunni, a human rights lawyer and head of the Syrian Center for Legal Studies and Research. ↗
106. Interview with human rights journalist Rawad Ballan, July 13, 2015 – previously cited reference. ↗
107. Ministry of Social Affairs and Labor, Circular no. 5201 – previously cited reference. ↗
108. HAC, Circular from The Office of the Humanitarian Action Coordination in Syria to All Humanitarian Entities, X, 29 December 2024: [https://x.com/HU\\_AC\\_CO/status/1873476775944368509](https://x.com/HU_AC_CO/status/1873476775944368509) ↗
109. Interview with human rights defender Jalal AlHamad, Justice for Life Organization, June 12, 2025 – previously cited reference. ↗
110. UN Human Rights Council, *First Thematic Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association*, UN Doc. A/HRC/20/27, 21 May 2012; and A/HRC/29/25, 28 April 2015. ↗

111. Ibid. ↗
112. MOSAL Tasharok Platform, Steps to establish an organization: <http://www.ngo.gov.sy/ngo-create-steps> ↗
113. For more information, see the introduction of the Civil Society Support Room (CSSR). *The Role of Civil Society Organizations in the Geneva Process*, Accessed 16 September 2025: <https://cssrweb.org/en/> ↗
114. Office of the Special Envoy of the Secretary-General for Syria (OSES), *Women's Advisory Board*, Accessed 16 September 2025: <https://specialenvoysyria.unmissions.org/women%E2%80%99s-advisory-board> ↗
115. OSES, *Constitutional Committee*. Accessed 16 September 2025: <https://specialenvoysyria.unmissions.org/constitutional-committee-0> ↗
116. "Syria forms preparatory committee for national dialogue conference", *the Syrian Observer*, 13 February 2025: <https://shorturl.at/iOuH7> ↗
117. The Cairo Institute for Human Rights Studies (CIHRS), *Syria's National Dialogue: A First Step, But Uncertainty Clouds the Way Forward*, 28 February 2025: <https://shorturl.at/6FXHZ> ↗
118. "National dialogue concludes with 18-point final statement", *the Syrian Observer*, 26 February 2025: <https://shorturl.at/vfFLW> ↗
119. UN Guidance Note of the Secretary-General, *United Nations Approach to Transitional Justice*, March 2010: <https://shorturl.at/KwHFo> ↗
120. Interview with journalist Mostafa Saad, a public affairs reporter from Latakia, conducted on July 9, 2025, with follow-up updates on August 26, 2025. ↗
121. Interview with legal researcher Dr. Ayham Moneim, conducted on May 22, 2025 – previous reference. ↗
122. Interview on 12 June 2025 with a human rights activist from Latakia (who wished to remain anonymous), who works on peacebuilding and social cohesion projects across Syria. Information updated via follow-up communication on 1 September 2025. ↗
123. It is a women-led organization, founded in 2012 in northeastern Syria, focusing on advocacy and empowering women across economic, social, and legal aspects ↗
124. Interview with a representative of Komela Şawîşka Organization, conducted on July 1, 2025 - previous reference. ↗
125. Timour Azhari, Tom Perry, Syria's Sharaa declared president for transition, consolidating his power, *Reuters*, 30 January 2025: <https://shorturl.at/7SpKO> ↗
126. President Al-Sharaa Announces Formation of The New Government: We Are Witnessing the Birth of a New Phase in Our National Process, *SANA*, 30 March 2025: <https://www.sana.sy/en/?p=350809> ↗
127. Ibid. ↗
128. Presidential Decree No. 47, 31 May 2025. See: <https://sana.sy/en/local/357878/> ↗
129. The Syrian Memory Institute, Mohammad Kheir Hasan Sha'i, SMI/A300/14064, Accessed: 16 September 2025: <https://syrianmemory.org/archive/figures/67767bd9ba4b4facd106f4eb> ↗

130. Syrian President Ahmed al-Sharaa's brother gets a senior role in government, *The New Arab*, 6 April 2025: <https://www.newarab.com/news/ahmed-al-sharaas-brother-gets-senior-role-syria-government> ↗
131. See: Timour Azhari, Feras Dalatey, Syria is secretly reshaping its economy. The president's brother is in charge, *Reuters*, 24 July 2025: <https://www.reuters.com/investigations/syria-is-secretly-reshaping-its-economy-presidents-brother-is-charge-2025-07-24/> ↗
132. Syrians for Truth and Justice: an independent organization working to document violations, promote a culture of human rights, and enhance access to justice and accountability across Syria. ↗
133. Interview with Bassam Al Ahmad from Syrians for Truth and Justice, conducted on May 26, 2025 – previous reference. ↗
134. Equal Citizenship Center is a legal, non-government and volunteer-based center specialized in equal rights and non-discrimination and peacebuilding. ↗
135. Interview with Faek Hwajeh from the Equal Citizenship Center on 26 May 2025; information updated via follow-up communication on 27 August 2025. Hwajeh is a founder of the Equal Citizenship Center, a founding member of the Civil Society Support Room (CSSR) and a political detainee for 10 years under the previous regime. He is based in Damascus and Germany. ↗
136. Madaniya is a Syrian-led, Syrian-funded initiative aimed at enhancing the political agency of the Syrian civic space. It is a network of over 200 organizations. ↗
137. Interview with Bakri Zeneldeen from Madaniya on 3 June 2025; Information updated via follow-up communication on 4 September 2025. Zeneldeen is a human rights defender, with vast experiences in mobilization, civic engagement, and grassroots empowerment. He currently serves as Membership Program Manager at Madaniya. ↗
138. Interview with feminist lawyer Rola Al Rukabi, conducted on June 30, 2025 – previous reference. ↗
139. The Syrian Constitutional Declaration of March 2025, Art. 43. ↗
140. Verify-Sy, *Did the current Minister of Justice appear in a video documenting the execution of a woman in the Idlib countryside?*, 4 January 2025: <https://verify-sy.com/en/details/10597/Did-the-current-Minister-of-Justice-appear-in-a-video-documenting-the-execution-of-a-woman-in-the-Idlib-countryside> ↗
141. The Syrian Memory Institute, Mazhar Abdelrahman Al Weis, SMI/A300/1194, Accessed 16 September 2025: <https://syrianmemory.org/archive/figures/5ea210e3ce219e0001e68638> ↗
142. Presidential Decree No. 56 of 31 March 2025. ↗
143. The Syrian Memory Institute, Hassan Youssef Al Turbah, SMI/A300/14186, Accessed 16 September 2025: <https://syrianmemory.org/archive/figures/67b06fb6f76cc834293d4476> ↗
144. Interview with lawyer Rola Al-Baghdadi, founder of Dowlaty, conducted on June 30, 2025 – previous reference. ↗
145. Interview with human rights journalist Rawad Ballan, July 13, 2025 – Previously cited. ↗

146. *Euronews*, Authority in the Shadows: Has the "Sheikh" Replaced the State in Syria?, 24 June 2025: <https://shorturl.at/R8xlv> ↗
147. Several interviews, including with Anwar Bunni, Rima Flihan, Rawad Ballan, Dawlaty, Rola Al Rukabi and Tayar Daleel. ↗
148. Interview with human rights journalist Rawad Balan, July 13, 2025 – previously cited source. ↗
149. Interview with human rights defender Lonjin Abdo, Lelun Association for Victims, July 1, 2025 – previously cited reference. ↗
150. Lelun Association for Victims – a survivor-led human rights group focused on achieving justice and restoring the rights of victims of human rights violations in Afrin. ↗
151. Abdo participated in a recent CNN documentary on the abuses carried out by Abu Bakr and his division against Kurdish women. For more information, see: “As Syria’s president preaches human rights, new evidence details abuse allegedly carried out under one of his key commanders”, *CNN*, 12 June 2025: <https://edition.cnn.com/interactive/asequals/syria-army-commander-women-abuse-as-equals-intl-invs/> ↗
152. US Department of the Treasury, *Treasury Sanctions Two Syria-Based Militias Responsible for Serious Human Rights Abuses in Northern Syria*, 17 August 2023: <https://home.treasury.gov/news/press-releases/jy1699> ↗
153. EU Council, Decision (CFSP) 2025/1110 on amending Decision (CFSP) 2020/1999 concerning restrictive measures against serious human rights violations and abuses, 28 May 2025: [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202501110](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202501110) ↗
154. US Department of the Treasury - previously cited reference. ↗
155. EU Council, Decision (CFSP) 2025/1110 – previously cited reference. ↗
156. US Department of Treasury, *Treasury Sanctions Syrian Regime Prisons, Officials, and Syrian Armed Group*, 28 July 2021: <https://home.treasury.gov/news/press-releases/jy0292> ↗
157. Synergy, *Appointing War Criminals to Lead the “Syrian Army” Undermines Justice and Insults Victims*, 7 May 2025: <https://hevdesti.org/en/appointing-war-criminals-to-lead-the-syrian-army-undermines-justice-and-insults-victims/> ↗
158. RDI Human Rights Organization; founded in 2019, it works on documenting violations and war crimes, conducting research, advocating for victims, and promoting justice and peaceful coexistence in northeastern Syria. ↗
159. Tayar Daleel is a youth-led civil political movement aiming to provide a new model for national political work based on democracy, liberalism, and decentralization. ↗
160. Interview with Tawfek Osman on 23 June 2025; Information updated via follow-up communication on 2 September 2025. Osman is a political activist from Tartus and PR officer for Tayar Daleel. ↗
161. Several interviews, including with the Equal Citizenship Centre and Jozour. ↗
162. Justice for Life; a human rights organization founded in northeastern Syria in 2015, focusing on advocating for survivors’ issues and promoting the political and civic participation of the local civil society in northeastern Syria. ↗

163. Interview with researcher Jalal ALHamad, Justice for Life Organization, June 12, 2025 – previously cited reference. [↗](#)
164. The Syrian Legal Development Programme; a survivor-led initiative based in the United Kingdom, works to support Syrian organizations and communities through international law, promote justice and human rights, and address violations resulting from corporate policies during the conflict. SLDP holds Special Consultative Status with the United Nations Economic and Social Council (ECOSOC) and is currently providing legal advice to several government committees concerned with transitional justice in Syria. [↗](#)
165. Interview with Sana Khikha, Syrian Legal Development Programme, May 22, 2025 – previously cited reference. [↗](#)
166. MOSAL, Circular no. 28 of 20 February 2025. [↗](#)
167. Interview with Faek Hwajeh, Equal Citizenship Center, May 26, 2025 – previously cited reference. [↗](#)
168. Interview with lawyer Rola Al Baghdadi, Dawlaty Foundation, June 30, 2025 – previously cited reference. [↗](#)
169. *Constitutional Declaration*, art. 49. [↗](#)
170. Presidential Decree no. 20 on *the establishment of the National commission for Transitional Justice*, 17 May 2025: <https://archive.sana.sy/en/?p=355958> [↗](#)
171. Synergy Association for Victims; a victim-led human rights organization based in northeastern Syria, aiming to organize victims to enhance their empowerment and engagement in public affairs. It is part of the Truth and Justice Charter, a member of the Human Rights Reference Group (HRRG) of the UNHCR and a member of the International Network of Victims and Survivors of Serious Human Rights Abuses (INOVAS). [↗](#)
172. Interview with a representative of Synergy Association for Victims, June 18, 2025 – previously cited reference. [↗](#)
173. Interview on 2 June 2025 with an organization (which preferred not to be named) founded by survivors of arbitrary arrest in Syria, aiming to provide support and protection for similar survivors through rehabilitation, advocacy and capacity building. Information updated via follow-up communication on 4 September 2025. [↗](#)
174. Presidential Decree no. 19 on *the establishment of the National Commission for the Missing*, 17 May 2025: <https://archive.sana.sy/en/?p=355953> [↗](#)
175. Interview with Sana Khikha, Syrian Legal Development Programme, May 22, 2025 – previously cited reference. [↗](#)
176. Presidential Decision on *establishing a national independent fact-finding committee in the incidents on Coastal Syria of 6 March 2025*, 9 March 2025: <https://archive.sana.sy/en/?p=349109> [↗](#)
177. Several interviews, including interviewees from Coastal regions: Hanady Zahlout, Tawfek Osman, Samer Abbas. [↗](#)
178. Several interviews, including with Synergy, RDI, Lelun and SLDP. [↗](#)
179. Interview with human rights defender Hanady Zahlout, June 30, 2025 – previously cited reference. [↗](#)

180. Interview with a representative of the Synergy Association for Victims, June 18, 2025 – previously cited reference. [↗](#)
181. Presidential decree no. 66 on *Presidential decree forming the Supreme Committee for People's Assembly elections*, 2 June 2025: <https://sana.sy/en/?p=359363> [↗](#)
182. Interview with Faek Hwajeh, Equal Citizenship Center, May 26, 2025 – previously cited reference. [↗](#)
183. The Syrian Democratic Council (SDC), Tamasok Coalition Shapes Syria's Future on Equality and Justice, accessed 16 September 2025: <https://m-syria-d.com/en/?p=8343> [↗](#)
184. Interview with Tawfek Osman from Tayar Daleel on 23 June 2025 - previously cited reference. [↗](#)
185. UN. Human Rights Committee, *General comment no. 25, The right to participate in public affairs, voting rights and the right of equal access to public service (article 25)*, 57th sess, CCPR/C/21/Rev.1/Add.7, 1996: <https://digitallibrary.un.org/record/221930?ln=en&v=pdf> [↗](#)
186. International Center for Not-for-Profit Law, “NGOs in the Political Realm: Political Activities of NGOs, International Law and Best Practices”, *The International Journal of Not-for-Profit Law* Volume 12, Issue 1 (2009): <https://www.icnl.org/resources/research/ijnl/political-activities-of-ngos-international-law-and-best-practices> [↗](#)
187. Ibid. [↗](#)
188. Amna Guellali, “Views: Revisiting Tunisia’s Failed Transitional Justice with an Eye on Syria.” *Rowaq Arabi* 30, Issue no. 1 (2025): <https://doi.org/10.53833/JQID8384> [↗](#)
189. Interview with human rights journalist Rawad Ballan, July 13 – previously cited reference. [↗](#)
190. Several interviews including with Madaniya, Synergy and RDI. [↗](#)
191. United Nations Security Council (UNSC), Resolution 2171 *on the maintenance of international peace and security and conflict prevention*, UN doc. S/RES/2171 (2014). [https://docs.un.org/en/S/RES/2171\(2014\)](https://docs.un.org/en/S/RES/2171(2014)), United Nations Security Council (UNSC), Resolution 1325 *on women, peace, and security*, UN Doc. S/RES/1325 (2000): [https://docs.un.org/S/res/1325\(2000\)](https://docs.un.org/S/res/1325(2000)). [↗](#)
192. Committee on the Elimination of Racial Discrimination (CERD), *General Recommendation XXVII on Discrimination Against Roma*, UN Doc. A/55/18, annex V (2000): <https://docs.un.org/en/A/55/18> [↗](#)
193. CEDAW, Concluding observations of the Committee on the Elimination of Discrimination against Women, Cyprus, U.N. Doc. CEDAW/C/CYP/CO/6-7 (2013): <https://docs.un.org/en/CEDAW/C/CYP/CO/6-7> [↗](#)
194. Interview with feminist human rights defender Rola Al-Rukabi, June 30, 2025 – previously cited reference. [↗](#)
195. Interview with Rima Flihan, Syrian Feminist Lobby, June 14, 2025 – previously cited reference. [↗](#)
196. Syrian Feminist Lobby; an organization working to empower women at both social and political levels through documenting violations, advocacy, and lobbying. [↗](#)
197. Al Arabi al Jadid, “Controversy over Aisha al-Dibs’ statements about her vision for the role of Syrian women,” 29 December 2024, <https://shorturl.at/3rtCw> [↗](#)

198. UN ESCWA, *Participation and civic engagement policy brief series: Policy brief on participation and transitional justice*, UN Doc. E/ESCWA/SDD/2013/Technical Paper.5, 27 May 2013. [↗](#)
199. UN HRC, Resolution “24/5. *The rights to freedom of peaceful assembly and of association*”, UN Doc. A/HRC/RES/24/5 (2013): <https://docs.un.org/A/HRC/RES/24/5> [↗](#)
200. Human Rights Committee, *general comment No. 25* (1996); UN OHCHR, *Factors that impede equal political participation and steps to overcome those challenges*, UN Doc. A/HRC/27/29 (2014): <https://docs.un.org/A/HRC/27/29> [↗](#)
201. *General Comment No. 25* (1996) [↗](#)
202. UN Human Rights Committee, *General Comment No. 27 on freedom of movement (Art. 12)*, UN Doc. CCPR/C/21/Rev.1/Add.9 (1999): <https://docs.un.org/CCPR/C/21/Rev.1/Add.9> [↗](#)
203. See, for example: *Report of the Special Rapporteur on the rights to freedom of peaceful assembly and of association*, UN Doc. A/HRC/20/27 (2012): <https://docs.un.org/A/HRC/20/27>; the *Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression*, UN Doc. A/66/290 (2011): <https://docs.un.org/A/66/290> [↗](#)
204. Conference of INGOS of the Council of Europe, *Code of Good Practice for Civil Participation*, CONF/PLE(2009)CODE1 (2009): <https://shorturl.at/skW5x> [↗](#)
205. UN General Assembly, *Convention on the Rights of Persons with Disabilities*, A/RES/61/106 (2008): <https://docs.un.org/A/Res/61/106>; *Declaration on the Right and Responsibility of Individuals, Groups and Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms*, A/RES/53/144 (1999): <https://docs.un.org/A/Res/53/144> [↗](#)
206. *Code of Good Practice for Civil Participation* - previously cited reference. [↗](#)
207. Guellali, *Revisiting Tunisia's Failed Transitional Justice with an Eye on Syria* – previously cited reference. [↗](#)
208. Jawa Initiative; based in Hama, it works to promote social cohesion and develop the education sector across Syria. [↗](#)
209. Interview with Eman Nasser, Jawa Initiative, June 14, 2025 – previously cited reference. [↗](#)
210. UN General Assembly, *Report of the OHCHR on the Promotion, protection and implementation of the right to participate in public affairs in the context of the existing human rights law: best practices, experiences, challenges and ways to overcome them*, A/HRC/30/26 (2015): <https://docs.un.org/en/A/HRC/30/26> [↗](#)
211. Ibid. [↗](#)
212. Interview with a human rights activist (who wished to remain anonymous) from Latakia, June 12, 2025 – previously cited reference. [↗](#)
213. Corrine Parver, Rebecca Wolf, “Civil Society’s Involvement in Post-Conflict Peacebuilding”, *International Journal of Legal Information* 36(1):51-79 (2008): [doi:10.1017/S0731126500002705](https://doi.org/10.1017/S0731126500002705) [↗](#)
214. Jozour Organization; founded in Suweida in 2014, it is a human rights organization aiming to promote an active and organized community through development and educational projects. [↗](#)

215. Interview with Ayham Azzam, Jozour Organization, June 15, 2025 – previously cited reference. [↗](#)
216. Interview with Sana Khikhia, Syrian Legal Development Programme, May 22, 2025 – previously cited reference. [↗](#)
217. UN Human Rights Council, *Report of the COI, A/HRC/58/66*, 19 March 2025: <https://docs.un.org/en/A/HRC/58/66> [↗](#)
218. “ICC prosecutor holds talks on supporting Syria on war crimes prosecution”, *Reuters*, 17 January 2025: <https://shorturl.at/vGryX> [↗](#)
219. CIHRS, *Syria’s National Dialogue: A First Step, But Uncertainty Clouds the Way Forward* – previously cited reference.. [↗](#)
220. Several states have implemented similar measures. In Estonia, ministries must include CSO representatives in the preparation of decisions, laws and development plans. In Croatia, CSOs are included from the earliest stages of consultations where they may submit comments and proposals, including through surveys and electronic consultations. [↗](#)
221. Interviewees strongly supported this mechanism. [↗](#)
222. *Report of the OHCHR*, UN Document A/HRC/30/26 (2015) – previously cited reference. [↗](#)