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Marota and Basilia: Reparation and the Limits of Fairness

Ministry of Endowments Opens the Waqf Property File: Drawing on Ottoman Waqf Records and Reappraising Rents

North Sakka in Raqqa: Urban Planning and the Threat to Residents' Rights

The Syria Report

Housing, Land & Property Rights

Editor-in-chief: Jihad Yazigi

Managing Editor: Mazen Ezzi

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25 Years of Reporting on Syria: A New Focus on Housing, Land and Property Rights

Editor-in-chief: Jihad Yazigi

This year marks the 25th anniversary of The Syria Report, a publication that has sought to provide, since its inception in October 2001, reliable and in-depth information and analysis on Syria's economy and political economy.

An anniversary is always an opportunity to start anew and what you have in hand, or rather on your screens, is the first issue of Syria's first quarterly journal dedicated to covering housing, land and property (HLP) rights issues.

HLP issues are among the most consequential and complex challenges facing Syria today. They affect millions of Syrians who have been displaced, lost homes or land, faced changes in property ownership or documentation, or are seeking to return to their places of origin. They are also directly connected to reconstruction, urban planning, investment, access to housing, the return of displaced populations and the restoration of local economies.

Yet HLP issues remain poorly understood and, too often, fragmented across legal, political, humanitarian, economic and administrative discussions. Our objective is to help bridge these gaps by providing a dedicated source of information and analysis on developments affecting housing, land and property rights across Syria.

Of course, we have been covering developments on HLP issues for many years now. Through weekly articles and an editorial team led by Mazen Ezzi, we have reported since 2020 about HLP rights violations across the country, mostly through a news lens, and have published more than 1,200 articles in English and Arabic on the subject.

Now, we are moving to a quarterly format. At the same time, this corresponds to a changing political situation and potentially more opportunities to contribute to, and weigh on, policy debates, while allowing us to go beyond reporting individual developments and to examine broader trends over time. Each issue will bring together factual reporting, legal and policy analysis, and policy briefs to better inform decision makers.

We have the ambition to reach a broader community of readers, including Syrian policymakers and professionals, international organisations, academics, lawyers, investors and others working on Syria's reconstruction. But we will also seek to call for a broader set of contributors, from the same

pool than our readers, to enable a broader debate on the various aspects of the HLP debate.

Our aim remains to provide readers with a clearer understanding of how HLP issues are evolving and what they mean for Syria's future.

We also see this publication as a continuation of the role that The Syria Report has sought to play since its inception: documenting change, identifying emerging trends and providing independent analysis at a time when reliable information is often difficult to obtain.

We hope that this new publication will contribute to a better-informed debate and provide a practical resource for those working to address these challenges. With such a large part of Syria on the ground and so many challenges affecting the housing and property sector, debates and discussions in the next few years are likely to be particularly rich.

After 25 years of reporting on Syria, we are pleased to begin this new chapter with a publication devoted to an issue that will be central to the country's future.

From the Green Tabu to the Right to Place

Managing Editor: Mazen Ezzi

For 5 years, I worked as editor of the Housing, Land and Property Rights Section at The Syria Report, as part of continuous coverage that included hundreds of news articles, in-depth features and analytical papers. During those years, the section documented the impact of the war on buildings and residents, rubble removal and building and demolition permits, displacement and camps, return, rehabilitation and repair, rights across zoned areas and informal settlements, the seizure of absentee property, security restrictions on the disposal of property and rulings by special courts, urban planning, expropriation and reconstruction, social and cooperative housing, property sales and real estate financing, damaged documents and the reconstruction of land records.

This experience revealed that housing, land and property rights are shaped at the intersection of power relations among central and local authorities, the judiciary and the law, urban policies, city planning, economic interests and residents' relationships to their places. At this intersection, the effects of war, displacement and return become long-term realities: land use changes, control over properties shifts, some residents recover their properties, while others remain far from them despite their established rights. A right may remain recorded in the land registry while the owner's ability to dispose of the property is obstructed.

That daily monitoring also revealed how information was fragmented across laws, ministerial decisions and administrative circulars, property documents, field testimonies, investment announcements and zoning plans. This fragmentation made it difficult to collect and compare information and to assess its cumulative impact on individuals, communities and institutions. It also showed that legal and humanitarian approaches, while essential, are insufficient on their own to explain what is happening. Displacement, reconstruction and the planning of destroyed areas are also spatial and urban processes that reshape the distribution of populations, resources, services and property values. They determine who can return and whose return is prevented by destruction, housing costs, legal and administrative restrictions, or ethnic or sectarian tensions.

Green Tabu grows out of this experience as an extension of the work of the Housing, Land and Property Rights Section at The Syria Report. The journal takes this work from the continuous monitoring of developments to a quarterly publication that brings together news reporting, investigations, analysis, Policy Options papers and interviews with specialists and relevant stakeholders within a single editorial structure. This format allows more time to verify information, place documents and

decisions in context, compare developments across regions and trace the effects of policies and practices on residents' rights over time.

In Syria, the official property title deed is commonly known as the "green tabu." Housing, land and property rights extend beyond the registered title deed to include other documents establishing ownership or possession in informal settlements, areas with building violations and unzoned areas, as well as rights that remain undocumented because of security restrictions or the conditions of war and displacement. They also encompass the ability to live in, use, dispose of and inherit property, the right of return, protection from seizure, displacement and demolition, and access to the courts and public administrations.

The journal takes its name from this document, then moves towards the wider field in which rights are actually shaped, where law, administration, urban planning, the market, power and realities on the ground intersect. Land is more than a legal or financial asset: it is a place to live, a repository of memory, a network of social relations and a site of local history. A neighbourhood is more than its buildings: it also includes schools, markets, roads, services, public spaces and neighbourhood networks that give return meaning and make it sustainable.

The need for this type of work is growing amid accelerating political, administrative and economic transformations in Syria. Questions of return, reconstruction, the planning of destroyed areas, real estate investment and the settlement of property claims are being addressed in an environment that lacks clear and regular official communication, while the effects of displacement, destruction, lost documents, property disputes and the involvement of multiple actors persist. In such a context, a single administrative decision can change whether a family is able to sell a home, obtain an estate inheritance inventory document, return to a village, repair a building or establish a right to land.

Reconstruction also raises questions that go beyond cost, financing and engineering capacity. It is a process that redefines who has the right to participate in shaping the future of cities and villages, whose needs and memories are taken into account, and who benefits from rising land values or changes in land use. This perspective positions residents as partners in shaping the places they inhabit, rather than treating them as recipients of projects decided on their behalf by public authorities or investors.

Green Tabu draws on a network of correspondents, contributors and experts, bringing together testimonies gathered in the field, legal texts, decisions, administrative documents, open sources and specialist analysis. The material undergoes a process of editing, verification and cross-checking, while preserving the voices of rights holders and situating their experiences within their legal, urban and political contexts. The journal aims to produce accurate and accessible knowledge that specialists can use as a reference and that non-specialist Syrian readers can use to understand the meaning of a decision or law and its direct impact on their lives.

Green Tabu is published under the umbrella of The Syria Report, with support from the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), as a digital publication in Arabic and English. Its articles are also published individually and in sequence on the journal's website within The Syria Report platform. Each issue also dedicates space to interviews with officials and experts, enabling policies to be presented, scrutinised and compared with realities on the ground.

Green Tabu opens its pages to contributions in Arabic and English from researchers, architects, lawyers, journalists, urban planners and all those interested in housing, land and property rights in Syria. It also welcomes legal and administrative documents, comments, corrections and proposals that broaden knowledge in this field and contribute to scrutinising policies and practices affecting residents' rights.

Green Tabu aspires to become a shared Syrian space for producing knowledge on housing, land and property, and a trusted record of the transformations affecting homes, land, neighbourhoods and residents' relationships to their places. The journal seeks to place documentation alongside testimony and law alongside its impact on daily life, while connecting local expertise with professional debate and policymaking. Over successive issues, it aims to become a widely accessible reference for understanding these transformations and a tool for placing residents' rights at the heart of every discussion on return, recovery and reconstruction in Syria.

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UPDATES

Yazidi Villages in Hassakeh: Protracted Displacement and Property Seizure

More than 6 years after most Yazidis were displaced from the villages around Ras Al-Ayn, their homes and land remain registered in their names, yet they live far away and are unable to return to or make use of them. For many displaced people, return is no longer connected only to recovering a home or agricultural land, but also to regaining a sense of safety in a place associated in their memories with violence, fear and uprooting. Between property rights that remain legally recorded and realities on the ground imposed by armed factions, the return of Yazidis to their villages remains a fragile and deferred possibility.

Following Türkiye's launch of Operation "Peace Spring" on 9 October 2019, Turkish forces and Turkish-backed Syrian armed factions took control of Ras Al-Ayn and its surrounding countryside in Hassakeh Governorate. Since then, the area's Yazidi villages have become almost entirely empty of their original inhabitants, after most residents fled to other parts of Syria or abroad. Their displacement resulted from both the military operations and an accumulated fear of armed Islamist factions following a series of religiously and ethnically motivated violations and threats in Ras Al-Ayn, Afrin and Sinjar.

The Yazidis are a Kurdish-speaking religious community whose presence in northern Syria and Iraq extends back centuries. They practise Yazidism, a non-proselytising esoteric religion whose principal temple is at Lalish in Sheikhan District, Nineveh Governorate, northern Iraq. Yazidis have historically lived in Syria's Jazira and Afrin regions, and many worked in agriculture and livestock farming. The former Assad regime subjected Yazidis to personal status legislation derived from Islamic Sharia, while allowing them to practise their religious rituals. The Kurdish-led Autonomous Administration also recognised Yazidism in the Social Contract adopted in 2014.

Yazidis historically lived in villages located south, east and west of Ras Al-Ayn, known in Kurdish as Serekaniye, and in the city's Zardasht neighbourhood. According to a survey conducted in 2012 by the Yazidi House, an institution that looks after and organises Yazidi affairs, approximately 15,000 Yazidis lived in Syria's Jazira region, including around 3,000 in the Yazidi villages around Ras Al-Ayn. According to Green Tabu's field reporting, only around 15 families from these communities now remain elsewhere in Syria, mainly in Qamishli, Hassakeh and Amuda, while most of the others have emigrated to Europe or Türkiye.

15 families
Only around 15 families from the Yazidi villages surrounding Ras Al-Ayn remain inside Syria.

Following their displacement in 2019, dozens of homes and agricultural lands belonging to displaced Yazidis remained under the control of fighters and families associated with armed factions. Other properties were looted, damaged or forcibly exploited, while no effective process was established to guarantee residents' return or restore their control over their property. Although Syria's transitional authorities have spoken since early 2025 of transitional justice and the protection of private property, fighters and commanders from factions accused of these violations have been incorporated into the new official military and security structure. This has deepened displaced people's sense of insecurity and made the prospect of return increasingly fragile.

The situation in the Yazidi villages around Ras Al-Ayn shows how forced displacement can become a long-term mechanism for reshaping control over land and population through religious fear, property seizure, the prevention of return and the repurposing of abandoned property within a local economy based on unrestricted appropriation. It also highlights the limits of official discourse on transitional justice amid the absence of

accountability and the continued influence of armed structures associated with displacement and property violations since 2019.

Empty Villages and Property Left Open to Seizure

Following the launch of Operation Peace Spring on 9 October 2019 and the subsequent takeover of Ras Al-Ayn and its countryside by Turkish forces and Turkish-backed Syrian armed factions, the area's Yazidi villages experienced mass displacement that emptied most of them of their original inhabitants and left much of their property open to de facto seizure. Before the operation, the area had a diverse population of Arabs, Kurds, Christians and Yazidis. Displacement primarily affected Kurdish residents, including Yazidis, while many Arab residents remained and some Muslim Kurds gradually returned in the following years. The Yazidi villages, however, remain nearly empty of their original inhabitants.

Hamid, a native of the village of Java, told Green Tabu that all the village's residents fled after Turkish-backed armed factions took control of the area in 2019. He added that the village had approximately 40 families who owned an estimated 8,000 dunams of agricultural land. Although he has reached Germany and obtained asylum there, he remains unable to visit Java or inspect his home and land. He said that an Arab family now lives in his family's home, while other people cultivate his agricultural land.

The violations extended beyond the occupation of homes and agricultural land to the reuse of displaced villages within the area's new military structure. According to testimonies collected by the Union of Syrian Yazidis, which was established in 2020 with support from the Autonomous Administration of North and East Syria, some homes were converted into military headquarters and bases, while residents were prevented from entering their villages or inspecting their property.

Local groups associated with the armed factions also leased homes and shops belonging to displaced Yazidis in Ras Al-Ayn's Zardasht neighbourhood, despite the continued absence of their original owners. Witnesses in Qamishli told Green Tabu that the local council formed after the factions' takeover had managed and unlawfully rented out some of these properties.

These practices were accompanied by the widespread exploitation of agricultural land belonging to displaced people. The cultivable agricultural land in the Yazidi villages is estimated at approximately 4,400 hectares, most of which is now outside the control of its original owners.

4,400 hectares
The estimated area of agricultural land in the Yazidi villages, most of which is now outside the control of its original owners.

Salma, who was displaced from one of the Yazidi villages, told Green Tabu that she now rents a furnished flat in Qamishli and relies on assistance sent by her brothers in Sweden to pay the rent. Meanwhile, her agricultural land is being cultivated by a man from Deir-ez-Zor without her receiving any proceeds from it. "Our villages have become a desolate place," she said. She added that many displaced people were prepared to accept any arrangement guaranteeing that they would not be targeted because of

their religion. "Even if we were required to pay jizya, the important thing is that we are not harmed because of our religion."

"Even if we were required to pay jizya, the important thing is that we are not harmed because of our religion." Salma, displaced from one of the Yazidi villages.

The situation in these villages reflects a transformation extending beyond war-related displacement towards the reproduction of control over the area by emptying it of its original population and repurposing abandoned property under new security and economic arrangements. Although years have passed since the area's major military operations ended, most Yazidi villages remain outside the control of their original residents, while their properties remain subject to realities imposed by the forces controlling the area since 2019.

Fear as a mechanism of permanent displacement

The Yazidis' reluctance to return to their villages around Ras Al-Ayn is connected to the loss of homes and agricultural land and to an accumulated fear formed through years of religious and ethnic targeting. For many displaced people, the displacement of 2019 was an extension of a long series of killings, threats and declarations that Yazidis were infidels, both inside Syria and in neighbouring Iraq.

On 17 August 2013, Jabhat Al-Nusra, then Al-Qaeda's affiliate in Syria, and allied factions attacked the predominantly Yazidi village of Al-Asadiya, south of Ras Al-Ayn. The attack killed Yazidi civilians, including the brothers Murad and Ali Sa'ado, burnt homes in the village and drove its remaining residents into displacement. Less than 1 year later, the massacre committed by the Islamic State against the Yazidis in Sinjar, northern Iraq, in 2014 deepened fears among Syrian Yazidi communities, amid the rise of armed Islamist factions in northern Syria that declared Yazidis to be "infidels". Violations against Yazidis in Afrin after armed factions took control of the area in 2018 further reinforced a widespread belief among the Yazidis of Ras Al-Ayn that remaining under these factions' authority could expose them to similar violence.

Hamid said that the residents of his village, Java, had previously been displaced in 2013 following an attack by Jabhat Al-Nusra, but returned later after the Kurdish People's Protection Units (YPG) took control of the area. Following the takeover by Turkish-backed factions in 2019, however, the situation changed yet again. According to him, residents now "do not dare to return" after receiving direct death threats. He added that current fear is connected not only to the presence of armed men in the villages, but also to the absence of any genuine guarantee of protection if residents return.

Suad Hasso, head of the Union of Syrian Yazidis, told Green Tabu that some displaced people who merely attempted to inspect their property received direct threats. Others were asked to pay between USD 2,000 and USD 10,000 to have the current occupants vacate their homes. Some were also promised that their property would be returned and their safety guaranteed in exchange for declaring their conversion to Islam. Hasso

said she considered any discussion of an actual return unrealistic unless the armed factions began vacating civilian homes and an internationally supervised mechanism was established to organise the return and protect residents.

Even after displacement, some Yazidis continued to face discrimination and hostility in places of refuge. Hamo Khodr, a Yazidi displaced from the village of Lazka, told Green Tabu that he had to leave Washokani camp, west of Hassakeh, after being harassed and attacked because of his religion. The attacks included slashing his tent, tampering with its contents, and stealing heating supplies, personal belongings and food. "In their eyes, I am an infidel and deserve any attack," he said, explaining that the camp administration allowed him to leave while keeping his name on its register of displaced people.

This climate has created a general feeling among many displaced people that return entails entering a space where their religious presence is itself perceived as a threat, alongside recovering a home or land. For many Yazidis, property is therefore connected first to the possibility of living safely in their villages, rather than to a purely legal right to land or housing.

For many Yazidis, displacement has also involved dual targeting based on their religious and ethnic identities. Most identify ethnically as Kurdish in a region where extensive demographic changes after 2019 affected Kurdish villages and communities in the Ras Al-Ayn countryside. Their non-Muslim religious identity made them still more vulnerable to armed Islamist factions.

An Economy Built on Seizing Displaced Villages

The displacement of Yazidis from the villages around Ras Al-Ayn came alongside a broad system for exploiting and repurposing abandoned property for economic and military uses. After Turkish-backed armed factions took control of the area, fighters' families were housed in Yazidi homes, while agricultural land was cultivated by people arriving from other parts of Syria. Some villages became open spaces for looting and the redistribution of local resources. Some homes and land in the abandoned villages were also converted into military headquarters and factional positions, directly integrating part of the private property into the area's new security and military structure.

According to Suad Hasso, almost no category of property escaped violations, including homes, shops, land and agricultural equipment. The violations included looting household contents, cutting down mature trees for heating fuel, stealing pumps and generators used to irrigate agricultural land, and seizing tractors and combine harvesters. The Union of Syrian Yazidis noted that some of this equipment is legally classified as "appurtenance real estate" under Syrian civil law, meaning that it is legally attached to the agricultural land it serves.

Many homes were also partially dismantled and their contents sold in

local second-hand markets. Hamo Khodr said he had recently learnt that his home in Lazka had been looted after his displacement. The doors, windows and iron staircase leading to the roof had been removed and sold cheaply in the second-hand market. He estimated that the cost of repairing his home and the value of his agricultural losses exceeded USD 15,000, but said that, for now, he demanded nothing more than a safe return.

These practices were accompanied by attempts to give the administration of displaced people's property an official appearance. Witnesses inside Ras Al-Ayn told Green Tabu that the local council formed following the takeover by Turkish-backed factions rented out homes and shops belonging to displaced civilians in the Zardasht neighbourhood, which had been home to approximately 30 Yazidi families before the displacement. These properties remain rented out without their original owners' consent.

The mechanisms established to address property disputes have failed to regain displaced people's confidence. In 2020, Turkish-backed opposition factions established a body called the "Committee for the Restitution of Rights to Their Owners" in the Tal Abyad and Ras Al-Ayn areas. Only a very small number of Yazidis submitted complaints to it. Lawyer Zaki Haji told Green Tabu that this was due to the committee's limited independence and the continued intervention of armed factions in the area. According to Haji, only 1 Yazidi, as far as he knew, had recovered agricultural land in the village of Al-Asadiya through mediation involving German and Turkish parties. Most other displaced people have limited themselves to presenting their ownership documents to human rights or documentation organisations without entering local judicial proceedings.

This situation created an economy based on exploiting displacement itself—properties left behind by their owners became sources of housing, income, and influence for the controlling forces. The continued absence of the original residents also contributed to consolidating new realities in the villages, making the restoration of property dependent not only on proving legal rights but also on dismantling the military and administrative networks established over these properties in 2019.

Property without protection, delayed justice

Article 16 of the Constitutional Declaration issued on 13 March 2025 states that the right to private property is protected and may not be expropriated except for the public benefit and in return for fair compensation. This principle has yet to be reflected in the situation of Yazidis displaced from Ras Al-Ayn.

The factions accused of property seizures and widespread violations against Kurdish and Yazidi civilians were formerly components of the Turkish-backed Syrian National Army. Their fighters and commanders have since been incorporated into the Syrian Armed Forces under the transitional Ministry of Defence, despite the involvement of some of these factions in serious abuses. This has further weakened confidence in the possibility of

genuine accountability or the restitution of property to its owners.

Berivan Abdul Karim, an administrator at the GAV Relief and Development Organisation in northeastern Syria, told Green Tabu that the absence of any accountability for factions involved in property violations since 2019 meant that discussions of return were closer to political promises than to a genuine process operating in practice. She also noted that promises by officials in the Syrian Interim Government to return residents or organise return convoys had not yet been implemented.

The case of displaced Yazidis concerns their legal and religious status in the new Syria alongside the restitution of their property. Article 3(2) of the Constitutional Declaration states that freedom of belief is protected and that the State respects all "divine religions". This wording has raised concerns within Yazidi communities because Yazidism is not classified within that category, particularly given the community's long history of religious persecution.

Syrian domestic legislation does not expressly criminalise forced displacement or forcible transfer as standalone offences. Many of the violations committed in the Yazidi villages nevertheless remain criminal offences under existing legislation. Under Article 723 of the Syrian Penal Code, taking possession of all or part of an immovable property held by another person without a title deed or document authorising disposal constitutes property extortion. Article 768 of the Civil Code provides that the owner alone has the right to use, exploit and dispose of their property within the limits of the law. Aggravated-theft provisions also criminalise looting carried out by force or by breaking into properties in their owners' absence.

Article 723 of the Syrian Penal Code
Taking possession of another person's immovable property without a legal title constitutes the offence of property extortion.

Lawyer Zaki Haji explained that the property records for the Yazidi villages remain preserved at the Cadastral Affairs Directorate in Hassakeh, meaning that proving legal ownership is not the main problem. He noted, however, that the armed factions' continued control of the area has led many owners living abroad to limit themselves to issuing powers of attorney to manage their property or collect its proceeds rather than returning personally. Haji added that some owners appoint acquaintances or intermediaries from outside the Yazidi and Kurdish communities to manage their property, while any effective solution remains dependent first on evicting unlawful occupants.

Under international humanitarian law and the Rome Statute of the International Criminal Court, some acts documented in the Yazidi villages may, depending on their circumstances and connection to the armed conflict, constitute war crimes. These include pillage and the destruction or seizure of property when not imperatively demanded by the necessities of the conflict. The conversion of civilian land and homes into military sites requires a case-specific legal assessment and cannot automatically be classified as a war crime.

Human rights organisations including the Kurdish Organisation for Human Rights in Syria (DAD), Synergy Association for Victims and Syrians for Truth and Justice have also attributed part of the responsibility to Türkiye, citing its support for the controlling factions and alleged direct violations by Turkish forces, including the establishment of military positions on privately owned agricultural land and attacks on civilian homes. Accountability inside Syria remains highly complicated by the strength of current political relations between Damascus and Ankara, leading some legal advocates to place their hopes in proceedings filed abroad under the principle of universal jurisdiction.

The Suspended Right of Return for People Displaced from Homs: Destroyed Housing and Repair Costs Turn Return into a Privilege

In Homs city, particularly in destroyed neighbourhoods such as Al-Khalidiya, Jouret Al-Shayyah and Al-Sabil, displaced people seeking to return face the absence of a clear vision for reconstruction in the city and in Syria more broadly. Weak funding, the absence of a national framework for reconciliation and transitional justice, and uncertainty over the future of zoning plans in destroyed areas delay decisions to return or make them fraught with risk. Many residents fear losing properties they have long owned, being unable to establish their rights, or encountering difficulties in obtaining individual building and repair permits. The right of return therefore extends beyond opening roads and removing rubble, becoming a test of the ability of the state and donors to protect property, finance repairs and transform return from a costly individual initiative into a safe and sustainable process.

Since late 2024, some people displaced from Homs's destroyed neighbourhoods have begun trying to return after years of displacement within Syria or as refugees abroad. They had been forcibly displaced from Jouret Al-Shayyah, Al-Khalidiya, Al-Sabil, Al-Waer and surrounding areas during the sieges and fighting between 2011 and 2017.

Their return quickly revealed a wide gap between the announcement of rubble-removal and service-rehabilitation projects and returnees' actual ability to recover or repair their homes. Housing has become the decisive condition for return: many homes have been reduced to rubble or left looted, burnt and structurally unsafe, while repair costs and rents exceed the means of most returnees and displaced people.

This gap subjects the right of return to a practical test of the ability of local authorities, organisations and donors to move from rubble removal and partial interventions towards a clear policy for repairing homes, providing reparations, protecting property and clarifying the zoning and legal status of destroyed areas. In the absence of such a framework, return becomes a selective process, available to those with money or a home that can be repaired but effectively closed to those who have lost their homes, documents and safety nets.

Housing as the First Condition for Return

"There is no house for me to repair." Ahmed, displaced from Jouret Al-Shayyah.

Ahmed, known as "Abu Farhan," summed up the dilemma of returning to Homs when he told Green Tabu, "There is no house for me to repair." He was speaking about his home in Jouret Al-Shayyah in central Homs, a predominantly Sunni neighbourhood that was home to relatively affluent middle-class and business communities before the war and later became one of the city's most severely damaged neighbourhoods.

Ahmed's home stood on one of the former front lines, which, according to him, resulted in the destruction of his street and reduced it to rubble. He has therefore ruled out repairing the home. "Repairing it is not part of my plans because my home is rubble, a pile of stones on the ground," he said. He added that rebuilding or repairing structures with damaged foundations would cost several thousand US dollars, an amount he described as "unimaginable" and beyond the means of someone struggling from day to day to provide for his family.

"Having a habitable home solves half the problem because it removes the burden of rent from the returnee." Ahmed, displaced from Jouret Al-Shayyah.

According to Ahmed, housing is the main obstacle to the return to Homs of people displaced within Syria and refugees abroad. Having a habitable home means, as he put it, "solving half the problem because it removes the burden of rent from the returnee." Losing a home or seeing it reduced to rubble, by contrast, pushes returnees into a high-cost rental market, particularly in neighbourhoods with services inside the city, where some rents exceed USD 500 per month. In the suburbs, Ahmed said, rents for modest homes are no less than between USD 200 and USD 250 per month.

Destruction Beyond the Reach of Repair Grants

Dr Ali Musharraf Jumaa, a family medicine specialist, told Green Tabu of another obstacle to return to Homs. The problem extends beyond the loss of a home or the high cost of repairing it to the nature of the destruction itself: many homes were looted and burnt and had structural elements removed, making them, in some cases, more expensive to repair than a new home would be to build.

Dr Ali moved into his home in 2006, after fitting it out and selecting all its new furniture. The home consisted of two bedrooms, a sitting room and a large kitchen. It held particular family significance for him, as it was where he began his married life, where his 2 children, Razan and Ahmed, were born and raised, and where he began building an independent family and professional life. That life was soon interrupted as violence escalated in Homs. In May 2011, Dr Ali was detained for two months, and in July of the same year his family was forcibly displaced for the 1st time.

The family's displacement began on Cairo Street in Al-Sabil, adjacent to Al-Khalidiya, Karm Al-Shami and Al-Bayada, where the street formed a dividing line and flashpoint between the neighbourhoods. Dr Ali and his family moved, as he recounted, from one neighbourhood to another within Homs before eventually settling in Al-Waer, which endured a crippling siege between 2013 and 2017. Following the 2017 evacuation agreement for Al-Waer, Dr Ali was forcibly displaced to Idlib Governorate in northern Syria. In late 2024, he returned to Homs, where he and his colleagues formed a voluntary medical committee that provided technical and professional oversight of the city's hospitals.

"The house was completely looted and burnt." Dr Ali Musharraf Jumaa.

When he considered returning to his home, Dr Ali found that repairing it would, by his estimate, cost more than building a new home. The house, he said, had been "completely looted and burnt." He explained that the first wave of looting targeted its furniture and doors in 2011, which were later sold in markets. A more dangerous phase followed in 2014, when reinforcing steel was stolen from the roofs and columns of buildings in an organised and widespread manner. The damage was therefore no longer confined to furniture or interior finishing but affected the structural safety of the building itself.

Dr Ali tried to find an alternative way to repair his home and registered with several humanitarian organisations and donors working to rehabilitate damaged homes. When he followed up with them, he found that his name had indeed been included on the repair lists for the first year. According to Dr Ali, however, financial support and humanitarian programmes soon declined under the pressure of the large number of returnees needing their homes repaired and the resulting financial burden, which the organisations were unable to bear.

Dr Ali's experience reveals the limits of partial interventions in a city where some neighbourhoods suffered compound destruction. Returning to a burnt and looted home stripped of reinforcing steel requires more than a door, a window and a few initial repairs; it requires a structural

assessment, substantial funding and a clear rehabilitation process. With repair programmes suspended or limited, a returnee is left with a home they legally own but cannot inhabit in practice.

Returning to a burnt and looted home stripped of reinforcing steel requires a structural assessment, substantial funding and a clear rehabilitation process.

A Tent Amid the Rubble

Retired teacher Mayada Al-Halawani told Green Tabu of another dimension to the obstacles preventing return to Homs, one connected to family life after years of displacement and the direct impact of the absence of housing on women, older people, the ill and children living abroad. Mayada's return to the city offered no path to stability and instead confronted her again with the most basic problem of shelter, leaving a family that had lost its home, could not repair it and could not afford rent with nowhere to live.

Mayada lived in Al-Khalidiya and worked in education when military operations began in the area at the start of the revolution in Homs. She recounted taking her three children and hurriedly leaving the neighbourhood in search of safety. In 2013, she resigned from education because of the considerable difficulties and risks involved in reaching and working at the school.

After leaving Al-Khalidiya, Mayada and her children spent years moving from place to place within Homs before reaching Al-Waer. There, the family lived under siege for three years amid shortages of food and medicine. In 2017, Mayada and her children were able to move to Hama Governorate and then to Turkey, where they lived for years on income from her work and without a stable support network.

Following the fall of the Assad regime, Mayada decided to return to Homs. She found her home in Al-Khalidiya uninhabitable and was unable to repair it. She currently lives in Hama Governorate with her ill husband, staying temporarily in a relative's home, while her children remain in Turkey because there is no home in Homs in which the family can be reunited.

Mayada approached Homs Governorate several times seeking a solution for herself and others in similar circumstances, but she said she had received no clear answer as to whether the governorate intended to undertake reconstruction or help affected families recover their homes. She explained that she faced two harsh options: renting a separate flat, which was impossible because of high rents and her lack of financial means, or setting up a shelter tent amid the rubble of her home in Al-Khalidiya and living there with her husband.

Mayada's situation shows that return is obstructed when both housing and a public policy for shelter, repair and reparation are absent. The family left Al-Khalidiya under pressure from military operations, endured the siege of Al-Waer and was then displaced to Hama and Turkey. Years later, it is left with a property that provides no shelter, a city that offers no alternative and a local administration that gives no clear answer about the future of

destroyed areas.

Between the Figures and the Limits of Return

The preceding testimonies place the official figures on housing damage in Homs against conditions on the ground. On 2 May 2026, the Directorate of Planning and Statistics at the Ministry of Local Administration and Environment, in cooperation with the United Nations Human Settlements Programme (UN-Habitat), issued the second package of damage and needs assessment reports for Homs Governorate, based on data from the final quarter of 2025. According to figures announced by the ministry, 5.2 percent of residential units had been completely destroyed, 7 percent had suffered severe damage, 9 percent moderate damage and 10.1 percent minor damage, while 68.8 percent of homes had retained their structural integrity.

5.2%
The proportion of residential units completely destroyed across Homs Governorate, according to the damage and needs assessment.

These figures present an aggregate picture at the governorate level, but do not in themselves reveal the impact of destruction in neighbourhoods that were centres of sieges and fighting or lay along front lines within Homs, such as Al-Khalidiya, Jouret Al-Shayyah, Al-Sabil, Al-Waer and surrounding areas. In these neighbourhoods, the obstacle to return lies less in the overall damage percentage than in the concentration of destruction in specific streets and buildings and the nature of the damage caused to some homes by shelling, looting, burning and the removal of reinforcing steel. A person may still legally own a home, yet it may remain uninhabitable or so expensive to repair that return becomes impossible in practice.

Alongside the damage assessments, local authorities began presenting rubble-removal and recycling projects as an entry point for urban recovery. On 26 March 2026, a rubble-removal and recycling project was launched in Homs in the presence of Homs Governor Abdul Rahman Al-Aama, Homs City Council President Bashar Al-Sibai and representatives of Etihad Al-Omran, which represents the Turkish company Erkış. Work began in the old bus station area and was to expand gradually into damaged neighbourhoods, with rubble from demolished properties transported to designated centres for processing and recycling into usable construction materials.

Al-Sibai estimated the volume of rubble in Homs at more than 8 million cubic metres. He said the joint work would continue for approximately 3 years and that rubble was being removed from private properties at their owners' request before work moved on to public properties.

8 million cubic metres
Homs City Council's estimate of the volume of rubble in the city.

On 23 April 2026, the state-run Syrian Arab News Agency (SANA) reported that Homs City Council, in cooperation with the United Nations Development Programme (UNDP), was continuing rubble-removal work in the southern Deir Baalba neighbourhood as part of a plan covering 13 neighbourhoods in the city. According to Samer Al-Mohammad, head of project supervision at the Homs City Council

Directorate of Public Works, the project aimed to clear streets closed by accumulated rubble, pave the way for residents to return to and repair their homes, and improve traffic and services.

These projects open roads and remove some immediate physical obstacles, but they alone do not address the central problem raised by returnees: the home itself. Removing rubble from the street or recycling debris does not mean that a family is able to rebuild a burnt, looted, or structurally damaged house. Removing rubble from private property at the owners' request also assumes that owners are able to initiate and follow up on the process and bear the cost of subsequent stages, while many displaced people are unable to finance repairs or rent alternative accommodation during the waiting period.

Broader humanitarian data supports this contrast between the desire to return and the ability to settle. In February 2025, the Norwegian Refugee Council (NRC) said it had surveyed 4,106 displaced people in northwest Syria between 10 December 2024 and 7 January 2025 to assess their intentions to return following the fall of the former government. Among the 1,600 respondents who had been able to visit their areas of origin, 72 percent said their homes had been completely destroyed or were uninhabitable, while 19 percent said their homes required substantial repairs or reconstruction. These percentages are not specific to Homs, but they provide a general framework for understanding what people displaced from Homs face when inspecting their homes after years of displacement.

FairPlanet, a Berlin-based non-profit media platform focusing on human rights and environmental justice, reported on 12 May 2025, in a report on some Homs residents returning to looted and destroyed homes, that Homs was among the Syrian cities most severely damaged and that the war had left an estimated 5.3 million tonnes of rubble there.

Although this estimate uses a different unit of measurement from that used by Homs City Council, it is consistent with the picture presented by local testimonies: the problem extends beyond the presence of rubble to the scale of destruction that transformed entire neighbourhoods into areas that are difficult to inhabit without extensive structural and financial intervention.

These obstacles intersect with the absence of a clear vision for reconstruction in Homs and Syria more broadly. Weak funding, the absence of a national framework for reconciliation and transitional justice, and uncertainty surrounding the future of zoning plans in destroyed areas all delay the decision to return or make it fraught with risk.

Suspended Ownership in Suweida: From Obstructed Estate Inheritance Inventories to Frozen Property Transactions

The property rights crisis in Suweida now unfolds through several channels, beginning with death registration and extending to Estate Inheritance Inventory Documents (EIIDs), powers of attorney, sales and ownership transfers. Since the July 2025 massacre, victims' families have faced obstacles in registering deaths and amending family civil registration records, preventing heirs from obtaining the documents needed to deal with inherited property. Then, on 20 May 2026, the Ministry of Justice issued Decision No. 1475, freezing most judicial, property and notarisation transactions in the governorate. The ministry presented the decision as a measure to protect property rights, but its broad application closed the legal channels residents, expatriates and heirs need to manage their property. With no clear time limit for the freeze and no exceptions for urgent cases, ownership remains recorded in the Land Registry while the ability to sell property, transfer ownership or derive income from it is effectively suspended.

On 20 May 2026, the Ministry of Justice of the Transitional Administration issued Decision No. 1475, freezing most judicial, real estate and notarisation transactions in Suweida Governorate on the basis of what it described as the "current situation" and the "exceptional circumstances" in the governorate. The ministry suspended the hearing of property sale cases, prohibited the issuance of general and specific powers of attorney relating to the sale of real estate and vehicles, and froze enforcement proceedings, ownership transfer transactions, compulsory sales and any act creating real property rights. In doing so, the Ministry of Justice extended the effects of Suweida's political and security crisis into the property sphere, suspending residents' ability to sell their properties, transfer ownership or manage existing legal disputes concerning them.

The decision was preceded by a state of disruption imposed by government forces and affiliated groups following the July 2025 massacre. The attack on Suweida, the subsequent institutional breakdown, and the disruption of roads and administrative transactions effectively halted essential judicial and administrative processes in the governorate. In this context, victims' families encountered another form of obstruction at the relevant Civil Affairs departments. According to local testimonies collected by Green Tabu, these departments required some families to amend the cause of death recorded in medical reports or change the date of death as a condition for registering the death in the Civil Registry. This obstructed amendments to civil registration records and family registers and subsequently delayed the issuance of the documents required to obtain an estate inheritance inventory document (EIID), preventing heirs from transferring ownership, selling property, investing in agricultural land or settling their legal affairs.

These events show that the Ministry of Justice's decision is only one part of the institutional restrictions on the exercise of property rights in Suweida. The Ministry of Justice, Civil Affairs departments, courts, enforcement departments, notaries and Cadastral Affairs offices now form an interconnected administrative and judicial chain that restricts property transactions through several channels. This chain begins with the registration of a death and the amendment of civil registration records and extends to estate inheritance inventories, powers of attorney, property sale cases, enforcement proceedings, ownership transfers and real property rights.

In this context, the Civil Registry, the courts and real estate documentation become tools for suspending the exercise of property rights in Suweida. This directly affects property sales, estate inheritance inventories, the management of expatriates' property, the investment of agricultural land and the stability of the local property market. A clear gap emerges between the Ministry of Justice's stated justification of protecting rights and preventing the exploitation of current circumstances, and the practical reality in which the freeze becomes an additional cause of suspended

property transactions and increased economic and legal vulnerability among residents.

From Civil Registration to Estate Inheritance Inventories

One link in the chain obstructing property transactions in Suweida begins at the Civil Registry, before a case reaches the courts or the Land Registry. Since the July 2025 massacre, victims' families have encountered obstacles when attempting to register the deaths of relatives or amend family civil registration records. These obstacles arose amid widespread violence documented by the Independent International Commission of Inquiry on the Syrian Arab Republic in its report of 27 March 2026, which estimated that at least 1,700 people had been killed and nearly 200,000 displaced. This prompted families to visit Civil Affairs departments in Damascus despite the risks of travelling between Suweida and the capital, the high cost of transport and the difficulty of completing transactions outside the governorate.

At least 1,700 killed and nearly 200,000 displaced
Estimates by the Independent International Commission of Inquiry of those killed and displaced in Suweida.

In Damascus, according to local testimonies collected by Green Tabu, Civil Affairs departments made death registration conditional on altering fundamental information concerning the circumstances in which the victims were killed. These departments required some families to amend the cause of death recorded in medical reports or change the date of death to one outside the final two-thirds of July before registering the death in the Civil Registry. This condition left families with 2 harsh choices: accept the alteration of information concerning the circumstances in which their relatives were killed, or leave the death unregistered and face the resulting legal obstruction.

The effect of this condition extends beyond the civil document itself. Registering a death is the necessary first step towards amending the civil registration record and family register, and then obtaining the documents required by the competent court to issue an EIID. When Civil Affairs departments refuse to register a death unless its cause or date is altered, they delay the administrative transaction and break the legal chain that heirs must follow to establish their status as heirs and deal with the deceased person's property.

An EIID is particularly important when victims' families need to dispose of property to secure a livelihood, finance their departure or settle their financial affairs. Without formal confirmation of the death and amendment of the civil registration record and family register, heirs cannot complete the documentation required to establish their legal status as heirs. This suspends any subsequent sale or transfer of the property, as well as its use as a financial asset on which the family can rely amid the deterioration in living conditions.

The effects of this obstruction also extend to agricultural land. In a governorate where much of the population relies on land as a productive resource and a form of family savings, the inability to obtain an EIID

freezes the capacity to invest in the land, settle existing disputes or regulate relations between co-owners. As agricultural seasons approach, delays in establishing the heirs' legal status translate into direct production losses, particularly where the land requires a prompt decision concerning cultivation, leasing or management.

This chain makes civil registration the starting point for the suspension of property rights. A family unable to register the death of one of its members cannot amend its family register; without that amendment, it cannot obtain an EIID; and without an EIID, it remains unable to transfer ownership, sell or administer the property or land in the heirs' names.

The obstruction takes the form of an institutional process linking official recognition of a death to the alteration of its details, and then linking the heirs' right to deal with their property to their acceptance of that alteration. Where families refuse to change the cause or date of death, the property remains effectively frozen because the heirs lack access to the complete legal process allowing them to sell, transfer or invest in it. The Civil Registry thus becomes the first link restricting property transactions in Suweida.

Decision No. 1475: From Protecting Property Rights to Suspending Their Exercise

On 20 May 2026, the Ministry of Justice of the Transitional Administration issued Decision No. 1475, suspending most judicial and notarisation procedures connected to property transactions in Suweida. In its preamble, the decision cited the governorate's "current situation" and "exceptional circumstances", presenting the freeze as a temporary measure intended to "safeguard citizens' rights" and "prevent the exploitation of current circumstances through any legal proceedings or transactions that may affect property rights and other rights".

Procedurally, the ministry suspended the hearing before all Suweida courts of property sale cases, civil and criminal proceedings involving people actually residing outside the governorate, and cases to which public bodies are parties. It also prohibited the issuance of general and specific powers of attorney relating to the sale of real estate and vehicles, whether issued in Syria or abroad and whether revocable or irrevocable. This prohibition affects one of the most important legal tools used by residents and expatriates to manage their property, as notarised powers of attorney provide a practical means of completing sales, administering property or concluding settlements when the principal is absent, travelling or unable to appear in person.

"The right remains valid on paper while the ability to turn it into an enforceable legal act is suspended."

The decision also extended to enforcement departments, ownership transfer transactions, compulsory sales and any act creating real property rights. The Ministry of Justice therefore suspended not only litigation but also the final legal effects produced by property judgments and proceedings. Judicial sales, the enforcement of judgments, ownership

transfers and the creation of real property rights all require a connected sequence of procedures involving the courts, enforcement departments, notaries and Cadastral Affairs offices. When this chain is frozen, the right remains valid on paper while the ability to turn it into an enforceable legal act is suspended.

The decision allowed new claims to be filed and registered solely so that precautionary notices could be entered on the relevant Land Records, thereby recording the date of the claim and preserving priority; it prohibited judgments on the merits. This exception gives an affected party a limited ability to protect their legal position formally, but does not provide an effective route for selling property, transferring ownership, enforcing a judgment or resolving a dispute. The Ministry of Justice therefore separates the theoretical preservation of a right from its practical exercise, allowing the entry of a precautionary notice that records the unresolved dispute while withholding the process that would resolve it.

The decision follows an earlier circular issued by the Ministry of Justice and the Supreme Judicial Council in early September 2025. That circular retroactively suspended legal and procedural deadlines from 13 July 2025 because force majeure had disrupted public services and transport in the governorate. At the time, the Ministry of Justice treated the suspension of deadlines as a response to the force majeure situation arising from the attack on Suweida. Decision No. 1475, however, extended the suspension beyond time limits and procedural deadlines to the substance of property, judicial and notarisation transactions, broadening the disruption to include sales, powers of attorney, enforcement and ownership transfers.

The Ministry of Justice presents the decision as a means of protecting property from exploitation and manipulation under exceptional circumstances. Its broad formulation, however, turns protection itself into a tool for suspending the exercise of property rights. Families needing to sell property, owners wishing to transfer ownership, expatriates relying on notarised powers of attorney, creditors awaiting the enforcement of judgments, and heirs seeking to give effect to an EIID all find themselves facing closed or deferred legal channels. Without a clear time limit for the freeze or exceptions for urgent cases, the temporary measure becomes an open-ended restriction on property transactions in the governorate.

Notarised powers of attorney suspended The decision prohibits the issuance of powers of attorney relating to the sale of real estate and vehicles, whether issued in Syria or abroad.

In this sense, the decision operates as a legal lock imposed on top of the obstruction of civil registration and the administrative difficulties faced by victims' families. While the Civil Registry may suspend the beginning of the legal process in some cases by obstructing the registration of deaths and the issuance of EIIDs, Decision No. 1475 suspends the end of the process by freezing sales, enforcement and ownership transfers. The two processes form a closed circle, beginning with a family's inability to establish its legal status and ending with its inability to deal with the property even where that status has been established or could be proven.

The decision is particularly dangerous because it simultaneously affects

interconnected legal sectors: the courts, notaries, enforcement departments, Cadastral Affairs offices, powers of attorney and real property rights. Instead of limiting intervention to cases in which a risk of exploitation or manipulation has been established, the Ministry of Justice chose a general freeze that turns the exception into the rule. In a governorate emerging from a large-scale massacre and experiencing internal displacement and institutional disruption, the freeze has a compounding effect because it deprives residents of the legal tools they need to manage their property.

Practical Consequences: A Suspended Market and Deferred Disputes

The freeze on property and notarisation transactions strikes at an essential part of Suweida's daily economic cycle. For many families, real estate, land and vehicles function as fixed assets, family savings and sources of finance for day-to-day living expenses, displacement, home repairs, debt repayment or travel. When the Ministry of Justice closes the routes for sales, ownership transfers, powers of attorney and enforcement, it prevents residents from converting these assets into usable resources amid intense economic and security pressures.

The impact is compounded in a governorate emerging from waves of widespread violence affecting residents, homes, commercial premises and land. The July 2025 massacre left an extremely fragile property situation, with homes that had been looted or burnt, villages that were destroyed or emptied of their residents, displaced families, absent owners, and heirs needing to establish their legal status. In this context, a property transaction becomes a means of reorganising daily life rather than merely a sale or ownership-transfer procedure. Every delay in a sale, power of attorney, or enforcement process prolongs families' inability to manage their losses or rebuild their livelihoods.

The Ministry of Justice's decision directly affects expatriates and absent owners. The prohibition on issuing general and specific powers of attorney relating to the sale of real estate and vehicles blocks the legal route most commonly used by people living outside the governorate or outside Syria to manage their assets. Such people usually rely on notarised powers of attorney to sell a property, settle matters concerning an ownership share, transfer ownership or manage a dispute with co-owners. With this mechanism frozen, expatriates lose the ability to deal with their property even when it is formally registered and even when the need to sell or manage it is urgent.

The freeze also opens the way for a growing accumulation of deferred disputes. Cases that courts do not hear, judgments that enforcement departments do not enforce, powers of attorney that notaries do not issue, and registrations that do not result in ownership transfers all leave financial and family disputes in an open-ended state of suspension. As this waiting period continues, disputes may escalate between heirs, co-owners, sellers

and buyers, and creditors and debtors, particularly where the property is the family's only available financial asset.

With official channels closed, the risk grows that some residents will resort to solutions outside formal institutions. The need to sell, reach a settlement or obtain liquidity may lead people to conclude customary contracts outside the courts, formalise agreements before local notables or carry out financial settlements without official registration. These practices may provide the parties with a temporary solution, but they create more complicated future disputes because an unregistered contract remains vulnerable to denial, conflicting claims or rights, or legal challenge when the courts and Cadastral Affairs offices resume their work.

This situation also increases the risk of self-help enforcement of rights. The longer the courts and enforcement procedures remain suspended, the more people may rely on local customs, balances of power, armed groups or notables to resolve disputes over property, debts and sales. This may shift property disputes from the courtroom into the community sphere by turning a disagreement over property, an inheritance share or a debt into an open social conflict.

The result is that ownership in Suweida remains formally recognised but effectively frozen. A rights holder may retain their name, share or claim but remains unable to sell, transfer ownership, enforce a judgment, grant a power of attorney or resolve the dispute. With no clear time limit for the decision, deferred transactions become a daily source of pressure on families, the market, expatriates, heirs and farmers. The freeze therefore suspends not only activity within the Land Registry but also part of residents' ability to recover from the July 2025 massacre.

Ownership recorded, disposal suspended
A rights holder retains their registered name, share or claim but cannot sell, transfer ownership, enforce a judgment, grant a power of attorney or resolve a dispute.

Hama: After Valuation Tables Are Cancelled; Judicial Appraisals Raise Rents for Shops Under the Furoogh System

The cancellation of Hama's property valuation tables shifted the dispute over rents for shops held under furoogh leases from a general reference that had provoked traders' protests to appraisals in individual court cases, whose results vary and whose detailed criteria remain undisclosed. One rent revaluation lawsuit shows how an appraisal by a 3-member panel of experts raised a shop's annual rent from SYP 58 million to SYP 133 million, amid objections to the method used to calculate the value of the leased premises, the treatment of the furoogh right and tenant-financed improvements within that calculation, and suspicions surrounding the interests of some experts. This process redistributes the effects of inflation between the bare owner and the holder of furoogh rights without published rules to ensure consistent valuations, transparent appraisals and protection of both parties' legal rights.

On 11 March 2026, the council of the Hama branch of the Engineers' Syndicate adopted tables of prevailing market values for commercial and residential properties and agricultural land in Hama city and its surrounding area, to serve as an indicative reference for experts conducting judicial appraisals. The value of a commercial property subject to compulsory lease extension directly affects its rent: Rental Law No. 20 of 2015 sets the annual rent at 7 percent of the value of the leased premises on the date the lawsuit is filed. The high values listed in the tables therefore prompted protests by holders of furoogh rights, some of whom closed their shops in several of the city's markets on 26 April 2026.

Rental Law No. 20 of 2015 Sets annual commercial rent at 7% of the value of the leased premises on the date the lawsuit is filed.

On 7 May 2026, representatives of furoogh rights holders met with officials in Hama and subsequently announced that the general tables had been cancelled, while individual rent revaluation lawsuits remained in place. The law allows both lessors and lessees to request that the rent be reassessed if either alleges unfairness in the amount, provided that no such claim has been filed within the previous 3 years.

From Preparing the Tables to Announcing Their Cancellation

The process of preparing the tables began on 31 December 2025, when the head of the Hama branch of the Engineers' Syndicate issued Decision No. 199/1. The decision established a committee of 7 engineers to prepare estimated values for commercial, residential and agricultural properties in Hama governorate and set the principles for preparing expert reports. The committee was chaired by Osama Baghdadi and included Raad Atallah, Sobhi Al-Sheikh Sobh, Gandhi Abu Ali, Abdul Razzaq Halqawi, Abdul Rahim Haddad and Ahmad Al-Razouq. Among the grounds cited in the decision was a letter that the "Hama Furoogh Rights Holders Committee" had sent to the Syndicate branch on 24 December 2025.

The tables were particularly significant for tenants of older commercial shops subject to compulsory lease extension, under which a lease continues automatically after its term expires regardless of the lessor's wishes. These include permanent commercial leases known as furoogh contracts. Under this older system, the tenant pays the landlord a lump sum at the outset of the tenancy, in addition to periodic rent that is often nominal. The tenant may transfer the right to occupy the shop to another tenant in return for a new furoogh payment, while ownership of the property remains with the original landlord.

The engineers' committee said it had prepared the tables after conducting field surveys, studying planning, urban and commercial conditions, and analysing the factors affecting property values. The study covered streets in Hama city, communities in its northern countryside and the town of Kafr Buhum, and classified values for commercial premises, residential properties and land. On 11 March 2026, the council of the Hama branch of the Engineers' Syndicate approved the committee's minutes and deemed the tables "advisory and indicative" for engineers accredited as

experts by the Ministry of Justice. The Syndicate branch referred the tables to the Attorney General in Hama under Letter No. 1183 on 15 March 2026. The number 1183 therefore refers to the letter by which the tables were transmitted, rather than to the decision establishing the committee or approving the tables.

Holders of furoogh rights argued that experts' use of these tables as a reference in rent revaluation lawsuits would raise the assessed values of leased premises and, consequently, their annual rents. Faced with a shared concern, furoogh rights holders in Hama gradually developed a representative framework. Their public mobilisation began under the name "Hama Traders' Group" during a protest on 9 November 2025. The name "Hama Furoogh Rights Holders Committee" then appeared in correspondence with the Engineers' Syndicate branch in December 2025. From April 2026, the name "Committee for the Protection of Furoogh Rights Holders" was used for the body that submitted the rights holders' objections, communicated with judicial authorities, the Engineers' Syndicate and the Chamber of Commerce, and organised protests and strikes.

A member of the "Committee for the Protection of Furoogh Rights Holders" told Green Tabu that the values in the tables treated as equivalent shops located on streets that differed in location and level of commercial activity. He added: "The central issue in Hama is arbitrary valuation," arguing that the engineers' committee had failed to account for differences between main and secondary streets or between shop locations on the same street.

More than 15,000% The increase in annual rent for some small shops, from SYP 250,000 to SYP 40 million, according to representatives of furoogh rights holders.

According to figures that representatives of the "Committee for the Protection of Furoogh Rights Holders" provided to Green Tabu, the annual rent for some small shops rose under the valuation tables from SYP 250,000 to SYP 40 million, an increase of more than 15,000 percent. The new annual rent reached SYP 28 million for a warehouse, SYP 95 million for a vegetable shop and SYP 450 million for Al-Sharq Cinema.

These values prompted the "Committee for the Protection of Furoogh Rights Holders" to call for a strike on 26 April 2026. Traders closed their shops on Al-Dabbagha Street, Ibn Rushd Street and in Al-Tawil Market, and held a protest outside Al-Sultan Mosque. They demanded that use of the tables be halted and that the engineers' committee disclose the criteria it had applied.

On 7 May 2026, representatives of furoogh rights holders met with the Attorney General in Hama, Mohammad Ahmad Al-Naasan; the head of the Engineers' Syndicate branch; and representatives of the Hama Chamber of Commerce. The rights holders' representatives said the meeting ended with a promise to stop using the tables and to establish an arbitration committee under the Chamber of Commerce's auspices. With the agreement of both parties to the lease, this committee would consider either ending the rental relationship or setting a new rent.

Following the meeting, the representatives announced that the general tables had been cancelled, although no official decision to that effect had been issued. Individual judicial rent revaluation lawsuits remained active, with an appraisal by a 3-member panel available when the initial appraisal was challenged. The continuation of individual cases shifted the dispute towards expert reports issued separately in each lawsuit.

Rent Revaluation Lawsuits and the Rights of Both Parties to the Lease

Rental Law No. 20 of 2015 regulates the reassessment of rents for older properties subject to compulsory lease extension. Both lessors and lessees may file a lawsuit before the Magistrates' Court if either alleges unfairness in the rent, meaning an unjust disparity between the amount paid and the amount determined under the law. The annual rent for property used for commercial, industrial or artisanal purposes is calculated at 7 percent of the value of the leased premises on the date the lawsuit is filed. The lessee continues to pay the previous rent until a final ruling is issued, after which the new rent applies from the date the claim was filed.

A new lawsuit to determine the rent may be filed only once every 3 years, calculated from the date of the contract, a written agreement to amend the rent or the previous claim. This mechanism helps explain why owners of long-leased commercial properties under the furoogh system have resorted to the courts after inflation eroded the real value of rents. It also allows tenants to seek a reduction if they believe the rent exceeds the amount legally due for the leased premises.

The law allows the Magistrates' Court to appoint either 1 expert or 3 experts to estimate the property's value. The parties may agree on their selection. If they cannot agree, each party nominates an expert from the roster issued by decision of the Minister of Justice, and the court selects the third. The panel submits its report after inspecting the leased premises and examining its characteristics, location, area, use and the factors affecting its value. Depending on the course of the case, the court may adopt the report, request that it be supplemented or order a new appraisal.

The effect of this mechanism can be seen in a lawsuit involving a commercial shop rented under the furoogh system in Hama's Al-Tawil Market, where Obada Abideen inherited the right to occupy the premises from his grandfather. The shop's bare owners filed the lawsuit on 28 August 2024, seeking a reassessment of the rent. On 25 May 2026, the court ordered an appraisal by a 3-member panel of experts. The experts inspected the shop on 12 July 2026 and submitted their report on 19 July 2026.

The expert panel valued the shop at approximately SYP 1.9 billion and set its annual rent at SYP 133 million, equivalent to 7 percent of the estimated value. The panel appraisal followed Abideen's objection to an earlier valuation that, he said, had set the annual rent at SYP 58 million. Rather than lowering the rent, the new appraisal raised it by more than

129 percent compared with the previous valuation.

The expert report took into account the shop's location, area, structural characteristics and commercial use, and referred to the equipment and improvements within it. These details matter in shops held under furoogh leases because the tenant may have paid a substantial sum at the beginning of the rental relationship and acquired a financial interest in the shop, then paid to fit it out and improve it, while the landlord retains bare ownership. Appraising the leased premises on the basis of the property's current real estate value raises the annual rent without, by itself, resolving how the furoogh right or the value of tenant-financed improvements should be calculated.

This dispute coincides with campaigns led by some bare owners of commercial shops demanding the return of their properties. Some participants in these campaigns describe occupants holding furoogh rights as "usurpers of their shops." Fadi Jammad, a lawyer specialising in real estate disputes and property rights, told Green Tabu that this description lacks a legal basis because a holder of furoogh rights occupies the property under a contract and on legal grounds. Jammad said that property extortion, by contrast, entails taking possession of a property by force and without legal basis.

"A holder of furoogh rights occupies the property under a contract and on legal grounds." Lawyer Fadi Jammad, responding to some bare owners' description of shop occupants as "usurpers."

Jammad added that the heirs of a bare owner succeed the deceased in both rights and obligations. Ownership of the property therefore passes to them, as do the obligations arising from the lease contract if the deceased had received the furoogh payment. He said Law No. 20 of 2015 had established rules governing the relationship between the parties, while economic changes and the erosion of the real value of rents require the law to be updated through provisions that protect both bare owners and holders of furoogh rights. Abideen's case shows that retaining individual valuation lawsuits shifted the dispute from the general tables to the method used to value each leased property, raising questions about appraisal criteria and the transparency of expert selection.

No Published Criteria and Suspected Conflicts of Interest

The shift from general valuation tables to individual expert reports left the fundamental problem unresolved: the basis on which experts estimate the value of each leased property. A member of the "Committee for the Protection of Furoogh Rights Holders" told Green Tabu that the committee's representatives asked the head of the Engineers' Syndicate branch during the meeting on 7 May 2026 about the methodology used to determine the elements of a valuation and the weight assigned to each. They received no clear answer. The member added that the discussion ended with a statement that the tables and the files on which the experts had relied had been lost, with no explanation of which body was responsible for preserving them or how they could be consulted when an appraisal was challenged.

The files on which the experts relied were "lost" What a member of the Committee for the Protection of Furoogh Rights Holders reported about the 7 May 2026 meeting on valuation methodology.

The absence of published criteria prevents interested parties from determining the effect of each factor on the final value, including a shop's position on a street, the level of commercial activity, its area, structural condition, the nature of the business operating there, the furoogh right and tenant-financed improvements. It also complicates comparisons between valuations issued in similar lawsuits and makes a challenge dependent on a new appraisal that may produce an even higher figure, as occurred in Obada Abideen's case.

The "Committee for the Protection of Furoogh Rights Holders" raised suspicions of conflicts of interest involving some experts, on the grounds that they hold bare ownership rights in commercial properties and could benefit from higher values being adopted across the market. Green Tabu compared the names of several engineers appearing in expert-panel documents with official land records and found commercial properties registered in the names of some of them. This shows that some individuals were both experts and property owners. Proving a conflict of interest in a specific case, however, would require establishing that an expert had a direct personal interest in the outcome or a connection to one of the parties.

The "Committee for the Protection of Furoogh Rights Holders" submitted a complaint naming engineers whom it accused of conflicts of interest, but the Hama Chamber of Commerce declined to sign it. The reasons for the Chamber's refusal, the outcome of the complaint and the identity of the authority that received it remain unclear. Current procedures also lack a published rule requiring experts to disclose property holdings or interests connected to the market in which they appraise properties, or specifying the circumstances in which they must recuse themselves.

In contrast to the high valuations in Hama, traders in Damascus and Aleppo told Green Tabu that rent revaluation lawsuits in their markets had produced figures they considered closer to actual market conditions. This suggests that Hama's crisis has a local dimension connected to the way appraisals are conducted there, although the comparison remains limited by the absence of published data on the number of cases and average assessed rents in the 3 governorates.

Fears that the crisis could spread to other markets prompted representatives of furoogh rights holders and bare owners in Damascus to work on establishing committees within chambers of commerce and industry. Similar initiatives emerged in some professional syndicates and artisans' unions. This organisation aims to provide representation for both parties in discussions over amendments to the Rental Law and the management of disputes arising from old contracts.

The effects of the appraisals extend to commerce more broadly and to consumer prices. A member of the "Committee for the Protection of Furoogh Rights Holders" said that raising a shop's annual rent from around SYP 2 million to SYP 30 million or SYP 40 million would force traders

to pass the increase on through the prices of goods, particularly in a city that relies on Damascus and Aleppo for a significant share of its supplies. He added that traders would be caught between the new rental costs and the profit margins allowed by price-control authorities, estimating that some increases could push the prices of goods to between 5 and 10 times their previous levels. This figure remains an estimate by the committee, unsupported by accounting data that would allow it to be generalised.

The Hama crisis highlights the need for rent revaluation lawsuits to be governed by written, published criteria; reports that explain how values are calculated; a mechanism requiring experts to disclose their interests and recuse themselves in cases of conflict; and data allowing judgements and expert appraisals to be compared across markets. Amendments to the Rental Law must also address the erosion of the real value of rents while protecting the financial value acquired by holders of furoogh rights, rather than leaving the rebalancing of the relationship to inconsistent individual appraisals that may pass the cost of the dispute on to traders and consumers.

Restoring Balance Through the Law

The furoogh crisis in Hama shows that efforts to correct the imbalance in rental relationships have moved away from a single statutory framework and towards a series of inconsistent appraisals whose underlying principles are difficult for the parties to identify and whose outcomes are difficult to predict. This process gives engineering appraisals a role that extends beyond estimating property values to redistributing the burden created by inflation between the bare owner and the holder of furoogh rights, although both rely on existing legal rights.

Restoring balance requires amendments to the Rental Law that establish a clear, periodic mechanism for adjusting rents and distinguish among the property's value, the furoogh right and improvements financed by the tenant. It also requires standardised, published valuation criteria, an obligation for experts to disclose their interests, and reasoned reports that can be challenged and compared. Such safeguards would move the dispute away from fluctuating individual estimates and towards rules that can be scrutinised, and would prevent the erosion of owners' rights from being addressed by weakening the financial right acquired by the tenant.

Rubble Removal in Rural Damascus: From Transportation Costs to Proving Rights

Rural Damascus Governorate's decisions to bring Darayya, Sayyida Zainab, Al-Husseiniya and Zabadani under Law No. 3 of 2018 bring the rubble issue back into focus as an obstacle to return, repair and the restoration of services, while shifting rubble removal from a cost borne individually by property owners to a process managed by the governorate and administrative units. The law, however, links removal to the sale of rubble at public auction and the deduction of transportation costs from the proceeds, while limiting the role of the Building Description and Ownership Verification Committee to the preliminary verification of those entitled to the rubble and private possessions, without restoring damaged real estate documents or resolving disputes over underlying property ownership. The experience of Darayya, where both buildings and documents were damaged, reveals the limits of this process amid lost documents, absent owners, the narrow scope for objecting to the classification of a building's condition or to its demolition, and uncertainty over the fate of the land after removal. Implementing the law therefore requires amendments that distinguish between rubble management and the establishment of ownership, expand the safeguards governing objections, protect the rights of absent and displaced people, and clearly define removal costs and their relationship to repair and reconstruction.

Rural Damascus Governorate recently reactivated Law No. 3 of 2018 on the removal of rubble from damaged buildings through a series of decisions bringing Darayya, Sayyida Zainab, Al-Husseiniya, and Zabadani under its provisions. These decisions give local administrative units a direct role in assessing the scale of the damage, the cost of removal, and the equipment required, in preparation for dealing with large quantities of rubble that continue to obstruct partial returns, the repair of homes, and the restoration of services in areas that suffered varying degrees of wartime destruction.

Local councils present this process as a means of reducing the direct burden on owners of damaged properties, after rubble removal became a cost that many residents could not bear alone. This gives the inclusion decisions a clear service-related and social dimension, as they move the rubble issue from scattered individual initiatives into an administrative process managed by the governorate and local authorities.

The application of Law No. 3 in Rural Damascus, however, reveals tension between the declared administrative promise and the law's actual mechanism. The law regulates the removal and sale of rubble by public auction and the deposit of the proceeds into a special account for those entitled to them, after deducting removal and transportation costs. It also allows for the formation of a Building Description and Ownership Verification Committee, chaired by a cadastral judge and including administrative, technical and community representatives. The committee is responsible for describing damaged buildings and preliminarily verifying those entitled to the rubble and private possessions. Its tables do not, however, replace the Land Registry or constitute a process for restoring damaged real estate documents.

The inclusion decisions assign the rubble removal law a broader function than its actual scope. They may move the rubble issue forward, reduce the direct cost to residents, and create an opportunity to collect documents and evidence that help organise rights holders' files. They nevertheless remain governed by limited safeguards, particularly concerning the right to object to the classification of a building's condition or to its demolition, the rights of absent and displaced owners, the fate of the land after the rubble is removed, and disputes that extend beyond ownership of the rubble and private possessions to the underlying ownership of the property itself.

Inclusion decisions and the scale of the rubble

The Rural Damascus Governorate issued decisions including Darayya, Sayyida Zainab, Al-Husseiniya, and Zabadani under Law No. 3 of 2018 on the removal of rubble from damaged buildings. The decisions come at a time when rubble remains one of the main obstacles to partial returns of displaced residents, home repairs, and the restoration of services across large areas of Rural Damascus. The cost of removal exceeds the means of

many owners of damaged properties, particularly those whose buildings have been completely or almost completely destroyed.

The 4 inclusion decisions, issued on September 5 under Nos. 3261–3264, have administrative significance beyond the 4 towns they cover. They establish a process that could be extended to other towns and cities in Rural Damascus and possibly to other governorates containing large quantities of rubble. At its current stage, however, the process remains limited to removing rubble and describing damaged buildings. It is not sufficient on its own to address lost or undocumented property rights.

Law No. 3 authorises the governor to identify the cadastral area and damaged buildings to which its provisions will apply, based on a proposal from the relevant administrative unit. Once the inclusion decision has been issued, the administrative unit must prepare a detailed report within 120 days. The report must set out the scale and percentage of damage, the expected costs, and the equipment needed to remove rubble from public and private property. It must also estimate the value expected to be recovered from the rubble and include a plan showing images of the damaged buildings, the names of the cadastral areas, the names of the building owners, and details of private possessions.

In Darayya, the scale of the rubble problem appears to be one of the reasons for resorting to this process. Raed Obeid, head of Darayya City Council, told Green Tabu that there were an estimated 1.3 million cubic metres of rubble in the city—earlier estimates had only been around 500,000 cubic metres. The difference between the two estimates shows that the volume of rubble exceeds initial calculations and that dealing with it requires organised intervention by the governorate and the administrative unit, rather than individual initiatives by owners of damaged properties.

1.3 million cubic metres
The current estimated volume of rubble in Darayya.

According to Obeid, the governorate will pay for rubble removal in Darayya through contracts with public or private bodies to carry out the work. This would reduce the direct burden on residents, who have struggled with rubble-removal costs, particularly owners of partially destroyed properties. His statement reflects the service-related and social dimension of the inclusion decisions, because removing rubble is no longer linked to each owner's ability to pay but has become part of a general administrative process led by the governorate and local authorities.

The wording of the law nevertheless requires a more precise reading of the question of cost. The law provides for rubble removed and transported by the administrative unit to be sold at public auctions. The value of the final auction award is then deposited in a special account in the name of the administrative unit for the benefit of those entitled to it, after the costs of removing and transporting the rubble have been deducted. In recent statements by local officials, removal is therefore presented as a public service that reduces the immediate burden on property owners, while under the law, it is also linked to the value of the rubble and a subsequent

mechanism for covering removal and transportation costs.

This creates a distinction between officials' promises and the law's actual mechanism. The governorate and local councils present the inclusion decisions as a way of easing the burden on residents and removing a physical obstacle to repairs and return. The law, however, links the process to assessing damage, determining the value of the rubble, selling it, and deducting removal costs from the resulting proceeds. In other words, the cost does not disappear entirely. Instead, it shifts from a direct advance payment by owners to a subsequent legal mechanism connected to the value of the rubble and the rights of its owners.

Obeid said the effect of rubble removal would be limited to helping residents dispose of the debris, without connecting the process to updates to zoning plans or to any reconstruction project. He also explained that rehabilitating homes remains the responsibility of their owners and may later take place through agreements between them and real estate development companies. This distinction is essential: removing rubble is not the same as reconstruction, nor does it automatically give owners of damaged properties the financial or legal capacity to repair their homes or construct new buildings in place of those destroyed by the war.

In Al-Husseiniya, the implementation process appears from another perspective. Youssef Yaqoub, head of the city council, told Green Tabu that a committee of engineers would inspect damaged homes, assess each one and then prioritise rubble removal according to the scale of destruction and after obtaining the property owner's approval. He also said that there was not yet a clear and accurate estimate of the quantity of rubble in the city, and that the estimated level of destruction was approximately 20 percent. The local council had begun compiling statistics on the number of damaged homes in preparation for submitting a detailed report to the governorate.

The accounts from Darayya and Al-Husseiniya show that the inclusion decisions are still at the stage of moving from legal text to local implementation. In Darayya, the large volume of rubble makes removal an immediate priority, while in Al-Husseiniya the urgent need is for engineering inspection and the setting of priorities before work begins. In both cases, the implementation of Law No. 3 remains dependent on the ability of administrative units to prepare accurate reports, secure implementing bodies, estimate costs, and deal with rubble as property belonging to rights holders rather than simply as construction waste that can be removed by administrative decision.

From Establishing Ownership to Preliminary Verification of Ownership

Darayya provides the clearest example of the overlap between rubble removal and the property documentation crisis. The scale of the rubble in the city raises not only questions about cost and transportation

mechanisms, but also a more complicated issue involving the proof of rights over properties whose buildings were damaged or completely destroyed, whose owners' documents were damaged or lost, and whose records serving as reference points in property disputes were themselves affected.

According to Obeid, the most important aspect of the inclusion decisions is the regularisation of property ownership. He explained that the 2012 destruction of the Darayya Palace of Justice, which housed the Land Registry office, damaged the principal register of property ownership. This left the city facing a serious documentation problem, particularly in relation to agricultural properties and informal settlements. Obeid said the committee to be formed under Law No. 3 would rely on documents held by property owners rather than referring every case directly to the courts, since judicial proceedings could take a long time.

Law No. 3 of 2018 Preliminary verification does not provide a rights holder with a new title deed.

Describing this process as the regularisation of property ownership, however, requires legal scrutiny. Law No. 3 does not give the Building Description and Ownership Verification Committee the authority to restore damaged real estate documents, nor does it make the committee's tables a substitute for the Land Registry or equivalent records of property ownership. The committee's role is to inventory, record and describe damaged buildings, conduct a preliminary verification of ownership, and then prepare a table containing the owners' names, their shares, and the necessary information relating to private possessions, rubble and buildings included in the removal process. Preliminary verification does not provide the rights holder with a new title deed or amend the Land Registry records. It merely organises a table of rights holders for the purposes of removing the rubble, dealing with private possessions and distributing the resulting proceeds.

In this sense, the inclusion decisions in Rural Damascus create a practical process for rights holders who possess ownership documents of varying legal value, but they do not, on their own, resolve the issue of property ownership in a final sense. The committee may rely on subdivision plans, lists of owners, official documents and papers, proof of payment of electricity and water bills, records from financial departments, testimony from neighbours concerning ownership of the property, and physical inspection, meaning an on-site examination of the property or its location. These tools may help to build a preliminary evidentiary file, but they remain connected to rubble-removal procedures and the organisation of the owners' rights in the rubble. They do not constitute the issuance of new title deeds or the reconstruction of a damaged Land Registry.

The procedures required of residents are consistent with this preliminary form of verification. The inclusion decisions require owners of properties, private possessions and rubble, or their legal representatives or relatives up to the fourth degree, to submit an application to the city council within 30 days of the announcement. The application must state their place of

residence and be accompanied by documents supporting their rights, or copies where the originals are unavailable. For clarity, rubble means the remains of a collapsed building, while private possessions refer to items inside the property, such as furniture, tools or other recoverable objects. The application must also state the property's location and boundaries, the relevant shares, its legal nature and legal classification, and details of the private possessions or claimed rights.

Obeid explained that a property owner in Darayya may submit any available document, such as a water or electricity bill, together with testimony from neighbours confirming that the property belongs to them, where the owner does not possess a formal contract, court judgment or judicial power of attorney. This mechanism reflects a local attempt to adapt the law to the destruction of documents and records. It nevertheless gives the committee broad discretion in assessing evidence, particularly where ownership is based on undocumented transactions, informal contracts or community testimony that may be difficult to verify independently of potential disputes.

The process becomes more sensitive where there is a conflict between two parties. According to Obeid, the matter is referred to the courts where one party claims to have bought the property from another, while the second party denies the sale and there is no document or contract proving the claim. Such cases fall outside the committee's preliminary administrative and legal function and return the matter to the judiciary, because the committee cannot resolve a serious dispute over the underlying right where claims conflict and decisive documents are absent.

The forms distributed by Darayya City Council to applicants beginning on June 10 therefore appear to be part of an organisational attempt to collect preliminary information rather than an alternative to complete real estate documentation. The forms include a description of the property, its location, the extent of the damage and the documents submitted by the owner to prove their right. This information helps organise inspections and removal and identify the parties concerned, but it is not sufficient on its own to resolve property disputes dating from before the destruction or arising from transactions conducted during forced displacement, internal displacement or the absence of rights holders.

This demonstrates the limits of relying on Law No. 3 to address property ownership. Local decisions may use it to collect residents' documents, organise preliminary tables and identify those entitled to rubble and private possessions. They go beyond the wording of the law, however, when they present it as a framework for establishing lost property rights or restoring their documentation. The difference between establishing ownership and carrying out preliminary verification is not merely linguistic but concerns the legal effect of the procedure on rights. Establishing ownership produces a stable legal effect, whereas preliminary verification involves collecting evidence sufficient to administer rubble removal and

the associated proceeds and private possessions.

Darayya represents a genuine test of the ability of the inclusion decisions to protect rights holders without assigning Law No. 3 a function it does not provide for. In a city where both buildings and records were damaged, the rubble-removal process may offer an opportunity to collect documents at risk of being lost and create an initial local archive concerning damaged properties. It will remain incomplete, however, unless accompanied by another legal framework addressing the restoration of damaged real estate documents, the protection of absent owners and the resolution of disputes extending beyond ownership of rubble and private possessions to the underlying ownership of the property itself.

Limited safeguards under Law No. 3

The inclusion decisions move from the stage of administrative announcement to implementation through a series of technical and legal procedures. These begin with the inspection of damaged buildings, the assessment of the scale of damage, the setting of priorities and the preparation of tables of rights holders, followed by the removal of rubble or its sale at public auction. At this stage, the limits of Law No. 3 become more apparent. It gives administrative units and specialised committees broad tools for managing the rubble issue but provides owners and rights holders with only limited safeguards, particularly concerning the classification of a building's condition, objections to demolition and the fate of the land after the rubble has been removed.

The first limitation becomes apparent when local statements about implementing the inclusion decisions are compared with the text of the law itself. Some local councils present rubble removal as a consensual process involving property owners and based on technical inspection, the setting of priorities and the owner's approval. Law No. 3, however, does not make the owner's approval a general and prior condition for every removal operation. Instead, it regulates the deadlines for submitting applications, recovering private possessions or rubble, and objecting to the table of rights holders before the Civil Court of Appeal. Approval, where mentioned in local statements, therefore amounts more to an implementing commitment or declared practice than to a legal safeguard sufficient in itself to protect all owners in the areas concerned.

This distinction is particularly important because the law gives the Building Description and Ownership Verification Committee a central role in describing damaged buildings, determining the amount and percentage of damage, assessing whether a building is structurally sound, and recommending whether it should be demolished fully or partially, or left standing. This authority also affects buildings that remain standing but are at risk of collapse or capable of repair, making the technical description itself a matter with significant consequences for owners' rights.

One of the law's principal weaknesses lies in the narrow scope of

Civil Court of Appeal Appeals concern the table of rights holders, not the classification of a building's condition or a decision to demolish it.

objections. The right to appeal before the Civil Court of Appeal relates to the information contained in the table of rights holders and does not provide a clear procedure for objecting to the classification of a building's condition or to a recommendation that it be demolished. An objection concerning ownership also does not suspend the public-auction proceedings conducted by the administrative unit. A rights holder may challenge the committee's table while procedures for dealing with or selling the rubble continue, limiting the practical effect of judicial protection.

Another problem concerns the fate of the land after rubble is removed or a building at risk of collapse is demolished. The law regulates ownership of the rubble and private possessions, the method for selling them, and the preservation of the resulting proceeds, but it does not clearly state what happens to the land once removal is complete. It does not specify whether the owner may immediately construct a new building on the land or whether this will later be subject to zoning conditions, permits or new zoning plans. Nor does it connect removal to compensation for the land, alternative housing or an expropriation process. This gap is particularly important in destroyed areas such as Darayya, where Obeid has stated that rubble removal is not connected to updates to zoning plans and that the rehabilitation of homes remains the responsibility of residents.

Removing rubble is, therefore, not sufficient to restore the right to housing or enable an effective return. The administrative unit may remove debris from private property and prepare a table of those entitled to the rubble and private possessions, but the property owner will still require the financial means to repair or rebuild, administrative permits, clarity concerning the zoning status of the land, and a resolution of any dispute over the underlying ownership. This makes Law No. 3 a tool for managing rubble rather than a framework for reconstruction or reparation for property-related harm.

The law allows rubble and similar materials to be sold at public auction, after which the value of the successful bid is deposited in a special account for those entitled to it, following the deduction of removal and transportation costs. This process may preserve a financial entitlement for anyone who later proves their claim, but it does not necessarily compensate for the loss of actual control over the rubble or private possessions, or for the limited ability to object within the specified deadlines. Converting rights into a cash payment may also fail to address the owner's actual loss where the rubble is connected to the property's location, the possibility of repairing it, or personal memories and belongings.

The inclusion decisions in Rural Damascus reveal a legal and administrative paradox. They are based on a law that gives local authorities practical tools for removing rubble and preparing preliminary tables of rights holders, yet these tools are being applied to problems that extend beyond the law's scope: damaged real estate documents, missing documents, absent owners, reconstruction costs, and the fate of the land after the debris is removed.

Without a complementary legal framework that addresses the restoration of damaged real estate documents, guarantees the rights of absent owners, and expands the ability to object to building classifications and demolition, the inclusion decisions may move the rubble issue forward but cannot, on their own, protect damaged property rights or establish a safe process for return and repair.

The limits of the law and the need for amendment

A serious response must begin with amending Law No. 3 of 2018, rather than expanding the inclusion decisions or leaving implementation dependent on promises made by local officials. The law needs to draw a clear distinction between rubble removal, the preliminary verification of rights holders and the restoration of damaged real estate documents. It also needs a more precise definition of the legal effect of the tables prepared by the committees, so that they are not used as an undeclared substitute for the Land Registry or as a means of confirming or denying rights that extend beyond ownership of rubble and private possessions.

Any amendment should expand the right of objection so that it is not limited to the list of rights holders but also applies to the classification of a building's condition and recommendations for its demolition or removal. An objection should also suspend procedures capable of causing irreparable harm. The deadlines granted to absent and displaced people should be extended, and a special mechanism should be established to protect those who have lost their documents or are unable to reach their areas or obtain legal representation.

The law also requires a clear provision concerning the fate of the land after rubble removal and the relationship between removal, repair, reconstruction, and compensation. It must explain how removal and transportation costs are calculated, when they are to be borne by the administrative unit, and when they are to be deducted from the value of the rubble, so that reducing the burden on residents does not remain merely an administrative promise. Only then can the rubble issue develop from a limited public-service measure into an organised legal process for protecting housing, land, and property rights in affected areas.

Rising Rents in Damascus and Its Nearby Suburbs: Demand Pressure and Limited Supply

Rental pressure moves across uneven but interconnected housing markets in Damascus and its nearby suburbs. Higher-priced neighbourhoods maintain elevated rents because of their location, services and dollarisation, while limited purchasing power pushes more tenants towards less expensive neighbourhoods and the suburbs. There, returnees increase demand as destruction and stalled repairs reduce the number of habitable units. Large security deposits and weak housing investment further intensify this imbalance, turning limited supply into steadily rising rents and making housing increasingly difficult to access.

The rental crisis in Damascus and its nearby suburbs is expanding across distinct housing markets that share dollarisation and weak purchasing power but differ in the nature and location of each area and the extent of damage to its housing. In some Damascus neighbourhoods, high rents reflect the area's location within the city and proximity to services, markets and employment opportunities, while in others, such as Al-Zahira and Al-Midan, the crisis is evident in the widening gap between actual incomes and the rents being demanded. In nearby suburbs in Rural Damascus Governorate, such as Moadamiyeh and Darayya, rental costs intersect with the difficulties faced by many displaced people and refugees who returned after the fall of the Assad regime but remain unable to go back to their damaged or destroyed homes.

These groups are entering a market with limited supply, where the available flats are insufficient to absorb rising demand, while dollarisation and depreciation of the Syrian pound push the cost of rent in pounds to levels detached from local purchasing power. Stagnation in real estate investment and the limited number of urban development projects are making it more difficult to produce new habitable units, while expectations surrounding urban and administrative projects are placing pressure on some nearby suburbs before those projects have produced actual housing.

Damascus Neighbourhoods: Between Peak Rents and the Income Gap

Within Damascus, the rental crisis differs from neighbourhood to neighbourhood. Rents in Al-Malki and parts of Mazzeh represent the upper end of the market because of these areas' location and proximity to services, markets and main roads. Older and relatively less expensive areas, such as Old Al-Zahira and Al-Midan, reveal another aspect of the crisis: rents exceed the means of broad sections of people seeking housing even in neighbourhoods that are not part of the city's highest-priced market.

USD 300–500 in Al-Zahira; USD 300–400 in Al-MidanMonthly rents in older, relatively less expensive neighbourhoods below the upper end of the Damascus market.

In Old Al-Zahira, rents range from USD 300 to USD 500 per month, depending on the size of the home, the standard of interior finishing and the floor on which it is located. Rents are usually higher on lower floors than on upper floors: a 1st-floor home generally rents for more than a comparable home on the 3rd or 4th floor, often because power cuts affect the operation of lifts.

In Al-Midan, close to Al-Zahira, rents range between USD300 and USD400 per month, although most of the buildings in the area are old. These figures show that rising rents in Damascus are not limited to neighbourhoods classified as high-priced property markets, but also affect areas with older urban fabric and a broader stock of lower-cost housing.

In Mazzeh, the price varies by location. Rents can reach approximately USD1,000 per month, particularly for properties located on the Mazzeh motorway, where proximity to the main road and services increases demand. In Al-Malki, one of the most expensive neighbourhoods in

Damascus, rents reach approximately USD3,000 per month. These figures do not explain the crisis facing people returning to damaged or destroyed homes, but they establish the upper limit of the rental market within the city and illustrate the scale of the gap between local income levels and housing prices in the areas with the highest demand.

Abu Mohammed, the owner of a real estate office in Al-Zahira, told Green Tabu that the number of homes being rented had fallen sharply because few properties were available to rent and rents had increased by 100 percent this year. He added that an entire month might pass without his office signing a single lease, which he considered an indication of limited supply in the area.

Moadamiyeh and Darayya: Nearby Suburbs Pressured by Return, Destruction and Investment Expectations

The rental crisis in Moadamiyeh Al-Sham and Darayya, both administratively part of Rural Damascus, differs from the crisis in neighbourhoods located inside Damascus. Prices here are not determined solely by location, proximity to services, and employment opportunities. They are also affected by the return of displaced people and refugees to areas that suffered varying levels of damage, the inability of many people to live in their damaged or destroyed homes, and expectations connected to urban and administrative projects that have not yet resulted in actual housing.

From USD 100–150 to USD 200–300 per month Both the minimum and maximum rents in Moadamiyeh Al-Sham approximately doubled within 1 year.

In Moadamiyeh Al-Sham, close to Mazzeh, rents have risen to between USD 200 and USD 300 per month, compared with between USD100 and USD 150 in 2025. This represents an approximate doubling of both the minimum and maximum rent levels within 1 year.

Part of the pressure on the city is due to rising demand and statements concerning plans to build an administrative city on nearby land. The project was announced on 12 May 2026 and is to be implemented in cooperation with the Emirati side, with a view to relocating state institutions there. Moadamiyeh is also seeing construction activity involving modern, licensed buildings in zoned areas, particularly around Al-Alam Roundabout.

Moadamiyeh combines two apparently contradictory factors. On the one hand, its proximity to Damascus encourages some people seeking housing to consider it a less expensive alternative to neighbourhoods in the capital city proper. On the other hand, expectations of future projects and modern construction activity are pushing prices upwards before this development has produced a sufficient supply of flats available for rent. The city is shifting from being a less expensive housing alternative into a market under pressure in its own right, particularly as purchasing power declines and buying a home becomes increasingly difficult.

In nearby Darayya, the effect of destruction is more evident. Although a large part of the city was damaged in the war, demand for rental housing

has remained high, recently pushing rents to between USD150 and USD300 per month, depending on the area and the size of the home.

This variation shows that destruction does not necessarily reduce demand. It may instead increase pressure on the habitable part of the city, particularly when displaced people and refugees return to an area whose available housing cannot accommodate them.

Samer Sbeiha, a real estate appraiser at the Real Estate Finance Oversight Commission, told Green Tabu that rising rents were linked to the return of large numbers of displaced people and refugees after the fall of the Assad regime, whether from northern Syria or abroad, to destroyed or damaged areas. He said that the inability of many people to live in their damaged homes had pushed them to search for rental housing in Damascus and some nearby suburbs, contributing to rents reaching unprecedented levels.

Mohammed, who owns a real estate office in Moadamiyeh, told Green Tabu that pressure in the nearby suburbs was linked not only to demand but also to limited supply. He said that rents in the area had increased substantially over the previous two months and that few flats were available to rent, while the properties listed through real estate offices were predominantly flats for sale at very high prices. He added that some owners were asking tenants to vacate their homes so that the properties could be rented again at higher prices, increasing pressure on people with limited incomes.

In this sense, Moadamiyeh and Darayya reveal a different aspect of the rental crisis surrounding Damascus. Nearby suburbs are no longer merely a less expensive outer margin of the capital but have become markets in which return, destruction, limited supply, project expectations and owners' efforts to bring lease terms into line with new market rates all intersect.

Dollarisation, Security Deposits and Stalled Investment: A Crisis the Market Cannot Solve Alone

The differences between neighbourhoods in Damascus and its nearby suburbs intersect with broader dynamics placing pressure on the entire rental market. The 1st of these is that rents are generally priced in US dollars, while most people seeking housing receive their incomes in Syrian pounds. Sbeiha linked owners' use of the dollar to determine rents to inflation and the depreciation of the Syrian pound, particularly over the previous two months. He said that rents in Syria may appear low compared with many other countries, but weak local incomes place them beyond Syrians' ability to pay.

Dollarisation turns the decline in the exchange rate of the Syrian pound into a direct factor increasing housing costs. The problem lies not only in the value of the rent itself, but also in its detachment from the purchasing power of people seeking housing and in the transfer of currency-fluctuation risks to the tenant. Monthly rent, therefore, becomes an indicator of a

monetary and cost-of-living crisis as much as it is an indicator of a property crisis.

6 months' rent—and sometimes a full year's
The security deposit some landlords in Al-Midan demand before signing a lease.

The initial cost of renting is further increased by some landlords demanding large security deposits before signing a lease. Khaled, who owns a real estate office in Al-Midan, said that many owners of homes offered for rent demanded a security deposit equivalent to six months' rent and sometimes one full year's rent. He added that many tenants could not afford these sums, while some owners insisted on receiving the entire amount. People seeking housing therefore enter the market not only through the monthly rent but also through an advance payment that may exceed their means before the tenancy has even begun.

The crisis extends beyond the relationship between landlord and tenant to the limited production of new or habitable housing. Sbeiha linked rising rents to weak investment in real estate development, which remains at minimal levels because Arab, foreign and local real estate development companies are reluctant to enter urban development projects in the country. He attributed this to two main factors: political instability and the crises surrounding Syria, and the local market's slow response to sanctions relief. According to Sbeiha, these factors have made companies wary of committing capital to large projects, despite the launch of some projects that are insufficient to address the worsening housing crisis in Damascus.

"Little more than plans on paper"
Samer Sbeiha's assessment of proposals to amend zoning plans and construct towers, particularly in destroyed areas.

Sbeiha proposed reducing rents and property prices by amending zoning plans in several areas of Damascus and Rural Damascus Governorate and modifying the Building Code to allow vertical expansion and the construction of towers. He argued that this would provide investors with a profit margin while allowing homes to be offered at reasonable prices. At the same time, he said that discussions of changing zoning plans and constructing residential towers, particularly in destroyed areas, remained little more than plans on paper, even where memoranda of understanding for housing projects had been signed.

Sbeiha also proposed rent-to-own housing projects because purchasing a home has become difficult amid current prices, weak purchasing power and inflation. This proposal reflects a crisis that is no longer confined to the rental market: home ownership has become inaccessible to broad sections of society, forcing them to remain in the rental market for longer periods.

Real estate expert Ammar Youssef told Green Tabu that amending laws governing real estate development was an essential condition for encouraging companies to invest and giving them a sense of security when committing capital in Syria.

Youssef also proposed redeveloping some informal settlements in Damascus and replanning them with high-rise towers, while stressing the principle of fairness between investors seeking profits and citizens seeking

housing. He said that such projects could help reduce rents by lowering property prices, provided that replanning did not become a tool for producing housing that low-income families could not afford.

40 years
The time Ammar Youssef estimates a Syrian would need to obtain a home of their own amid inflation and weak purchasing power.

Youssef estimated that, given inflation and weak purchasing power, a Syrian would need 40 years to obtain a home of their own. He added that the current market was characterised by high demand for rental housing, limited supply and high rents. This description summarises the limits of the proposed market-based solutions. Increasing the number of apartment blocks or amending zoning plans may theoretically expand supply, but these measures alone would remain insufficient if prices, dollarisation and payment conditions remained detached from the actual means of people seeking housing.

In this sense, the rental crisis in Damascus and its nearby suburbs reveals a broader problem of housing access. Neighbourhoods differ in the reasons behind rising rents, including location, services, destruction, return, and expectations surrounding construction projects. The crisis nevertheless converges around common factors: weak incomes, dollarisation, high deposits, limited supply, and stalled investment in the production of habitable and affordable housing.

Reconstruction Through Reduced Engineers' Fees: Engineering Fee Exemptions Fall Short of Enabling Displaced People to Return to Their Areas

The decisions issued by the Ministry of Public Works and Housing remove a limited share of the cost of repairing damaged homes from homeowners through exemptions from engineering fees and charges, while the Engineers' Syndicate and engineers absorb the effect of forgoing those fees. The decisions also expand the syndicate's role in registering applications, conducting technical inspections and providing local councils with specialist staff. Eligibility requires a title deed and a document from the local council, while the exemptions have little practical effect in unzoned areas and leave permit fees, construction costs and services untouched. With approximately half of damaged homes located in informal or unzoned areas, return still depends on a broader policy combining financing, new zoning plans, and the rehabilitation of infrastructure and services.

In April 2026, the Ministry of Public Works and Housing issued a series of decisions exempting owners of homes damaged by wartime hostilities, as well as people whose disabilities resulted from injuries sustained during the war, from all engineering fees and charges related to repairing their homes. The ministry also reduced the engineering fees and charges imposed on projects implemented by international humanitarian organisations by 50 percent, as part of a government approach linking these measures to reconstruction plans and efforts to encourage displaced people to return. The Engineers' Syndicate expects between 30,000 and 40,000 applications for these exemptions, mainly from Rural Damascus and Rural Aleppo.

These measures, however, raise broader questions about the limits of the current approach to housing reconstruction, given the continuing high cost of repairs, the absence of new zoning plans for damaged areas, and the weakness of infrastructure and services in many areas destroyed during the war.

Government Decisions and the Limits of the Exemptions

Decision No. 2422 of 2026
Exempts the owner of a home damaged by wartime hostilities from all engineering fees and charges.

On 16 April 2026, the Minister of Public Works and Housing issued Decision No. 2422, exempting homes damaged by wartime hostilities from all engineering fees and charges, provided that only the owner of the home benefits from the exemption. The decision followed a proposal submitted by the Engineers' Syndicate as part of efforts to reduce the financial burden on those affected and encourage them to return to their homes, particularly given the high costs many residents face in carrying out repair and rehabilitation work.

On the same date, the ministry also issued Decision No. 2426, exempting people whose disabilities resulted from injuries sustained during the war from all engineering fees and charges for 1 home only. The ministry thereby extended eligibility to another group affected by the war while retaining the restriction on the number of homes covered.

Despite these partial concessions, many of those affected consider the current measures limited because engineering fees are only one fraction of the total cost required for return and repair. Residents are awaiting further measures from the Ministry of Local Administration and Environment, including broader exemptions from administrative charges similar to those granted for engineering fees, particularly given the continuing rise in rehabilitation costs and the absence of comprehensive support programmes for those affected.

Administrative Fees for Permits

The burdens borne by owners of damaged homes extend beyond engineering fees, as repair or reconstruction work entails a long series of administrative and regulatory fees. Obtaining construction, reinforcement or demolition permits requires paying multiple fees to local administrative units, in addition to the costs of property documents, technical plans, engineering inspections and administrative approvals.

Financial Law of Administrative Units, Law No. 37 of 2021
Imposes a levy of 1 percent of current property value on the total floor area and 4 percent on balcony area.

Implementation of the Financial Law of Administrative Units, Law No. 37 of 2021, caused a substantial increase in construction permit fees. These fees consist of a registration fee, 1 percent of the current value of the property for the building's entire floor area, 4 percent of the current value of the property for the area of balconies, and other fees related to planning and the use of pavements to store construction materials. The levy of 1 percent of the property's current value is the main reason for the increase in permit fees, particularly given the sharp rise in current property values.

Repair or reconstruction work also requires a large number of documents, technical studies and administrative approvals, whether for construction, reinforcement or demolition permits. These procedures include ownership documents, engineering plans and technical reports, as well as approvals from several bodies, including the Engineers' Syndicate, utility companies, planning departments and antiquities authorities.

In cases involving partially damaged buildings or those at risk of collapse, the procedures become more complicated because of the need for structural reports and additional approvals from owners or judicial and planning authorities. These lengthy and complex administrative processes increase repair costs and slow down rehabilitation, particularly in areas that suffered extensive destruction during the war or the February 2023 earthquake.

The syndicate's conditions and implementation mechanism

After the Ministry of Public Works and Housing issued the 2 decisions, the Engineers' Syndicate established a set of conditions and mechanisms for implementing the engineering fee exemptions for damaged homes. Under these conditions, the exemption is limited to 1 home per owner, with a maximum area of 140 square metres.

Applicants must also submit a document issued by the local council in the area where the property is located, confirming that it was shelled by the former regime during the war, together with a title deed proving the applicant's ownership of the property.

The syndicate also required the property to be used exclusively for housing and not for commercial or investment purposes. All properties and premises used for commercial purposes were therefore excluded from the two decisions granting full exemptions, thereby restricting eligibility to damaged homes.

According to estimates obtained by Green Tabu, the Engineers' Syndicate expects to receive between 30,000 and 40,000 applications concerning homes damaged to varying degrees, ranging from partial to complete destruction. The estimates indicate that priority will be given to homes that were completely destroyed and that Rural Damascus and Rural Aleppo are expected to record the largest numbers of applications because of the scale of destruction there, particularly in Eastern and Western Ghouta in Rural Damascus.

To implement this mechanism, the syndicate instructed its branch councils across Syria's governorates to coordinate directly with local councils to register applications and conduct on-site inspections of damaged homes, while stressing that homeowners must not be charged any additional fees for these procedures.

The syndicate also asked its branches to provide local councils with the specialist engineers required for technical inspections, given the serious shortage of engineering staff in many local councils. Some councils have only one engineer, while others have no more than two.

The Role of Local Councils and the Administrative Problem

Administrative fees associated with permits and zoning remained outside the scope of the new exemptions. At the time of writing, the Ministry of Local Administration and Environment had issued no official decision exempting those affected from fees for renewing administrative permits, as such a measure would require a law or specific legislative intervention.

The costs of administrative and regulatory procedures therefore remain part of the financial burden borne by owners of damaged homes during repair and rehabilitation work.

In the absence of a central decision, some local councils adopted partial measures to reduce the burden, particularly in cities and towns in Rural Damascus such as Douma, Harasta, and Darayya. Some councils issued administrative permits without charging inspection fees for damaged buildings.

These measures formed part of local attempts to facilitate residents' return to their homes and encourage repairs, but they remained limited and were not standardised nationally. Many of those affected also considered these concessions insufficient because other administrative fees and the high costs of repair and construction remained in place. They demanded broader measures, including complete exemptions from permit and administrative-procedure fees similar to the exemption from engineering fees.

Fee Reductions for International Organisations

The measures approved by the Ministry of Public Works and Housing also included international and local organisations working on reconstruction and service projects. Ministerial Decision No. 2423, issued in April 2026, provided for a 50 percent reduction in engineering fees and charges for projects implemented by these organisations, given the growing role of international bodies in rubble removal, home repairs and the implementation of humanitarian and service projects in Syria.

The decision established several conditions for benefiting from the reduction. Most importantly, projects must fall within specified sectors, including housing reconstruction, temporary housing, the rehabilitation of hospitals, health centres and schools, and drinking-water and sewerage

networks, whether funded by international organisations or local associations.

The decision also stipulated that the reduction would not apply to projects outside these specified sectors, in an attempt to restrict eligibility to projects directly connected to reconstruction and essential services.

Raseen Ismat, Secretary of the Engineers' Syndicate, told Green Tabu that the United Nations Development Programme (UNDP) signed a contract with the syndicate in May 2025 to rehabilitate approximately 58 schools, 25 health centres and 8 public markets in 10 governorates at greatly reduced engineering fees. According to the syndicate, the contract forms part of a plan to support the return of displaced people and rehabilitate infrastructure and essential services.

The Limits of Engineering Fee Exemptions in Informal and Damaged Areas

The engineering fee exemptions approved by the Ministry of Public Works and Housing reveal the limits of the current approach to damaged housing because they reduce only part of the administrative and engineering cost without addressing the problems associated with unzoned areas and informal settlements. Many owners of damaged homes in these areas do not approach the Engineers' Syndicate in the first place to obtain official studies or permits. Instead, they carry out repairs directly and outside formal planning frameworks, which limits the practical effect of the current exemptions.

The two Ministry of Public Works and Housing decisions contain no clear mechanism for dealing with damaged homes in unzoned areas, even though these areas constitute the most vulnerable and high-risk part of the damaged urban fabric. The problem appears to be linked to the absence of zoning plans needed to address these areas before proceeding with repair and reconstruction.

The significance of this issue becomes clearer in light of the scale of destruction in Syria. According to estimates by Raseen Ismat, more than 750,000 homes have been damaged, approximately half of which are located in informal or unzoned areas.

The number of homes that may actually benefit from the current exemptions remains limited compared with the true scale of the destruction, particularly as the Engineers' Syndicate expects to receive only between 30,000 and 40,000 applications. This means that a large proportion of damaged homes are located outside the planning frameworks targeted by the current decisions.

The return of residents to damaged areas also depends on more than repairing homes. It is connected to the condition of infrastructure and essential services in those areas. Even with an exemption from engineering fees, returning remains difficult in the absence of water, electricity, and

sewage networks, and where roads and public services have been damaged in many areas destroyed during the years of war.

Many people living in displacement camps also refuse to return to their home areas because they are unable to repair their houses as they wait for donors or major companies to enter and implement reconstruction and rehabilitation projects. The absence of essential services is regarded as the greatest obstacle to the return of displaced people, as residents cannot be encouraged to return to areas lacking minimum living conditions and basic services.

From this perspective, the current engineering fee exemptions appear to be a limited component of a broader response that should include the issuance of new zoning plans for unzoned areas, the rehabilitation of infrastructure and services, and the expansion of rehabilitation and reconstruction programmes beyond reductions in engineering fees alone.

Are engineers bearing the cost of reconstruction?

The engineering fee exemptions approved by the Ministry of Public Works and Housing appear to form part of a broader approach that the Syrian Engineers' Syndicate has sought to establish since 2025. This approach involves expanding the syndicate's role in reconstruction through participation in damage surveys, the development of zoning plans and cooperation with ministries and international organisations, alongside reductions in engineering fees for damaged homes and urban and service projects.

At the same time, this role reveals a notable shift in the syndicate's function. Instead of focusing on defending engineers' interests and improving their wages and fees, the syndicate is moving towards a role closer to a public function associated with facilitating return and rehabilitation, even where this comes at the expense of part of engineers' own income.

"Part of the early cost of reconstruction" The syndicate bears it by relinquishing some engineering fees without gaining a decisive role in managing the process.

This shift appears connected to the syndicate's attempt to establish its position within the reconstruction process, while its ability to exert meaningful influence over reconstruction policies remains limited. Those policies remain primarily subject to decisions by the government and official bodies. The syndicate therefore appears to bear part of the early cost of reconstruction by relinquishing a portion of engineering fees without acquiring a decisive role in managing the process or determining its priorities.

Decree No. 66 of 2012: Objections and Judicial Proceedings Following the Reparation Package

Damascus Governorate's "reparation" package has placed the Decree No. 66 issue on 2 parallel tracks: implementing adjustments within the existing legal and urban-planning framework, and expanding objections calling for its review or repeal. The governorate has begun paying the new rent allowances and reopening previously suspended beneficiaries' cases, while pledging to finance alternative housing and increase the floor areas allocated to rights holders. Disagreement has continued over the calculation of owners' shares, community representation and the terms of negotiation. Following the detention of 2 representatives of those affected, their referral to the judiciary and subsequent release on bail, the dispute has expanded from compensation and alternative housing to the space available for objection and community organising, and the limits of the judicial process.

After the Damascus Governorate announced a package of measures to address some of the consequences of implementing Decree No. 66 of 2012 in Marota City and Basilia City, the dispute entered a new phase with the detention of representatives of those affected, followed by their release on bail while judicial proceedings against them continued. This occurred as the governorate began implementing some elements of the package, most notably the payment of the new rent allowances, while local committees and the Association for the Repeal of Decree No. 66 continued to object to the figures, representation mechanisms and the way the issue was being managed.

The governorate presented its measures as a process of "reparation", following years of delays in providing alternative housing, the erosion of rent allowances and the suspension of some beneficiaries' cases for security or legal reasons under the Assad regime. The package included increasing rent allowances, expanding the floor areas allocated to the original owners, financing alternative housing towers and reconsidering several grievances and unresolved cases.

The announcement, however, did not bring the objections to an end. Groups of rights holders argued that the governorate's proposals did not address their demands concerning the owners' shares, the value of the rent allowance and the method used to select residents' representatives for negotiations. The governorate, meanwhile, maintains that Decree No. 66 is a zoning decree rather than an expropriation decree, and that the current measures are intended to correct problems in its implementation while the project continues. Between these 2 positions, the dispute has expanded from questions of compensation and alternative housing into a broader disagreement over representation, the right to object and the limits of the judicial process.

The Governorate Presents a "Reparation" Package

On 5 May 2026, Damascus Governorate presented a package of measures that it said was intended to address some of the harm suffered by rights holders in the 2 Decree No. 66 areas, Marota City and Basilia City, during earlier years of implementation. The statement was preceded by a media workshop attended by Green Tabu, held on 30 April 2026 at the headquarters of the Decree No. 66 Implementation Directorate. Damascus Governorate organised the workshop to present the general outlines of the solutions it was preparing to announce. During the workshop, governorate officials used expressions such as "injustice" and "reparation" to describe what some owners and beneficiaries had experienced during earlier stages of implementation.

1,606 grievance applications 1,122 were resolved, while 484 remained under review.

In its statement, the governorate said it had received 1,606 grievance applications and resolved 1,122 of them, while the remaining cases were still under review. It also announced the restoration of the right to alternative housing and rent allowance compensation for more than

1,000 families who had previously been deprived of them under the Assad regime for reasons described by the governorate as "security-related" or "legal". The statement also provided for opening Land Records for owners who had previously been unable to receive allocations because of security-related prosecutions or legal annotations.

The package also included a 35-fold increase in the rent allowance paid to those entitled to alternative housing. A source at Damascus Governorate told Green Tabu that payment of the new rent allowances began on 13 May 2026, after they were increased from their previous values, which the same source described as "almost symbolic". The source added that the allowance now averages approximately USD 1,500 per year for each entitlement case, whereas the previous amounts were insufficient to cover even a small portion of housing costs in Damascus.

A 35-fold increase; approximately USD 1,500 per year
The average new rent allowance per entitlement case.

The governorate said that rent allowances had been among the most contested aspects of the project in recent years because beneficiaries continued to receive low amounts in SYP while housing costs rose and the real value of the allowances declined. The governorate also linked the increase in the allowance to delays in providing alternative housing, which went from being one of the project's central promises to becoming one of the main sources of objections to it.

Regarding alternative housing, the governorate announced that it would finance the construction of 54 alternative housing towers over 3 years, allow beneficiaries to pay the costs in installments over 10 years and reduce the proportion of implementation costs charged to them from 11.5 percent to 5 percent. According to the governorate's statement, alternative housing is intended for specific groups, most notably the owners of residential or commercial properties built on agricultural land within the zoned real estate area, as well as some occupants of state-owned property. These groups would receive temporary rent allowances until the alternative housing units were delivered.

The governorate also announced a 13.9 percent increase in the floor area allocated to holders of zoning shares, adding approximately 270,000 square metres of floor area. This refers to the residential zoning plots allocated to owners and rights holders whose properties or real rights are compensated with zoning shares, rather than to the alternative housing towers allocated to other categories of beneficiaries. The project's total floor area designated for construction is approximately 3.3 million square metres: 1.946 million square metres of floor area had been allocated to rights holders, compared with approximately 1.4 million square metres allocated to Damascus Governorate. Based on the announced distribution of floor area, the increase appears to represent either the reallocation of part of the floor area previously assigned to the governorate or a limited zoning adjustment in favour of the owners, although the governorate did not provide a complete explanation of how the increase was calculated.

Damascus Governorate said that the share of holders of zoning shares in

Marota City, measured as zoning floor area, averaged approximately 98 percent of the area of their properties before zoning. According to the governorate's calculations, a person who owned 100 square metres before zoning receives, on average, 98 square metres of floor area after zoning, within the plots allocated to rights holders rather than in the alternative housing towers. The governorate said the remaining deductions were allocated to infrastructure, roads, green spaces, public services and financing the project's implementation. In this context, it stated that green spaces account for approximately 32 percent of the zoned area, while roads, pavements and public facilities occupy approximately 31 percent.

The governorate also confirmed that it would bear the cost of completing the area's infrastructure, estimated at more than USD250 million, including roads, parks, electricity substations, service tunnels, and the smart city control centre. It said financing these works, together with alternative housing and rent allowances, requires it to continue investing in certain plots and converting the project's resources into cash.

In its statements and press conferences, the governorate stressed that Decree No. 66 is "a zoning decree, not an expropriation decree". Under this interpretation, the governorate maintains that owners are not deprived of their properties; instead, ownership is reorganised into shares and plots within the same area, while alternative housing is provided to eligible groups. In its public statements, the governorate links the current crisis primarily to problems in implementation, delays in alternative housing and the exclusion of some beneficiaries, rather than to the concept of zoning itself.

The governorate also announced the formation of administrative, technical, legal and financial committees to complete implementation of the reparation package, receive objections and resolve outstanding cases. At the end of its statement, it confirmed that the right to submit objections and grievances remained open to everyone through the courts and that it was committed to implementing any decision issued by the competent courts. At the same time, however, it stated that it reserved the right to initiate legal proceedings against anyone it considered to be creating confusion, causing harm or obstructing public interests or the interests of residents.

Residents' Objections: A Dispute over Figures and Representation

The Damascus Governorate's package did not halt objections in Mazzeh and Kafr Sousseh. A few days after the statement of 5 May 2026, dozens of rights holders and affected residents held protests in Mazzeh, carrying slogans demanding the complete repeal of Decree No. 66. Some protesters described the project as "looting and theft" and a "war crime", arguing that the new decisions did not address the underlying harm but instead offered compensation that was disproportionate to the losses suffered by rights holders during previous years.

One of the most prominent disputes concerned the rent allowance. The Mazzeh Committee for Following Up on Decree No. 66 accused the governorate of retreating from previous understandings under which the rent allowance would be increased 50-fold, before the final decision set the increase at only 35-fold. The committee presents itself as a local community body that follows up on the rights and grievances of those affected in Mazzeh. It says it participated in negotiations with the governorate before the package was announced, and Engineer Ibrahim Sheikh Al-Shabab usually speaks on its behalf.

98% versus 17–25% The governorate calculates the former in terms of floor area, while community representatives put forward the latter without specifying the basis of calculation.

The dispute was not limited to the rent allowance but extended to the method used to calculate the rights holders' share of the project. The governorate presented the matter in terms of the zoning floor areas allocated to holders of zoning shares and said this share was equivalent, on average, to approximately 98 percent of the area of their properties before zoning. A statement issued by community representatives from Mazzeh and Kafr Sousseh, however, presented the share from a different perspective, demanding that the owners' share in Marota City be increased from 17 percent to 25 percent, without explaining precisely how this percentage was calculated. The dispute therefore concerns more than a single figure: it reflects a broader disagreement over the meaning of the share itself and whether it should be measured by comparing the area before zoning with the floor area afterward, or by calculating the owners' share of the value and returns generated by the project after zoning.

Regarding objections to the residents' share of investment returns, a source at Damascus Governorate told Green Tabu that these returns would not be distributed directly to owners because they would be spent on developing the infrastructure and completing the project. The governorate relies on this argument to justify continuing to convert some plots into cash and invest the project's resources, on the grounds that, according to its account, this is necessary to finance roads, parks, services, alternative housing and rent allowances.

The dispute expanded to include negotiation and representation mechanisms. Groups of rights holders demanded that negotiations be conducted exclusively with committees elected by residents, rejecting what they described as "appointed" committees or committees close to Damascus Governorate and Damascus Cham Holding, which is owned by the governorate and authorised to manage its assets. The governorate, in contrast, said that the committees it formed following its statement of 5 May 2026 have specific responsibilities. These technical, legal and financial committees are tasked with receiving objections, amending certain plans, confirming ownership and paying financial entitlements, and their work will end once the cases connected to the project have been completed.

In this context, the Association for the Repeal of Decree No. 66 emerged as a party taking a more explicit position against the governorate's approach. The association, established on 18 May 2026, comprises lawyers,

judges, engineers and activists who are themselves affected or hold rights in the project. It rejects any solution based on amending Decree No. 66 or improving compensation conditions within its framework. It maintains that the problem concerns not only poor implementation or inadequate compensation, but also the legal framework on which the project was based during the years of war.

The association demands the complete repeal of Decree No. 66 and the reorganisation of rights under a new law. In its statements, however, it stresses that repeal would not mean demolishing the towers or removing existing buildings. Rather, it would mean abolishing the legal framework on which the project was based and reorganising financial and property rights in a manner that protects the rights of the original landowners, while also protecting those who subsequently purchased or invested in good faith. The association also accuses Damascus Governorate and Damascus Cham Holding of working to entrench the status quo instead of restoring rights. It argues that any amendment of the decree within the current framework would, in practice, legitimise the outcomes to which those affected have objected for years.

Representatives of Those Affected Detained

On 2 June 2026, the Criminal Investigation Department in Damascus detained Ibrahim Sheikh Al-Shabab and Yasser Abbas, 2 of the most prominent figures associated with the movement representing those affected by Decree No. 66. They were detained following a complaint referred to the Cybercrime Branch before the case was subsequently transferred to the criminal courts. Several days later, they were released on bail following a letter from the Governor of Damascus stating that he had no objection to their release, while judicial proceedings continued.

According to the prosecution record, Sheikh Al-Shabab faces charges relating to "systematic incitement", "defamation", "publishing false news online and through satellite television channels" and "undermining the reputation and prestige of a public administration", under the Penal Code and Legislative Decree No. 20 of 2022 on Cybercrime. The prosecution links these charges to his appearances in recordings and statements as a representative of the Mazzeh Committee for Following Up on Decree No. 66 and to his criticism of Damascus Governorate's statement on the issue.

The prosecution cited the Cybercrime Law, together with the Penal Code, in the charges brought against Ibrahim Sheikh Al-Shabab.

As for Yasser Abbas, also known as Abu Wasim, the charges against him focus, according to the prosecution record, on "systematic incitement" and "defamation" arising from his appearance on the Qasioun Facebook page in his capacity as a person associated with the Association for the Repeal of Decree No. 66. The prosecution also attributes to him statements that it says included verbal insults against the governorate and an accusation of bribery against a legal person represented by the governor. It further accuses him of obstructing the work of institutions and insulting the new government by publishing information that the prosecution described as

false.

The detentions prompted community and rights-based reactions. Solidarity gatherings were held outside the Palace of Justice and in neighbourhoods of Mazzeh in Damascus to demand the release of Sheikh Al-Shabab and Abbas. In addition, 54 civil society organisations and 132 individuals issued a statement expressing concern about the judicial process and arguing that Abbas and Sheikh Al-Shabab had been detained because of their public activities connected to objections by those affected to Damascus Governorate's approach to compensation and reparation.

The first hearing was held in Damascus on 18 June 2026. The court formally recorded the appearance of the defence and its request for additional time to submit a written defence memorandum. The court scheduled the next hearing for 17 September 2026. The Decree No. 66 issue has thus moved from a dispute over compensation and representation into an open-ended judicial process, while the disagreement between the governorate and groups representing those affected continues over the conditions under which the issue should be addressed.

A Case That Remains Open

The Damascus Governorate is continuing to implement the package it announced in May by paying the new rent allowances and following up on grievance and alternative housing cases through the committees it formed following its statement of 5 May 2026. Local committees and the Association for the Repeal of Decree No. 66, meanwhile, continue to reject treating these measures as a final settlement and are demanding a broader review of the figures and the mechanisms for negotiation and representation.

With judicial proceedings still underway against several representatives of those affected and the next hearing scheduled for 17 September 2026, the issue remains open to further developments. The governorate considers the package to mark the beginning of the implementation of a corrective process, while some of those affected see it as a new stage in an unresolved dispute over rights, compensation and the way the project is managed. The package presented by the governorate therefore remains the beginning of an open-ended process rather than a final settlement of an issue in which compensation, alternative housing, representation and judicial proceedings intersect.

A New Classification for Housing Cooperatives: Between Project Completion, Dissolution and Liquidation

The Ministry of Public Works and Housing is reorganising the cooperative housing sector through 3 parallel tracks: a deadline for cooperatives without an ongoing project or allocated land; a "green plan" linking project completion to completion rates and delivery dates; and a "red plan" placing cooperatives without boards of directors or whose general assemblies have not convened at risk of dissolution and liquidation. This classification comes in a sector whose capacity to finance construction has been weakened by the collapse of the Syrian pound, while old instalments have lost much of their value, causing projects to stall and disputes between cooperatives and applicants to accumulate. Its effects extend from the cooperatives' administrative structures to applicants' rights, as the fate of their payments and homes depends on decisions concerning project completion, merger or liquidation, as well as the government proposal to revalue old deposits according to their value at the time of payment.

On 28 April 2026, the Ministry of Public Works and Housing gave housing cooperatives that had neither an ongoing project nor allocated land until 30 June 2026 to provide evidence that they owned land suitable for a housing project or had begun the necessary administrative and technical licensing procedures. The measure formed part of a broader effort by the ministry to classify housing cooperatives according to the status of their projects and their completion rates, distinguishing between cooperatives capable of completing their projects and delivering homes over the coming years and those that could face dissolution or liquidation if they continued to refrain from initiating any project.

Cooperative housing is one means of providing medium-cost housing in Syria, alongside the social housing programmes implemented by public entities affiliated with the Ministry of Public Works and Housing. Housing cooperatives generally enrol members in order to construct homes for them and sell those homes at cost. They benefit from government facilities such as access to building plots at reduced prices, the purchase of construction materials at official prices and streamlined licensing procedures.

Historically, the sector was supervised by the Ministry of Public Works and Housing and the General Union of Housing Cooperatives. In 2019, Legislative Decree No. 37 dissolved the General Union of Housing Cooperatives and transferred its responsibilities, functions and property to the ministry's Cooperative Housing Directorate. Since then, the directorate has been the central authority responsible for overseeing housing cooperatives, monitoring their projects and taking measures relating to their dissolution, merger or liquidation.

Legislative Decree No. 37 of 2019 Dissolved the General Union of Housing Cooperatives and transferred its responsibilities, functions and property to the Cooperative Housing Directorate.

A Final Deadline for Inactive Cooperatives

Under Circular No. 2777, issued by the Ministry of Public Works and Housing on 28 April 2026, housing cooperatives that had neither an ongoing project nor allocated land were given until 30 June 2026 to regularise their status. During this period, they were required to submit documents proving their ownership of, or allocation of, suitable land on which a housing project could be established. They could also provide documented evidence that they had begun the administrative and technical procedures required to obtain the necessary licences. The circular further allowed these cooperatives to submit acceptable legal or technical justifications to the Cooperative Housing directorates in the governorates for consideration by the competent committee.

As of 28 July 2026, the outcome of the deadline remained unannounced, with no official information on the number of cooperatives that had regularised their status or the dissolution, merger or liquidation measures taken by the ministry against the others.

In its circular, the ministry said that some licensed housing cooperatives had not initiated any project since receiving their licences, requiring concrete measures to be taken against them. Cooperatives unable

to prove that they owned or had been allocated land, or that they had initiated the procedures required to implement a housing project, could therefore become subject to dissolution, merger or liquidation after the deadline expired, under Legislative Decree No. 99 of 2011 governing the cooperative housing sector.

Under the version in force before the General Union of Housing Cooperatives was dissolved, Article 37 of Legislative Decree No. 99 permitted a cooperative to be dissolved or merged by a reasoned ministerial decision based on a proposal from the competent authority. A cooperative could be dissolved in several circumstances, including the completion of the activities for which it was established, the emergence of obstacles preventing it from operating regularly or meeting its obligations, or the passage of 3 years from the date of licensing without the cooperative initiating any project. The same article also permitted dissolution if the number of members fell below the minimum number of founding members and the cooperative failed to remedy the shortfall before its annual general meeting.

3 years without a project
After that, the minister may dissolve or merge the cooperative by a reasoned decision, under Article 37 of Legislative Decree No. 99 of 2011.

A decision to dissolve a cooperative includes the formation of a liquidation committee chaired by an auditor and specifies the committee's responsibilities and the duration of its work. Under Article 38 of the same decree, liquidation procedures begin on the date when the decision on the cooperative's dissolution or expiry is published in the Official Gazette. The cooperative's funds and assets may also be placed under cautionary seizure through the Public Prosecution from the date of the decision, if the decision provides for this.

Classifying Cooperatives under the "Green" and "Red" Plans

Alongside the deadline given to inactive cooperatives, the Ministry of Public Works and Housing has been classifying housing cooperatives under 2 plans known as the "green plan" and the "red plan", a source in the cooperative housing sector told Green Tabu. The classification considers the current status of each cooperative, whether it has a board of directors and an ongoing housing project, and the stage reached in implementing that project.

30%, 70%, 100%
Land ownership and excavation, followed by foundations and the structural frame, and then completion of the remaining works—the rates used by the "green plan" to classify project progress.

The green plan covers cooperatives with boards of directors, members and ongoing housing projects. Following assessments conducted by supervisory engineers from the Cooperative Housing directorates, these cooperatives were divided into three categories according to the stage reached by their projects. Land ownership and excavation works were assessed as representing 30 percent completion, foundations and the structural frame as 70 percent, and the remaining works as bringing the project to 100 percent completion. Category A comprises projects that have reached 100 percent completion and should deliver flats in 2026. Category B comprises projects assessed at 70 percent completion and should deliver flats in 2028, while Category C projects should deliver flats

in 2030.

The red plan, by contrast, targets cooperatives without boards of directors or whose general assemblies have not convened. These cooperatives may be subject to dissolution, liquidation or other measures under Legislative Decree No. 99 of 2011. The red plan should be distinguished from the deadline of 30 June 2026, which applied to cooperatives that had neither an ongoing project nor allocated land.

Financing Difficulties and the Declining Value of Instalments

These measures come amid the continuing difficulties facing a number of housing cooperatives, following years of dissolution, liquidation and merger campaigns led by the Ministry of Public Works and Housing after the General Union of Housing Cooperatives was dissolved in 2019. Official figures published in 2024 indicated that there were 1,860 housing cooperatives, of which 1,481 were active, with approximately 800,000 applicants and 94,000 cooperative homes under construction. On 31 July 2025, the Directorate of Cooperative Housing said that the data available to it covered 1,520 cooperatives. However, the classification it announced at the same time included 1,432 active cooperatives and 172 struggling cooperatives—a total of 1,604—without explaining the discrepancy between the 2 figures. According to the directorate, 8 of the struggling cooperatives needed to be merged, 34 dissolved and liquidated, and 130 placed under temporary boards of directors.

According to specialists in cooperative housing, financing has been the principal problem facing many cooperatives in recent years. Cooperatives generally relied on the monthly instalments paid by applicants to implement their projects, before the collapse in the value of the Syrian pound and rising construction material prices widened the gap between the instalments previously set and actual construction costs. Many applicants were also unable to continue paying their installments, while the sums collected by the cooperatives were insufficient to complete the buildings or bring them to the finishing and utility-installation stages. The absence of flexible financial plans at some cooperatives further impeded their ability to respond to rising construction costs after the real value of the instalments collected from applicants declined.

A number of applicants were also unable to continue paying their installments, while the sums collected by the associations were insufficient to complete the buildings or bring them to the finishing and service-installation stages. The absence of flexible financial plans at some associations further increased the difficulty of responding to rising implementation costs, as the real value of the instalments collected from subscribers declined.

This caused a number of housing projects to stop and drew some cooperatives into legal disputes with applicants who had paid installments for years without receiving their homes. A further problem arose from

waivers of housing allocations, whereby some members sold their places in a project to other people in return for payment. This further complicated the cooperatives' internal administration and impeded follow-up on project implementation.

"Would be valued according to their US dollar equivalent at the time of payment" Mohammad Osama Shaabani, Director of Cooperative Housing, on applicants' old deposits.

On 19 May 2026, Mohammad Osama Shaabani, Director of Cooperative Housing at the Ministry of Public Works and Housing, said that old deposits paid by cooperative members at the application or allocation stages would be valued according to their US dollar equivalent at the time of payment. Under the proposed approach, a payment of SYP 500,000 made before the war would not be treated according to its greatly reduced present-day nominal value. Instead, its US dollar equivalent at the time of payment would be calculated and then converted into Syrian pounds at the current exchange rate.

The ministry has also been working to amend Legislative Decree No. 99 of 2011, which governs the cooperative housing sector. On 31 July 2025, the ministry stated that the committee tasked with amending the legislation had completed its work and that the draft was undergoing final review. The details of the proposed amendments have yet to be published.

Measures Leave Applicants' Questions Unresolved

Although the deadline of 30 June 2026 applied to cooperatives without ongoing projects or allocated land, its consequences may extend to applicants who paid installments or deposits to cooperatives that were unable to implement their projects. If some of these cooperatives are dissolved and liquidated, the fate of the applicants' rights will depend both on the liquidation mechanism and on whether the ministry adopts the plan to revalue older deposits according to their value at the time of payment.

The new measures therefore go beyond reclassifying housing cooperatives as active or inactive. They also reopen the broader issue of applicants' rights in a sector that has experienced a declining ability to implement projects, an accumulation of disputes and a change in its supervisory authority following the dissolution of the General Union of Housing Cooperatives and the transfer of its powers to the Ministry of Public Works and Housing.

ANALYSIS

Marota and Basilia: Reparation and the Limits of Fairness

Mazen Ezzi

Legislative Decree No. 66 of 2012 was issued as a tool for rezoning large areas of unlicensed and informal housing in Damascus. Over more than a decade, however, it has become one of Syria's most sensitive property and housing issues. The problem is no longer confined to an urban plan or an administrative delay, but lies in a lengthy process that changed the very form of the right itself: from direct ownership of a property to zoning shares, from an existing home to a promise of alternative housing, and from property available for everyday use to a right requiring proof, valuation, allocation, financing and years of waiting. Decree No. 66 has thus become a test of how rights are produced within a reconstruction project before it is a test of the ability to construct buildings, roads and infrastructure.

After the fall of the Assad regime, the issue returned to the forefront from a new angle. Marota City and Basilia City were no longer suspended projects that could be treated as two vacant areas. They had become an established legal, urban and financial reality. Zoning shares had been created and rights traded; buyers, contractors and companies had become involved; and construction work had begun on some plots. Meanwhile, alternative housing remained stalled, rent allowances had lost their value, and the cases of some beneficiaries remained suspended because of absence, displacement, or security and legal annotations. The Damascus Governorate thus faced a twofold problem: a project that would be difficult to dismantle without creating new disputes, and social and rights-related harm that could not be overcome simply by continuing implementation.

A package of measures announced by Damascus Governorate on 5 May 2026 reveals the direction of the official approach at this stage. The governorate did not move towards suspending the decree or legally reformulating it, but towards correcting some of its consequences from within its existing structure. The measures included increasing rent allowances, reopening the cases of those previously excluded, increasing the floor areas allocated to holders of zoning shares, financing alternative housing towers and reducing their cost for beneficiaries. In this sense, reparation was introduced as a mechanism for making completion of the project possible after acknowledging some of the harm accumulated during previous years of implementation.

The crisis surrounding Decree No. 66 lies in the mechanisms that turned urban planning into a lengthy process of redefining property, housing and the ability to negotiate. Ownership remained legally recognised, but was converted into shares held in common and subjected to committees, valuations, allocations, companies or auctions. Alternative housing remained a right provided for certain groups, but became conditional on proof, residence, the ability to finance it and waiting for implementation. As the governorate needed to convert project assets into cash to finance infrastructure and alternative housing, the relationship between rights, planning and investment became far more complex than a simple compensation formula.

The limits of correction are therefore determined by the ability to address harm that arose from within the project's own mechanisms, rather than merely from subsequent errors in implementation. Increasing the rent allowance or restoring certain excluded rights may reduce part of the loss, but these measures are not sufficient to address valuation, the rights holders' share, the representation of those affected, transparency concerning resources and contracts, and the fate of small shareholders and alternative housing beneficiaries. The judicial prosecution of some representatives of those affected adds yet another dimension to the issue, because it links reparation not only to payments and decisions, but also to the space available for objection, organisation, and negotiation.

The issue, therefore, lies in the reparation package's capacity to evolve from a partial settlement that allows Marota and Basilia to be completed into an entry point for redefining the relationship between zoning and rights. This can be examined on three interconnected levels: the shift in the official approach from reviewing the decree to correcting its consequences; the legal and urban mechanisms that transformed property and housing into shares and deferred entitlements; and the limits of a possible settlement within a project that has already become established but still lacks the confidence of a significant number of rights holders.

From Reviewing the Decree to Correcting Its Consequences

The statement issued by Damascus Governorate on 5 May 2026 marked a decisive moment in the official handling of Decree No. 66 after months of uncertainty. The issue had returned to the forefront following the fall of the Assad regime and growing objections from rights holders in the Marota City and Basilia City areas. The project's future appeared open to several possibilities: a legal review, amendments to implementation mechanisms, referral to the People's Assembly, or a broader suspension until a new formula could be reached. The package announced by the governorate, however, revealed a different direction, based on addressing accumulated harm from within the existing zoning framework rather than suspending it or rebuilding it from the beginning.

This shift began to take shape gradually in autumn 2025. On 20 October 2025, the Governor of Damascus announced the suspension of work in Basilia City amid growing criticism of how the decree had been implemented under the Assad regime and complaints concerning the valuation of rights, alternative housing, rent allowances, and the exclusion of certain owners and beneficiaries for security or administrative reasons. Subsequently, on 4 December 2025, the General Secretariat of the Presidency issued Decision No. 14, establishing a special committee to review the stages of implementation of Decree No. 66, verify the representation of rights, examine grievances, and submit proposals and recommendations concerning the project. The committee included representatives of the Ministry of Local Administration and Environment, the Ministry of Justice, the Ministry of Public Works and Housing, Damascus Governorate, Damascus Cham Holding, which is owned by the governorate and authorised to manage its assets, the Bar Association and the Engineers' Syndicate, as well as a real estate appraisal expert and 2 experts representing owners in the 2 zoned real estate areas.

At the time, the establishment of the committee created the impression that the matter had moved beyond being an administrative issue confined to the Damascus Governorate and the Decree No. 66 Implementation Directorate, and had become the subject of a broader review within the transitional administration's institutions. It also reflected an implicit acknowledgement that the problems accumulated around Marota and Basilia had gone beyond technical or administrative errors and affected the

very structure of the relationship between rights holders and the bodies managing the project. The demands of those affected expanded from improving compensation conditions to reconsidering their representation on committees, valuation, allocation, and trading mechanisms, and the fate of alternative housing, which had become one of the most sensitive aspects of the issue because of delays and rising costs.

Yet the measures introduced in May 2026 shifted the discussion from reviewing the process to correcting its consequences. The governorate focused on specific grievance cases, restoring rights that had been suspended or excluded, improving rent allowances, increasing the floor areas allocated to beneficiaries, financing alternative housing, and reducing the cost of its implementation for those entitled to it.

The governorate's reparations package reflects a clear attempt to rebuild a less confrontational relationship with rights holders by acknowledging some of the harm caused by the previous implementation of the decree, particularly the harm connected to delays, the exclusion of certain beneficiaries, and the erosion of rent allowances amid the currency collapse. In this sense, the package has practical importance for beneficiaries who waited many years to receive alternative housing, a reasonable rent allowance, or confirmation of rights that had remained suspended.

The package itself also reveals the limits of the official approach. The governorate did not propose a comprehensive review of the foundations of property valuation, the method used to calculate zoning-share entitlements, the financial and administrative relationship between the Decree No. 66 Implementation Directorate and Damascus Cham Holding, or the investment contracts concluded in previous years. Nor did it provide a clear framework for rights holders to participate in decision-making outside the grievance and objection committees and the technical and legal processes under its supervision. The measures therefore remained closer to correcting specific problems within the project than to reopening the entire system that governed the production of rights and the distribution of burdens and returns within it.

Overlapping Rights and Legal Positions
Original owners, alternative-housing subscribers, purchasers, contractors and investors have entered the project; dismantling it could therefore generate new disputes.

The governorate bases this approach on a practical argument that is difficult to ignore. More than a decade after Decree No. 66 was issued, parts of the project, particularly in Marota City, have become an established urban and investment reality involving new rights and overlapping legal positions: original owners, subscribers to alternative housing, buyers of zoning shares, contractors, companies, and investors who entered into agreements with Damascus Cham Holding or with the owners of zoning plots. Parts of the infrastructure have also been completed, and construction has begun on many plots, while other parts remain suspended or stalled. In this situation, completely reversing the project would carry high legal and financial costs because it could itself open a new series of disputes over contracts, traded shares, allocated plots and rights created after the rezoning process.

The Damascus Governorate thus appears to be attempting to balance two

conflicting demands. On the one hand, it needs to acknowledge the harm suffered by rights holders, particularly those who were previously deprived of alternative housing, compensation, or confirmation of ownership for security reasons, or because of absence, displacement, or the loss of documents. On the other hand, there is an evident desire to preserve the project's continuity as an advanced planning and urban framework that would be difficult to dismantle without considerable legal and financial costs.

This approach explains the tension that followed the announcement of the package. From the governorate's perspective, the new measures represent an acknowledgement of harm and a practical step towards fairness without sacrificing what has already been achieved in urban development or creating new legal disorder. But from the perspective of some of those affected, improving the rent allowance, increasing floor areas, or restoring certain excluded rights is not sufficient to address the deeper problem concerning valuation, representation, the owners' share of returns, and the governorate's role as both an administrative and financial partner in the project.

The measures announced in May 2026 reveal an attempt to re-establish the project under new conditions by reducing the social and financial cost of the harm accumulated in previous years. The success of this approach, however, will depend on its ability to move beyond partial settlements towards a more transparent treatment of valuation, alternative housing, investment contracts and the representation of rights holders. The problem facing Marota and Basilia today concerns not only how to complete a stalled zoning project, but also how to turn its completion into a process that restores confidence in the protection of rights rather than reproducing the doubts that have surrounded the decree's implementation from the beginning.

The Legal and Urban Framework: From Direct Rights to Zoning Shares and Alternative Housing

Decree No. 66 of 2012 is based on a clear zoning concept: rezoning large areas of unlicensed and informal housing within Damascus and converting them into 2 zoned real estate areas under new urban plans. The first area included parts of Mazzeh and Kafr Sousseh and later became known as Marota City. The second covered areas south of the Southern Ring Road in Mazzeh, Kafr Sousseh, Qanawat Basatin, Darayya and Qadam and later became known as Basilia City. At the time, the decree was presented as a legal tool for developing areas suffering from inadequate services and widespread unlicensed construction, while providing for the rights of property owners and eligible occupants according to their respective legal positions.

Under this framework, a rights holder does not retain their previous property in its existing form, nor do they directly receive a specific

replacement property. The decree converts ownership within the zoned area into joint ownership among rights holders, with each person's share determined according to the estimated value of their property or real right before the re-zoning. The right is thus transformed from ownership of specific land, a building, or a dwelling into a share in the zoning plots designated for construction once the plan is completed.

The process begins with the inventory and description of properties. Real estate schedules are prepared, existing properties are inspected, and buildings, structures, trees, crops, occupants and claimed rights are recorded. At this stage, owners and other rights holders must submit their documents or declare their rights, while disputes and objections are referred to the Dispute Resolution Committee. Rights holders do not all enter the share-allocation stage from equal positions: a person with clear documents and legal representation is in a stronger position than someone who is absent, displaced or whose right is disputed.

This is followed by the valuation stage. Rights are calculated not solely according to the property's area, but on the basis of an estimated value that takes into account its location, condition, type of ownership, zoning status and any buildings or real rights attached to it. The new zoning plots are then valued after the plan has been prepared, and their value is compared with that of the original rights within the area. On the basis of this comparison, each rights holder's share in the common property is calculated and converted into zoning shares in the plots allocated to rights holders.

Receiving zoning shares, however, does not mean owning a specific plot or being able to build immediately. A zoning share is an undivided interest within the project, and converting it into an actual benefit requires further steps: pooling enough shares to obtain the allocation of a plot, forming or joining a joint-stock company with other owners, or selling the shares or plot at auction when pooling or partnership is impossible. Differences between rights holders become evident at this stage. A person with a large share can negotiate, obtain an allocation or enter into a partnership from a stronger position, whereas someone with a small share is more likely to sell or accept arrangements whose conditions they cannot control.

A Zoning Share Is Not a Plot
Turning a zoning share into an actual benefit requires pooling shares, entering into a partnership or selling at auction.

This mechanism explains a significant part of the objections to Decree No. 66. Property remained legally recognised, but it was no longer a direct relationship with property that could be used. It became a share-based right that passed through committees, valuations, schedules, allocations, companies, and auctions. The longer the period between the valuation of the original right and the conversion of the share into housing or income, the wider the gap became between legal recognition of the right and the actual ability to benefit from it. This was particularly the case for small shareholders, absent owners, displaced people and those whose cases were obstructed by missing documents or legal or security annotations.

This distinction leads to the second pillar of the decree's structure:

alternative housing. While owners of licensed properties and holders of recognised real rights receive zoning shares in residential plots designated for construction, other groups do not enter the same process. Instead, they are directed towards subscribing to paid alternative housing. These groups include, in particular, owners of unlicensed dwellings, those who owned agricultural land within the zoned area and constructed residential or commercial property on it, and certain occupants of state-owned property where the Damascus Governorate has a surplus of alternative housing.

This distinction is essential to understanding Decree No. 66 and how it differs from other zoning or expropriation tools that ignored the circumstances of people living in informal and unlicensed settlements. Zoning shares compensate for recognised ownership or real rights, whereas alternative housing is a process intended for groups who lost a dwelling or occupancy under specific conditions. Those eligible for alternative housing receive temporary rent allowances until delivery, but alternative housing itself is not provided free of charge. It is a home to which the beneficiary subscribes and for which they pay the cost in accordance with instalments and conditions determined by the relevant public authorities. Despite its importance as recognition of the circumstances of residents of unlicensed and informal settlements, alternative housing thus became one of the most sensitive aspects of the decree as implementation was delayed and the value of rent allowances declined.

Over time, alternative housing shifted from a social guarantee into an additional source of tension. Construction of the housing towers was delayed for many years, and thousands of beneficiaries remained outside their homes, relying on rent allowances that lost their real value as the Syrian pound collapsed and housing prices in Damascus soared. Subscription, allocation, and instalment costs also became more burdensome for beneficiaries, particularly after years of displacement, falling income, or unemployment. The problem was no longer limited to the date of delivery, but extended to the beneficiaries' own ability to finance the alternative housing intended to compensate them for the loss of their original homes.

Decision No. 112 of 2015, issued by the Minister of Housing to regulate eligibility for alternative housing, further complicated the matter because it did not link eligibility merely to the existence of a dwelling within the planning area, but to a series of evidentiary requirements. Occupants had to prove that they had actually lived in the property from the date Decree No. 66 was issued until the moment of evacuation, establish their legal status as occupants or owners, and provide the documents required for their case to be included in the beneficiary schedules. Alternative housing thus became linked to the loss of a home as well as the ability to prove that loss through a precise administrative process. This condition clashed with the realities of war, security persecution, displacement, and leaving the country. Many people had left their homes before the official evacuation, lost their documents, or were unable to appoint someone to follow up on

their cases. The continuous-residence requirement consequently changed from an administrative control measure into a reason for excluding some of those affected.

This is where the importance of the new measures introduced by Damascus Governorate lies. Reopening the cases of beneficiaries previously excluded from alternative housing or rent allowances means, in practice, that the governorate acknowledges that previous implementation mechanisms deprived people who would otherwise have qualified were it not for residence requirements, missing documents, or security and legal annotations. Increasing rent allowances, financing new alternative housing blocks, allowing costs to be paid in instalments, and reducing the proportion of implementation costs charged to beneficiaries also shifts the issue from simple recognition of entitlement to actual access to housing. Beneficiaries must contend not only with allocation but also with the price per square metre, the instalment period, payments required at allocation or delivery, and the location of the towers in relation to the areas from which they were displaced. Resolving the alternative housing issue cannot be measured solely by the number of reopened cases, but by the ability of these measures to transform entitlement from an administrative record and temporary rent allowance into housing that can actually be financed and taken possession of.

The mechanisms of zoning shares and alternative housing reveal that the problem with Decree No. 66 is not limited to the concept of urban planning itself. Rezoning unlicensed and informal areas and providing roads, infrastructure, and public spaces can offer an opportunity to improve the city. Converting overlapping ownership interests into joint ownership and then zoning shares may also be a legal means of distributing rights within a project that could not be implemented while preserving the previous property structure unchanged. These mechanisms, however, do not automatically produce fairness. They transform a right from a direct relationship with property or a home into a process of valuation, allocation, accumulation, instalments, and time spent waiting.

A legally recognised right may have limited practical value if its owner cannot use it to obtain a plot, form or join a company, generate a return, or secure alternative housing they can afford. Rights holders are therefore not equal within the same mechanism. Those with substantial shares, clear documents and financial means are better positioned to benefit from the rezoning process, while small shareholders, absentee owners, displaced people and alternative housing beneficiaries face a longer and more costly process that depends more heavily on decisions made by committees and administrative authorities.

In this sense, the crisis surrounding Decree No. 66 is as much a crisis in the management of rights as it is a legal or urban planning crisis. The project combined a broad zoning objective with a complex implementation system in which powers overlap among Damascus Governorate, the

A Crisis in the Management of Rights
The powers of Damascus Governorate, the Decree No. 66 Implementation Directorate, Damascus Cham Holding and several committees overlap in producing and reviewing rights.

Decree No. 66 Implementation Directorate, Damascus Cham Holding, and the Inventory and Description, Real Estate Appraisal, Distribution and Dispute Resolution committees. As implementation dragged on, transparency remained absent and rights holders' representation in reviewing figures and decisions remained weak, the zoning mechanism itself increasingly became a source of unfairness, even where property rights or entitlements remained recognised in principle.

The new measures announced by Damascus Governorate on 5 May 2026 cannot be assessed solely from the perspective of direct compensation. Increasing rent allowances, expanding the floor areas allocated to rights holders, financing alternative housing and reopening certain cases all reduce part of the harm. On their own, however, these steps are insufficient to transform a right within the project from a share, record or promise of alternative housing into a practical benefit that its holder can use and defend. Without a clearer review of valuation, allocation, instalment and representation mechanisms, the package will remain an important correction within the process rather than a complete redefinition of its rules of fairness.

Reparation and the Limits of Settlement

The package of measures announced on 5 May 2026 redefined the focus of the dispute surrounding Marota and Basilia. After months of discussion about the possibility of reviewing, suspending or altering the course of Decree No. 66, Damascus Governorate chose to address the issue from within the project itself. It reopened grievance cases, increased rent allowances, reconsidered some previous exclusions, proposed new financing for alternative housing, and increased the floor areas allocated to holders of zoning shares. Through these steps, the governorate made reparation part of the process of completing the existing project rather than an entry point for suspending or re-establishing it.

This approach gave the package a dual character. On the one hand, it acknowledges that the previous implementation caused real harm. Beneficiaries were deprived of alternative housing or rent allowances, rights remained suspended because of security or legal annotations, allowances lost their value, and alternative housing was delayed for years. On the other hand, the correction process remained within the same administrative and financial structure that had managed the project: the Damascus Governorate, the Decree No. 66 Implementation Directorate, the technical, legal and financial committees, and Damascus Cham Holding. Objections following the package thus shifted from the value of compensation alone to the identity of the authority calculating the harm, determining how it should be remedied and supervising implementation of the solution.

Representation consequently emerges as a fundamental mechanism in the dispute rather than a procedural detail. The governorate says

that the committees formed after the statement of 5 May 2026 are responsible for receiving objections, addressing annotations, amending certain plans, confirming rights and paying entitlements. Some of those affected, however, demand that negotiations take place through committees elected or authorised by rights holders themselves rather than through administrative bodies formed by the decision-making authority. The difference between the two approaches is substantial. Grievance committees receive individual cases under predetermined rules, whereas committees representing affected communities seek to review the rules themselves, from valuation and shares to alternative housing, returns and implementation mechanisms.

The disagreement over representation is linked to Damascus Governorate's position within the project. The governorate is a central administrative, financial and executive party rather than an external arbitrator between rights holders and investors. It manages the rezoning, represents the zoned real estate area as a legal person, owns Damascus Cham Holding, and simultaneously needs resources to complete infrastructure and alternative housing and to pay rent allowances. This overlap does not in itself invalidate every corrective measure, but it requires a higher level of transparency because the authority announcing reparation is also the authority managing the project's resources and determining how they are spent.

The discussion thus moves beyond compensation to the project's financing structure as established by Decree No. 66 itself. The project is not based solely on distributing plots among rights holders; it also provides for plots and resources to be set aside for the administrative and executive authority to cover rezoning costs, develop infrastructure, and finance alternative housing and rent allowances. The governorate invokes this mechanism to justify converting certain plots into cash and investing the project's resources, arguing that the returns are intended for roads, parks, services, alternative housing and rent allowances rather than being distributed to owners as a direct cash share. Those affected, however, argue that these returns originally resulted from rezoning land that had owners, occupants and residents, and that excluding them from the discussion confines reparation to specific payments and individual cases while leaving the greater property value outside the review.

98% Versus 17–25% The figures reflect 2 different ways of measuring owners' rights: allocated floor area or their share of the project's new property value.

For this reason, the disagreement goes beyond the announced figures to the way in which they are produced. For example, the governorate says that share-based rights holders in Marota have an average share of approximately 98 percent of the area of their properties before rezoning. This percentage is difficult to accept at face value, however, because it does not align with the decree's mechanism, which converts rights into jointly owned shares and distributes zoning plots through a value-based rather than a direct area-based relationship. The governorate also does not explain how the figure was calculated. The 98 percent share thus appears closer to

a defensive figure in the governorate's public narrative than to sufficient data for measuring the owners' share or the fairness of the distribution.

Community statements, by contrast, approach the matter from a different perspective by demanding that the owners' share in Marota City be increased from 17 percent to 25 percent. Like the governorate's 98 percent figure, this percentage also requires clarification regarding its method of calculation. It nevertheless reveals a shift in the objection from the floor area allocated as compensation to the owners' share of the project, its value and the returns produced by rezoning. The dispute does not concern merely the difference between 2 figures, but a conflict between 2 methods of measuring the right: an official approach that focuses on the floor areas allocated to rights holders, and a community approach that links fairness to the owners' share of the new property value generated by the project. In both cases, the basis of calculation remains insufficiently explained, particularly in view of deductions, the governorate's share, the new property value and the mechanisms used to finance the project from its own resources. The dispute becomes even more sensitive because part of the project's value and resources is used, according to the logic of the decree and the governorate, to finance infrastructure, alternative housing and rent allowances rather than being allocated as shares to rights holders.

The history of implementation further complicates the settlement. Harm accumulated over time rather than occurring at a single moment that could be compensated through an administrative decision. Alternative housing was delayed, the value of rent allowances collapsed, the value of shares changed, buyers, contractors and companies became involved, and some rights holders were forced to sell their shares or rights under the pressure of need, absence or prolonged waiting. Addressing these losses therefore requires more than reopening certain cases or improving some allowances. Some rights remained valid on paper but changed in practice as a result of time, market conditions, and necessity.

At the same time, the continuing demand for the complete repeal of Decree No. 66 presents significant practical complications. The project has moved beyond the stage of a plan on paper. In previous years, tradable shares, allocated plots, contracts, sales, purchases, construction work, and obligations involving contractors, companies and investors have all come into existence. Even the discourse demanding repeal of the decree must therefore distinguish between abolishing the old legal framework and dealing with the rights, contracts and legal positions created after it. The actual centre of the dispute has shifted towards a choice between continuation subject to a thorough review and administrative continuation limited to correcting some of the outcomes.

The shift of the dispute into the judicial sphere has further weakened confidence. The detention of certain prominent figures associated with the movement representing those affected, followed by their release while prosecution remained ongoing, placed the act of objecting in more

sensitive territory. Irrespective of the outcome of the case, its political and rights implications are clear: building a stable settlement becomes more difficult when those affected believe that criticism of the governorate's decisions or questioning its figures may turn into a criminal case. An issue involving housing, property and compensation requires a safe space for objection, organisation and negotiation rather than a relationship in which the promise of fairness is mixed with fear of prosecution.

In this sense, reparation tests the way in which the dispute itself is managed, not merely the governorate's ability to pay higher allowances or reopen additional cases. Genuine correction requires clear mechanisms for representing rights holders, publishing essential figures, explaining how shares are calculated, reviewing the cost of alternative housing, disclosing the project's resources and how they are spent, and protecting small shareholders and those harmed by absence, displacement or missing documents. In the absence of these elements, the reparation package may reduce some of the harm but will remain limited in its ability to rebuild confidence in the process that produced it.

The required settlement therefore appears broader than the May package, although the package represents an important entry point. Completing Marota and Basilia requires a process that avoids 2 inadequate options: a complete suspension that ignores the rights, contracts and legal positions created in previous years, or rapid implementation that turns reparation into a cover for continuing under the same conditions. The more balanced approach is conditional continuation: recognising the new rights that have arisen while simultaneously reopening the issues of valuation, representation, returns, alternative housing, contracts and the protection of the most vulnerable groups within the project. Only then can reparation become more than a delayed administrative settlement and develop into a mechanism for redefining the relationship between rights holders and the authority managing the rezoning process.

Conclusion: Between Completing the Project and Rebuilding Confidence

The course of Decree No. 66 in the post-Assad era reveals that the dispute surrounding Marota and Basilia has moved beyond the binary choice of continuation or repeal. The project has created a reality that cannot be ignored and harm that cannot be reduced to implementation delays or inadequate compensation. The reparation package announced on 5 May 2026 therefore represents an important step, but one limited by the logic from which it emerged. It operates within the project rather than outside it, addresses specific cases rather than reopening the entire valuation, distribution and financing system, and places the governorate in the position of the corrective authority even though the governorate itself remains an administrative, financial and executive party to the project. This overlap means that reparation requires more than the payment of allowances or the financing of residential towers. It requires clarification of

how shares are calculated, disclosure of how funds are spent, review of the cost of alternative housing, and genuine representation of rights holders in overseeing decisions that determine their future.

The central problem is evident in the distance between legal recognition of a right and the practical ability to benefit from it. A zoning share may remain a suspended right if its owner is unable to obtain an allocation, enter into a partnership or secure financing. Alternative housing may remain merely a promise if it cannot be delivered or paid for in installments under conditions the beneficiary can afford. An objection may lose its effectiveness if it remains confined to administrative committees or becomes threatened by judicial proceedings. At these points, justice shifts from being a matter of legal texts and decisions to one of the actual ability to secure housing, negotiate, seek review and receive a tangible benefit from the right.

The Suspended Right
A zoning share or alternative home has little practical value if its holder cannot obtain an allocation, secure financing or take possession.

The next phase will determine the position of Decree No. 66 within the broader transitional period. If the reparation package is used as a tool to calm objections and complete the project under the same conditions, Marota and Basilia will remain an example of reconstruction that generates substantial property value without restoring balance between the project and the original rights holders. If, however, the package becomes an entry point for a deeper review of valuation, representation, financing, and alternative housing mechanisms, the issue could become a different kind of model: a project that does not merely correct some of its losses, but redefines the relationship between residents, property, and the city after years of imposed zoning, war, and delay.

In this sense, the next phase should not be assessed solely by the number of towers constructed or the speed with which infrastructure is completed. The more important standard is the project's ability to transform rights from shares, records and deferred promises into actual protection for their owners. Only then can reparation move beyond being a delayed settlement and become part of rebuilding confidence between rights holders and the authority managing the rezoning process.

Ministry of Endowments Opens the Waqf Property File: Drawing on Ottoman Waqf Records and Reappraising Rents

Mohamad Manar Hemejo

The Ministry of Endowments under Syria's transitional government has begun reorganising the management of waqf ("endowment") properties after many years in which these assets were subject to centralised administration and long-term investment and rental contracts. A waqf is, essentially, money or property dedicated to a religious, charitable, or social purpose. Its proceeds are removed from ordinary individual circulation and remain tied to the purpose specified by the founder of the waqf. According to the ministry, today's reorganisation involves documenting endowment properties, recovering properties it considers lost or unlawfully occupied, and reassessing the rents charged on endowment real estate. The ministry presents these measures as part of an effort to regulate the endowments sector and collect the proceeds generated by its assets. However, a request by one ministry official for Ottoman archives from Turkey has raised legal and social concerns, particularly about the possible use of these records to trace certain properties and reconsider usufruct and rental agreements that have existed for many years.

The ministry's recent measures go beyond managing endowment assets or increasing their financial returns. They raise questions about the extent of the Ministry of Endowments' authority to reorganise the relationship between endowment property, private ownership and usufruct rights. The ministry's recovery of properties it regards as unlawfully occupied endowment assets, or its reappraisal of rents on endowment properties registered in its records, may conflict with existing property arrangements that their holders regard as private ownership, or with usufruct, tenancy and furough rights established under successive laws and contracts. This places the legal authority of Land Registry entries and public confidence in the Land Registry under renewed scrutiny, particularly in the absence of a clear legal and judicial framework distinguishing between the protection of endowment assets, private ownership, and existing usufruct, tenancy and furough rights.

The sensitivity of this process is heightened by the fact that some endowment properties are located in city centres and historic markets, where high property values intersect with commercial activity, local memory and everyday networks of livelihood. Reorganising the endowments sector concerns more than the administrative relationship between the Ministry of Endowments and the occupants of its properties. It also affects the position of endowment property within the real estate market and the status of owners, tenants and holders of furough rights who have treated these properties as sources of livelihood or as rights capable of being inherited and invested. The ministry's actions therefore constitute a test of the transitional government's ability to protect endowment assets without undermining the authority of the Land Registry or the rights of owners, tenants and holders of furough rights.

From documenting properties to requesting Ottoman archives

The transitional government's Ministry of Endowments presents its recent action as part of a process to reorganise a sector that it says suffered neglect and encroachment in previous years. According to this view, the problem is not limited to endowment properties already known and registered with the ministry, but also includes properties the ministry considers lost or undocumented in its records, as well as properties registered as endowments in the Land Registry but absent from the records of the directorates of religious endowments or generating no income for them.

The matter returned to public attention following statements made to state-run media in April 2026 by Samer Bayraqdar, Deputy Minister of Religious Endowments for Waqf Affairs. He said that the ministry had contacted Turkey's Presidency of Religious Affairs to obtain Ottoman archives relating to endowment properties in Syria. According to Bayraqdar, requesting the archives did not mean that Ottoman-era endowment properties in Syria were Turkish assets. Rather, he described them as "Syrian waqfs owned by the Syrian state". Bayraqdar presented recourse to these archives as a tool for identifying and organising endowment properties,

in light of what he described as years of neglect of Syrian endowments, the absence of a clear inventory, and the existence of properties lost or stolen by people whom he described as "unscrupulous". He added that, according to the ministry, consulting Ottoman documents was one means of reviving endowments, bringing them together, and directing their proceeds towards the designated purposes of Syrian endowments.

Historically, endowments in Syria extend even further back than the Ottoman period to earlier eras, including the Umayyad Caliphate. During the Ottoman era, however, documentation and administration expanded through registers, records, and waqf deeds. The expression "Ottoman waqf" therefore does not refer to Ottoman or Turkish ownership, but to endowments established, documented, or administered in records dating from the Ottoman era. These records are important because the Ottoman state maintained extensive government registers and documents concerning land, property, and endowments in its provinces. This explains the ministry's interest in obtaining copies of Ottoman documents relating to Syria, which it presents as a means of tracing endowment properties that it says disappeared from its records or passed out of its administration.

"Ottoman Waqf" The term refers to Syrian endowments established, documented or administered in Ottoman-era records; it does not imply Turkish ownership.

In this sense, the ministry places the Ottoman archives among its documentation and tracing tools, alongside a review of Land Registry records. In its official presentation, the process is not based on transferring ownership from Turkey or reviving Ottoman sovereignty over Syrian property, but on using historical documents to investigate the origins of properties that the ministry believes have passed out of its administration or are no longer documented in its records. Nevertheless, the introduction of Ottoman-era documents into the search for existing properties, some of which have been occupied, transferred, or invested via long-term contracts, explains part of the concern the issue has caused among owners, occupants, and tenants.

A source at the Ministry of Endowments told Green Tabu on condition of anonymity that the ministry is currently inventorying and documenting endowment properties and recovering those that have been unlawfully occupied. The source said that the ministry was working to establish an accurate database for these properties, against the backdrop of "severe neglect" of the endowments system under the Assad regime. This indicates that the ministry is treating the issue as a lengthy administrative process aimed at rebuilding an internal register of endowment assets and comparing it with entries in the Land Registry or other documents.

In another statement to official media on June 9, 2026, Deputy Minister Bayraqdar said that the ministry had conducted a comprehensive inventory of endowment properties, documented their data, and created an accurate database that constituted an "advanced administrative reference" for the sector. He added that the work completed during the preceding period represented the first step in a lengthy process intended to restore the status of waqf as a form of trust and social responsibility. This formulation shows

that the ministry presents the documentation process as an entry point for regulating the administration of endowments rather than merely as a search through scattered property records.

Green Tabu observed the initial results of this process during a visit to the Damascus Directorate of Endowments. According to employees at the directorate, a review of the Land Registry revealed properties registered there as endowment properties but not documented with the Ministry of Endowments, whose occupants were using them without paying rent to the ministry. The employees said that the directorate had contacted a number of occupants to regularise their status and that searches conducted with the Land Registry were continuing in order to identify endowment properties recorded there but absent from the ministry's documents.

38,000 Endowment Properties
These properties have individual Land Records in Syria, while the ministry reported discovering approximately 40 lost endowment properties in Aleppo.

In Aleppo, the ministry reported the discovery of approximately 40 lost endowment properties after consulting the Land Registry, according to official figures announced by Bayraqdar. According to the official account, Aleppo has one of the largest concentrations of endowment properties in Syria. Bayraqdar also said that 38,000 endowment properties across Syria had undergone delimitation and census, meaning that they had individual Land Records in the Land Registry. This figure indicates the scale of the process described by the ministry and suggests that the reorganisation includes a wide-ranging review of endowment records and assets in more than one governorate.

Within this approach, the Land Registry is the ministry's first tool for tracing properties that it regards as proven endowment assets but that are either undocumented in its own records or outside its revenue-collection system. The Ottoman archives appear as a second tool for researching older origins, particularly where the documents available within the ministry are insufficient or its internal records are dispersed. The ministry's account of "lost properties" is therefore based on three interconnected elements: the existence of endowment properties absent from its records, the need for a new database, and the use of historical or real estate sources to trace the origins of those assets.

The ministry's presentation of this process as documentation and the recovery of unlawfully occupied properties does not, however, resolve the nature of the rights currently attached to those properties. It remains necessary to distinguish between properties whose endowment status is evident in the Land Registry records but from which the ministry is not collecting its entitlements, and properties whose endowment status the ministry is attempting to establish through historical documents or incomplete records.

This distinction determines the limits of the recovery process and separates the collection of clear endowment rights from the reopening of disputes over existing property. The ministry's argument concerning "lost assets" therefore raises the wider legal question of the authority of the Land Registry, the limits of using historical documents, and the rights

of occupants or owners who have treated these properties for many years as ownership interests or as established usufruct, tenancy, and permanent lease rights.

Waqf and private ownership: The limits of recovering disputed properties

Recovering properties that the Ministry of Endowments considers lost or unlawfully occupied becomes more complicated when it encounters property rights that arose outside the ministry's records, or which have been treated for many years as private ownership or as usufruct, tenancy, or permanent lease rights. In such cases, the existence of a historical document or old property record is not sufficient to produce immediate legal effects on Land Registry entries, sale or rental agreements, or the rights of occupants. Proving unlawful occupation, forgery, or invalid registration also requires a judicial process that determines the nature of the right, its holders and the consequences of any possible correction, rather than an administrative measure taken by the Ministry of Endowments or its directorates.

This distinction is the essential starting point for understanding the limits of recovery. A proven endowment property differs legally from an existing property that its owners or occupants have treated for many years as private property or as a right capable of transfer, inheritance and investment. It also differs from a property that was not originally an endowment but carries old endowment annotations or rights in its Land Record. Some non-endowment properties may, for example, carry endowment rights recorded in the legal nature field or the annotations field of the Land Record without this turning the property itself into an endowment. Using historical documents or old records in a recovery process therefore requires legal scrutiny that distinguishes the status of the property itself from the rights or annotations recorded against it.

Lawyer and human rights activist Fawaz Khouja expressed this concern to Green Tabu. According to him, consulting historical records could threaten confidence in property transactions in Syria and create a social crisis at an inappropriate time. Khouja linked the issue to compulsory lease extensions and furough rights, which had previously prompted protests from shopkeepers demanding the abolition of the committee formed to examine the matter. A compulsory lease extension is the automatic continuation of a rental agreement by force of law after its term expires, regardless of the landlord's wishes. Furough rights allow a tenant to transfer the right to occupy or commercially exploit a property to another tenant in exchange for a payment that effectively reflects the market value of the premises, without transferring ownership of the property. According to Khouja, "raising the issue of the Ottoman archives to establish the origins of ownership of certain properties in favour of the Ministry of Endowments may create a new problem at a time when the transitional government has other priorities".

Khouja suggested that, if the ministry insisted on proceeding, a committee headed by a judge should be formed to investigate the matter and that the committee should be neutral and impartial. In his view, any property dispute should then be referred to the courts. Khouja stressed that private property could not be expropriated by a ministerial decision because the Constitutional Declaration protected private property and only the judiciary could resolve ownership disputes. The role of the Land Registry, he said, was limited to implementing judicial decisions rather than ministerial decisions.

Fellow lawyer and human rights activist Aref Al-Shaal expressed a similar view. He told Green Tabu that, where loss or manipulation had resulted in the disappearance of certain endowment assets, specialised committees could be formed, preferably chaired by a judge, to examine the records of the Land Registry and the directorates of religious endowments, investigate those suspected of involvement in any manipulation, and establish the truth concerning the missing properties. According to Al-Shaal, claims that documents proving endowment ownership had become dispersed were exaggerated. He argued that reviewing the Land Registry, established in 1926, was sufficient to identify the different categories of endowment property. Such a review, he said, would not be difficult.

Al-Shaal highlighted a specific judicial process applicable where an endowment property had been transferred to another party. If the transfer occurred through forgery or in violation of the law, an action could be brought before the courts to annul the registration and restore the property to endowment ownership. In this sense, Al-Shaal did not object to recovering an endowment property lost through manipulation or forgery, but made recovery conditional upon proving the violation before the courts rather than through an administrative decision by the Ministry of Endowments or its directorates.

Historical Records Are Evidence, Not a Ruling
Historical records may help trace an endowment's origins, but changing the status of an existing property requires legal scrutiny and judicial proceedings.

These positions show that today's dispute does not concern the right of the Ministry of Endowments to protect proven endowment properties that have been unlawfully occupied. Rather, it concerns the method the ministry will use, the legal force of historical documents, and the role of the judiciary in resolving conflicting claims. The Ottoman archives may help the ministry investigate the historical origins of certain endowments, but they alone cannot determine the current status of existing properties. Old records may serve as evidence or as a starting point for scrutiny, but they are not sufficient to overturn property arrangements formed through the Land Registry or through usufruct, rental, and permanent lease agreements that have existed for many years.

Adding to the sensitivity of the matter is the range of rights that may have accumulated over an endowment property. A property may remain an endowment in origin while its occupant holds a usufruct right, a long-term tenancy, or a transferable and inheritable furough right. The "right of two leases", for example, grants a beneficiary a permanent right to use

and exploit an endowment property in exchange for a lump-sum payment and a nominal annual rent, while allowing the right to be transferred and inherited even though the underlying ownership remains an endowment. Protecting endowment assets therefore does not automatically extinguish the rights acquired by beneficiaries, tenants and holders of furough rights, nor does it turn them into occupants without legal title.

From this perspective, the properties under review need to be classified before any action is taken. Some are proven endowment properties that the ministry needs to document and from which it must collect its entitlements. Others are properties the ministry claims to be endowments on the basis of historical documents or incomplete records and may be the subject of disputes with owners or occupants. A third category consists of non-endowment properties carrying old endowment annotations or rights that do not alter their legal nature. Confusing these categories could transform the documentation of endowments into a wide-ranging dispute over ownership, usufruct, tenancy, and permanent lease rights, particularly in the absence of judicial oversight or where historical documents are used beyond their proper legal limits.

The judiciary, therefore, becomes the decisive authority in this area. The Ministry of Endowments may investigate, document, collect evidence, and review the Land Registry, but when it encounters existing private ownership, usufruct, tenancy, or permanent lease rights, it requires a judicial process proving unlawful occupation, forgery, or another violation. Without this, the recovery of endowment properties could shift from correcting earlier encroachments to creating a new source of instability in property rights, particularly in cities where endowment properties are interwoven with historic markets, homes, shops, and sources of livelihood.

Reappraising Rents: Waqf Between Occupants' Rights and Market Returns

For endowment properties already known to the ministry, the reorganisation takes a more direct financial and administrative form through the reassessment of rents, the amendment of contract terms and pressure on occupants to regularise their status with their local directorates of religious endowments. This process differs from the issue of properties the ministry says are lost or unlawfully occupied, because it concerns registered properties already known to it but rented for many years at rates the ministry considers lower than their current market value.

The ministry administers endowment properties under Law No. 31 of 2018 and, within this framework, is applying a new mechanism for reappraising rents on endowment properties, including properties subject to the furough or compulsory lease extension systems. Under the current process, the reappraisal covers commercial premises, residential properties and land, with new rents determined according to the property's market value rather than the old amounts stated in previous contracts.

Property valuation expert and engineer Moataz Qubaitari, one of the engineers commissioned to reappraise endowment properties in Damascus, told Green Tabu that in 2025 the ministry had applied a rate of 0.7 percent of the market value of commercial properties before increasing it to 1.4 percent in 2026. For residential properties, the reappraisal rate was set at 0.5 percent of the market value, according to Qubaitari, who said that the process in Damascus covered approximately 8,000 commercial and residential endowment properties.

1.4% of Market Value
The rate applied in 2026 to reappraise commercial endowment rents; the Damascus process covered approximately 8,000 commercial and residential properties.

Qubaitari linked variations in the new rents to several criteria, including the size of the property, its location, its market value and the nature of its use. He said that the annual rent for some commercial properties could reach USD 5,000, depending on their location and value. He also referred to an endowment residential property in the Abu Rummaneh area whose annual rent had been reappraised at approximately USD 4,000, compared with its previous annual rent of only SYP 200,000. Qubaitari considered reappraisal according to market value reasonable, given the substantial difference between old rents and current property values.

The regularisation process begins with the occupant of an endowment property submitting an application to the Directorate of Endowments in their governorate. The application states the details of the property, the area in which it is located and, if it is commercial, the profession practised there. A committee is then assigned to assess the property according to its market value. The occupant subsequently returns to the directorate to pay the new rent and renew the contract after it has been referred to the ministry for approval. According to documents reviewed by Green Tabu, the new contract is usually valid for 3 years.

The amendments also include the conditions under which the property is occupied and used. The occupant of a commercial property must specify one profession in the regularisation application. If two professions are listed for the same premises, the directorate may reject the application as this breaches the contractual conditions imposed by the ministry. In this sense, regularisation becomes a comprehensive redefinition of the contractual relationship rather than merely a financial adjustment.

The Damascus Directorate of Endowments has seen many endowment property occupants seeking to regularise their status, as this process appears to be their only practical option in the face of the possibility that the contract may be terminated or the property offered for investment via public auction. The ministry treats auctions as one of its tools for reinvestment, particularly for properties it recovers or where it ends the contractual relationship with former occupants. Some occupants regard the new valuation as unavoidable even when they consider the resulting rent high or burdensome.

Abu Mohammed, who occupies a commercial property on Khaled Ibn Al-Walid Street, told Green Tabu that the endowment attached to his shop was a family waqf and that he had inherited the premises from his father,

who rented it in 1988 after purchasing the furough right from another person. He added that the rent for his shop had now been appraised at approximately USD 2,000 per year according to its market value. A family waqf is an endowment whose benefits are allocated to the descendants or family of its founder before subsequently passing to a charitable body under the conditions of the waqf.

Abu Mohammed's account reveals the complex nature of the relationship between the Ministry of Endowments and the occupants of certain endowment properties. The occupant does not present himself as a new tenant, but as the heir to a tenancy and permanent lease relationship purchased by his father decades ago. Although the property itself remains an endowment, the right of occupation and investment has passed within the family and become linked to an established source of income. Increasing the rent or changing the contract terms affects a long-standing economic and social position.

In the Sarouja neighbourhood of central Damascus, another endowment property tenant, who asked not to be named, told Green Tabu that his father had rented the property under the permanent lease system in the 1960s and that he later inherited it. He said that he did not object in principle to reassessing the shop according to prevailing market value and setting a new rent, but stressed that the process needed to be equitable and fair to both parties. He added that a high valuation could affect the prices of goods because the tenant would attempt to recover the new rental cost by raising prices for customers.

These accounts show that reappraisal affects broader networks of rights and interests. Some occupants paid furough payments, inherited occupancy rights from their fathers, or invested in their properties and businesses over many years. Increasing rents in line with market value may improve endowment revenues, but it also places a new burden on shopkeepers and tenants, part of which may be passed on to consumers in historic markets and commercial centres.

The process becomes more sensitive where family waqfs or endowments associated with specific families are concerned. The case of the Al-Sibai family guesthouse in Homs caused widespread objection after the Directorate of Endowments took control of the guesthouse, which the family said it had inherited since the Zengid era. The directorate subsequently reversed its decision and issued a statement on April 22, 2026 confirming that the waqf would remain under the family's control, while the guesthouse would be converted into a public library and prayer room. The case illustrates that reorganising endowments is not always related to financial returns but may also affect family and social memory connected to particular properties.

The reassessment policy places the Ministry of Endowments in a delicate position. On the one hand, it seeks to increase rents that it considers excessively low, impose clearer contractual conditions, and obtain higher

returns from endowment assets. On the other, many occupants regard these properties as long-standing usufruct or permanent lease rights and sources of livelihood that have continued for decades. Prevailing market value is an important financial benchmark for the ministry, but it is not sufficient on its own to regulate the effect of reassessment on tenants, markets, and the historical rights of occupants. Nor does it answer the parallel question of how the revenues will be managed, who will benefit from them, and how their expenditure will be monitored.

Endowment properties are not ordinary administrative resources, but assets dedicated to a specified purpose whose revenues are meant to be spent in accordance with the endowment's conditions, objectives, and the beneficiaries designated by the founder or the law. Without transparency in managing these resources, the policy of protecting endowment assets may become an expansion of the Ministry of Endowments' authority over property and revenue rather than a restoration of the charitable, religious, and social purposes for which endowments were created.

Conclusion: Protecting waqf without destabilising existing rights

The Ministry of Endowments' policy towards endowment properties reveals an attempt to rebuild administrative and financial authority over a broad sector of assets after years of weak documentation, low returns and accumulated old contracts. This process is warranted where proven endowment properties have been unlawfully occupied, used in ways that deprived the ministry of its rights, or rented at rates that no longer reflect their value. However, the need to protect endowment assets does not grant the ministry unlimited authority to redefine ownership, usufruct or furough rights through administrative decisions, particularly where those rights have been established through property records, contracts and practices extending over decades.

The limits of correction begin with distinguishing between different cases. A proven endowment property requires documentation, income collection, and regularisation of its occupant's status. A property that the ministry claims to be an endowment on the basis of historical documents or incomplete records requires judicial proof before any consequences can be imposed on owners or occupants. Non-endowment properties carrying old endowment annotations or rights require a careful legal interpretation distinguishing the status of the property from the rights recorded against it. Without this classification, the recovery of endowments may shift from correcting earlier encroachments to creating a new source of property disputes.

The reappraisal of rents cannot be completed simply by raising them to market levels. The relationship between the Ministry of Endowments and the occupants of endowment properties includes usufruct rights, furough rights, inherited tenancies and established sources of livelihood, particularly in historic markets and city centres. A fair reappraisal policy

requires publicly announced rules, clear objection procedures and transitional periods that take account of occupants' ability to adapt, without eliminating the right of the waqf to receive fair returns.

The question of revenue remains central to the process. The money collected by the Ministry of Endowments through rents, regularisation, and auctions is not an ordinary administrative resource, but income tied to the purposes, conditions, and objectives of the endowment. The ministry needs to be transparent about how these resources are spent, who benefits from them, and what oversight mechanisms apply. Protecting an endowment also means protecting its purpose, rather than merely expanding the ministry's control over its properties and income.

Protecting a Waqf Means Protecting Its Purpose
Income from rents, regularisation and auctions requires transparency regarding expenditure, beneficiaries and oversight.

In this sense, the endowment property issue is a test of the transitional government's ability to deal with a complex administrative and legal legacy without creating new instability in property rights. The ministry may recover proven endowment properties, increase rents that are unreasonably low, and reorganise its contracts, but the success of this process depends on an effective judiciary, transparent procedures, and a strict distinction between protecting endowment assets and protecting the rights of owners, tenants, and holders of permanent lease rights. Only within these limits can the reorganisation of endowments become an institutional reform rather than an administrative expansion within a property market already burdened by disputes and a lack of confidence.

North Sakka in Raqqa: Urban Planning and the Threat to Residents' Rights

Batool Alshekh

The North Sakka area in Raqqa risks extensive urban transformation following eviction notices and initial demolitions affecting some homes and structures—amid local reports of a poorly communicated, opaque development project that would remove some 4,000 housing units on the grounds of eliminating encroachments on state property and rezoning informal settlements.

Three dynamics intersect in this case: (1) usufruct rights and local transactions that developed on land within the Al-Raed Project; (2) a long-term urban transformation that shifted the area from agriculture to housing; and (3) a new investment project that presents the land as a space for replanning and profit.

The risk lies in how urban planning is defined and implemented. When planning is separated from the history of the land, existing housing and the documents accumulated by residents, it changes from a tool for regularising a complex urban situation into a mechanism for redistributing land and real estate. In this sense, the North Sakka case tests how the new authorities will deal with the existing urban fabric, between regarding it as a space of rights and services and treating it as an obstacle to new investment value.

The issue centres on which party has the right to define "violation", "urban planning" and "public benefit". Residents present urban planning as a process of classifying rights, distinguishing established housing from recent encroachments and improving services in place. The official process, as reflected in verbal promises of compensation, the opacity surrounding investors and discussions of extensive replanning, shifts the dispute away from residents' right to remain and have the area regularised in place towards accepting relocation or compensation within a project whose criteria, boundaries and beneficiaries remain unclear.

From a land reclamation project to a complex legal area

Documents collected by residents of North Sakka and obtained by Green Tabu show that the land within the Al-Raed Project did not reach its current situation through a single process. It began as a state-managed land reclamation and irrigation project in the Euphrates Basin, before some of the land was distributed to beneficiaries under distribution decisions and handover records. It was subsequently transferred between different individuals through sale agreements, assignments and powers of attorney. This background makes the current dispute broader than a matter of unlicensed construction on agricultural land, because it concerns land whose legal and administrative status was itself largely produced by the state.

The Al-Raed agricultural project dates back to the early 1970s and is one of the oldest land reclamation and irrigation projects in Raqqa Governorate. Implementation began in 1970, and the project became operational in 1974 over an area of approximately 24,000 hectares north of Raqqa. Its purpose was to reclaim agricultural land and establish modern irrigation and drainage networks, as well as to rehouse and compensate some residents affected by the formation of Lake Assad following the construction of the Euphrates Dam. State farms and model farms administered by the General Organisation for the Investment and Development of the Euphrates Basin were created as part of the project.

Over time, the project's state farms began to incur financial losses. An article published in Tishreen newspaper on January 22, 2001, entitled "The Decision to Distribute State Farm Land to Farmers Ended Their Losses and Preserved Their Workers' Rights, stated that the farms had suffered losses of SYP 277 million over 5 years. Baath Party Regional Command Resolution No. 83, issued on December 16, 2000, subsequently approved the distribution of the land of "unstable" state farms under the applicable laws and regulations, with an estimated allocation of 3 hectares of irrigated land or 8 hectares of rainfed land per family. The resolution also provided for the recovery of reclamation and irrigation costs from those eligible for distribution, the sale of existing farm housing to some beneficiaries, and the retention of public infrastructure, including schools, mosques and health centres, by the relevant public authorities.

Usufruct Rights
A usufruct right allows its holder to use and exploit land, while bare ownership remains with another owner.

Part of the Al-Raed Project's land was distributed under the usufruct system. Under Syrian Civil Code No. 84 of 1949, usufruct is a real right granting its holder the authority to use and exploit an asset while actual ownership, known as bare ownership, remains with another owner. A beneficiary may therefore use the land, benefit from its proceeds and dispose of the usufruct right in accordance with legal conditions without owning the underlying property. This arrangement gave beneficiaries a legal basis for using the land, while keeping its use tied to agricultural production and to irrigation and reclamation requirements.

This sequence appears in a temporary handover record dated March 27, 2012, concerning the handover to Issa Ali Hammoud of 30 dunams of agricultural land at Hattin Farm, in field /2-2/ on canal NR6. The handover was based on Baath Party Regional Command Resolution No. 83 of December 16, 2000, the schedules approved by the General Organisation for the Investment and Development of the Euphrates Basin, and the schedules issued by the committee formed by the Governor of Raqqa. The record states that the recipient undertook to cultivate the land in accordance with the agricultural plan and not to object to demands for payment of reclamation and irrigation costs.

Some residents of North Sakka later relied on these documents when challenging demolition decisions. In a petition submitted by Mohammed Nasser Al-Marei Al-Hassan to the Governor of Raqqa on April 6, 2026, he stated that on September 24, 2025, he had purchased a plot of land from Dali Ati bin Hanadi under a final sale contract deposited with the Raqqa branch of the Bar Association under serial number 305 of 2025. He said the seller had obtained the land from the beneficiary Issa Ali Hammoud under the attached usufruct document concerning field /2-2/ on canal NR6 within Hattin Farm.

He added that the land was among those formally distributed before 2011 by the Land Distribution Committee within the Al-Raed Project, which falls under the Raqqa Directorate of Agriculture. On it, he constructed a prefabricated warehouse consisting of 2 hangars for the trade and

distribution of foodstuffs and cleaning products, at a cost of over USD 500,000.

In the same petition, Mohammed Nasser distinguished between land belonging to the Al-Raed Project, meaning formally distributed land, and municipal property or undistributed public property. He said that the land he occupied lay outside the zoning plan of Raqqa City Council, belonged to the Raqqa Directorate of Agriculture, and had been formally distributed through the Al-Raed Project's Land Distribution Committee.

He also referred to Raqqa Governor's Decision No. 583, issued on March 8, 2026, which established a technical committee to inspect field /2-2/ on canal NR6 at Hattin Farm, establish its legal and current status, and prepare a report on rights supported by a sketch map and real estate documents. According to the petition, after conducting an on-site inspection and comparing the handover records, the committee concluded that several beneficiaries had formally received their land. These included Issa Ali Hammoud, listed in item 10 of the committee's report as the beneficiary of an undivided area of 30 dunams under Document No. 257.

The beneficiaries' dossier, submitted to the Central Authority for Supervision and Inspection in Raqqa, was compiled in April 2026 and signed by hundreds of affected residents. It presents a collective account from residents of North Sakka. The dossier speaks on behalf of a group of residents and states that the area contains more than 3,000 homes, which have provided shelter for people on limited incomes. It says that some mosques and prayer halls, as well as some eastern parts of the area, were built more than 50 years ago, before the area later developed into a settlement containing facilities, factories and warehouses.

The dossier describes the land's legal status as originally private property that was expropriated under Decree No. 20 of 1972 for the benefit of the General Organisation for the Investment and Development of the Euphrates Basin, before being distributed to eligible beneficiaries following Baath Party Regional Command Resolution No. 83 of 2000.

These documents place North Sakka within a complex legal and urban situation. Residents do not rely solely on physical occupation, but on distribution decisions, handover records, usufruct rights, and subsequent contracts. At the same time, some of these rights remained attached to agricultural land outside the urban plan before the land gradually shifted to residential and economic use as agricultural activity declined. Residents' documents are therefore a central element in the discussion of demolition, but they also reveal the limits of the legal settlement that the state failed to complete before the municipality returned today to treat its consequences as violations.

From demolition notices to an investment project

The North Sakka area extends along the northern and northeastern outskirts of central Raqqa, between the city's urban expansion and the

agricultural areas towards the northern countryside. It includes the Andalus neighbourhood, the area around Hazima Roundabout, the vicinity of Al-Andalus School, the Agricultural Airport grounds, the outskirts of the Rumaila neighbourhood, and Al-Saqiya Street. Over the past 2 decades, the area has developed into a densely built urban mass containing thousands of residential plots and housing tens of thousands of residents, as part of rapid expansion that remained outside zoning plans and adequate service provision.

At the beginning of March 2026, unexpected notices appeared on the walls of some buildings near Hazima Roundabout, ordering occupants to vacate within 72 hours. The notices coincided with demolitions carried out by machinery operated by Raqqa Municipality, affecting some built-up plots and structures in what is known as the Palm Forest area. This caused widespread fear among residents, particularly because of the conflicting answers they received when consulting different service institutions and local authorities. Some sources said the area was facing comprehensive demolition and clearance, while others denied that any clear decision to that effect existed.

Faced with this uncertainty, residents launched simultaneous public and legal action. Sit-ins and protest gatherings brought together affected women, men and children, while residents began searching the Official Gazette and records of presidential decrees and government decisions for documents proving their rights. At that stage, residents treated the matter as a legal dispute over ownership and usufruct, before later discovering that the governorate was dealing with the area as part of a broader replanning project.

Media coverage of the protests prompted Raqqa Governorate to form a technical committee under Decision No. 583 of March 8, 2026. The committee was tasked with establishing the legal and current status of field /2-2/ on canal NR6 at Hattin Farm and preparing a report on rights accompanied by a sketch map and real estate documents.

The Committee's Acknowledgement Did Not Stop the Demolition
According to residents' documents, the committee acknowledged that the land had been distributed through official usufruct decisions, but the demolition process continued.

On March 29, 2026, the committee completed its report following an on-site inspection and comparison of the beneficiaries' handover records. According to residents' documents, the committee acknowledged that the land had been distributed under official usufruct decisions issued by the Al-Raed agricultural project and that, under Syrian custom and law, beneficiaries are legally treated in the same way as owners—that is, as usufructuaries in the position of owners. This acknowledgement did not, however, halt the demolition process, shifting the issue from the question of documents to the question of which authority had the right to decide how the land would be treated.

The case of Hajj Mohammed Nasser Al-Marei Al-Hassan emerged as an example of this contradiction. At the beginning of March 2026, Hajj Mohammed received a notice ordering him to vacate the warehouses and structures situated on his land in field /2-2/ on canal NR6 at Hattin

Farm. He had purchased the land on September 24, 2025 from Dali Ati bin Hanadi under a final sale agreement deposited with the Raqqa branch of the Bar Association under serial number 305 of 2025. On the land, he constructed a prefabricated warehouse consisting of two hangars used for the trade and distribution of foodstuffs and cleaning products, at a cost he said exceeded USD 500,000.

Hajj Mohammed submitted an urgent formal complaint to the governorate's registry, relying on the purchase contract, usufruct documents and handover records associated with the land. According to his letter to the governor, the committee that had been formed recognised the validity of his documents and the legality of his real estate ownership and the associated usufruct right. Despite this, bulldozers and machinery belonging to Raqqa City Council demolished the 2 hangars, accompanied by armed reinforcements and internal security personnel. The civil engineer who supervised the design, construction and fitting out of the facility testified that the demolished building was an existing and fully equipped economic facility, rather than merely an isolated encroachment on state property.

The demolitions were not limited to Hajj Mohammed's facility. A further 4 homes and 6 walled plots were demolished at the end of the Agricultural Airport road near the university grounds, following the withdrawal of the Syrian Democratic Forces (SDF) and the takeover of Raqqa by the transitional administration's forces in January 2026. The official justification was that these were recent structures constituting encroachments on state property.

This began to reveal the overlap between relatively recent buildings, potentially genuine encroachments, and older rights connected to the land of the Al-Raed Project and its local transfer.

The case of Tawfiq Al-Abdullah reveals another aspect of this overlap. On November 18, 2025, Al-Abdullah, born in Raqqa in 1999, purchased an 8-dunam agricultural plot within Hattin Farm for USD 20,000 from Bassem Al-Basir. The accompanying documents show that the seller dealt with the land under a power of attorney certified by the Raqqa branch of the Bar Association on September 18, 2022, and based on earlier handover records.

According to Al-Abdullah, he paid USD 1,500 to employees of the Violations Department of the People's Municipality during the period of SDF control in order to overcome obstacles to obtaining a residential building permit and avoid demolition orders. After the change of authority at the beginning of 2026, those employees remained in their administrative and supervisory positions before later approving the demolition of the same building they had previously overlooked, Al-Abdullah said. The violation thus does not appear solely as an individual act, but as the product of a local administration that accepted or benefited from the existing reality and then returned to use it as a justification for

demolition.

The demolitions and notices prompted residents to expand their campaign. Activist Malik Al-Khader, head and spokesperson of the North Sakka Neighbourhoods Committee, led the opposition movement. A page opposing the demolitions was launched, amid calls for protests at Hazima Roundabout and in front of the governorate building.

Protesters carried slogans including: "My home is my future—do not demolish it" and "This is my right, and I will not give it up". One speech delivered during a protest addressed the local authorities as follows: "We know that you want to turn Raqqa into the Paris of the East, but Paris was built on land; it was not built on the ruins of people's homes and their displacement. Development begins with people, not with expelling them."

As the protests expanded, Governor Abdul Rahman Salama arranged a meeting with a delegation representing the neighbourhood. A 6-person representative committee was formed from local dignitaries and prominent figures. Its members included engineer Jassem Al-Askar, director of the Al-Raed Project in Raqqa, who joined to provide the delegation with technical and legal support. During the meeting, held in the governor's office at the end of May, residents discovered a situation different from the one they had initially understood. The dispute was not, as they had first believed, merely a matter of ownership or usufruct, nor simply the removal of recent violations, but part of a broader investment project to replan the area.

Al-Khader recounted that the governor displayed modern engineering plans on a digital screen showing the complete removal of the North Sakka neighbourhoods to make way for investment-oriented residential complexes to be constructed by Arab and international companies. Basil Mustafa Al-Basir, one of the landowners in the area, said that the neighbourhood delegation had gone to the governorate carrying documents because it believed that the dispute concerned the underlying ownership of the land. The delegation was surprised to discover that "the issue concerned a new investment project" and that governorate employees were, according to him, not interested in residents' documents or ownership rights.

The governor attempted to ease the delegation's anger by making verbal promises that residents would receive full compensation and be transferred to modern housing complexes and replacement flats delivered before any demolition or eviction. These promises, however, collided with residents' lack of trust and the country's general economic situation. Malik Al-Khader asked him: "How will you provide us with homes and secure alternative housing complexes when the government is unable to pay public-sector salaries?" The committee informed the governorate of a unified position: residents did not want compensation or replacement flats, but wished to remain in their homes and have services and infrastructure improved, including roads, sewage, electricity, schools and health centres.

At the end of the meeting, the governor attempted to negotiate with residents outside the framework of the unified committee, announcing that he preferred to meet families separately in order to consult and negotiate with them individually. The meeting had nevertheless moved the case into a new phase. It began with notices and the demolition of violations, then became a dispute over usufruct and sale documents, before emerging as an investment project to reshape an entire area of the city. From this point onwards, the issue was no longer limited to the validity of residents' documents or the recent construction of some buildings, but concerned whether urban planning would address an existing situation or use it as an entry point for clearing the land and reinvesting it.

From an Agricultural Belt to Residential Blocks

The North Sakka case is not limited to the legal dispute concerning usufruct and sale documents. It also includes the long-term urban transformation of Raqqa's northern outskirts. The area, once part of the agricultural belt surrounding the city, gradually developed into a densely built residential and economic extension amid declining agriculture, damaged irrigation networks, displacement, weak planning and successive changes in controlling authorities. Describing the area today as one of recent encroachments does not explain the process that produced this urban fabric, nor does it distinguish between homes established for years and more recent commercial facilities or plots in specific locations.

Urban Transformation Predated the War
Land subdivision and construction began between 2004 and 2013, accelerated during the war and became more established afterwards.

Using Hazima Roundabout as a geographical reference point, three stages can be identified in the transformation of North Sakka. Between 2004 and 2013, agricultural land in the northwestern sector along the agricultural airport road and the northeastern sector in Al-Andalus neighbourhood began to undergo early changes in the form of dirt roads, grid-like subdivisions and low-density construction. This means that the initial transition from agriculture to urban development preceded the war.

Construction accelerated during Islamic State control between 2014 and 2017, amid declining administrative planning and internal displacement, and became more established after the SDF took control in late 2017. During this period, construction density increased and the area came to include not only homes but also commercial and industrial facilities.

The outskirts of North Sakka were thus transformed from agricultural land surrounding Raqqa into an existing urban and economic mass, but without recognition in zoning plans or adequate infrastructure.

Abu Abbas, a resident of the area, explained part of this transformation by referring to the fate of the Al-Raed agricultural project itself. During the war, pumping stations and irrigation canals were destroyed, causing water supplies to stop and drought and desertification to spread across the surrounding agricultural land.

According to his testimony, this agricultural paralysis pushed small landowners and farmers to sell their land as residential plots in order

to secure their livelihoods, and the purchasers then constructed homes on them. The conversion of part of the land to housing was therefore connected to the collapse of agriculture in an area dependent on irrigation and drainage networks that no longer functioned properly.

Abu Abbas added that the owners of these homes possess title deeds and legal documents, and that the actual encroachment is concentrated in the Palm Forest area, where Raqqa Governorate recently demolished existing structures and plots. This distinction is fundamental to the case because it separates a stable residential area formed over many years from newer encroachments or structures that can be addressed as a separate matter. Treating North Sakka as a single mass of violations, by contrast, allows specific encroachments to be used as a justification for removing entire neighbourhoods without distinguishing between occupied homes, walled plots, commercial facilities, recent construction and homes in which families have lived for years.

Residents of North Sakka therefore do not reject the principle of urban planning itself. Their objection concerns the type of planning proposed and whether it aims to improve housing conditions in the area's existing location or empty it and reinvest the land.

Activist and residents' committee member Malik Al-Shahada proposed an alternative based on municipal replanning of the area in its present location rather than its removal. The proposal includes widening existing streets by 1 metre on each side and clearing and demolishing only those structures located on sites designated for public facilities and services, such as schools, hospitals and public parks. Those affected by these specific removals would be compensated in the nearby Al-Taamir area.

USD 10 Million
Residents said they were prepared to help finance sewerage, roads and electricity in exchange for regularising the area in its current location.

Al-Shahada also said that residents were prepared to contribute approximately USD 10 million towards financing infrastructure projects, to be allocated to rehabilitating sewerage networks, opening and paving roads, and installing electricity lines and other essential services. Residents are therefore proposing an alternative based on regularising the area's urban and service conditions in place, rather than relocating them to replacement complexes whose terms, financing and guarantees remain unclear.

This process demonstrates that North Sakka requires urban planning, but that the dispute concerns the nature of that planning. The model proposed by residents is based on distinguishing between different cases, widening roads, providing services and compensating specific affected people. Planning through removal, by contrast, turns the crisis of planning and services into a means of reshaping the entire area and relocating its residents elsewhere.

Investment instead of regularisation

In late May, Raqqa Governor Abdul Rahman Salama said in an interview with Syria TV that the proposed North Sakka project was in residents'

interests and aimed to regularise informal settlements in the area. Residents, however, also report that he used the expression "turning Raqqa into Dubai" while discussing the removal of encroachments and the area's reorganisation. This expression reinforced their fears that the plan was closer to an investment project than to an urban and service-related regularisation process. The governor said that the committee formed by residents had not conveyed the situation accurately and that everyone would benefit and be satisfied.

Salama had previously told SANA in early April that the plan would extend over 2 to 4 years and have an estimated cost of approximately USD 250 million. This financial scale places North Sakka within a broader vision for reconstructing Raqqa and attracting investment, rather than within a limited municipal response to building violations. According to official statements, the plan is based on launching major investment projects to be implemented and managed by Chinese and Saudi engineering and construction companies, with North Sakka identified as the focal point for implementing these projects. The plan also includes relocating some economic and industrial functions from inside the city to areas outside it, including industrial activities, livestock markets, the wholesale fruit and vegetable market, and slaughterhouses, to the nearby open area of Sahl Al-Banat, alongside recreational projects on the banks of the Euphrates.

USD 250 Million Over 2–4 Years
The announced cost and timeframe of the plan, while the companies, contracts and compensation criteria remain insufficiently disclosed.

In other words, the project concerns not only North Sakka, but also the redistribution of the city's functions between a centre whose density is to be reduced, the outskirts reorganised to accommodate relocated activities, and other sites offered for investment. The problem lies in the gap between the plan's scale and the limited information disclosed about it. A search for the investors or companies sponsoring and developing the North Sakka planning project revealed no clear financial disclosures, explicit names of implementing bodies, contracting mechanisms, or criteria for selecting investors in official statements issued by the governorate council.

This uncertainty also extends to the criteria for compensation and alternative housing. The governor's promises to residents remained verbal, with no documents specifying who would qualify for compensation, how the value of homes, facilities and land would be assessed, when replacement flats would be delivered, and whether they would genuinely be provided before demolition.

Some residents, including Abdo Al-Khoja, have also raised questions about Governor Abdul Rahman Salama's background in the contracting sector and whether his company—Al-Raqi Construction Company, which was established in the city of Sarmada in Idlib in 2020 and was widely accused of monopolising the contracting and reconstruction sector under the rule of the Salvation Government affiliated with Hayat Tahrir Al-Sham—has any direct or indirect connection to the project.

There is no evidence supporting such a connection. However, the lack of disclosure concerning the implementing companies and contracts keeps

the question of a conflict of interest open, particularly when a local official with a previous background in construction leads an urban and investment project of this scale.

In this sense, the North Sakka case extends beyond the fate of 4,000 threatened housing units. It reveals a pattern in the administration of urban areas following the transfer of power to the transitional administration, in which the future of land is determined by the governorate and investors, while residents are asked to accept compensation or relocation without written guarantees, meaningful participation in the decision, or a precise distinction between different rights and circumstances.

The central issue becomes whether urban planning will begin by regularising the status of the existing neighbourhoods, enabling their residents to remain and improving their services, or by transforming the land into a new real estate market under the heading of removing encroachments and attracting investment.

A test of fair planning

The North Sakka case reveals the interaction of three central dynamics. The first is legal: residents rely on layers of usufruct rights, handover records, contracts, and powers of attorney, while the municipality reduces the situation to a violation on agricultural or public land. The second is urban: the area is no longer an empty agricultural belt, but has become a residential and economic mass formed over years of agricultural decline, the breakdown of irrigation networks, displacement and the absence of planning. The third is investment-related: the planning project appears to be part of a broader vision for reshaping Raqqa and attracting companies rather than a plan for regularising residents' rights in their existing locations.

The dispute, in this sense, is not about the need for urban planning. North Sakka requires the classification of rights, a distinction between established housing and recent encroachments, improved services, wider roads, and compensation for specifically affected residents. The disagreement concerns which party has the authority to define the nature and direction of planning.

If planning begins with investment maps and verbal promises of compensation, the cost of moving from disorder to regulation will be borne by residents who lived in an administrative and service vacuum created by successive authorities. If it begins instead with a publicly accessible register of rights, written compensation criteria, and disclosure of investors and contracts, it could become an entry point for a fair settlement.

The significance of North Sakka extends beyond Raqqa. In many Syrian cities, reconstruction projects will encounter existing neighbourhoods, rights that are difficult to document, and residential histories formed during war and the absence of the state. The measure of fairness in urban planning therefore becomes the ability of residents to remain decision-

making participants in the future of their areas, rather than merely recipients of compensation or relocation.

Without this condition, the regularisation of informal settlements may become a new name for removing low-income families, small landowners and usufruct holders from sites whose value has increased, and reintroducing the same land into a real estate market whose conditions they cannot meet.

POLICY OPTIONS

Major Real Estate Development Projects in Syria: Towards a Framework Linking Investment to the Protection of Property Rights and Occupants and Guaranteeing Objection and Compensation

Mazen Ezzi, Mohamad Manar Hemejo

Executive summary

This paper approaches major real estate development projects as a test of how reconstruction is managed in Syria, rather than merely as investment or urban development projects. When land and property become a means of attracting finance and reactivating assets, protecting housing, land, and property rights becomes a necessary condition for preventing investment from turning into a tool for redistributing space and value outside a clear rights-based process.

The risks arise from a gap between the speed with which projects are proposed and the slow pace at which the Syrian war's effects on ownership, documentation, and occupancy are addressed. This gap appears in projects such as "New Damascus" and the coastal Al-Bassa project, where more investment and urban-planning information is available than rights-related information concerning the boundaries of the land, its legal status, rights holders, occupants, and the procedures for objection and compensation. The central role of the Syrian Sovereign Fund in consolidating assets and offering them for investment further increases the need for transparency concerning the origins of these assets, how they are valued, and the existing rights attached to them.

The paper proposes a temporary framework to precede contracting and implementation in major real estate development projects. This framework is based on publishing information about land and property, identifying the legal process applicable to each project, establishing local claims registers, adopting a multi-source mechanism for proving rights, suspending any final disposal of land until objections have been resolved, and separating the roles of the owning, regulatory, implementing, and contracting bodies. Without these safeguards, reconstruction projects may create new property-related injustice, particularly against absentees, displaced people, occupants, and holders of rights that have not been formally documented.

First: The policy problem

Syria's transitional administration is addressing real estate development within a fragile rights-related and institutional context. The issue concerns not only attracting external finance or launching major urban projects, but also the state's ability to prevent these projects from becoming new means of redistributing land and housing before the rights of their owners have been established. Any large-scale development project not preceded by scrutiny of housing, land and property rights can create disputes over ownership, occupancy, compensation and the right to return to the original area.

The Syrian authorities are proposing these projects at a time when the effects of the war remain embedded in the structure of property ownership itself. Years of internal displacement, exile and destruction have led to the loss of real estate documents, inability to access records or properties, and damage to some Land Records. Informal settlements and areas with building violations also continue to be governed by ownership and occupancy relationships that are not documented in the Land Registry. Introducing these areas into development projects before rights have been inventoried may therefore transfer the burden of the war onto rights holders themselves and make proof of ownership or possession a precondition for protection or compensation.

These risks increase with the emerging role of the Syrian Sovereign

Fund (SSF) in offering assets and property for investment. The fund is presented as a central channel for reactivating public and unused assets, but it requires publicly available rules determining how properties are selected, valued, and transferred into investment and how existing rights attached to them are addressed. Without such transparency, the fund may shift from being an asset-management tool into a process that bypasses traditional safeguards for protecting rights.

This problem appears in projects such as the "New Damascus Project" and the coastal Al-Bassa project. The available information points to large-scale projects with administrative, residential and commercial functions, but does not provide sufficient detail concerning the boundaries of the land, its legal status, the nature of existing ownership, or the fate of occupants and potential rights holders. The currently available information does not allow any definitive conclusion that specific violations have occurred, but it is sufficient to reveal a gap between the scale of the investment proposals and the limited rights-related information that has been published.

This gap is inseparable from urban planning and the legal process applicable to the projects. A zoning plan determines land use, value, the fate of existing buildings and the share of rights holders in any subsequent project. The project's legal process also determines the responsible authority, how the land is secured, and the mechanisms for objection and compensation. It is not sufficient to present a project as an investment opportunity before clarifying whether it will be established as a real estate development and investment zone, managed as a direct investment, or implemented through a private partnership arrangement.

Accordingly, the principal policy problem is the absence of a transitional framework linking every major real estate development project to prior scrutiny of housing, land, and property rights. Such a framework requires the publication of project boundaries before contracting, disclosure of the legal status of the land before it is offered to investors, an inventory of ownership, occupancy and usufruct rights, an opportunity to object before implementation, and the establishment of compensation principles before land use is changed or its value redistributed. Without these conditions, real estate development may shift from an entry point for reconstruction into a tool for creating new property-related injustice, particularly against absent people, displaced people, occupants, and holders of incomplete documentation.

Second: real estate development projects and areas of risk

The major real estate projects presented by SSF officials during the Syrian–Emirati Investment Forum, held in Damascus on May 11, 2026, reveal a gradual transition from general discussions about attracting investment towards identifying land and areas that can be converted into large-scale urban, residential and commercial projects. The forum did not result in any signed investment agreements or memoranda of understanding, but

it did demonstrate the fund's role in consolidating real estate assets and presenting them to investors.

The sensitivity of this transition lies in the fact that the land itself becomes the subject of investment, together with the private ownership, public property, occupancy, usufruct rights, different uses, and unresolved disputes arising from the years of war that it carries. These projects cannot be evaluated solely from the perspective of finance or urban design—they must also be assessed in terms of their potential impact on housing, land, and property rights.

3,300 Hectares and USD 40–50 Billion
The area and estimated investment cost of New Damascus, including USD 7.6 billion for infrastructure.

The "New Damascus Project" stands out as the clearest example of this direction. It was presented as part of a package of major urban projects offered for investment on both sides of the Damascus-Beirut highway, extending from the Mazzeh motorway to the Sabboura area in Rural Damascus, over an area of 3,300 hectares.

The project is not proposed as an ordinary urban extension, but as a new mixed-use city including residential and commercial neighbourhoods, educational, health and recreational facilities, and extensive infrastructure. Published information also indicates that it may include diplomatic, financial and residential functions, with plots allocated to private investors. Investment requirements were estimated at between USD 40 billion and USD 50 billion, including USD 7.6 billion for infrastructure.

A project of this scale makes it essential to determine the legal status of the land included in it, identify rights holders and occupants, and establish the mechanism by which land will be converted into plots and investment opportunities before any contract is signed.

The information presented concerning the fate of existing residents within the project area further increases the importance of a rights-based process before implementation. Two compensation mechanisms have been proposed: occupants of state-owned land would receive financial compensation for vacating it, while landowners, including owners in parts of Western Dummar, Moadamiyeh, Mazzeh and parts of Qudsaya suburb, would be given the option of receiving shares in the new project or financial compensation.

This process covers approximately 700 properties. It transforms compensation from a general question into a matter requiring detailed legal treatment concerning the basis for distinguishing occupants from owners, the method used to calculate compensation, the mechanism for calculating shares, and the rights of heirs, absentees, tenants, and holders of incomplete documentation.

Urban development pressure around the Damascus-Beirut highway also extends to smaller projects. The "Damascus Hills Complex" project was proposed in the Dimas area of Rural Damascus, on the western side of the highway, for the development of residential buildings and schools over an area of 284 hectares, with an estimated investment value of USD 384

million.

There was no information concerning the legal status of the land, the owning authority, or the existence of occupants and existing rights. Its significance, however, lies in the fact that it reveals a direction towards treating the highway's surroundings as a multi-project investment belt, requiring rights-related scrutiny across the entire area rather than only within the boundaries of the "New Damascus" project.

1,150 Hectares and USD 20–30 Billion
The area and estimated investment value of the coastal Laodicea Ad Mare project.

By contrast, the coastal Al-Bassa project is more developed from an investment perspective but remains unclear from a rights-related perspective. The project was presented under the name Laodicea Ad Mare and extends for more than 10 kilometres between Al-Bassa and Al-Sanobar in the southern countryside of Lattakia city, over an area of 1,150 hectares. It has an estimated investment value of between USD 20 billion and USD 30 billion. The project is not limited to tourism facilities; it combines residential complexes, tourism facilities, shopping centres and a golf course. This makes it closer to a project for reshaping a large, multifunctional coastal strip than to a limited tourism investment.

The breadth of the available urban and investment information concerning Laodicea Ad Mare is not matched by comparable clarity in the rights-related information. The available information does not clarify the legal status of the land between Al-Bassa and Al-Sanobar or whether it includes private property, state property, existing occupancies, homes, structures or usufruct rights. No information is available concerning the mechanism for identifying rights holders, compensating them or enabling them to object. The project could therefore become a clear example of the gap between its detailed presentation as an investment opportunity and its opacity as a housing, land and property rights issue.

The importance of these projects is also connected to the context in which they were presented. The forum demonstrated openness to potential Gulf partnerships in real estate development projects, but did not result in the signing of investment agreements or memoranda of understanding. These projects remain at the proposal and partnership-seeking stage rather than implementation.

The forum should consequently be treated as a window into how land and projects are presented to investors, rather than as the sole framework for understanding the course of real estate development in Syria. The rights-related risk does not arise from the nationality of the investor, but from the absence of prior information concerning the land included, the existing rights attached to it and the safeguards preceding contracting and implementation.

More Than 7,000 Hectares Across 47 Sites
Land that the Syrian Sovereign Fund says is allocated for real estate development across Syria.

The significance of the projects extends beyond the "New Damascus Project" and Al-Bassa. Officials in the SSF's Real Estate Development Sector announced that the fund holds more than 7,000 hectares of land allocated for real estate development at 47 sites across Syria. This figure

makes the matter broader than 1 or 2 projects and requires major real estate development projects to be treated as a potential public policy for land reuse, rather than as isolated investment initiatives. While this scale expands the fund's capacity to attract investors, it also increases the need to scrutinise housing, land and property rights before any new site is offered for investment.

This question becomes more important in the absence of a clear announcement concerning the legal process applicable to each project. The available information does not clarify whether the "New Damascus Project", Al-Bassa or other proposed sites will be established as real estate development and investment zones, offered as direct investments in real estate assets managed by the fund, or implemented through partnership agreements with developers and investors. This uncertainty concerns not only the administrative form but also directly affects housing, land and property rights, because each process produces different consequences for the inventory of rights, compensation, alternative housing, objections, subdivision and real estate registration.

The risks begin before implementation. Every large-scale project assumes an existing ability to determine the legal status of the land and property included in it. This ability remains limited by the effects of the war on documents, records, and access to property. Although processes have been launched to restore cadastral records and digitise the Land Registry, addressing this gap requires more time than the pace at which investment projects are being proposed. Introducing land into development projects before the completion of rights inventories may shift disputes to the post-contracting stage and impose on rights holders a delayed and weaker burden of proof.

These risks are also connected to the failure to update urban plans in destroyed or damaged areas and to the question of how informal settlements that expanded during the war will be treated. Local councils face difficulties in regularising these areas legally, while regional committees appear almost absent, and the Engineers' Syndicate has not yet been consulted regarding the proposed real estate projects.

Economic feasibility studies or announcements of new projects are therefore insufficient to assess their feasibility. Before any large-scale real estate development project is launched, the following issues require clear treatment: proof of ownership, updated plans, the role of local councils, the participation of technical bodies, and legal safeguards allowing objections and disputes to be resolved before the land becomes an investment asset.

Third: Risks in the legal and institutional framework

The legal and institutional risks begin with the body that will lead the presentation of land and property for development projects. The SSF was established under Decree No. 113 of 2025 as a public institution of an economic nature, affiliated with the Presidency of the Republic and

enjoying legal personality and financial and administrative independence.

This structure places it in a central position in managing unused government assets and converting them into development and productive projects. Its position becomes sensitive in real estate development because the fund does not deal solely with liquid assets, but also with property and land that may be connected to ownership, occupancy or usufruct rights, or disputes that have not yet been resolved.

Investment Law No. 18 of 2021
Real estate development projects were brought under this law after Law No. 15 of 2008 was repealed; it was amended by Law No. 2 of 2023.

Real estate development projects also do not operate in a legal vacuum. Following the repeal of Real Estate Development and Investment Law No. 15 of 2008, real estate development and investment projects became subject to Investment Law No. 18 of 2021, as amended by Law No. 2 of 2023. The powers of the General Commission for Real Estate Development and Investment were transferred to the Syrian Investment Agency (SIA). The executive instructions for Law No. 2 of 2023 also regulated the establishment of real estate development and investment zones, the development plan, the securing of land, contracting with developers, implementation of infrastructure, subdivision, registration, and the relationship between the real estate developer and the responsible administrative authority.

This framework itself, however, presents rights-related and institutional risks. The executive instructions were issued under 2 separate Resolutions, Nos. 1575 and 1576, which overlap in their scope of application and in defining the relationship between the public authority and the real estate developer. Incorporating real estate development into the Investment Law also strengthened the logic of attracting investment and providing incentives without eliminating the tension between the rapid offering of land for investment and the slow inventory of rights and settlement of disputes.

The central question is whether the proposed projects will actually follow the process for establishing real estate development and investment zones, including establishment decisions, plans and responsible authorities, or whether the land and real estate will be treated as investment assets available for contracting before rights have been fully inventoried and their legal status resolved. In either case, announcing the project or presenting the land to investors is insufficient before clarifying its legal status, the rights of occupants and owners, and the objection and compensation mechanism.

The dangers of this framework become particularly apparent in areas where documented ownership is mixed with unregistered occupancy, licensed construction with building violations, and private land with agricultural land used for housing or with state property. The 2023 executive instructions reopened the possibility of establishing real estate development and investment zones within or outside urban plans and within informal-settlement areas. They did not, however, eliminate the distinctions between a registered owner, an occupant, the owner of an

unlicensed building, and the owner of land whose actual use has changed without its legal status being amended.

One of the most sensitive points is that unlawful occupants of state property are entitled only to remove the rubble of their buildings, while they may be allocated non-free alternative housing at cost, subject to availability, either inside or outside their original area. This means that the legal process selected for a project may determine in practice whether a person is treated as an owner, a holder of a housing right, an occupant requiring regularisation, or an unlawful occupant entitled only to limited compensation and conditional alternative housing.

The SSF does not operate alone within the reconstruction structure. Alongside it, the Syrian Development Fund (SYDF), established under Decree No. 112 of 2025, has emerged as a channel for financing infrastructure and essential-service projects and supporting administrative units in rehabilitating damaged areas, removing rubble and repairing homes. Available information also indicates that the SYDF, the Syrian Investment Agency and the SSF operate under the umbrella of the Higher Council for Economic Development (HCED). This makes real estate development part of a broader institutional structure combining finance, investment, asset management, planning and reconstruction.

That means it is not enough to scrutinise the role of the SSF alone. The relationship between these bodies, the limits of their respective powers, and the process preventing housing and infrastructure projects from shifting from public support into property investment without prior rights safeguards must also be clarified.

The fund's role in real estate development projects presents an additional problem concerning overlapping functions. The fund may simultaneously manage assets, offer land and real estate, negotiate with investors, and supervise implementation, amid a reorganisation of existing real estate development companies and their relationship with the Syrian Investment Agency. In projects affecting housing, land and property rights, this overlap may weaken transparency unless the powers of the landowner, the regulatory authority, the contracting authority and the body receiving objections from rights holders are clearly separated.

The issue became yet more sensitive with the SSF's recent announcement that it owns or manages a real estate portfolio of approximately 2,000 properties with an estimated value of up to USD 2.5 billion. The problem concerns not only the size of the portfolio, but also the absence of published information about the nature of the properties it contains, their locations, legal status, valuation methods and the existing rights attached to them. This is particularly important because assets offered for investment are not necessarily limited to public property in the narrow sense. They may include state-owned assets or assets transferred to the fund through confiscation, settlement or ownership-transfer processes whose details have not been published. In such cases, describing an asset as an

"investment opportunity" is insufficient. Its legal origin and any previous or existing rights attached to it must be identified before it is introduced into a contract or partnership.

The limitations of financial oversight of the SSF become apparent here. Even if its revenues and expenditures are audited, this is insufficient to protect housing, land and property rights unless oversight also covers the origins of the properties offered, their legal status, and existing rights or disputes. The SSF's governance should therefore not be measured only by its ability to attract investment, but also by its ability to prevent real estate assets from being converted into contractual opportunities before rights-related scrutiny has been completed.

An additional problem concerns the legal safeguards available to both investors and rights holders. Weak confidence in the judicial system does not merely slow investment. It also weakens the ability of owners, occupants, heirs, holders of unregistered contracts, displaced people, and absentees to protect their rights before implementation begins. In projects of this scale, an administrative process within the implementing body or the body owning the asset is insufficient. An independent and effective objection process must be available before the land becomes part of a major investment project.

Accordingly, the institutional risks lie in the possible concentration of several functions within a single process: asset management, offering land to investors, negotiation, planning, and supervision of implementation. This concentration may accelerate the launch of projects, but it weakens rights holders' ability to know what will happen to their land or object to it. Major real estate development projects require a clearer separation between the owning, regulatory, and contracting authorities, and any proposed investment must be linked in advance to rights-related scrutiny and an objection and compensation process.

Fourth: Public policy options

The transitional administration needs a special framework for major real estate development projects that does not merely regulate relations with investors, but restructures the relationship between investment and rights. This framework should move scrutiny of housing, land, and property rights from a stage following implementation to one preceding contracting. The issue is not merely technical, but concerns whether the land will enter investment as an asset considered free of disputes, or as an area subject to ownership, occupancy, and rights that require settlement beforehand.

The first option is to make transparency a condition for classifying the project itself. Before determining the project's cost or partnership structure, it must be clear whether the land will be subject to the legal process governing a real estate development and investment zone, offered for direct investment, or managed through a special partnership

arrangement.

This classification determines the responsible authority, the method of securing the land, the rules for subdivision and registration, and the scope of the rights of owners, occupants and usufruct holders. Urban and investment information is therefore insufficient unless accompanied by rights-related and legal information concerning the project boundaries and the land included in it.

The second option involves treating urban planning as a tool for confirming rights rather than as a separate technical stage. A zoning plan determines land use, value and the share of rights holders in the project, and may transform existing ownership and occupancy into compensation, shares or replacement units. Any zoning amendment should be preceded by scrutiny of ownership, possession and actual land use, particularly in destroyed areas, informal settlements and land used for housing without complete documentation.

The third option is to separate the state's functions within the project. Combining asset management, offering land, negotiating with investors, planning, and considering objections within a single process accelerates contracting but weakens the protection of rights holders. Any policy framework requires a clear distribution of roles between the body owning or managing the asset, the body regulating investment, the technical authority responsible for planning, and the body receiving objections and deciding compensation.

In this sense, objection and compensation become part of the design of the project rather than a corrective procedure introduced after implementation begins.

Fifth: Implementation recommendations

The following recommendations translate the preceding options into specific measures distributed among the authorities responsible for investment, asset management, planning and the protection of rights.

1- The transitional administration should issue a temporary framework specifically governing major real estate development projects, linking any project affecting housing, land, and property rights to prior scrutiny of those rights before contracts are signed or land is introduced into any investment partnership.

2- The Syrian Investment Agency and the bodies regulating investment should determine the legal process applicable to each project before presenting it to investors, including whether it will be subject to Investment Law No. 18 of 2021, as amended by Law No. 2 of 2023 and its executive instructions, or to another legal arrangement.

3- The Syrian Sovereign Fund should publish information concerning the land and property it intends to offer for investment, particularly their location, area, legal status, the source of their transfer to the fund, the body

owning or managing them, and the method used to value them.

4- The Ministry of Local Administration and Environment, in coordination with administrative units, should establish a local claims register in every area included within a major real estate development project, allowing rights holders to submit official and alternative documentation under a clear verification mechanism.

A Local Claims Register Allows rights holders to submit official and alternative documents before any final disposal or change in land use.

5- Local administrative units should suspend any final disposal of land or change in its use within development-project areas until the initial objection period has ended and the principal claims have been resolved.

6- The transitional administration should separate institutional roles within major real estate development projects between the body owning or managing the assets, the body regulating urban planning, the body contracting with investors, and the body considering objections submitted by rights holders, while linking any international support to standards protecting housing, land and property rights.

Reconstruction and the Right to Housing in Syria: Toward a Transitional Policy that Protects Property and Reduces Real Estate Investment Risks

Main Kafa

Executive summary

This paper concludes that reconstruction in Syria cannot be managed as an urban planning or investment matter separate from housing, property and return rights. With millions of Syrians still displaced or living abroad as refugees, a large portion of the housing stock damaged, and the cost of reconstructing residential buildings reaching levels beyond the state's current capacity, any reconstruction process undertaken before rights are established and property disputes addressed risks producing a new wave of exclusion. The problem, therefore, lies in the possibility that urban planning and external financing may become mechanisms for redistributing property, reducing the rights of original residents, or making those affected bear the cost of reconstruction through shares and deductions.

The plans proposed in some Damascus neighbourhoods, particularly Jobar and Qaboun, show that the risk lies in an investment model that may precede the establishment of rights and place investors ahead of homeowners. While some residents are calling for a clear regulatory framework, such as Planning and Urban Development Law No. 23 of 2015, the model of financing reconstruction through companies and deductions from future allocations raises concerns that return could be turned into a real estate deal. The transitional administration therefore needs a transitional housing policy that begins with establishing property rights, recognising alternative documents, regulating debris removal, supporting repair and self-construction, and involving local communities before launching zoning plans or incorporating destroyed areas into real estate investment calculations.

First: The policy problem

The transitional administration in Syria faces reconstruction within a highly complex housing and rights context. The issue extends beyond rebuilding destroyed homes or repairing infrastructure and involves 3 interconnected problems: a severe shortage of housing, widespread difficulties in proving ownership and housing rights, and a major need for external or investment financing amid the state's limited resources. This overlap risks turning reconstruction into a new source of property and social conflict unless it is preceded by a clear rights-based framework.

Waves of return that began in late 2024 have started to reveal the limits of the current approach. Return is not achieved simply by opening roads or issuing administrative decisions. Returnees need habitable homes, the ability to repair their homes, the opportunity to prove their rights to them, or fair alternatives. With millions of Syrians still displaced or living abroad as refugees, a large part of the housing stock damaged, and reconstruction costs rising, housing has become the first practical condition for any safe and stable return.

The problem becomes more complex in informal settlements, semi-urban areas, and areas classified as agricultural despite having been used for housing for decades. In these areas, many residents do not rely on formally registered title deeds, but on unregistered contracts, financial and judicial documents, powers of attorney, local testimonies, or facts of long-term occupancy. Relying on the Land Registry alone as the standard for proving ownership rights may exclude wide sections of the population, especially displaced people and refugees who have lost their documents or are unable to access them.

At the same time, the cost of reconstruction places considerable pressure on the transitional administration and pushes it to seek financing arrangements that depend on investors and companies. Introducing investment into the reconstruction process before residents' rights are established creates a double risk: destroyed neighbourhoods may become

subject to rezoning and deductions, while the rights of owners and residents may be converted into shares or compensation that does not guarantee their return to their original locations.

These risks are clearly visible in the ongoing discussions around the reconstruction of some Damascus neighbourhoods, particularly Jobar and Qaboun. The dispute does not revolve around the principle of urban planning itself, but around the model that will govern it. Will planning be carried out as a tool to establish rights and integrate damaged areas into the formal urban fabric, or as a mechanism for financing reconstruction through broad deductions from owners' rights and by prioritising companies over rights-holders?

On this basis, the basic policy problem is the absence of a clear transitional housing policy that precedes investment and zoning plans. Reconstruction requires a different order of priorities: establishing rights before removing debris, recognising alternative documents before redistributing ownership, involving residents before adopting plans, and defining fair financing mechanisms before making those affected pay the cost of reconstruction from their future shares. Without this framework, reconstruction may turn from an entry point for return and reparation into a tool for redistributing property and producing new grievances.

Second: The scale of the housing and return crisis

325,000 Homes Completely Destroyed
A further 600,000 to 1 million homes were partially damaged, leaving 1 in every 4 Syrian households without adequate shelter.

Indicators of destruction, displacement and return reveal that the housing crisis in Syria goes beyond urban planning or traditional real estate financing. According to a United Nations Development Programme report issued in February 2025, around 325,000 homes were completely destroyed during the war, while between 600,000 and 1 million homes sustained partial damage, leaving 1 in every 4 Syrian households without adequate shelter. This means that a large part of the housing stock is now out of use or requires repair and rehabilitation before residents can return.

This gap in housing supply coincides with renewed population pressure. According to World Bank data updated in July 2025, Syria's population reached around 24.67 million people in 2024, compared with 22.87 million in 2011, an increase of around 1.8 million people. Although these estimates rely on a broad population definition that usually includes refugees who are not permanently settled in countries of asylum, they suggest a cumulative housing demand resulting from natural population growth during the years of war, in addition to the needs of returnees and displaced people.

Data from the United Nations High Commissioner for Refugees (UNHCR) also indicate that displacement and refugeehood remain widespread. As of December 2025, there were 4.3 million registered Syrian refugees in Turkey, Lebanon, Jordan, Iraq and Egypt. On June 4, 2026, UNHCR estimated that around 1,672,052 people had returned since December 8, 2024. It also reported on April 21, 2026 that around

5.5 million people remained internally displaced inside Syria, despite the return and resettlement of more than 1.8 million internally displaced people since December 2024. This means that the housing sector is simultaneously facing the pressures of continued displacement and actual return.

The crisis deepens in informal settlements and semi-urban areas, where housing and property were already precarious before the war. According to 2010 estimates, unlicensed housing or informal settlements accounted for between 30 percent and 40 percent of all housing in Syria. A 2013 academic study showed that informal housing areas accounted for around 40 percent of total residential land in Damascus, Aleppo and Hama, and around 66 percent in Lattakia and Daraa, while the area of informal housing in Raqqa was more than 4 times the area of planned housing. The World Bank database, based on UN-Habitat data, also indicates that around 27 percent of the population lived in informal settlements before the war, rising to around 41 percent by 2022.

These figures have a direct significance for return policies. A large proportion of displaced people and refugees come from informal or semi-urban areas or from neighbourhoods that suffered widespread destruction, where it is difficult to prove ownership or obtain compensation through the Land Registry alone. Therefore, increasing the housing stock or reducing rents is not enough to address the crisis. The housing file needs a direct link between return, proof of rights, rehabilitation of infrastructure, and the provision of alternatives for people who cannot repair their homes or prove their ownership through traditional methods.

The cost of reconstruction reveals the limits of the state's and the market's ability to address the crisis without a clear policy framework. According to World Bank estimates issued on October 21, 2025, the cost of reconstructing residential buildings alone amounts to around USD 75 billion, out of a conservative total reconstruction cost estimate of USD 216 billion. Compared with Syria's nominal gross domestic product, which reached around USD 20 billion in 2023 according to World Bank data, the cost of reconstructing residential buildings alone represents around 3.75 times annual GDP. The total reconstruction cost amounts to nearly 10 times the expected GDP for 2024.

USD 75 Billion for Residential Reconstruction
Part of a conservative estimate of USD 216 billion for Syria's total reconstruction costs.

The housing crisis poses a double policy dilemma. On the one hand, the state lacks sufficient resources to rebuild the damaged housing stock or absorb waves of return. On the other hand, the market alone cannot produce affordable and fair housing for the groups most affected by war and displacement. Therefore, relying on investment without prior safeguards to protect rights may turn the financing crisis into a new entry point for reducing residents' rights, instead of being a tool to support their return and stability.

Third: Risks in the legal and institutional framework

The legal risks in the housing sector begin with the question of proving rights. After years of displacement, forced displacement, destruction and property seizures, many residents find themselves required to prove a housing or property connection that the war severed both materially and administratively. When official bodies rely on the Land Registry alone or treat alternative documents as secondary evidence, the burden of the war is shifted onto rights holders themselves, and return is transformed from a right into a complex evidentiary process that many displaced people and refugees cannot navigate.

This problem takes on a broader dimension in informal settlements, semi-urban areas and areas classified as agricultural, where housing and property relationships were often based on unregistered contracts, powers of attorney, financial and judicial documents, service and tax receipts, or local testimonies. In these cases, the Land Registry alone does not reflect the actual landscape of rights. Restricting proof to official deeds therefore excludes broad groups from protection despite their actual and continuous connection to the land or home.

The accumulation of legislation related to housing, land and property has worsened this risk. The Independent International Commission of Inquiry on the Syrian Arab Republic stated in its January 21, 2021 report that at least 40 laws related to housing, land and property had been issued since 2011. This accumulation created a complex legal environment in which confiscation, seizure, expropriation, urban planning and the de facto takeover of properties belonging to absent and displaced people overlapped. The transitional phase therefore requires a comprehensive approach to property rather than scattered procedures that address individual cases while leaving the underlying legal structure unrevised.

Decree No. 16 of 2025
Cancelled precautionary seizure decisions issued between 2012 and 2024 under security-service directives.

The transitional administration has taken some steps in this direction. These include Decree No. 16 of 2025 concerning the cancellation of precautionary seizure decisions issued between 2012 and 2024 under the directives of the security services, in addition to later decisions lifting some precautionary seizures. These measures are an important entry point for addressing some of the effects of using property as a punitive tool during the Assad regime. But they remain limited if not accompanied by a unified national mechanism for receiving property claims, examining alternative documents, settling disputes, and protecting the rights of absent people, refugees, women, and heirs.

Local mechanisms have also emerged to address some cases of property seizure, such as committees examining clear cases of property extortion, meaning the obvious and overt seizure of property without legal grounds. These committees are useful when the usurper and the rights holder can be clearly identified. They remain insufficient to address the broader body of complex housing rights, particularly in areas where common property,

unregistered contracts, long-term occupancy, lost documents and damaged records overlap. In this sense, these committees reveal the need for a broader institutional framework rather than the partial treatment of only the clearest cases.

The same risks emerge in the issue of debris removal. Removing rubble is not a neutral technical or service operation, because it may erase features that help residents prove their ownership or possession, such as the remains of houses, property boundaries, and the features of neighbourhoods, streets and alleys. Therefore, launching debris removal before documenting rights, features, and alternative records weakens the ability of residents, especially holders of unregistered or shared property, to prove their connection to the place later.

Rubble Removal Can Erase Evidence of Rights
House remains, property boundaries and alternative records should be documented before debris is removed.

Protecting rights, therefore, requires a multi-source institutional approach. This approach includes the Land Registry, judicial and financial records, notary archives, private contracts, powers of attorney, service and tax receipts, and local testimonies, subject to clear safeguards for verification and the prevention of forgery or exploitation. It also requires a freeze on any large-scale debris removal or the launch of zoning plans in damaged areas before residents' original rights are documented. Without this condition, reconstruction measures may become a new mechanism for weakening property rights and the right of return rather than a means of reparation.

Fourth: The Jobar and Qaboun Model — The Cost of Reconstruction and Who Pays It?

The proposed plans for reconstructing Jobar and Qaboun provide a tangible model of the risks that may result from introducing investment into the reconstruction file before rights are established. The issue in these two neighbourhoods is not residents' rejection of the principle of urban planning, but their rejection of a financing model based on bringing in foreign companies to implement the project and its infrastructure in return for receiving a large percentage of the project area.

50% and 70%
The proposed shares for foreign companies in previously zoned areas and informal settlements built on agriculturally classified land.

According to reports from a meeting held at Damascus Governorate on March 13, 2026, the proposed share for foreign companies could reach 50 percent of previously zoned areas and 70 percent of informal settlements built on land classified as agricultural. This means that the cost of reconstruction would not only be financed through investment but would, in practice, be deducted from the rights of owners and affected residents by converting a large portion of the future project area into a share for the implementing companies.

By contrast, some actors from Qaboun issued a statement on March 29 entitled "Towards Fair Reconstruction that Preserves Land and Dignity," calling for the adoption of Planning and Urban Development Law No. 23 of 2015 as the framework for rezoning, while granting owners the right to partition, establish joint-stock companies and choose contractors. The

importance of this position lies in its distinction between urban planning as a tool for establishing and redistributing rights within a legal framework and urban planning when it becomes a cover for imposing an investment model on rights holders.

The sensitivity of this model increases in areas that fall outside formally zoned areas or on land classified as agricultural, despite having been used for housing for decades. In these cases, handling land according to its administrative classification alone may reduce residents' rights, lower their future shares, and ignore the value of existing buildings and the reality of long-term occupancy. In addition, multiple owners or heirs in a single property may turn the original ownership into small shares that are insufficient to obtain alternative housing.

The case of Jobar and Qaboun raises a central policy question: who pays the cost of reconstruction? If the project is financed through broad deductions from owners' rights, reconstruction turns from a path for reparation into a process of property redistribution. But if planning is carried out after rights have been established, and within clear mechanisms for valuation, distribution, and objection, it can become a tool for reintegrating destroyed neighbourhoods into the urban fabric without pushing original residents out.

Fifth: Public policy options

The transitional administration needs a transitional housing policy that precedes investment and zoning plans and treats housing as a condition for return rather than as a delayed outcome of reconstruction. This policy can be based on 6 interconnected options.

1- A housing policy for the most vulnerable groups: Housing policy should begin with families that cannot return or repair their homes using their own resources and that lack bargaining power in the real estate market. This includes displaced families, returnees to destroyed or uninhabitable homes, female-headed households, older people, persons with disabilities, heirs and absent persons. Prioritising them requires transparent criteria and the linking of housing support to the condition of the original home, the degree of damage, and the family's legal and living conditions.

2- Support for regulated repair and self-construction: Residents' initiatives to repair their homes using their own resources have demonstrated a viable social pathway for return. This pathway can be transformed from an emergency response into a regulated option through technical, engineering and legal support provided by municipalities and the competent authorities. This includes structural-safety guidance, facilitating temporary or phased licences, and providing small grants or concessional loans to families able to undertake repairs, thereby reducing the need to wait for major reconstruction projects that may take years.

3- A multi-source mechanism for proving ownership: Protecting rights requires moving beyond exclusive reliance on the Land Registry. Property

and housing in many areas, especially informal settlements and semi-urban areas, are based on alternative documents or facts of long-term occupancy. Therefore, a verification mechanism should be adopted that combines the Land Registry, judicial and financial records, notary archives, private contracts, powers of attorney, service and tax receipts, and local testimonies. This allows the protection of rights-holders who lost their documents or whose ownership was not duly registered.

4- Involving municipalities and neighbourhood committees: Municipalities and neighbourhood committees have local knowledge that is necessary for identifying original residents, assessing damage, and understanding patterns of ownership and occupancy. They should therefore be involved in documenting rights, reviewing plans, setting service priorities, and monitoring implementation. This involvement must take place within controls that prevent the monopolisation of local representation or its use to exclude absent people, refugees, women, and marginalised rights-holders.

5- Controlling real estate speculation: The post-war period creates favourable conditions for consolidating property holdings and purchasing damaged properties at low prices, especially when owners or displaced people are forced to sell because of financial need or fear of losing their rights. The real estate market therefore requires tax and regulatory instruments that limit speculation, monitor large-scale property sales in destroyed areas, and prevent reconstruction from becoming an opportunity to exclude original residents from their neighbourhoods.

6- Suspending Urban Planning and Debris Removal Until Rights Are Established: Establishing rights is a precondition for any large-scale debris removal or the launch of zoning plans in damaged areas. Removing rubble may erase physical markers that help prove ownership or possession, while undertaking urban planning before rights are verified may convert existing ownership into unfair shares or compensation. Properties, physical markers and alternative records must therefore be documented, objections must be permitted, and rights holders must be identified before destroyed areas are incorporated into urban planning or investment projects.

Sixth: Implementation recommendations

1- The transitional administration should issue a temporary national framework for housing, land, and property, linking any reconstruction project to the establishment of rights first, and setting clear rules for proving ownership, debris removal, compensation, objection, and the representation of absent people, refugees, women, and heirs.

2- The relevant ministries and central bodies should suspend any zoning or investment plans in destroyed areas until the initial documentation of rights and property boundaries and features has been completed. They should also open a local claims register that allows rights holders to submit official and alternative documents and local testimonies through a clear

verification mechanism.

3- Municipalities and administrative units should establish local housing and property centres responsible for collecting documents, providing administrative guidance, registering objections, coordinating debris removal and repair work, and ensuring the participation of neighbourhood committees without excluding absent people or weaker groups.

4- Donors and international organisations should direct part of their funding to direct programmes for housing repair and regulated self-construction, instead of limiting support to major infrastructure projects, while linking funding to standards for protecting rights and preventing secondary displacement.

5- Legal and engineering organisations should support joint local clinics that provide residents with free or low-cost advice on proof of ownership, structural-soundness inspections, damage assessment, the pursuit of objections, and the documentation of rights before rubble removal or replanning.

6- The transitional administration and municipalities should introduce temporary instruments to control real estate speculation in destroyed areas, including monitoring large-scale property sales, restricting purchases made under duress, and documenting property waivers. These measures should prevent economic need and fear of losing rights from becoming drivers of property consolidation and the exclusion of original residents.

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