JUDGMENT OF THE GENERAL COURT (Fifth Chamber)

14 October 2026(*)

(Common Foreign and Security Policy – Restrictive measures taken in view of the situation in Syria – Freezing of funds – Restrictions on entry into the territory of the Member States – Lists of persons, entities and bodies subject to the freezing of funds and economic resources and subject to restrictions on entry into the territory of the Member States – Maintenance of the applicant's name on the lists – Concept of 'leading businessperson operating in Syria' – Fall of the regime of Bashar al-Assad – Presumption of a link with the former regime of Bashar al-Assad – Obligation to state reasons – Plea of illegality – Error of assessment)

In Case T-561/25,

Anas Talas, residing in Damascus (Syria), represented by L. Cloquet and L. Degeest, lawyers,

applicant,

v

Council of the European Union, represented by E. Kübler and S. Van Overmeire, acting as Agents,

defendant,

THE GENERAL COURT (Fifth Chamber),

composed of M. Sampol Pucurull, President, M. Stancu (Rapporteur) and W. Valasidis, Judges,

Registrar: I. Kurme, Administrator,

having regard to the written part of the procedure,

further to the hearing on 11 June 2026,

gives the following

Judgment

1 By his action under Article 263 TFEU, the applicant, Mr Anas Talas, seeks, in essence, annulment of Council Implementing Decision (CFSP) 2025/1095 of 27 May 2025 implementing Decision 2013/255/CFSP concerning restrictive measures in view of the situation in Syria (OJ L, 2025/1095) and Council Implementing Regulation (EU) 2025/1094 of 27 May 2025 implementing Regulation (EU) No 36/2012 concerning restrictive measures in view of the situation in Syria (OJ L, 2025/1094), (together, 'the contested acts'), in so far as those acts concern him.

Background to the dispute

2 The applicant is a Syrian businessman.

3 The present case has been brought in connection with the restrictive measures taken by the Council of the European Union, from 2011, against Syria and persons responsible for the violent repression against the civilian population in Syria, as is apparent from Council Decision 2011/273/CFSP of 9 May 2011 concerning restrictive measures against Syria (OJ 2011 L 121, p. 11).

4 The names of the persons responsible for that repression and of persons and entities benefiting from or supporting the regime of Bashar al-Assad and of persons and entities associated with them were included on the lists in Annex II to Council Regulation (EU) No 36/2012 of 18 January 2012 concerning restrictive measures in

view of the situation in Syria and repealing Regulation (EU) No 442/2011 (OJ 2012 L 16, p. 1) and in Annex I to Council Decision 2013/255/CFSP of 31 May 2013 concerning restrictive measures against Syria (OJ 2013 L 147, p. 14) (together, ‘the lists at issue’).

5 In view of the persisting gravity of the situation in Syria, the Council adopted, on 12 October 2015, Decision (CFSP) 2015/1836 amending Decision 2013/255 (OJ 2015 L 266, p. 75) and Regulation (EU) 2015/1828 amending Regulation No 36/2012 (OJ 2015 L 266, p. 1).

6 According to recital 6 of Decision 2015/1836, ‘the Council has assessed that because of the close control exercised over the economy by the [regime of Bashar al-Assad], an inner cadre of leading businesspersons operating in Syria [was] only able to maintain its status by enjoying a close association with, and the support of, the regime, and by having influence within it’, and ‘that it should provide for restrictive measures … in order to prevent them from providing material or financial support to the regime and, through their influence, to increase pressure on the regime itself to change its policies of repression’.

7 The wording of Articles 27 and 28 of Decision 2013/255 was amended by Decision 2015/1836 in order to provide for restrictions on the entry into, or transit through, the territories of the Member States and for, inter alia, the funds of ‘leading businesspersons operating in Syria’ to be frozen, unless there is ‘sufficient information that [those persons] are not, or are no longer, associated with the regime or do not exercise influence over it or do not pose a real risk of circumvention’. Regulation 2015/1828 amended, inter alia, the wording of Article 15 of Regulation No 36/2012 in order to incorporate therein the new listing criteria defined by Decision 2015/1836.

8 By Council Implementing Decision (CFSP) 2019/87 of 21 January 2019 implementing Decision 2013/255 (OJ 2019 L 18I, p. 13) and by Council Implementing Regulation (EU) 2019/85 of 21 January 2019 implementing Regulation No 36/2012 (OJ 2019 L 18I, p. 4), the applicant’s name was included for the first time on the lists at issue.

9 The Council has maintained the applicant’s name on those lists ever since.

10 Following the fall of the regime of Bashar al-Assad in Syria on 8 December 2024, the Council adopted, on 27 May 2025, Decision (CFSP) 2025/1096 amending Decision 2013/255 (OJ L, 2025/1096) and Regulation 2025/1098 amending Regulation No 36/2012 (OJ L, 2025/1098).

11 The Council stated, in recital 8 of Decision 2025/1096, that ‘despite the fall of the [Bashar] al-Assad regime and the establishment of the transitional authorities, the situation in Syria [remained] unstable and [Bashar] al-Assad’s network, spread inside and outside Syria, [had] not yet been held accountable and [could not] be considered dissolved’. The Council added that ‘there [remained] a credible risk of destabilisation and a potential resurgence of the former regime’s influence, exemplified by the incidents in support of the [Bashar] al-Assad regime aimed at undermining the transitional process, that have led to deadly violence in Syria’s coastal region’. According to the Council, ‘listed individuals and entities linked to the [former regime of Bashar al-Assad] continue to hold powerful influential roles and pose a risk of supporting, through financing or other means, further armed conflict, and may play a part in attempts to reverse the transition’.

12 In addition, according to recital 13 of Decision 2025/1096, ‘leading businesspersons operating in Syria linked to the [former regime of Bashar al-Assad] and who have amassed substantial wealth and power due to this connection remain influential and their networks have stayed in place. As such, these individuals carry an inherent risk of violent repression of the civil society and the peaceful transition in Syria’.

13 The wording of Article 27(1) and (2) and of Article 28(1) and (2) of Decision 2013/255 was amended by Decision 2025/1096. Those articles now provide for restrictions on the entry into, or transit through, the territories of the Member States and for the funds, inter alia, of ‘persons benefiting from or supporting the former [regime of Bashar al-Assad]’ (‘the new criterion of association with the former regime of Bashar al-Assad’) and ‘leading businesspersons operating in Syria linked to the former [regime of Bashar al-Assad]’ (‘the new criterion of a leading businessperson operating in Syria’) to be frozen. Regulation 2025/1098 amended, inter alia, the

wording of Article 15 of Regulation No 36/2012 in order to incorporate therein the new criteria for inclusion defined by Decision 2025/1096.

14 By letter of 15 April 2025, the Council informed the applicant, first of all, of its intention to maintain his name on the lists at issue. Next, the Council sent him the documents bearing the references WK 4844/2025 INIT and WK 4875/2025 REV 1, of 11 and 14 April 2025, respectively, containing the evidence in support of the proposal to maintain the applicant's name on the lists at issue. Lastly, the Council invited him to submit his observations on the proposed grounds for listing by 27 April 2025 at the latest.

15 The applicant submitted his observations on 22 and 26 May 2025.

16 On 27 May 2025, the Council adopted the contested acts and informed the applicant by letter of 28 May 2025.

17 The Council justified maintaining the restrictive measures against the applicant citing the following grounds:

'Leading businessperson operating in Syria with interests and activities in multiple sectors of Syria's economy. Through his business activities and investments, [the applicant] also benefits from and/or supports the former [regime of Bashar al-Assad]. In 2018 the Talas Group, chaired by [the applicant], entered into a [23 billion Syrian pounds (SYP)] joint venture with Damascus Cham Holding for the construction of Marota City, a luxury residential and commercial development backed by the former [regime of Bashar al-Assad].'

Forms of order sought

18 In his form of order as it now stands, as specified at the hearing, the applicant claims that the Court should:

– annul the contested acts and Decision 2025/1096 and Regulation 2025/1098, in so far as they concern him;

– order the Council to pay the costs.

19 In its form of order as it now stands, as specified at the hearing, the Council claims that the Court should:

– dismiss the action as inadmissible in so far as it concerns Regulation 2025/1098;

– dismiss the action as unfounded as to the remainder; and

– order the applicant to pay the costs.

Law

The claims for annulment in so far as they relate to Regulation 2025/1098 and Decision 2025/1096

20 The Council submits that the claims for annulment are inadmissible in so far as they relate to Regulation 2025/1098, since the applicant lacks standing to bring proceedings. First, the applicant is not the addressee of Regulation 2025/1098; secondly, he is neither directly nor individually concerned by the provisions of that regulation; and, thirdly, those provisions require implementing measures. By contrast, the Council does not dispute the admissibility of the action in so far as it is directed against Decision 2025/1096, in so far as that decision also extended the period of application of the restrictive measures adopted against the applicant by a further 12 months.

21 The applicant disputes the inadmissibility of the head of claim relating to Regulation 2025/1098.

22 At the outset, it should be noted that the applicant states in the form of order sought that he is challenging those acts in so far as they concern him. The applicant does not seek their annulment in their entirety. At the hearing, the applicant also confirmed that the claims for annulment relating to Regulation 2025/1098 and

Decision 2025/1096 had to be interpreted as a plea of illegality in respect of those acts, formal note of which was taken in the minutes of the hearing.

23 In that regard, it must be recalled that, under the first paragraph of Article 275 TFEU, the EU judicature is not to have jurisdiction with respect to the provisions relating to the Common Foreign and Security Policy (CFSP) nor with respect to acts adopted on the basis of those provisions.

24 However, under the second paragraph of Article 275 TFEU the EU judicature is to have jurisdiction to rule on proceedings, brought in accordance with the conditions laid down in the fourth paragraph of Article 263 TFEU, reviewing the legality of decisions providing for restrictive measures against natural or legal persons adopted by the Council on the basis of Chapter 2 of Title V TEU. The provision does not preclude the possibility of challenging, incidentally under Article 277 TFEU, the legality of a general provision, in support of an action for annulment brought against an individual restrictive measure (see judgment of 18 December 2024, *Mironovich Shor* v *Council*, T-489/23, EU:T:2024:912, paragraph 42 and the case-law cited).

25 That being so, since the purpose of Article 277 TFEU is not to enable a party to contest the applicability of any act of general application in support of any action whatsoever, the scope of a plea of illegality must be limited to what is necessary for the outcome of the proceedings. Thus, in an action for annulment brought against Council decisions imposing restrictive measures against natural or legal persons, the Court has accepted that the provision of an act of general application that lays down the criterion on the basis of which the name of the person concerned had been included on the lists at issue may legitimately form the subject matter of an objection of illegality (see judgment of 18 December 2024, *Mironovich Shor* v *Council*, T-489/23, EU:T:2024:912, paragraph 43 and the case-law cited).

26 In the present case, therefore, the General Court has jurisdiction over pleas of illegality limited to the provisions of Decision 2025/1096 and Regulation 2025/1098 which lay down the criteria referred to in paragraph 13 above.

The claims for annulment in so far as they concern the contested acts

27 In support of his action, the applicant raises three pleas in law, alleging, in essence, first, a plea of illegality in respect of Regulation 2025/1098 and Decision 2025/1096, secondly, infringement of the obligation to state reasons, and thirdly, divided into two parts, an error of assessment and infringement of the obligation to state reasons.

28 The Court considers it appropriate to deal with, first of all, the second plea and the second part of the third plea, then, the first plea and, lastly, the first part of the third plea.

The second plea and the second part of the third plea, alleging infringement of the obligation to state reasons

29 The applicant claims, in essence, that the Council has not proved to the requisite legal standard that he is linked to the former regime of Bashar al-Assad. In particular, according to the applicant, the Council does not identify the actual and specific reasons justifying the renewal of the restrictive measures against him.

30 The Council disputes those arguments.

31 It should be noted at the outset that the applicant’s arguments are, in part, seeking to challenge the facts on which the Council relied when it adopted the contested acts.

32 It should be recalled in that regard that the obligation to state reasons laid down in Article 296 TFEU is an essential procedural requirement, to be distinguished from the question of whether the reasoning is well founded, which goes to the substantive legality of the contested act. The reasoning on which a decision is based consists in a formal statement of the grounds on which that decision is based. If those grounds are vitiated by errors, the latter will vitiate the substantive legality of the decision, but not the statement of reasons in it, which may be

adequate even though it sets out reasons which are incorrect (see judgment of 24 September 2025, *Cham Wings Airlines* v *Council*, T-415/24, not published, EU:T:2025:910, paragraph 20 and the case-law cited).

33 In so far as the applicant's arguments specifically seek to call into question the merits of the grounds for listing, in particular the existence of links between the applicant and the former regime of Bashar al-Assad, those arguments will be examined in the context of the first part of the third plea, alleging an error of assessment.

34 Furthermore, the Court notes that the statement of reasons for the contested acts, as recalled in paragraph 17 above, appears to be sufficiently clear.

35 First, in that statement of reasons, the statement that the applicant, in the first place, is a 'leading businessperson operating in Syria' and, in the second place, 'also benefits from and/or supports the [former regime of Bashar al-Assad]' refers explicitly to the two criteria referred to in paragraph 13 above, from which it is apparent that the persons benefiting from or supporting the former regime of Bashar al-Assad and leading businesspersons operating in Syria and associated with that regime are subject to restrictive measures. Secondly, that statement of reasons specifies the actual and specific reasons why the applicant fulfils those criteria. In particular, it is apparent from the grounds for listing that the applicant has interests and activities in multiple sectors of Syria's economy and that, among those activities, he chairs Talas Group, which invested in the construction of a real estate development project backed by the regime, namely the Marota City project.

36 Furthermore, the arguments put forward in connection with the pleas in law raised by the applicant in his written submissions indicate that he was placed in a position in which he could ascertain the reasons for the measures taken against him so as to be able to challenge them effectively before the Courts of the European Union (see, to that effect, judgment of 24 September 2025, *Cham Wings Airlines* v *Council*, T-415/24, not published, EU:T:2025:910, paragraph 24 and the case-law cited).

37 In the light of the foregoing, the second plea and the second part of the third plea must be rejected.

The first plea, alleging, in essence, a plea of illegality in respect of Regulation 2025/1098 and Decision 2025/1096

38 The applicant submits, in essence, that Regulation 2025/1098 and Decision 2025/1096 are vitiated by illegality, on the ground that the fall of the regime of Bashar al-Assad has rendered pointless the restrictive measures to which he was subject. The objective laid down by Decision 2013/255 and Regulation No 36/2012, namely the fall of the regime of Bashar al-Assad, has been achieved, which the Court also recognised in the judgment of 7 May 2025, *Anwar Akkad* v *Council* (T-502/23, not published, EU:T:2025:445, paragraph 18). In support of those arguments, the applicant submits, in the reply, two press articles which explain, in his view, that it is unlikely that Bashar al-Assad would return to power in Syria. They are an article published on 15 December 2025 by *The Guardian* entitled 'Assad family live in Russian luxury as Bashar "brushes up on ophthalmology"' and an article published on 13 November 2025 by *EU Reporter* entitled 'Al-Sharaa dismantles Assad regime in Syria'.

39 The Council disputes, first, the admissibility of that plea in the light of Article 76(d) of the Rules of Procedure of the General Court, on account of its lack of clarity, and, secondly, its merits.

40 It should be recalled that, under the first paragraph of Article 21 of the Statute of the Court of Justice of the European Union, which is applicable to proceedings before the General Court by virtue of the first paragraph of Article 53 of that Statute, and under Article 76(d) of the Rules of Procedure, all applications must state the subject matter of the dispute, the pleas and arguments put forward and a brief statement of those pleas. Those elements must be sufficiently clear and precise to enable the defendant to prepare its defence and the General Court to rule on the application, if necessary without any further information (see judgment of 8 March 2023, *Assaad* v *Council*, T-426/21, EU:T:2023:114, paragraph 181 and the case-law cited). The Court considers that, while it is true, as the Council maintains, that the applicant does not expressly state which provisions of those acts are vitiated by illegality, it is nevertheless apparent from the arguments put forward in the application that

they relate to the illegality of the provisions of Decision 2025/1096 and Regulation 2025/1098 relating to the criteria referred to in paragraph 13 above.

41 The plea is also set out in a sufficiently clear and precise manner, since it enabled the Council to adopt a position on the merits (see, to that effect, judgment of 8 March 2023, *Assaad* v *Council*, T-426/21, EU:T:2023:114, paragraph 184).

42 The plea of inadmissibility raised by the Council must therefore be rejected.

43 As regards the merits of this plea, it should be recalled that, according to the case-law, as regards the general and abstract definition of the designation criteria and the procedures for adopting restrictive measures, the Council has a broad discretion. As the EU judicature may not, in particular, substitute its assessment of the evidence, facts and circumstances justifying the adoption of such measures for that of the Council, the review carried out by the Court concerning rules of general application defining those criteria, such as the provisions of Regulation 2025/1098 and Decision 2025/1096 laying down the criteria against which the plea of illegality is directed, must be restricted to checking that the rules governing procedure and the statement of reasons have been complied with, that the facts are materially accurate, and that there has been no manifest error of assessment of the facts or misuse of power. That limited review applies, especially, to the Council's assessment of the considerations of appropriateness on which such measures are based (see, to that effect, judgments of 13 September 2023, *Venezuela* v *Council*, T-65/18 RENV, EU:T:2023:529, paragraph 63 and the case-law cited, and of 17 December 2025, *Melnichenko* v *Council*, T-1113/23, not published, EU:T:2025:1110, paragraph 52 and the case-law cited).

44 In addition, the validity of the designation criteria and the procedures for adopting restrictive measures always depends on whether the factual and legal circumstances which led to their adoption continue to apply and on the need to persist with them in order to achieve their objective. It is thus for the Council, in the course of its review of those criteria, to conduct an updated assessment of the situation and to appraise the impact of the restrictive measures, in order to determine whether they have made it possible to attain the objectives pursued by the initial inclusion of the names of the persons and entities concerned on the lists at issue (see, to that effect, judgment of 18 December 2024, *Mironovich Shor* v *Council*, T-489/23, EU:T:2024:912, paragraph 92 and the case-law cited).

45 In the present case, as is apparent from recital 3 of Decision 2025/1096, following the fall of the regime of Bashar al-Assad, the Council eased a number of EU restrictive measures in order to facilitate engagement with Syria. Thus, the Council decided to lift its economic sanctions against Syria. Nevertheless, as is apparent from recital 7 of Decision 2025/1096, the Council decided to maintain restrictive measures against certain persons and entities on security grounds.

46 The Council, in its discretion, assessed the situation in Syria and adopted an approach described as 'gradual [and] reversible', based on the belief that the situation in Syria remained unstable despite the fall of the regime of Bashar al-Assad. In particular, in recital 8 of Decision 2025/1096, the Council justified the adoption of the restrictive measures provided for in Decision 2025/1096 on the basis, first, that the Bashar al-Assad network could not be considered dissolved, secondly, that there remained a credible risk of destabilisation and a potential resurgence of the influence of the former regime of Bashar al-Assad, exemplified by the incidents in support of the al-Assad regime aimed at undermining the transitional process, that have led to deadly violence in Syria's coastal region and, thirdly, that certain individuals and entities formerly linked to the Bashar al-Assad regime continued to hold influential roles capable of fuelling further armed conflict or undermining the political transition in Syria.

47 Furthermore, more specifically as regards the criterion relating to the status of 'leading businesspersons' referred to in Article 27(2)(a) and Article 28(2)(a) of Decision 2013/255, as amended by Decision 2025/1096, the Council stated in recital 13 of Decision 2025/1096 that leading businesspersons operating in Syria linked to the former regime of Bashar al-Assad and who had amassed substantial wealth and power due to that connection remained influential and their networks had stayed in place.

48 In that respect, it must be noted that the new evidence produced by the Council refers to the fragility of the Syrian economy, vast swathes of which were still, when Regulation 2025/1098 and Decision 2025/1096 were adopted, in the hands of businesspersons associated with the former regime of Bashar al-Assad whose networks were difficult to dismantle. That relates, in particular, to items of evidence Nos 9 and 17 of document WK 4875/2025 REV 1, namely, an article published by the Reuters Press Agency on 13 February 2025, entitled 'Exclusive: Syria's new leaders zero in on Assad's business barons' and an article published on the 'KaramShaar' website on 18 March 2025, entitled 'Tracking Regime Cronies: How to Deal with Assad's Economic Networks'. That evidence also refers to the involvement of Mr Rami Makhlouf and other persons associated with the former regime of Bashar al-Assad residing in Lebanon, in the financing of violence perpetrated in the coastal region of Syria, as is apparent from item of evidence No 21 of document WK 4875/2025 REV 1 which is an article published by Syria TV on 12 April 2025 and entitled 'Special Source: Rami Makhlouf Involved in Financing Coastal Events'.

49 In order to challenge the legality of the criteria referred to in paragraph 13 above, the applicant does not put forward, in the application, any specific argument or any evidence to dispute the Council's claim, set out in recital 8 of Decision 2025/1096, that 'despite the fall of the [Bashar] al-Assad regime and the establishment of the transitional authorities, the situation in Syria remains unstable' and 'there remains a credible risk of destabilisation and a potential resurgence of the former regime's influence, exemplified by the incidents in support of the [Bashar] al-Assad regime aimed at undermining the transitional process, that have led to deadly violence in Syria's coastal region'.

50 Nor did the applicant dispute, with supporting evidence, the finding, set out in recital 13 of that decision, which states that 'leading businesspersons operating in Syria linked to the [former regime of Bashar al-Assad] and who have amassed substantial wealth and power due to this connection remain influential and their networks have stayed in place. As such, these individuals carry an inherent risk of violent repression of the civil society and the peaceful transition in Syria'.

51 Those considerations cannot be called into question by the evidence submitted by the applicant in the reply.

52 First, those items of evidence are subsequent to the adoption of Regulation 2025/1098 and Decision 2025/1096. In that regard, it need only be borne in mind that the legality of those acts may be assessed only on the basis of the elements of fact and of law on which they were adopted, and not on the basis of information brought to the Council's knowledge after the adoption of those acts (see judgment of 24 September 2025, *Shammout* v *Council*, T-413/24, not published, EU:T:2025:909, paragraph 47 and the case-law cited).

53 Secondly, and in any event, the fact that (i) Bashar al-Assad and his family moved to Russia and withdrew from the political scene and (ii) the transitional authorities began to dismantle the network of persons linked to Bashar al-Assad does not invalidate the Council's findings in recitals 8 and 13 of Decision 2025/1096. Those findings are based on the existence of an 'inherent risk of violent repression of the civil society and the peaceful transition in Syria'. As is apparent from the various items of evidence concerning the situation of businesspersons contained, inter alia, in document WK 4875/2025 REV 1, referred to in paragraph 48 above, when Regulation 2025/1098 and Decision 2025/1096 were adopted, that risk was still current and thus justified maintaining the restrictive measures against persons associated with the former regime of Bashar al-Assad, such as the applicant.

54 In that regard, the press articles submitted by the applicant do not demonstrate that that 'risk' was completely neutralised or that the peaceful and inclusive transition process in Syria had been completed. At most, they show that such a process was initiated, as the Foreign Affairs Council also confirmed at its meeting of 23 June 2025. On that occasion, while taking note of the 'initial' steps taken to lay the groundwork for a peaceful and inclusive transition, the Council requested that 'these initial steps and commitments, as well as the key principles enshrined in the Constitutional Declaration, [be] fully implemented and put into effect, for the National Dialogue to continue, for the swift formation of the People's Assembly and the drafting of a permanent Constitution both responding to the aspirations of all Syrians, and for genuine elections to be held within three to five years as envisaged in line with international standards, allowing for the full political participation of all

Syrians’. In addition, the Council noted that while ‘the fall of the [Bashar al-Assad] regime has created an immense hope to return home among millions of Syrian refugees, including in Member States [of the European Union], and among internally displaced persons …, the humanitarian, economic and security situation [in Syria] … currently [does not] allow for large-scale voluntary repatriations to Syria’.

55 Lastly, contrary to what the applicant claims, in the judgment of 7 May 2025, *Anwar Akkad* v *Council* (T-502/23, not published, EU:T:2025:445, paragraph 18), the Court did not in any way state, even implicitly, that, because of the fall of the regime of Bashar al-Assad, the restrictive measures taken in view of the situation in Syria had achieved their objective. The Court merely stated that that event ‘is a significant new fact capable of affecting the restrictive measures regime under which the acts were adopted’, without, however, substituting its assessment for that of the Council, which, as recalled in paragraph 43 above, enjoys a broad discretion as regards the general and abstract definition of the designation criteria and the procedures for adopting restrictive measures.

56 In the light of the foregoing, the first plea in law must be rejected as unfounded.

The first part of the third plea, alleging an error of assessment

57 The applicant submits, in essence, that he has no association with the former regime of Bashar al-Assad and that he carries out his business activities in Syria, without the approval of that regime, in the production, packaging and distribution of goods of the Tolido brand, and in the real estate sector.

58 First, the applicant states that Marota City is a private sector real estate development project managed by Damascus Cham Holding, a private undertaking with which the applicant’s family business signed a joint venture agreement. The Governorate of Damascus, which is independent of the Bashar al-Assad regime, intervened in that project only to allocate plots intended for public infrastructure and social housing for low-income people free of charge. The applicant claims to have invested a small sum of money in that project, namely 450 000 United States dollars (USD), and that his family owned a plot of land of 15 000 m² on which part of that project is being developed. The applicant states that, in any event, the Marota City project was abandoned in 2019 and that he is no longer involved in it.

59 Secondly, the applicant submits that his companies and he were discriminated against by the former regime of Bashar al-Assad. In that regard, the applicant explains, in the first place, that he was forced to flee Syria between 2012 and 2017, following threats from that regime. In the second place, that regime arrested members of staff of the applicant’s undertakings and some were even killed. In the third place, the applicant’s warehouses in the region of Akraba (Syria), in the cities of Douma (Syria) and Aleppo (Syria), and the Odel Mart shopping centre in the region of Zabadani (Syria) were destroyed by the former regime of Bashar al-Assad. In the fourth place, in 2015, two containers of tuna valued at USD 200 000 belonging to the applicant were stolen as they left the port of Latakia in order to be moved to the city of Qardaha. In the fifth place, the applicant submits that, after resuming his activities in 2017, his company’s accountant was arrested and sent to the Al Khateeb State Security Directorate and a tax of approximately USD 485 000 was imposed by the former regime on the applicant, who paid it to the Syrian central bank on 29 September 2022. The applicant produces proof of payment in Annex A7 to the application.

60 Thirdly, the applicant claims that he remained in Syria after the fall of the regime of Bashar al-Assad and that he is dealing with the day-to-day management of his business ‘under the auspices’ of the transitional authorities.

61 Fourthly, the applicant disputes that his election as a member of the Damascus and Rural Damascus Chamber of Commerce, as well as the Damascus Chamber of Industry constitutes evidence that he is associated with the former regime of Bashar al-Assad. He states that, of the eighteen elected members of the Damascus and Rural Damascus Chamber of Commerce, he was the only member to be included on the lists at issue and that, in any event, the elections within that chamber of commerce involved the participation of 3 247 traders.

62 The Council disputes those arguments.

63 It should be borne in mind that the effectiveness of the judicial review guaranteed by Article 47 of the Charter of Fundamental Rights of the European Union requires, inter alia, that the Courts of the European Union ensure that the decision by which restrictive measures were adopted or maintained, which affects the person or entity concerned individually, is taken on a sufficiently solid factual basis. That entails a verification of the factual allegations in the summary of reasons underpinning that decision, with the consequence that judicial review cannot be restricted to an assessment of the cogency in the abstract of the reasons relied on, but must concern whether those reasons, or, at the very least, one of those reasons, deemed sufficient in itself to support that decision, is substantiated (see judgment of 12 June 2024, *Shammout* v *Council*, T-649/22, not published, EU:T:2024:376, paragraph 59 and the case-law cited).

64 That is because it is the task of the competent European Union authority to establish, in the event of challenge, that the reasons relied on against the person or entity concerned are well founded, and not the task of that person or that entity to adduce evidence of the negative, that those reasons are not well founded (see judgment of 12 June 2024, *Shammout* v *Council*, T-649/22, not published, EU:T:2024:376, paragraph 61 and the case-law cited).

65 If the competent European Union authority provides relevant information or evidence, the Courts of the European Union must then determine whether the facts alleged are made out in the light of that information or evidence and assess the probative value of that information or evidence in the circumstances of the particular case and in the light of any observations submitted in relation to them by, among others, the person or entity concerned (see judgment of 12 June 2024, *Shammout* v *Council*, T-649/22, not published, EU:T:2024:376, paragraph 63 and the case-law cited).

66 Such an assessment must be carried out by examining the evidence and information not in isolation, but in the context in which they fit (see, to that effect, judgment of 12 June 2024, *Shammout* v *Council*, T-649/22, not published, EU:T:2024:376, paragraph 64 and the case-law cited).

67 In the present case, it should be stated that, as is apparent from paragraph 35 above, the reasons why the applicant is regarded by the Council as satisfying the new criterion of association with the former regime of Bashar al-Assad overlap with those which led it to regard him as a leading businessperson operating in Syria.

68 In that regard, it should be borne in mind that, according to the case-law, it cannot be excluded that, for a specific person, the grounds for listing might overlap to a certain extent, in that a person may be considered to be a leading businessperson operating in Syria and also regarded as benefiting, in the course of his or her activities, from the regime of Bashar al-Assad or supporting it through those same activities. That follows precisely, as established in recital 6 of Decision 2015/1836, from the fact that the close ties to the Bashar al-Assad regime and the support provided by the latter to that category of persons are one of the reasons why the Council decided to establish that category. The fact remains that, even in such a situation, those are separate criteria (see, to that effect, judgment of 8 March 2023, *Assaad* v *Council*, T-426/21, EU:T:2023:114, paragraph 167 and the case-law cited).

69 The Court considers it appropriate to examine the contested acts in view of the new criterion of a leading businessperson operating in Syria, to the exclusion of the argument referred to in paragraph 61 above, which specifically concerns the new criterion of association with the former regime of Bashar al-Assad.

70 It should be noted that the applicant acknowledges that he carries on commercial activities in multiple sectors of the Syrian economy, including the field of production, packaging and distribution of goods of the Tolido brand as well as in real estate. In addition, he does not deny being the president of Talas Group.

71 Consequently, the applicant does not dispute that he is a businessperson operating in Syria.

72 By contrast, the applicant disputes that he is linked to the former regime of Bashar al-Assad and that he has ever exerted any influence over it or that he invested a significant sum of money in the Marota City project in which he is, moreover, no longer involved. On the contrary, he has been the victim of acts of retaliation by the

regime of Bashar al-Assad. In addition, he remained in Syria after the fall of that regime and is responsible for the day-to-day management of his business affairs under the auspices of the new Syrian authorities.

73 It must be stated that Decision 2015/1836 introduced, inter alia, as an objective, autonomous and sufficient listing criterion, that of ‘leading businesspersons operating in Syria’, with the result that the Council was no longer required to demonstrate the existence of a link between that category of person and the former regime of Bashar al-Assad, as understood under Decision 2013/255 prior to its amendment, or between that category of person and the support provided to, or the benefit derived from, the regime, since being a leading businessperson operating in Syria was sufficient for the restrictive measures in question to be applied to a person. Thus, it in no way followed from Decision 2013/255, as amended by Decision 2015/1836, that it is for the Council to prove that both the condition of being a leading businessperson and having sufficient links with the former regime of Bashar al-Assad were satisfied (see judgment of 24 September 2025, *Shammout* v *Council*, T-413/24, not published, EU:T:2025:909, paragraph 27 and the case-law cited).

74 To that effect, a rebuttable presumption of a link with the former regime of Bashar al-Assad could be inferred from the criterion relating to the status of ‘leading businesspersons operating in Syria’. That presumption applied where the Council was able to show that the person was not only a businessperson operating in Syria but could also be described as ‘leading’. As is clear from the wording of recital 6 of Decision 2015/1836, it is the influence that that category of person was likely to exercise over the former regime of Bashar al-Assad that the Council aimed to exploit by urging those people, by means of the restrictive measures it adopts against them, to put pressure on that regime to change its policies of repression. Thus, once the Council succeeded in demonstrating the influence that a businessperson could have on that regime, the link between that person and the former regime of Bashar al-Assad was presumed in the absence of proof to the contrary (see, to that effect, judgment of 24 September 2025, *Shammout* v *Council*, T-413/24, not published, EU:T:2025:909, paragraph 28 and the case-law cited).

75 That presumption also remains after the amendment of Decision 2013/255 by Decision 2025/1096. It now relies on the circumstances set out in recitals 8 and 13 of Decision 2025/1096, according to which, first, ‘despite the fall of the [Bashar] al-Assad regime and the establishment of the transitional authorities, the situation in Syria remains unstable’ and ‘there remains a credible risk of destabilisation and a potential resurgence of the former regime’s influence’ and, secondly, that ‘leading businesspersons operating in Syria linked to the [former regime of Bashar al-Assad] and who have amassed substantial wealth and power due to this connection remain influential and their networks have stayed in place’ and ‘carry an inherent risk of violent repression of the civil society and the peaceful transition in Syria’.

76 However, it should be recalled that compliance with the rules on the burden of proof and evaluation of evidence in the area of restrictive measures by the General Court implies that the latter abide by the principle stated in the settled case-law referred to in paragraph 64 above, according to which, in essence, the burden of proof lies with the institution in the event of a challenge to the merits of the grounds for listing.

77 Consequently, an excessive standard of proof may not be imposed on the applicant in order to rebut the presumption of a link with the former regime of Bashar al-Assad. The applicant must therefore be considered to have succeeded in rebutting the presumption of a link to that regime if he or she puts forward arguments or evidence capable of seriously calling into question the reliability of the evidence submitted by the Council or the Council’s assessment, in particular in the light of the conditions laid down in Article 27(3) and Article 28(3) of Decision 2013/255, as amended by Decision 2015/1836, or if he or she produces before the Courts of the European Union a body of evidence establishing that he or she is not, or is no longer, associated with the former regime of Bashar al-Assad, or that he or she does not exercise influence over it, or that he or she does not pose a real risk of circumvention of the restrictive measures, in accordance with Article 27(3) and Article 28(3) (see, to that effect, judgment of 24 September 2025, *Shammout* v *Council*, T-413/24, not published, EU:T:2025:909, paragraph 30 and the case-law cited).

78 In the present case, as regards, first, the applicant’s involvement in the Marota City project, it should be noted, in the first place, that he does not adduce any evidence demonstrating that his investment in that project

was limited to USD 450 000. The applicant has not produced before the Court any document proving that the contribution of his undertaking, Talas Group, to that project was no more than that amount.

79 On the contrary, the file before the Court casts doubt on the veracity of that claim. In the observations submitted to the Council on 26 May 2025, the applicant stated that his shareholding in Mirza was 25%. Mirza was included and maintained on the lists at issue on the grounds that it is 'a USD 52.7 million joint venture between Damascus Cham Holding and Talas Group. Through its participation in the luxury development Marota City [, it] supports and/or benefits from the former [regime of Bashar al-Assad]'. Accordingly, it follows that the contribution of Talas Group, and therefore of the applicant, to the Marota City project amounts to at least 25% of USD 52.7 million, that is to say, approximately USD 13.175 million, which corresponds to an amount 29 times higher than that declared by the applicant.

80 In the second place, it should be stated that the applicant did not fundamentally dispute the relevance or reliability of the Council's evidence, since it does no more than assert in a general manner that there is 'no specific, individualised or credible evidence'.

81 Such a general and unsubstantiated remark is in no way sufficient to call into question the reliability of the evidence contained in the Council's documents. Since that evidence, which was communicated to the applicant, is from publicly accessible sources, the applicant was able to indicate which items of evidence were, in his view, untrustworthy. It should be noted in that regard that, while it is for the Council to adduce evidence in support of the inclusion and maintenance of his name on the lists at issue, it is for the applicant to indicate which items of evidence might raise doubts as to their reliability. Consequently, general and declaratory allegations which the applicant does not support with any concrete evidence cannot call into question the soundness and reliability of the evidence contained in documents WK 4844/2025 INIT and WK 4875/2025 REV 1 (see, to that effect, judgment of 24 September 2025, *Cham Wings Airlines* v *Council*, T-415/24, not published, EU:T:2025:910, paragraph 50 and the case-law cited).

82 Several items of evidence contained in those files demonstrate to the requisite legal standard the scale of the Marota City project, the applicant's interests in that project and the significance of that project for the former regime of Bashar al-Assad, inter alia:

– item of evidence No 1 of document WK 4844/2025 INIT, namely an article published on the website 'Pro-Justice' stating that the applicant is involved in the undertaking Mirza, which holds a stake in the controversial Marota City project, a real estate development built on land expropriated by the regime;

– item of evidence No 2 of document WK 4844/2025 INIT, namely an article published on 7 March 2018 on the website 'Atlantic Council' stating that the former regime of Bashar al-Assad had adopted Decree No 66/2012 which authorised the Governorate of Damascus to expel the populations of two large areas of Damascus, including, in particular, the area where the luxury development project Marota City was under construction. According to that regime, that decree was intended to improve the living conditions of inhabitants by eliminating unstable buildings and replacing them with comfortable and modern housing. However, the decree selected two areas which supported the opposition, while the areas occupied by the supporters of the regime, where housing conditions were not better, were left intact. The article also states that, in the context of the Marota City project, several new businesspersons appeared and developed close links with the regime, including the applicant;

– item of evidence No 3 of document WK 4844/2025 INIT, namely a study carried out in April 2019 by the Robert Schuman Centre for Advanced Studies of the European University Institute, which refers to the Marota City project as a leading example of the approach of the former regime of Bashar al-Assad, under which the regime envisaged the construction of a series of tourism projects and luxury services to transform the Damascus real estate market into a primary source of revenue. To that end, the legislation enabled the Governorate of Damascus to expropriate real estate owned by the inhabitants of the development zone of Khalaf Al-Razi in breach of their property rights. The undertaking Damascus Cham Holding was established to manage the properties of the Governorate of Damascus with the aim of implementing the Marota City project. That measure was essential in order to resolve the financial crisis facing the Governorate. That undertaking then concluded an agreement with a group of businesspersons, including the applicant, to implement tourism projects and luxury

services. As regards, more specifically, the applicant, it is stated that the company Mirza will undertake the construction of four residential and commercial districts, the building area of which extends to 60 000 m² and that, in that context, Talas Group received a 25% share of that area in exchange for cash shares valued at SYP 5.7 billion (approximately USD 12.6 million).

83 It is true that the applicant claims that the Marota City project was abandoned in 2019 and that, consequently, at the time when the contested acts were adopted, he was no longer involved in it. However, the applicant has not adduced any evidence that he terminated the joint venture contract with Damascus Cham Holding. On the contrary, Annex B.17 to the defence, which contains an extract from the website devoted to that project and which dates from 2025, shows that that project is under development, in particular with the construction of a commercial centre of 5 300m². The applicant also explained at the hearing that the works for that project resumed after the fall of the former regime of Bashar al-Assad and after the lifting of certain restrictive measures concerning the situation in Syria. He also stated that he was still the owner of a plot of land of 15 000 m² on which part of that project is being developed.

84 As regards, secondly, the discrimination against the applicant and his undertakings by the former regime of Bashar al-Assad, it should be noted that that argument is in no way substantiated.

85 It is clear that the file contains no evidence that the applicant was forced to leave Syria between 2012 and 2017, following threats from that regime, or that that regime arrested members of staff of the applicant's businesses, some of whom were even killed, or that the applicant's warehouses in the region of Akraba, the cities of Douma and Aleppo, and the Odel Mart shopping centre in the Zabadani region were destroyed by the former regime of Bashar al-Assad, or that two containers of tuna worth USD 200 000 belonging to the applicant were stolen while leaving the port of Latakia, in order to be moved to the city of Qardaha in 2015.

86 In addition, as regards the complaint that the accountant of the applicant's company was arrested and sent to the Al Khateeb State Security Directorate and that a tax of approximately USD 485 000 was imposed by the former regime on the applicant and was paid by him to the Syrian central bank on 29 September 2022, it must be stated that the evidence produced as Annex A7 to the application only specifies the following: 'payment [made] by [the] TALAS Company for [Mr A], [whose] mother is [Ms B], [domiciled in C]' and makes no reference to the Al Khateeb State Security Directorate or to the possible arrest of the accountant of the applicant's undertaking. Moreover, the applicant has not adduced any evidence that that person is the accountant of his undertaking.

87 As regards, thirdly, the argument that the applicant is involved in the day-to-day management of his business 'under the auspices' of the transitional authorities, it must be stated that he has adduced no evidence of his collaboration with those authorities. In that regard, it should be noted that the fact that the applicant remained in Syria and continues to manage his business activities cannot automatically demonstrate that he developed closer ties with the transitional authorities and that he no longer has any association with the former regime of Bashar al-Assad.

88 In the light of the foregoing, it must be found that, first, the Council has demonstrated, in accordance with recitals 8 and 13 of Decision 2025/1096 referred to in paragraph 75 above, that the applicant remains a leading businessperson, on account of the wealth and considerable power acquired by reason of his links with the former regime of Bashar al-Assad; secondly, the applicant has not submitted any evidence from which it can be concluded that he was not, or was no longer, associated with the former regime of Bashar al-Assad, or that he did not exercise influence over that regime or that he did not pose a real risk of circumvention of the restrictive measures within the meaning of Article 27(3) and Article 28(3) of Decision 2013/255, as amended by Decision 2015/1836. Consequently, in the light of the criterion referred to in paragraph 13 above, the maintenance of his name on the lists at issue, resulting from the contested acts, is well founded (see, to that effect, judgment of 24 September 2025, *Shammout* v *Council*, T-413/24, not published, EU:T:2025:909, paragraph 45 and the case-law cited).

89 In accordance with settled case-law, having regard to the preventive nature of decisions adopting restrictive measures, if the Courts of the European Union consider that, at the very least, one of the reasons

mentioned is sufficiently detailed and specific, that it is substantiated and that it constitutes in itself a sufficient basis to support that decision, the fact that the same cannot be said of other such reasons cannot justify the annulment of that decision (see judgment of 8 May 2025, *Gutseriev* v *Council*, C-681/23 P, not published, EU:C:2025:327, paragraph 101 and the case-law cited).

90 Therefore, without it being necessary to examine the contested acts in the light of the other ground on which they are based, namely compliance with the new criterion of association with the former regime of Bashar al-Assad, the first part of the third plea must be rejected as unfounded. Accordingly, the claims for annulment and, consequently, the action in its entirety must be dismissed.

Costs

91 Under Article 134(1) of the Rules of Procedure, the unsuccessful party is to be ordered to pay the costs if they have been applied for in the successful party's pleadings.

92 In the present case, since the applicant has been unsuccessful, he must be ordered to bear his own costs and to pay those incurred by the Council, in accordance with the form of order sought by it.

On those grounds,

THE GENERAL COURT (Fifth Chamber)

hereby:

1. **Dismisses the action;**

2. **Orders Mr Anas Talas to pay the costs.**

Sampol Pucurull Stancu Valasidis

Delivered in open court in Luxembourg on 14 October 2026.

T. Henze M.J. Costeira

Acting Registrar President

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* Language of the case: English.