# Syria: Seizure, Illegal Investment of IDPs' Lands in Idlib and Hama



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### **Background**

The government of Syria (GOS) has been for <u>years seizing</u> vast swathes of agricultural land in the countryside of Hama and Idlib provinces in northern Syria through occasional confiscation or illegitimate auctioning. It lays claim to such lands—freezing ownership for a limited or unlimited time—under the pretext of the absence of the original owners and their de facto inability to access them for several reasons, including forced displacement from these areas as a result of previous military operations. Additionally, many landowners fear returning due to being wanted by Syrian security services for alleged "terrorism" charges, meaning they risk arbitrary arrest, torture, enforced disappearance upon return. Furthermore, some owners of these lands are refugees in Türkiye or other countries.

The GOS-led military operations that affected the suburbs of Hama and Idlib—which were directly supported by the Russian air force—caused a massive wave of forced displacement from the targeted areas. In late August 2019, the United Nations <u>reported</u> that **over 400,000 people fled their homes**, **escaping from violence**. GOS forces subsequently consolidated control over vast territories, including lands belonging to internally displaced people (IDPs) from <u>northern</u> and western Hama countryside as well as southern Idlib. By early March 2020, the GOS was estimated to have recaptured more than 270 towns, villages and regions across Idlib, Aleppo and Hama's rural areas over the preceding months, according to the Syrian Observatory for Human Rights. Their December 2020 <u>report</u> documented the scale of territory recovered by the GOS.

Following military control of these areas, the GOS and affiliates began unlawfully seizing and claiming ownership of land belonging to IDPs, refugees and expats under the guise of "investment." The properties were then leased out and put up for public auction by the so-called Province General Secretariat (PGS) in both Idlib and Hama since mid-2020.

In September 2021, Syrians for Truth and Justice (STJ) <u>published</u> an investigative report examining how the GOS held public auctions in Hama aimed at investing agricultural lands owned by IDPs and refugees through the province's Security Committee, including pistachio orchards. Similarly, on 25 June 2022, the media outlet Syria Direct <u>published</u> a report titled "Public auctioning of displaced people's land threatens Syria's social fabric", as it caused "divorces and threats of killing and revenge among relatives." They have also created "antagonism and estrangement between co-owners, whether they are co-owners of the land or heirs to it."

This report covers auctions announced since the beginning of 2024, relying on five exclusive testimonies obtained by STJ from landowners originally from Hama and Idlib provinces. All are unable to return to their lands, which have been continuously and annually auctioned off for investment.

Only two landowners were able to access agricultural yields by granting powers of attorney (POAs) to their first or second-degree relatives who participate in the public auctions annually annually degree that the goal of t

Pseudonyms are used in this report to refer to sources in order to ensure their safety and the safety of their relatives remaining in GOS-held areas. Sources also noted that individuals close



to the government or *shabiha* (pro-GOS militiamen) at times benefit from lands belonging to IDPs and expats, along with Syrian army members.

In addition to testimonies, the report relies on verified open-source information, including data from other investigations into the auctions or social media posts.

### **Public Auctions and Application Conditions**

STJ tracked announcements published on the GOS affiliates' platforms, including Facebook pages, listing dates for public auctions, which offered various plots of land in southern Idlib countryside for investment. The bidding was open through nine <u>auctions</u> from May to late August 2024. In Hamas's northern and western suburbs, <u>six auctions</u> were announced–five for pistachio orchards and one for olive trees from January to late August 2024 (See appendices).

The public auctions announced by the <u>Idlib PGS</u> covered several areas within the province, such as: Khan Shaykhun town and its farmlands, al-Tamana'ah town and its farms, the villages of Rafa, Sekik, Moqa, Tahtaya, Kafr Sijnah, al-Habeet, Haish, Kafr Yasin, Abu Haya, al-Tah, Um Jalal, al-Heliya, al-Khawien, Abu Dali, Umm Trikiya, Tal Mareq, At-Tama and Tal Alkiram, among others (See Image 1 in appendices).

The public auction announcements published by the Hama PGS on Facebook included several areas such as: Latmeen, Latamenah, Kafr Zita, Morek, Lahaya, Tayyibat al-Imam, Maardes, Suran, Koukab, al-Sha'tha, al-Fan al-Shamali, Khufsain, al-Jineneh al-Gharbiya, Tayiybat al-Ism, Ma'an, Umm Hartein, Qasr Abu Samrah, al-Talisiya, al-Kubari, Atshan, Qibeyat and other locations (See Image 2 in appendices).

For its initial announcement about Idlib's farmlands, the GOS <u>cited</u> provisions of the Unified Contract System issued under Law No. 51 of 2004. It also referenced a letter from the GOS Ministry of Agriculture and Agrarian Reform No. 289 dated 26 May 2024.

For its part, the Hama PGS <u>stated</u> its auctions would proceed "pursuant to the Ministry of Agriculture and Agrarian Reform's plan for investing vacant and investment-ready lands, and in adherence with the Unified Contracts System No. 51 of 2004."

The following table outlines the auction announcements from January through August 2024 in Hama and Idlib provinces:



#	Announcing Entity	Announcemen t Date	Type of Lands Auctioned	Locatoions Covered by the Auction	Key Requirements for Participating in the Auction	The Legal Basis Cited for the Auction
1	The Hama PGS (Image 3 in appendices)	3 January 2024	Rainfed farmlands	Locations undefined	-One agricultural season - 5,000 Syrian Pounds (SYP) initial deposit per irrigated dunum -2,000 SYP initial deposit per rainfed dunum	-Provisions of the Unified Contract System No. 51 of 2004 -Letter from Ministry of Agriculture and Agrarian Reform No. 217 dated 8 April 8 2023
2	The Hama PGS (Image 4 in appendices)	28 April 2024	Pistachio trees for first- and second- degree relatives	Locations undefined	-The applicant must be a first or second-degree relative of the property owner as stipulated in Article 38 of the Civil Law  - The applicant must obtain the necessary security approval  - The applicant must return the land to its owner upon their return  - The applicant must not have been blocked from participating in auctions previously announced by public entities	-Provisions of the Unified Contracts System No. 51 of 2004
3	The Hama PGS (Image 5 in appendices)	9 May2024	Pistachio trees for the first time with utmost urgency	Latmeen - al- Latameneh - Kafr Zita - Morek - Tayyibat al- Imam - Suran - Koukab - Khufsain - Ma'an - Qasr Abu Samra - al-Talisiya and others.	-One agricultural season -150,000 SYP initial deposit per donum -10% of the referral value paid by financial receipt as final deposit	-Provisions of the Unified Contract System No. 51 of 2004

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4	The Hama PGS (Image 6 in appendices)	24 May 2024	Pistachio trees for the second time with utmost urgency	- Suran subdistrict and affiliated areas - Muhrada region and affiliated areas - Remaining areas	-One agricultural season -150,000 SYP initial deposit per dunum -10% of the referral value paid by financial receipt as final deposit	-Provisions of the Unified Contracts System No. 51 of 2004 -Letter from the Ministry of Agriculture and Agrarian Reform No. 289 - dated 16 May 2024
5	The Idlib PGS (Image 7 in appendices)	26 May 2024	Pistachio trees with utmost urgency	-The areas across Khan Shaykhoun and its farms -The town of al-Tamanah and its farms -The villages of Rafa, Sekik, Moqa, Tahtaya, Kafr Sijnah	-Investors cannot include more than one real estate area in a single application	-Provisions of the Unified Contracts System No. 51 of 2004 -Letter from the Ministry of Agriculture and Agrarian Reform No. 289 dated 16 May 2024
6	The Hama PGS (Image 8 in appendices)	3 June 2024	Pistachio trees exclusively for Hama locals	All areas	-One agricultural season -150,000 SYP initial deposit per dunum -10% of the referral value to be paid via an official financial receipt as the final guarantee.	- Provisions of the Unified Contracts System No. 51 of 2004. -Letter from the Ministry of Agriculture and Agrarian Reform No. 289, dated 16 May 2024.
7	The Idlib PGS (Image 9 in appendices)	27 June 2024	Pistachio trees for the second time	-Khan Shaykhoun and its farms -al-Tamanah village and its farms -The villages of of Ar-Rifa, Sekik, Moqa, Tahtaya, Kafr Sijnah, al- Habeet, Haish, Kafr Yasin, Abu Haya, al-Tah,	-One agricultural season -150,000 SYP initial insurance for each donum -10% of the transfer value by financial receipt as final insurance	-Provisions of the Unified Contracts System No. 51 of 2004 - Letter from the Ministry of Agriculture and Agrarian Reform No. 289, dated 16 May 2024



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				Um Jalal, al- Heliya, al- Khawien, Abu Dali, Umm Trikiya, Tal Mareq, At- Tama and Tal Alkiram		
8	The Idlib PGS (Image 10 in appendices)	4 July 2024	Pistachio trees	Kahan Shaykhoun	-One agricultural season -150,000 SYP initial security deposit for each donum -10% of the transfer value as per a financial receipt as final security deposit	_Provisions of the Unified Contracts System No. 51 Of 2004 - Letter from the Ministry of Agriculture and Agrarian Reform No. 289, dated 16 May 2024
9	The Idlib PGS (Image 11 in appendices)	9 July2024	Pistachio trees	-All areas for relatives by consent -All regions auctioned off exclusively for Idlib locals -All remaining regions under a public auction	-Obtaining the required security approval  -A statement from the Finance Directorate proving they are not prohibited from participating in the auction  -A family registry statement or inheritance statement proving the lineage of first- and second-degree relative investors	-Provisions of the Unified Contracts System No. 51 of 2004 -Letter from the Ministry of Agriculture and Agrarian Reform No. 289 dated 16 May 2024
10	The Idlib PGS (Image 12 in appendices)	15 July 2024	Pistachio trees	-All regions auctioned off exclusively for locals -All remaining regions under a public auction	-One agricultural season -150,000 SYP initial security deposit for each donum -10% of the transfer value as per a financial receipt as final security deposit	-Provisions of the Unified Contracts System No. 51 of 2004 -Letter from the Ministry of Agriculture and Agrarian Reform No. 289 dated 16 May 2024
11	The Idlib PGS	22 July 2024	Pistachio trees	All regions	-One agricultural season	-Provisions of the Unified Contracts System No. 51 of 2004



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	(Image 13 in appendices)				-150,000 SYP initial security deposit for each donum -10% of the transfer value as per a financial receipt as final security deposit - An investor is not permitted to include more than one real	-Letter from the Ministry of Agriculture and Agrarian Reform No. 289 dated 16 May 2024
					estate region in a single bid request	
12	The Idlib PGS (Image 14 in appendices)	25 July 2024	Pistachio trees	All properties across all regions	-One agricultural season -150,000 SYP initial security deposit for each donum -10% of the transfer value as per a financial receipt as final security deposit - An investor is not permitted to include more than one real estate region in a single bid request	-Provisions of the Unified Contracts System No. 51 of 2004 -Letter from the Ministry of Agriculture and Agrarian Reform No. 289 dated 16 May 2024
13	The Idlib PGS (Image 15 in appendices)	4 August 2024	Pistachio trees	All regions	-One agricultural season -150,000 SYP initial security deposit for each donum -10% of the transfer value as per a financial receipt as final security deposit - An investor is not permitted to include more than one real estate region in a single bid request	-Provisions of the Unified Contracts System No. 51 of 2004 -Letter from the Ministry of Agriculture and Agrarian Reform No. 289 dated 16 May 2024
14	The Idlib PGS	12 August 2024	Pistachio trees	-All regions whose auction was canceled due	-A bidder must not have had their auction previously cancelled	-Provisions of the Unified Contracts System No. 51 of 2004

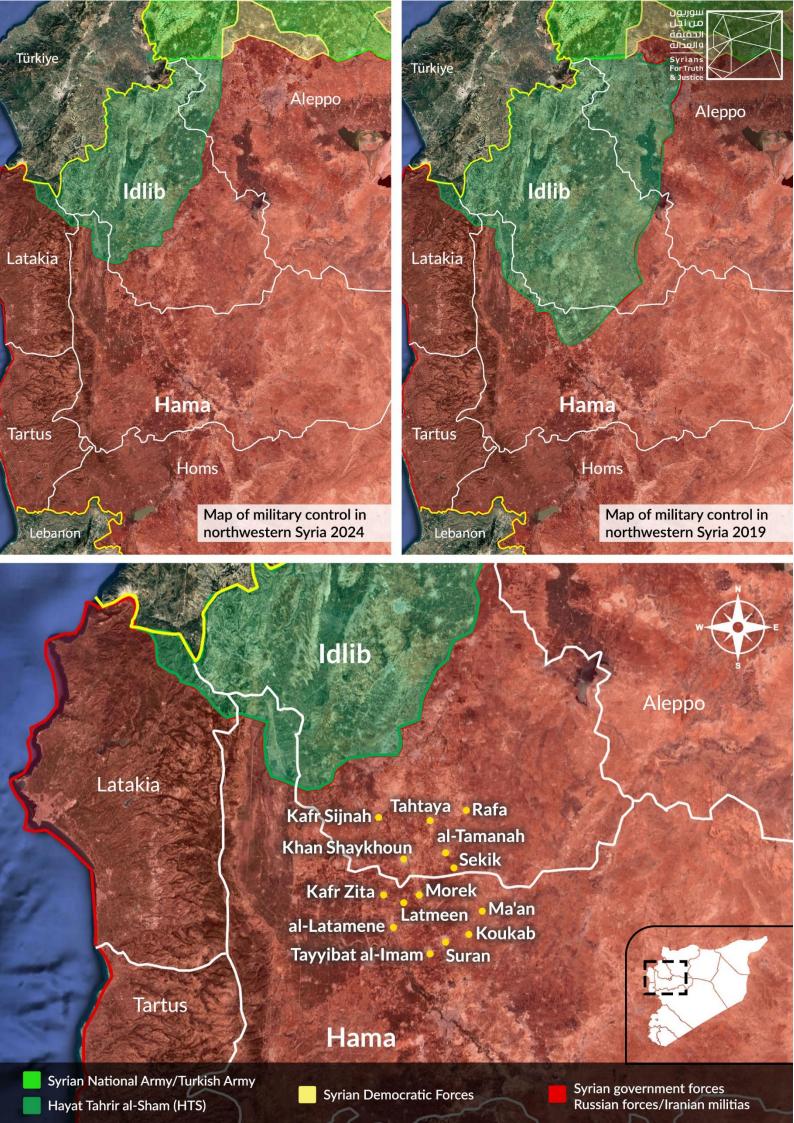


	(Image 16 in appendices)			to delay in settling financial dues  -All properties previously auctioned  -Concealed properties whose discoverer did not agree to invest in them at the highest neighboring property auction price	due to delayed payment of financial dues  -The full amount must be paid immediately according to the auction record once investment is awarded to the investor	-Letter from the Ministry of Agriculture and Agrarian Reform No. 289 dated 16 May 2024
15	The Hama PGS (Image 17 in appendices)	17 August 2024	Olive trees for the first time with utmost urgency	Locations undefined	-100,000 SYP as initial deposit -10% of the transfer value by financial receipt as final security deposit	-Provisions of the Unified Contracts System No. 51 of 2004 -Letter from the Ministry of Agriculture and Agrarian Reform No. 289 dated 16 May 2024

A map showing areas under military control between January 2020 and August 2024, and areas covered by the auctions:









#### Testimonies from Farmers whose Lands in Hama were Seized

After the displacement of thousands from northern and western Hama countryside and southern Idlib countryside upon Syrian army control, many local landowners were denied managing their lands or benefiting from their annual profits. Their attempts to join the public auctions announced by the General Secretariat in both provinces to "invest" in pistachio and olive trees failed, even though some continued to care for their lands through relatives despite being unable to benefit from the harvest.

#### Officer from 4<sup>th</sup> Division seizes IDPs' lands

Muhammed is a farmer who was displaced multiple times since 2011 and was forced to entirely relocate from Kafr Zita in Hama's countryside to Sarmada in Idlib's countryside in August 2019, when GOS forces took control of the suburbs in northern Hama, southern Idlib and western Aleppo. He said his struggles over investing the land he co-owned with his brother started ever since. His land was planted with pistachio and olive trees. During an interview over WhatsApp on 21 August 2024, he narrated:

"In past years, especially 2021, public 'investment' auction announcements were made by the security committee. However, our grove was not among those auctioned because a 4<sup>th</sup> Division¹ officer had taken control of it. He prevented our land from being included in the auction while allowing workers to enter and care for it. And when the harvest time came, he would claim the yield. Later, when our land began to be enlisted in these auctions, that same officer used people under his command to win the bid, enabling him to fully confiscate that season's yield."

Mohammed went on to explain that his 25 dunum (2.5 hectares) plot contained around 270 pistachio trees and 60 olive trees, over 50 years old. In a good season they would yield around \$14,000, and during poor seasons they would produce around \$5,000. The last time they managed to harvest crops was in 2019.He continued:

"I tried numerous times to grant a power of attorney to someone in the area to recover my land, but I failed as I am wanted by the GOS. Still, I did not stop trying. I sent my neighbor to tend the land, but local 4<sup>th</sup> Division forces threatened him with death, confirming they knew to whom the land belonged, [to me and my brother]. After that, I did not send anyone for fear of endangering their life. Later, when my brother participated in the auction and won the investment for large sums per dunum, he was shocked to lose the season due to the expenses of farming and tending to the land, and the money he paid to land the investment."

## **Caring for Trees Despite Inability to Harvest**

On 29 August 2024, STJ spoke with lawyer Ahmed, the son of a landowner from Hama's countryside, specifically from Taybeh al-Imam village, via a secure messaging app. Ahmed had been detained from 26 November 2011 until 26 October 2012.

<sup>&</sup>lt;sup>1</sup> The 4<sup>th</sup> Division is one of the core Syrian military units. It is headed by Maher al-Assad, the brother of the current Syrian president Bashar al-Assad





About five days after his release, he travelled to Türkiye to settle in for a year before returning to northern Syria where he currently lives in Binnish in Idlib's countryside. Ahmed narrated:

"My family and siblings left Taybeh al-Imam in June 2013, leaving behind the land owned by my father and two uncles, totaling 150 dunums (15 hectares). The land was planted with pistachio trees, over 45 years old, considered mature and fruitful bearing 50-75 kilograms of pistachio per tree in good seasons."

#### The lawyer added:

"During battles in Hama's countryside, 'shabiha' took control of locals' harvest. The GOS later formed a central security committee headed by the provincial security chief, with subsidiary local committees in each area. Then they delegated the Farmers' Unions, guidance and security units to survey regime-pursued or pro-revolution individuals, expanding even to absent landowners, cataloging and seizing their lands, including ours."

Ahmed recounted their attempts to join the public auction, saying:

"My sister who remains in Hama's countryside tried to participate in the public auction, which listed our family land but was unable due to the high starting bid, which would not prove profitable for the family if we won the investment rights. Still, our relatives continue annual care of the trees through pruning and watering to preserve them, aware that regime forces will still claim the entire harvest each season."

### An Attempt to Steal Land through Forgery

Ibrahim B, a native of Taybeh al-Imam village in northern Hama's countryside, has been displaced since March 2012. He owns a 25-dunum (2.5 hectares) olive grove that he lost access to since his displacement. He recounted to STJ over a WhatsApp call on 21 August 2024 the importance of his farmland and how he lost it. He said:

"The land was located in the southern neighborhood of Taybeh al-Imam, and my last harvest was in 2011 after the Syrian revolution began, as I fled before the 2012 season. The grove contained over 500 olive trees planted in 1987 that annually produced at least 100 cans of olive oil, worth approximately \$8,000 USD."

Ibrahim also recounted how the GOS controlled his land in an attempt to seize it, saying:

"Initially, locals from the village informed me that a group of 'shabiha' had taken control of my home and land, and seized the crops. Later in early 2022, somebody told me [the ownership to] my land was being illegally transferred and registered under another person's name at the Hama courthouse through forged documents. In the beginning, I did not believe the claims, but when the informant called back twice, confirming the next court session would legalize transferring the title to another's name and that a final verdict would be made I demanded the names of the witnesses and the lawyer involved and other detail related to the proceedings."

#### He added:

"I discovered the forgery operation was led by lawyer N. Durjar, and the witnesses were S. Samra and M. Tuqani from Taybeh al-Imam. I threatened to seek the media and





publicly expose the lawyer as a former informant who revealed locations of Syrian army positions to be targeted in exchange for \$500-1000 per site. This caused him to withdraw from proceeding with the case, though I do not know if any new attempts were made to illegally seize or vacate my land."

# Farmers Regain Lands in Idlib through POAs

Despite elements of the 4<sup>th</sup> Division and Syrian army seizing the lands of IDPs from Hama and Idlib countryside, some managed to recover their farmlands through granting POAs to relatives remaining in GOS-held areas, as stated by two witnesses currently residing in Türkiye.

#### Land Returns on the Condition of Reconciliation with the GOS

Fadi (63 years), a refugee in Türkiye since 2012 and originally from southern Idlib countryside, was deprived of the pistachio orchard he co-owns with siblings for around five years after the GOS confiscated it in 2018. On 22 August, he told STJ, through a phone call, about the land area and income amounts, and narrated the steps he followed to grant a relative a POA:

"The land I co-own with my six brothers expands over an area of 600 dunums (6 hectares), we each inherited 100 dunums (1 hectare) from our father's estate. In bountiful years we would earn \$150,000, or \$50,000 less in poor ones. Until 2018, we managed the land through farmers and hired workers and collected the profits, but we have been denied harvests after the 4<sup>th</sup> Division took over and the Syrian army entered the area."

The source, known for opposing the government since the onset of the Syrian uprising in 2011, added:

"When the army entered our area, the harvest was ready but they seized our land, denying us the crops on the pretext that we are GOS opponents and outside Syria. The members of the Syrian army and affiliated-shabiha remained in control [of our land] without admitting they have [confiscated it], auctioning it off at the absurdly high price of 1.5 million SYP per dunum, making it impossible for relatives to pay on our behalf and leaving us no potential profits. This continued until 2023 when we sought alternative reclamation methods, as the land is our main source of income even if were unable to personally maintain it or return to Syria."

Fadi concluded by describing what subsequently occurred with him, saying:

"In 2023, my five brothers managed to bid on part of the auctioned harvest, paying amounts above those requested. I had several issues with obtaining needed documents as a known GOS opponent, so I paid large sums at the Syrian consulate in Istanbul for a 'security settlement/reconciliation' document, enabling me to provide a POA to a relative in regime areas. This gave us access to the entire 2024 season harvest."

# **High Auction Prices Deprive Landowners of Profits**







Another source from al-Tamanah`a village in southern Idlib countryside, preferring the pseudonym Samer, through a WhatsApp call on 22 August 2024, described how the family managed their lands affairs after the majority of his siblings were displace:

"Our 120-dunum (12 hectares) estate was passed down as inheritance and is co-owned by seven siblings. Until 2016, we managed harvesting through our brother as he remained in these areas while the rest of us fled the bombardment to northern Syria in 2012. Then, I moved to Türkiye in under a year."

Samer added that in bountiful years, their land would yield around 300,000,000 SYP (\$20,477), and 100,000,000 SYP (\$6,825) in poor ones—that was until auctions began in 2020. He noted that his sister, who remains in GOS-held areas, is handling auctions involving their land:

"Our pistachio orchard was among lands auctioned. Each season one heir's portion of the land is offered [for investment], with the PGS usually opening the bidding at 1.5 million SYP per dunum as happened for 2024. My sister was compelled to pay to obtain investment and preserve the land."

Samer noted that despite incurring financial losses, they still participate in the public auctions, continuing:

"When the bidding opens, investors offer amounts higher than those [set up by the PGS], amounting to over 2.5 million SYP at times. If my sister, being a first-degree relative, accepts to pay the highest bid and no one offers a higher amount, she retains investment rights for the season, and this is what we try to achieve annually, even if [the process] does not yield us profits."

Regarding the reasons for their insistence on participating in the public auctions, Samer said:

"If another investor neglects the trees, our losses would double. At least by winning, we know the trees will not be damaged, even if we just break even after costs that total 50 million SYP a year."

# The Importance of Pistachio Groves

Out of the 15 monitored GOS-advertised auctions, only one offered "investment" in olive groves in Hama province. All other auctions focused on pistachio orchards in Hama and Idlib, since pistachio trees are investment-worthy given their longer lifespan, high-yield, and lucrative profits relative to olives and other trees.

This is supported by estimates from the director of the pistachio office at the Agriculture Ministry, Yunis Hamdan. In <u>remarks</u> to pro-GOS newspaper al-Watan, he indicated the expected 2024 initial production is 77.301 tons of pistachios, compared to around 45,000 tons last season. Also, there are approximately 9.7 million pistachio trees in Syria, with 7.7 million bearing fruit. Of this, around 33,349 tons are produced in "secure" areas covering 60,595 hectares— 23.516 hectares in Aleppo, 21.363 in Hama, 981 in Homs, 3.031 in Rif Damascus, and 676 in al-Sweida, as well as smaller areas in al-Hasakah, Raqqa, al-Ghab and Deir ez-Zor.

Hama's pistachio cooperative head Abdul Moneim al-Ibrahim also <u>told</u> al-Watan that pistachio farming in Hama concentrates in the town of Morek, in the northern countryside, which is home to around 50,000 trees and is Syria's top pistachio producer. Production there alone is expected to reach 17,000 tons this season.





# **Legal Opinion**

The right to ownership, whether individual or communal, is a fundamental human right. it is unacceptable to arbitrarily seize civilians' property in contravention of the Syrian constitution and relevant laws. Article 15 of the existing 2012 Syrian constitution stipulates that "Collective and individual private ownership shall be protected ... Private ownership shall not be removed except in the public interest by a decree and against fair compensation according to the law; [and] confiscation of private property shall not be imposed without a final court ruling."

As demonstrated by the sources interviewed for this report, agricultural lands subject to these auctions remain registered under original owners' names and none have been confiscated by virtue of a final court judgment for public benefit with fair compensation. Therefore, these auctions and their outcomes constitute a clear violation of constitutionally protected private property rights under the current constitution, as well as prior constitutions, notably the 1950 constitution. The auctions infringe on owners' rights to utilize, benefit from and manage their property as outlined in Article 768 of Syrian Civil Code. It also denies them profits from crops on their lands per Article 770.

Furthermore, as the monitored announcements indicate, these auctions were supposedly based on provisions within Syria's 2004 Contracts System No. 51, which governs contracts for public sector agencies. Upon examining the text of this law, it is noted that it pertains to contracting between state institutions and private individuals or entities to provide goods or services to those institutions. These contracts are based on tendering processes, not auctions. The regulations governing property sales in Chapter Six of this law relate to the sale, lease or investment of public sector assets, not private assets, where Article 73 states: "The sale or leasing or investment of properties and funds owned by public bodies and institutions, as well as other items, materials and equipment approved for sale, shall take place through one of the following means: direct sale; sale by mutual consent; public auction, in the absence of any other specified means in applicable laws and regulations." Given that the properties subject to these auctions are private, not publicly owned, relying on Law No.51 of 2004 to conduct these auctions, has no legal basis whatsoever, and all these decisions and announcements are considered absolutely null and void.

Moreover, these decisions constitute a flagrant violation of numerous international conventions and treaties that affirmed the human right to property and prohibit the arbitrary deprivation of property. This includes Article 17 of the 1948 Universal Declaration of Human Rights, and Article 5 of the 1965 International Convention on the Elimination of All Forms of Racial Discrimination.

<u>The Guiding Principles on Internal Displacement</u> also affirm the duty to protect the property and assets of IDPs, and prohibit their arbitrary seizure as a form of collective punishment, occupation or use. Customary international humanitarian law likewise obliges parties to an armed conflict to respect private property and refrain from confiscation.<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> Rule 51 of Customary International Humanitarian Law <a href="https://www.icrc.org/eng/assets/files/other/customary-international-humanitarian-law-i-icrc-eng.pdf">https://www.icrc.org/eng/assets/files/other/customary-international-humanitarian-law-i-icrc-eng.pdf</a>





# **Appendices**

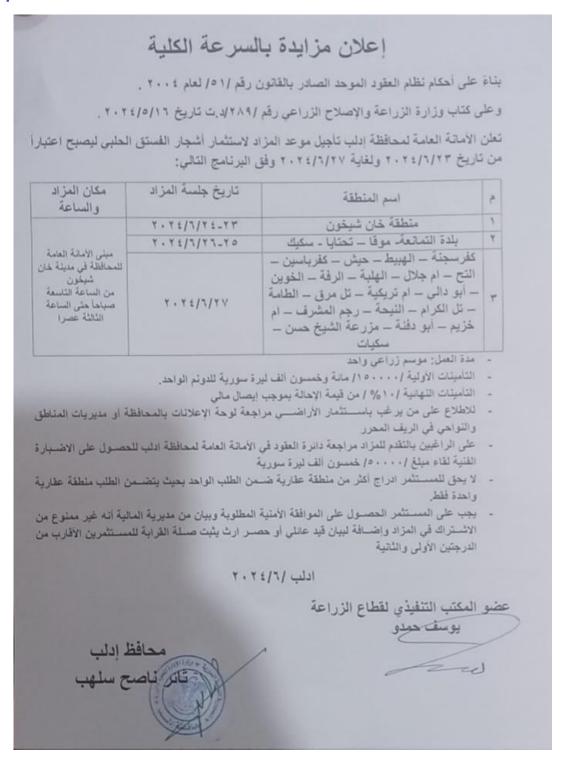


Image 1 of the Idlib PGS auction announcement, published on 6 June 2024.





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#### #اعلان

مزاد استثمار اشجار الفستق الحلبي للمرة الاولى بالسرعة الكلية بناءً على خطة وزارة الزراعة والاصلاح الزراعي بخصوص استثمار الاراضي الشاغرة والمعدة للاستثمار ,واستئناساً بنظام العقود رقم 51 لعام 2004 .

تعلن الأمانة العامة لمحافظة حماة عن قبول طلبات الاشتراك بالمزاد العلني لاستثمار اشجار الفستق الحلبي اعتباراً من يوم الاحد الواقع بـ 12/ 5/ 2024 ولغاية يوم الخميس الواقع بـ 16/ 5/ 2024 وتكون جلسات المزاد وفق البرنامج المحدد في الأسفل

- التأمينات الأولية : /150,000 / مئة وخمسون الف ليرة سورية للدونم الواحد .
- التأمينات النهائية: 10% من قيمة الاحالة بموجب ايصال مالي \_\_\_\_ مدة العمل: موسم زراعي واحد
- على الراغبين بالاشتراك بالمزاد الاخذ بعين الاعتبار التعليمات الخاصة باستثمار الاقارب وفق دفاتر الشروط .
  - تقدم الطلبات الى ديوان النافذة الواحدة في الامانة العامة لمحافظة حماة مرفقة بالأوراق الثبوتية (صورة عن البطاقة الشخصية , لا حكم عليه , سند اقامة , تصريح , تعهد , التأمينات الاولية ) .
    - يمكن الاطلاع على الاراضي المعروضة للاستثمار لدى اللجان المكانية المختصة او مكتب المتابعة بالمحافظة .
- على الراغبين بالتقدم للمزاد مراجعة دائرة العقود في الامانة العامة لمحافظة حماة للحصول على الاضبارة الفنية لقاء مبلغ /35,000 / ل س .

مكان وساعة المزاد	تاريخ جلسة المزاد	اسم المنطقة	٩
	7.71/0/19	لطمين — اللطامنية	,
قاع الاجتماعات	7.71/0/7.	كفوزيشا	۲
في المحافظة	7.71/0/71	مورك + لحايا + طيبة الامام + معردس	٣
الساعة التاسعة	7.71/0/77	صوران + كوكب+ الشعثة +الفان الشمالي + خفسين + الجنينة الغربية + طيبة الاسم	£
صباحاً.	7.75/0/77	معان + قصر المخرم+ قصر ابو سمرا+ الطليسية+ الكبارية+ ام حارتين +قبيبات + كراح +عطشان + المتبقي من المناطق	٥

Image 2 of the Hama PGS auction announcement, published on 9 May 2024.







محافظة حماة



#### #إعلان

استئناساً بأحكام القانون رقم 51 لعام 2004 .

وعلى كتاب وزارة الزراعة والإصلاح الزراعي رقم 217/ د ت تاريخ 8/4/2023 .

تُعلنَ الأمانَة الُعانَمة لَمُحافَظَةً حماةً عَنَ قَبُولَ طلبات الاشتراكُ بالمزاد العلني لاستثمار أراضي السليخ للأراضي المقدم بها طلبات استثمار اقارب ولم تسدد قيمة الاستثمار ومحاضر الاراضي للمزاودين ممن رسى عليهم المزاد ولم يسددوا قيمة المحاضر حتى تاريخه اضافة إلى الاراضي المتبقية اعتبارا من يوم الثلاثاء الواقع في 2/1/2024 ولغاية يوم الاثنين الواقع بـ 8/1/2024 وتجري المزايدة يوم الثلاثاء الواقع في 9/1/2024 في قاعة الاجتماعات بالمحافظة الساعة العاشرة صباحاً .

وفق الشروط التالية :

التأمينات الأولية : تحدد بمبلغ وقدره /5000/ ل س للدونم المروي الواحد و /2000/ ل س للدونم البعل الواحد . التأمينات النهائية : 10% من قيمة الاحالة بموجب ايصال مالي .

مدة العمل: موسم زراعي واحد

تقدم الطلبات الى ديوان النافذة الواحدة في الامانة العامة لمحافظة حماة مرفقة بالأوراق الثبوتية ( صورة عن البطاقة الشخصية , لا حكم عليه , سند اقامة , التأمينات الاولية ) .

للإطلاع على الاراضي المطروحة لاستثمار مراجعة لوحة اعلانات المحافظة أو مديريات المناطق والنواحي المعنية

على الراغبين بالتقدم للمزاد مراجعة دائرة العقود في الامانة العامة لمحافظة حماة للحصول على الاضبارة الفنية لقاء مبلغ /35,000 / ل س .

على من يرسو عليه المزاد أن يسدد كافة الالتزامات المالية المترتبة بحقه خلال مدة 10 أيام من تاريخ رسو المزاد وفق أحكام المادة /6/ من دفتر الشروط الخاصة المالية والحقوقية .

#المكتب\_الاعلامي #محافظة\_حماة



Image 3 of the Hama PGS auction announcement, published on 3 January 2024.

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محافظة حم 28 أبريل · 🚱

#### #اعلان

تقديم طلبات اقارب لاستثمار أشجار #الفستق\_الحلبي لموسم 2024 ناقعار منات مل تاليامة بالإرباد المام

بناءً على خطة وزارة الزراعة والاصلاح الزراعي بخصوص استثمار الاراضي الشاغرة والمعدة للاستثمار , واستئناساً بنظام العقود رقم 51 لعام 2004 .

تعلن محافظة حماة بالسماح للأقارب بالتقدم بطلبات استثمار اراضي اشجار الفستق الحلبي لأقاربهم من الدرجتين ( الأولى والثانية ) والمقرر اعلانها للاستثمار اعتباراً من يوم الاحد الواقع في 28 / 4 / 2024 ولغاية يوم الاحد الواقع في 12 / 5 / 2024 دون الدخول بالمزاد وفق الشروط التالية :

أَنَّ يكون من اقارب صاحب العقار من الدَّرجتين الأولى والثانية وفق ما نصت عليه المادة 38 من القانون المدنى .

حصول المتقدم على الموافقة الامنية اللازمة . 3) تعهد المتقدم باعادة الارض الى صاحبها فور عودته . ألا يكون محروم من الدخول بالمزادات المعلن عنها من قبل الجهات العامة .

وثيقة تثبت درجة القرابة بيان عائلي أو حصر ارث أو اخراج قيد للدرجتين الأولى والثانية لصاحب العقار ولأصحاب الحقوق باستثمار الارض .

 6) في حال وجود أكثر من شخص من الاقارب يتقدم الراغب بالاستثمار بمحضر اتفاق فيما بينهم يشير الى تفويضه باستثمار الارض والقيام بالإجراءات المطلوبة .

7) تعهد بتقديم الخدمات الفنية المطلوبة للأرض من فلاحة وتسميد وغيرها وفق البرنامج الفني المعتمد . ) يحدد بدل الاستثمار فيما يخص الاشجار المثمرة وفق التالي :

تعرض العقارات التي تم قبول طلباتها بالمزاد وبعد رسو المزاد يتم الطلب من الاقارب المعنيين بالعقارات بيان رغبتهم بالتعاقد على استثمارها وفق المبلغ الذي وصل اليه المزاد منقوصاً منه ميّزة تفضيلية تحدد حسب مدة التعاقد وفق ما ورد بالخطة ودفاتر الشروط , وفي حال الموافقة ينظم العقد لصاحب طلب الاقارب وفي حال عدم الموافقة يتم استكمال اجراءات المزاد الاصولية .

مدة الاستثمار موسم زراعي واحد أو موسمين حسب رغبة المتعاقد من الاقارب .

تقدم الطلبات مرفقة بالثبوتيات إلى ديوان المحافظة خلال المدة المحددة اعلاه ويرفض كل طلب يقدم خارج المدة .

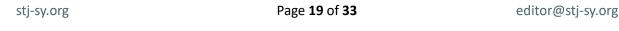
يمكن الاطلاع على الاراضي المعروضة للاستثمار لدى اللجان المكانية المختصة او مكتب المتابعة بالمحافظة . على المقبولة طلباتهم الراغبين بالاستثمار بسعر المزاد ابداء الرغبة بالاستثمار بصورة واضحة وصريحة وخطية وتسديد قيمة العقد والتأمينات النهائية ورسم المزاد خلال سبعة أيام من تاريخ جلسة المزاد تحت طائلة الغاء طلب استثمار الاقارب والتعاقد مع من رسى عليه المزاد وفق التعليمات النافذة .

> على المقبولة طلباتهم حضور جلسة المزاد وفق البرنامج الزمني الذي سيحدد في اعلان المزاد . ثمن الاضبارة / 35000/ ل س فقط .

> > #المكتب\_الاعلامي #محافظة\_حماة



Image 4 of the Hama PGS auction announcement, published on 28 April 2024.





محافظة حماة 9 مايو · ﴿

#### #اعلان

مزاد استثمار اشجار الفستق الحلبي للمرة الاولى بالسرعة الكلية

بناءً على خطة وزارة الزراعة والاصلاح الزراعي بخصوص استثمار الاراضي الشاغرة والمعدة للاستثمار ,واستئناساً بنظام العقود رقم 51 لعام 2004 .

تعلن الأمانة العامة لمحافظة حماة عن قبول طلبات الاشتراك بالمزاد العلني لاستثمار اشجار الفستق الحلبي اعتبارا من يوم الاحد الواقع بـ 12/ 5/ 2024 ولغاية يوم الخميس الواقع بـ 16/ 5/ 2024 وتكون جلسات المزاد وفق البرنامج المحدد في الأسفل

- · التَّامِيناُت الْأُولِية : /150,000 / مئة وخمسون الف ليرة سورية للدونم الواحد .
- التأمينات النهائية : 10% من قيمة الاحالة بموجب ايصال مالي \_\_\_\_ مدة العمل : موسم زراعي واحد
- على الراغبينُ بالاشتراك بالمَّزاد الاخذ بعين الاّعتبار التعليمات الخاصة باستثمار الاقارب وفق دَّفاتر الشروط .
- تقدم الطلبات الى ديوان النافذة الواحدة في الامانة العامة لمحافظة حماة مرفقة بالأوراق الثبوتية( صورة عن البطاقة الشخصية , لا حكم عليه , سند اقامة , تصريح , تعهد , التأمينات الاولية ) .
- يمكن الاطلاع على الاراضي المعروضة للاستثمار لدى اللجان المكانية المختصة او مكتب المتابعة بالمحافظة
- على الراغبين بالتقدم للمزاد مراجعة دائرة العقود في الامانة العامة لمحافظة حماة للحصول على الاضبارة الفنية لقاء مبلغ /35,000 / ل س .

مكان وساعة المزاد	تاريخ جلسة المزاد	اسم المنطقة	٩
	7.71/0/19	لطمين — اللطامنة	,
قاع الاجتماعات	7.71/0/7.	كفوزيشا	۲
في المحافظة	7.71/0/71	مورك + لحايا + طيبة الامام + معردس	٣
الساعة التاسعة	7.71/0/77	صوران + كوكب+ الشعثة +الفان الشمالي + خفسين + الجنينة الغربية + طيبة الاسم	٤
صباحاً.	7.71/0/77	معان + قصر المخرم+ قصر ابو سمرا+ الطليسية+ الكبارية+ ام حارتين +قبيبات + كراح +عطشان + المتيقي من المناطق	٥

Image 5 of the Hama PGS auction announcement, published on 9 May 2024.







#اعلان

مزاد استثمار اشجار #الفستق\_الحلبي للمرة الثانية بالسرعة الكلية

بناءً على كتاب السيد #وزير\_الزراعة والاصلاح الزراعي رقم 289/ د ت تاريخ 16/5/2024بخصوص خطة استثمار الاراضي الشاغرة والمعدة للاستثمار واستئناساً بنظام العقود رقم 51 لعام 2004.

تعلن الأمانة العامة لمحافظة #حماة وللمرة الثانية عن قبول طلبات الاشتراك بالمزاد العلني لاستثمار اشجار الفستق الحلبي اعتبارا من يوم الاحد الواقع بـ 26/ 5/ 2024 ولغاية يوم الثلاثاء الواقع بـ 28/ 5/ 2024 وتكون جلسات المزاد وفق البرنامج الموضح ضمن الجدول ادناه

-التأمينات الأولية: /150,000 / مئة وخمسون ألف ليرة سورية للدونم الواحد.

-التأمينات النهّائية: 10% من قيمة الاحالة بموجب ايصًال مّالي للهُ لله مدة العمل: موسم زراعي واحد

-على الراغبين بالاشتراك بالمزاد الاخذ بعين الاعتبار التعليمات الخاصة باستثمار الاقارب وفق دفاتر الشروط. -على المتقدمين بطلبات اشتراك للمزاد الأول والراغبين بالاشتراك في المزاد الثاني التقدم بطلبات يبين فيها رغبتهم بالاشتراك بالمزاد الثاني وارفق ايصال تسديد رسم اشتراك بالمزاد الثاني مع ارفاق اشعار بتسديد قيمة التأمينات بما يتناسب مع طلب الاشتراك الجديد.

-تقدم الطلبات الى ديوان النافذة الواحدة في الامانة العامة لمحافظة حماة مرفقة بالأوراق الثبوتية( صورة عن البطاقة الشخصية , لا حكم عليه , سند اقامة , تصريح , تعهد , التأمينات الاولية ) .

-يمكن الاطلاع على الاراضي المعروضة للاستثمار لدى اللجان المكانية المختصة او مكتب المتابعة بالمحافظة. -على الراغبين بالتقدم للمزاد مراجعة دائرة العقود في الامانة العامة لمحافظة حماة للحصول على الاضبارة الفنية لقاء مبلغ /35,000 / ل س.

-على الاقارب المتقدمين بطلبات استثمار ضمن المدة المحددة لقبول طلبات الاقارب ولم يحدد سعر مزاد لها بالمزاد الاول حضور جلسة المزاد وفق الجدول ادناه.

#المكتب\_الاعلامي #محافظة\_حماة

مكان وساعة المزاد	تاريخ جلسة المزاد	اسم المنطقة	٩
قاعة الاجتماعات في المحافظة	Y.Y£/0/Y9	ناحية صوران وتوابعها	,
الساعة التاسعة صباحاً.	Y . Y £ / 0/T .	منطقة محردة وتوابعها + باقىي المناطق	*

Image 6 of the Hama PGS auction announcement, published on 24 May 2024.







اعلان مزايدة بالسرعة الكلية لاستثمار اشجار الفستق الحلبي لموسم ٢٠٢٥/٢٠٢٤

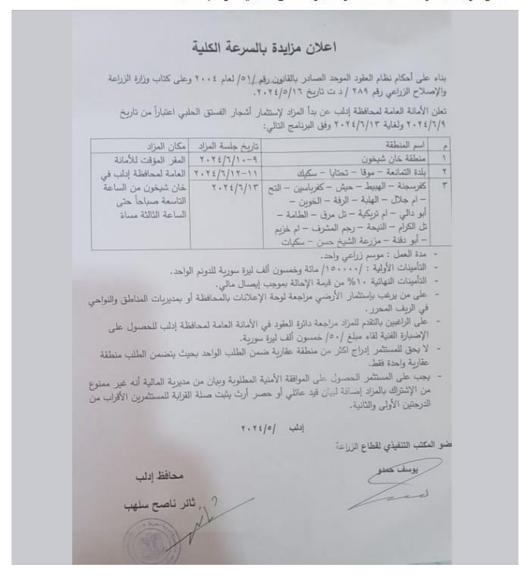


Image 7 of the Idlib PGS auction for investment in 25 regions, published on 26 May 2024.









بناءً على كتاب السيد #وزير\_الزراعة والاصلاح الزراعي رقم 289/ د ت تاريخ 16/5/2024بخصوص خطة استثمار الاراضي الشاغرة والمعدة للاستثمار واستئناساً بنظام العقود رقم 51 لعام 2004 . تعلن #الأمانة\_العامة\_لمحافظة\_حماة عن قبول طلبات الاشتراك بالمزاد العلني لاستثمار اشجار #الفستق\_الحلبي لأبناء محافظة حماة حصراً اعتبارا من يوم الاثنين الواقع بـ 3/ 6/ 2024 ولغاية يوم الاربعاء

\_\_\_\_

•التأمينات الأولية : /150,000 / مئة وخمسون الف ليرة سورية للدونم الواحد .

الواقع بـ 5/ 6/ 2024 وتكون جلسات المزاد وفق البرنامج الموضح في الصورة ادناه

- •التأمينات النهائية : 10% من قيمة الأحالة بموجب ايصال مالي 🔍 مدة العمل : موسم زراعي واحد
- •تقدم الطلبات الى ديوان النافذة الواحدة في الامانة العامة لمحافظة حماة مرفقة بالأوراق الثبوتية ( صورة عن البطاقة الشخصية , لا حكم عليه , سند اقامة , تصريح , تعهد , التأمينات الاولية وثيقة تثبت أنه من أبناء محافظة حماة ) .
- •يمكن الاطلاع على الاراضي المعروضة للاستثمار لدى اللجان المكانية المختصة او مكتب المتابعة بالمحافظة . •على الراغبين بالتقدم للمزاد مراجعة دائرة العقود في الامانة العامة لمحافظة حماة للحصول على الاضبارة الفنية لقاء مبلغ /35,000 / ل س .
- ملاحظة : على الاقارب المتقدمين بطلبات استثمار ضمن المدة المحددة لقبول طلبات الاقارب ولم يحدد سعر مزاد لها مراجعة لجنة المزاد مكتب المتابعة للإبداء رغبتهم بالتعاقد وفق السعر المحدد من قبل اللجنة الرئيسية وخلال فترة الاعلان المحددة من 3/6/2024 ولغاية 5/6/2024 تحت طائلة فقدان الحق بالتعاقد .
  - #المكتب\_الاعلامي #محافظة\_حماة



Image 8 of the Hama PGS auction announcement, published on 3 June 2024.







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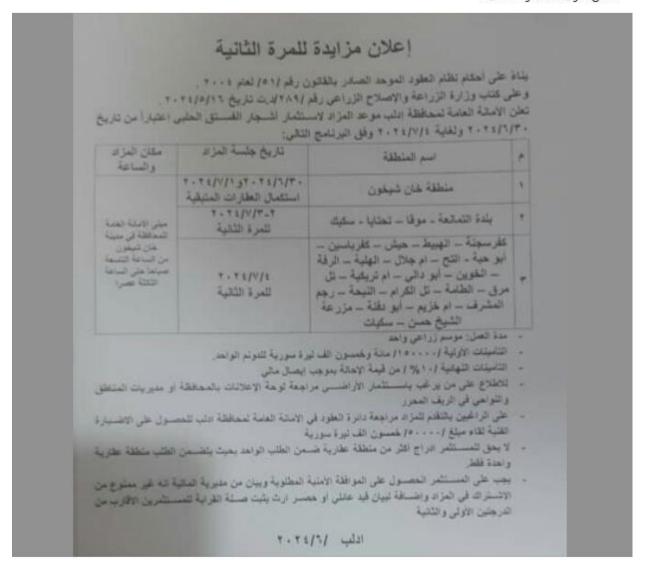


Image 9 of the Idlib PGS auction announcement, published on 27 June 2024.









Image 10 of the Idlib PGS auction announcement, published on 4 July 2024.



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اعلان مزايد للمرة الثالثة



Image 11 of the Idlib PGS auction announcement, published on 9 July 2024.





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إعلان مزايدة للمرة الثالثة..

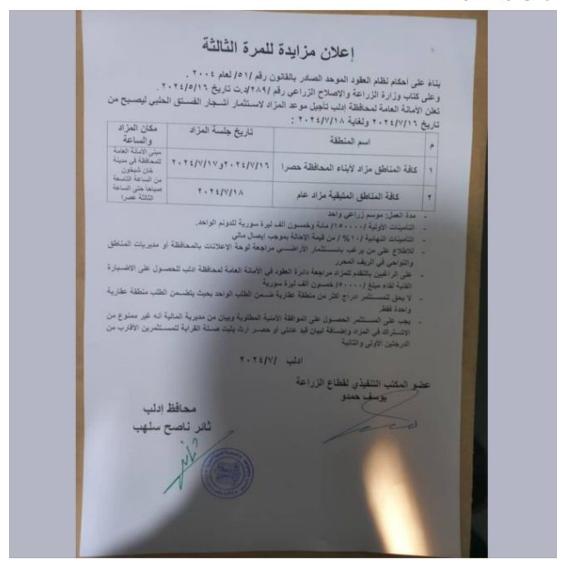


Image 12 of the Idlib PGS auction announcement, published on 15 July 2024.







إعلان مزايدة للمرة الثالثة..

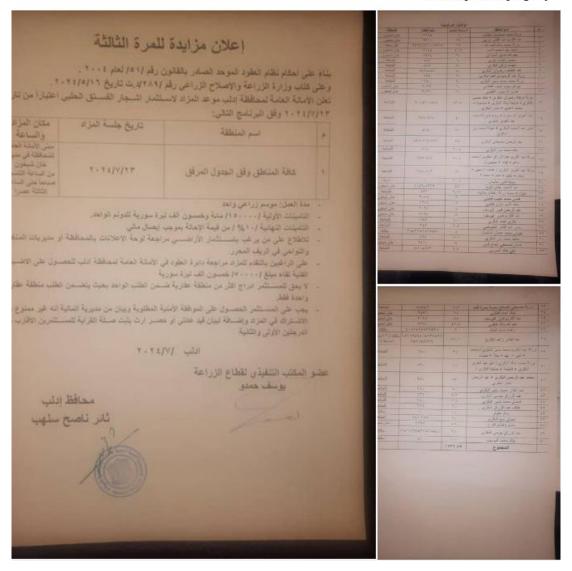


Image 13 the Idlib PGS auction announcement, published on 22 July 2024.







•••





Image 14 the Idlib PGS auction announcement, published on 25 July, 2024.









95 98 NOTING 94 NOTING



Image 15 the Idlib PGS auction announcement, published on 4 August 2024.









علان #مزاد استثمار أشجار #الزيتون

160 2024 / 8 /

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الرق\_م: التاريخ:



الجمهورية العربية السورية وزارة الادارة المحلية والبيئة محافظة حماة

إعلان مزاد استثمار اشجار الزيتون للمرة الاولى بالسرعة الكلية

بناءٌ على كتاب وزارة الزراعة والاصلاح الزراعي رقم 289/ د ت تاريخ 2024/5/16 . واستئناسا بنظام العقود رقم 51 لعام 2004

واستندسا بنظام العقود رقم 51 نعام 2004 . تعلن الأمانة العامة لمحافظة حماة عن قبول طلبات الاشتراك **بالمزاد العلني** لاستثمار اشجار الزيتون اعتبارا من يوم الاحد الواقع بــ 18/ 8/ 2024 ولغاية يوم الاحد الواقع بــ 9/1 / 2024 وتجرى المزايدة يوم ا لاثنين الواقع بد 2 / 9 / 4 / 9 / 2 في قاعة مجلس المحافظة الساعة التآسعة صباحا وفق الشروط التالية:

- التأمينات الأولية : /000,100 / مئة الف ليرة سورية للدونم الواحد .
  - التأمينات النهائية: 10% من قيمة الاحالة بموجب إيصال مالي .
    - مدة العمل : موسم زراعي واحد
- على الراغبين بالاشتراك بالمزاد الاخذ بعين الاعتبار التعليمات الخاصة باستثمار الاقارب وفق دفاتر
- تقدم الطلبات الى ديوان النافذة الواحدة في الامانة العامة لمحافظة حماة مرفقة بالأوراق النبوتية ( صورة عن البطاقة الشَّخصية . لا حكم عليه . سند اقامة . تصريح . تعهد . التامينات الأولية ) .

محافظة حماة

# اع\_لان تقديم طلبات اقارب لاستثمار أشجار الزيتون لموسم 2024 بناء على كتاب وزارة الزراعة والاصلاح الزراعي رقم 289/ د ت تاريخ 2024/5/16.

واستئناسا بنظام العقود رقم 51 لعام 2004

تعلن محافظة حماة بالسماح للأقارب بالتقدم بطلبات استثمار اراضي اشجار الزيتون لأقاربهم من نين ( الأولى والتانية ) والمقرر اعلانها للاستثمار اعتبارا من **يوم الاحد** الواقع في 18 / 8 / 2024 ولغاية يوم الاحد الواقع في 1 / 9 / 2024 دون الدخول بالمزاد وفَّقُ السَّروطُ التآليةُ

- 1) أن يكون من أقارب صاحب العقار من الدرجتين الأولى والتأنية وفق ما نصت عليه المادة 38 من القانون
- حصول المتقدم على الموافقة الامنية اللازمة . 3) تعهد المتقدم باعادة الارض الى صاحبها فور عودته .
- 4) الا يكون محروم من الدخول بالمزادات المعلن عنها من قبل الجهات العامة .
   5) وثيقة تنبت درجة القرابة بيان عائلي أو حصر ارث أو اخراج قيد للدرجتين الأولى والثانية لصاحب العقار ولأصحاب الحقوق باستثمار الارض .
- 6) في حال وجود أكثر من شخص من الأقارب يتقدم الراغب بالاستثمار بمحضر اتفاق فيما بينهم يشير الى تفويضه باستثمار الارض والقيام بالإجراءات المطلوبة .
  - 7) تعهد بتقديم الخدمات الفنية المطلوبة للأرض من فلاحة وتسميد وغيرها وفق البرنامج الفني المعتمد .
    - 8 ) يحدد بدل الاستثمار فيما يخص الاشجار المثمرة وفق التالي :
- تعرض العقارات التي تم قبول طلباتها بالمزاد وبعد رسو المزاد يتم الطلب من الاقارب المعتيين بالعقارات

Image 16 of the Hama PGS auction announcement, published on 17 August 2024.











Image 17 of the Idlib PGS auction announcement, published on 12 August 2024.



# ABOUT STJ

Syrians for Truth and Justice (STJ) started as an idea in a co-founder's mind while attending the U.S. Middle-East Partnership Initiative's (MEPI) Leaders for Democracy Fellowship program (LDF) in 2015. The idea became a reality and flourished into an independent, non-profit, impartial, non-governmental human rights organization.

STJ's beginnings were more than humble; initially, it only reported stories of Syrians who experienced arbitrary arrest, enforced disappearance, or torture. Planted in fertile soil, the seed of this project grew into an established human rights organization licensed in the Middle East and the European Union. STJ today undertakes to detect and uncover violations of all types committed in all Syrian parts by the various parties to the conflict.

Convinced that Syria's diversity is a wealth, our researchers and volunteers serve with unfailing dedication to monitor, expose, and document human rights violations that continue unabated in Syria since 2011, regardless of the affiliation of the victims or perpetrators.

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