

Article 15(c) QD/QR: indiscriminate violence in situations of armed conflict

COMMON ANALYSIS

Last update: June 2025

For general guidance on the country guidance approach to the assessment of subsidiary protection needs under Article 15(c) QD/QR, see 'EUAA, [Country Guidance: Explained](#), February 2025'.

In armed conflicts, the targeting of civilians may have a nexus to one of the grounds for persecution according to the refugee definition. Therefore, refugee status may be granted. Such targeted violence, furthermore, would not be considered 'indiscriminate'.

☐ Reference period

The following assessment is primarily based on the 'EUAA, [COI Report - Syria: Country Focus](#), March 2025', with the reference period 1 November 2024 – 28 February 2025. Some limited additional information was added during the finalisation of this report until 11 March 2025. Background information regarding the conflict in Syria is also taken into account.

This guidance should be considered valid as long as current events and developments fall within the trends and patterns of violence observed within the reference period of the mentioned COI report. New events and developments that cause substantial changes, new trends or geographical shifts in the violence, may lead to a different assessment. The security situation in a given territory should always be assessed in light of the most up-to-date COI available.

☐ Armed conflict (international or internal)

Syria is currently affected by multiple overlapping conflicts, in the meaning of Article 15(c) QD/QR:

- Syria continued to be involved in an international armed conflict with the US-led coalition against ISIL, due to the coalition's military intervention in the country without the consent of the current Syrian transitional government.
- Syria continued to be involved in an international armed conflict with Israel as well, which has intensified air strikes on numerous targets in the country and which, beyond the parts of Syrian territory which it already had occupied, seized control of the demilitarised buffer zone between the Israeli-controlled Golan Heights and Syria and conducted ground incursions on southern Syrian territory beyond the buffer zone.
- Syria continued to be involved in several non-international armed conflicts with various armed groups which contest the authority of the Transitional Administration, most notably pro-Assad armed groups and ISIL.

- Non-international armed conflicts on Syrian territory further included ongoing fighting among various non-State armed groups, notably between pro-Assad armed groups and armed groups affiliated to the Transitional Administration, as well as between the SNA and SDF/Kurdish forces. Türkiye is engaged in a non-international armed conflict in Syria with Kurdish forces and with ISIL and controls parts of northern Syria with the help of Turkish-backed armed groups.

[[Country Focus 2025](#),3,4]

These conflicts affect different areas in Syria at different degrees. See more under [Indiscriminate violence](#).

☐ Qualification of a person as a ‘civilian’

Being a civilian is a prerequisite in order to be able to benefit from protection under Article 15(c) QD/QR. The purpose of the provision is to protect only those who are not taking part in the conflict. **This includes the potential application of Article 15(c) QD/QR to former combatants who have genuinely and permanently renounced armed activity.**

In the context of Syria, applications by persons falling under the following profiles should be examined carefully. Based on an individual assessment, such applicants may be found not to qualify as civilians under Article 15(c) QD/QR. For example:

- **Military and security forces of the Assad regime that would have not genuinely and permanently renounced armed activity:** Including all the components of the Assad Syrian Armed Forces (SAF), the police force, the intelligence services, etc. See ‘EUAA, [‘3.2. The Government of Syria and associated armed groups’](#) in *Country Guidance: Syria*, April 2024’.
- **Pro-Assad militias and armed gangs that would have not genuinely and permanently renounced armed activity:** Remnants of pro-Assad groups are still operating but there is unclarity regarding their structure, presence and operational capacity.
- **SDF and Asayish:** Kurdish-led multi-ethnic force that supported the US-led coalition in the war against ISIL.
- **SNA:** a collection of Turkish-backed armed opposition groups, being hostile towards the SDF.
- **HTS and other armed groups** integrated into the forces of the Transitional Administration, as well as affiliated armed groups.
- **ISIL and its predecessor groups.**

[[Country Focus 2025](#) 2,4; [Actors](#) 2.3, 3.2, 4, 5.1, 6]



Exclusion considerations may also apply (see [Exclusion](#)).

☐ Indiscriminate violence

The common analysis regarding the degree of indiscriminate violence combines quantitative and qualitative elements in a **holistic and inclusive assessment**.

For more information on the methodology and indicators used to assess the level of indiscriminate violence in country guidance documents, see 'EUAA '[Article 15\(c\) QD/QR: indiscriminate violence in situations of armed conflict](#)' in *Country Guidance: Explained*, February 2025'.

For further information on the sources used for this assessment and their methodology, see [Country Focus 2025, Sources](#).

This section should be read in conjunction with [Recent developments in Syria](#).

The information which forms the basis of this Guidance covers the period from November 2024 to the end of February 2025, as well as significant security incidents from early March 2025, particularly in the coastal provinces (see also [Scope of this update](#)). The information available is limited to a short timeframe and presents a mixed picture.

Taking into account the areas of control of the different actors present and operation in Syria [see [Country Focus 2025, 4.1, 4.2, 4.3](#)] and the impact of the Israel-Hamas war on the security in Syria [see [Country Focus 2025, 4.4](#)], the following can be noted.

The security situation is marked by the Transitional Administration's lack of a secure grip over certain areas, such as the coastal regions. The extent of military involvement by the United States, Türkiye, and Israel in Syria also remains unclear. This uncertainty is further compounded by the unknown success of integrating armed groups such as the SNA, SDF, and Druze factions into the new military and Ministry of Defence. Additionally, it is yet to be determined whether the events that unfolded in the coastal areas in early March 2025 were isolated incidents or will recur.

Additionally, the quantitative data, and the potential underreporting of certain incidents, makes it difficult to distinguish between targeted and indiscriminate violence. It can be noted, however, that during this period, SNHR recorded 1 032 civilian fatalities [see [Country Focus 2025, 4.5.3](#)], significantly higher than the 930 civilian fatalities documented by the same source for the period from September 2023 to August 2024 [[Security 2024, 1.5.3](#)]. This increase is largely due to large-scale hostilities between HTS and Assad forces leading up to the fall of the Assad regime on 8 December 2024. Civilian fatalities declined in January and February 2025 but surged again in early March 2025 due to an uprising by pro-Assad militias, retaliatory actions by armed forces, and sectarian violence.

ACLED data shows a similar trend, with 2 288 security incidents reported between 8 December 2024 and the end of February 2025. Aleppo, Hasaka, Raqqa, and Deir Ez-Zor experienced the most security incidents, while the lowest figures were recorded in Quneitra, Damascus, Sweida, and Tartous. The early March 2025 surge in incidents and fatalities primarily occurred in Latakia, Tartous, and Hama ([1](#)).

By the end of February 2025, 885 294 IDPs had returned within Syria, and 297 292 Syrians had returned mostly from the neighbouring countries. However, the potentially permanent character of such return movements remains to be confirmed. 7.4 million people remain internally displaced, and around 6 million Syrian refugees have not yet returned from neighbouring countries.

The hostilities leading to the fall of Assad regime caused the destruction or damage to healthcare facilities and other civilian infrastructure including water and electricity stations. The potential pressure from high numbers of people returning to Syria must also be considered, given the already fragile situation.

Additionally, civilians were killed and injured by explosive remnants of war present in large parts of the country.

It can therefore be concluded that, at the time of writing, the security situation in Syria remains volatile, and in various respects uncertain. While developments since the fall of the Assad regime provide important indicators, this period remains too short for definitive conclusions. Future shifts in patterns and risks may emerge and continued monitoring would be essential. Limitations with regard to reliable reporting from the country should also be taken into account. **Therefore, at the time of writing, it is not considered feasible to assess the level of indiscriminate violence in Syria under the meaning of Article 15(c) QD/QR.**

As the security situation in Syria evolves, in order to make a forward-looking assessment with regard to the level of risk due to indiscriminate violence in a situation of armed conflict, several indicators should be taken into account on the basis of relevant and up-to-date COI. See 'EUAA, ['Indiscriminate violence'](#) in *Country Guidance: Explained*, February 2025'.

☐ Serious and individual threat

As mentioned above, even if refugee status is not granted, established personal circumstances must be taken into account in the examination of subsidiary protection.

The CJEU has ruled on the importance of the individual circumstances to be taken into account while determining if an applicant is eligible for subsidiary protection, notably [\(2\)](#):

'1. Article 15 of Directive 2011/95/EU (...) must be interpreted as meaning that in order to determine whether an applicant for international protection is eligible for subsidiary protection, **the competent national authority must examine all the relevant factors**, relating both to the individual position and personal circumstances of the applicant and to the general situation in the country of origin, **before identifying the type of serious harm** that those factors may potentially substantiate.'

Each case should be assessed individually, taking into account the nature and intensity of the violence in the area, together with the applicant's personal circumstances. It is not feasible to provide exhaustive guidance as to what the relevant personal circumstances could be and how those should be assessed.

For further information on the individual circumstances which may be relevant to consider in the assessment of a serious and individual threat in territories where the 'mere presence' threshold is not reached, please consult 'EUAA, ['Serious and individual threat'](#) in *Country Guidance: Explained*, February 2025'.

☐ Qualification of the harm as 'threat to (a civilian's) life or person'

Some of the commonly reported types of harm to civilians' life or person in Syria include killings, injuries, abduction/kidnapping/forced disappearance, child recruitment, explosive remnants of war, etc. A real risk of such serious harm would qualify as a threat to a civilian's life or person in accordance with the provision of Article 15(c) QD/QR.

☐ Nexus/'by reason of'

The interpretation of the causation 'by reason of' may not be limited to harm which is directly caused by the indiscriminate violence or by acts that emanate from the actors in the conflict. To a certain extent, it may also include the indirect effect of indiscriminate violence in situations of armed conflict. As long as there is a demonstrable link to the indiscriminate violence, such elements may be taken into account in the assessment, for example: widespread criminal violence as a result of lawlessness, destruction of the necessary means to

survive, destruction of infrastructure, denial of or limited access of humanitarian aid, limited access to healthcare facilities.

☐ Conclusion on Article 15(c) QD/QR

At the time of writing, it is not considered feasible to assess the risk of serious harm in relation to the level of indiscriminate violence in Syria under the meaning of Article 15(c) QD/QR.

1

Evolution of ACLED security events coded 'battles, explosions/remote violence' and 'violence against civilians' between 1 November 2024 and 28 February 2025. EUAA analysis based on publicly available ACLED data. ACLED, Curated Data Files, Middle East (28 February 2025), <https://acleddata.com/data-export-tool/>.

2

CJEU, *X and Y v Staatssecretaris van Veiligheid en Justitie*, C-125/22, Fourth Chamber, judgment of 9 November 2023, operative part (Court's ruling), [https://curia.europa.eu/juris/document/document.jsf?text=&docid=279488&pageIndex=0&doclang=en&mode=lst&docpart=1](https://curia.europa.eu/juris/document/document.jsf?text=&docid=279488&pageIndex=0&doclang=en&mode=lst&docpart=1&docid=279488&pageIndex=0&doclang=en&mode=lst&docpart=1)