Iran

Specification	Restrictive measures in relation to serious human rights violations in Iran
Acronym	HR
Adopted by	EU
Program	IRN
Expiry date	13.04.2024
Last amendment date	15.09.2023
Notes	The restrictive measures in relation to serious human rights violations in Iran were first put in place on 12 April 2011. Travel restrictions and an asset freeze were introduced with respect to persons complicit in or responsible for directing or implementing grave human rights violations in the repression of peaceful demonstrators, journalists, human rights defenders, students or other persons who speak up in defense of their legitimate rights. The measures can also be imposed against those who are complicit in or responsible for directing or implementing grave violations of the right to due process, torture, cruel, inhuman and degrading treatment, or the indiscriminate, excessive and increasing application of the death penalty, including public executions, stoning, hangings or executions of juvenile offenders in contravention of Iran’s international human rights obligations. On 23 March 2012, in view of the gravity of the human rights situation in Iran, additional restrictive measures were introduced, namely an embargo on equipment which may be used for internal repression and on equipment that may be used to monitor or intercept the Internet and telephone communications on mobile or fixed networks.

Measures



Asset freeze and prohibition to make funds available

All assets of the listed persons and entities should be frozen. It is also prohibited to make any funds or assets directly or indirectly available to them.



Restrictions on admission

Member States shall enforce travel restrictions on persons listed in the Annex of Council Decision 2011/235/CFSP.

Restrictions on equipment used for internal repression

It is prohibited to export equipment which might be used for internal repression to Iran. Related technical or financial assistance and services are also prohibited.

Telecommunications equipment

It is prohibited to export equipment or software listed in Annex IV of Council Regulation (EU) No 359/2011 intended for use in the monitoring or interception by the Iranian regime of the Internet and of telephone communications in Iran. Related assistance to install, operate or update such equipment or software is also prohibited.

Guidances

Title	File
Guidance note on the provision of humanitarian aid to fight the COVID-19 pandemic in certain environments subject to EU restrictive measures	210813-humanitarian-aid-guidance-note_en.pdf
EU Best Practices for the effective implementation of restrictive measures	ST-10572-2022-INIT_en.pdf
Guidelines on implementation and evaluation of restrictive measures (sanctions) in the framework of the EU Common Foreign and Security Policy	ST_15598_2017_INIT_EN_Public.pdf

Iran

Specification	Restrictive measures in relation to the non-proliferation of weapons of mass destruction
Acronym	WMD
Adopted by	UN and EU
Program	IRN
Last amendment date	14.03.2024

Notes

On Implementation Day (16 January 2016), the EU lifted all its economic and financial restrictive measures imposed in connection with the Iranian nuclear program. As a consequence, the following activities, including associated services, are again allowed as of Implementation Day: financial, banking and insurance measures; trade in the oil, gas and petrochemical sectors; activity in the shipping, shipbuilding and transport sectors. Moreover, a number of persons, entities and bodies were delisted and are therefore no longer subject to asset freezes, prohibitions to make funds available and visa bans. Details can be found in the JCPOA Information Note (Section 3). The JCPOA Information Note is available here: https://eeas.europa.eu/delegations/iran/32286/nuclear-agreement_en#JCPOA+Information+Note.

However, a number of proliferation-related measures and restrictions remain in place even after Implementation Day. These concern inter alia the arms embargo, restrictive measures related to missile technology, restrictions on certain nuclear-related transfers and activities, and provisions concerning certain metals and software which are subject to an authorisation regime.

In addition, one should bear in mind that restrictive measures imposed by the EU in view of the human rights situation in Iran, support for terrorism and other grounds (e.g. the war in Syria) are not part of the JCPOA and remain in place.

Measures



Arms export

A prohibition to sell, supply, or transfer, directly or indirectly, or procure arms and related materiel of all types, including weapons and ammunition, military vehicles and equipment, paramilitary equipment and spare parts for such arms and related materiel; and the provision of associated services continues to apply after Implementation Day. The EU arms embargo covers all goods included in the EU common military list. The EU arms embargo stays in place until Transition Day



Arms procurement

It is prohibited to procure arms and related materiel from Iran.



Asset freeze and prohibition to make funds available

All assets of the persons and entities listed in Annexes VIII and IX of Council Regulation (EU) 267/2012 should be frozen. It is also prohibited to make any funds or assets directly or indirectly available to them. It is also prohibited to supply specialized financial messaging services, which are used to exchange financial data, to the listed persons and entities. The list of persons and entities concerned is included in the Financial Sanctions Database (linked).

Embargo on dual-use goods

The proliferation-sensitive transfers and activities concerning items on Annex II to Council Regulation 267/2012, including associated services and related investments are subject to prior authorisation by the competent authorities of the Member State.

Inspections

Member States shall inspect all cargo to and from Iran, if they have information that the cargo contains prohibited items. Upon discovery, Member States shall seize and dispose prohibited items.

Prohibition to satisfy claims

It is prohibited to satisfy claims made by the Iranian persons, entities or bodies; or persons listed in the Council Regulation (EU) No 267/2012, in connection with any contract or transaction the performance of which has been affected by the measures imposed by the same regulation.

Restrictions on admission

Member States shall enforce travel restrictions on persons who are also subject to the asset freeze.

Restrictions on goods

It is prohibited to sell, supply, transfer, export or procure items listed in Annex III to Council Regulation (EU) 267/2012 and any other item that the Member State determines that could contribute to the development of nuclear weapon delivery systems. The provision of associated services is also prohibited.

Restrictions on goods

Proliferation-sensitive transfers and activities concerning items listed under Annex I to Council Regulation 267/2012, including associated services and related investments are subject to prior authorisation by the competent authorities of the Member State. In some cases, the Member State will need to refer the matter to the UN

Security Council.

Restrictions on goods

The sale, supply transfer or export of Enterprise Resource Planning software, designed
specifically for use in nuclear and military industries, as described in Annex VIIA to Council Regulation 267/2012, and the provision of associated services is subject to prior authorisation to be granted by the competent authorities of the Member State.

Restrictions on goods

The sale, supply, transfer or export of certain graphite and raw or semi-finished metals as listed in Annex VIIB to Council Regulation 267/2012 and the provision of associated services is subject to prior authorisation to be granted by the competent authorities of the Member State.

Guidances

Title	File
Information Note on EU sanctions to be lifted under the Joint Comprehensive Plan of Action (JCPOA)	jcpoa_note_en.pdf
Guidance note on the provision of humanitarian aid to fight the COVID-19 pandemic in certain environments subject to EU restrictive measures	210813-humanitarian-aid-guidance-note_en.pdf
Opinion on the freezing of funds of a non-designated person transferred into a Member State from a designated bank and the derogation for “extraordinary expenses” under Article 28 of Council Regulation (EU) No 267/2012	190704-opinion-freeze-of-funds_en.pdf
EU Best Practices for the effective implementation of restrictive measures	ST-10572-2022-INIT_en.pdf
Guidelines on implementation and evaluation of restrictive measures (sanctions) in the framework of the EU Common Foreign and Security Policy	ST_15598_2017_INIT_EN_Public.pdf