

Iran's Sanctioned Terror Airlines Still Fly Throughout Europe

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In the past few weeks, Russia has used Iranian-made unmanned aerial vehicles (UAVs) to attack Ukrainian forces and destroy U.S.-supplied military equipment. The three Iranian airlines that flew those UAVs to Russia—Mahan Air, Iran Air, and Qeshm Air—also operate commercial flights to European airports. By allowing these flights, even as NATO arms Ukraine to repel Russia's illegal invasion, several alliance members, namely the United Kingdom, France, Germany, Spain, Italy, the Netherlands, Bulgaria, and Turkey, are enabling a revenue stream that facilitates the transport of Iranian drones to Russia. The United States should impose additional sanctions on these Iranian airlines as well as strongly push European and other countries to follow suit.

What Happened?

- At the end of August, Iran began [supplying Russia](#) with Mohajer-6 and Shahed variant UAVs, including Shahed-136 loitering munitions that it starting using to destroy Ukrainian military hardware in Kharkiv in mid-September.
 - » A Ukrainian security official recently [claimed](#) that Iran provided the drones to Russia on the condition that they also be used to target Israeli citizens. On Rosh Hashanah, the Jewish New Year, Russia reportedly launched ten [Shahed-136 UAVs over Uman](#), a Ukrainian city where tens of thousands of Hasidic Jews pilgrimage every year during the holiday.
- Iran transferred its drones to Russia using three commercial Iranian airlines—Mahan Air, Iran Air, and Qeshm Air— which are still currently operating in European and other international airports, in violation of U.S. sanctions, according to data collected by JINSA through flight tracking software.
 - » On September 19, the U.S. Commerce Department's Bureau of Industry and Security (BIS) added to its Export Administration Regulations (EAR) list [three Boeing 747 aircraft](#), one each operated by Mahan Air, Iran Air, and Qeshm Air—citing their use in transporting Iranian UAVs to Russia—but did not impose additional sanctions on the airlines or airplanes themselves.

- One of the aircraft (designation “EP-MEE”), owned by Mahan Air, has made commercial flights to Beijing, Baghdad, and at least seven trips to Istanbul’s International Airport, including most recently on September 29, since delivering weapons to Moscow and getting added to the Commerce EAR list.
- Another aircraft (“EP-ICD”), owned by Iran Air, also traveled to Istanbul’s International Airport – most recently on September 9 after delivering weapons to Russia, while the aircraft owned by Qeshm Air (“EP-FAA”) has flown to Delhi and Macau in between trips to Moscow.
- » On September 26, the Commerce Department added a fourth plane, belonging to Iran’s Saha Airlines—owned by Iran’s Air Force—to its EAR list for delivering weapons to Russia.
- Saha Airlines typically only flies Iranian civilian passengers to domestic destinations, but the recently designated plane also flies routes to Delhi, with the most recent flight on September 24.

International Flights on Mahan Air, Iran Air, and Qeshm Air Originating from Tehran’s Imam Khomeini International Airport



Why Is It Important?

- By allowing Mahan Air, Iran Air, and Qeshm Air to operate commercial flights using its airports, foreign countries are supporting companies proliferating Iranian weaponry to Russia that are used to attack Ukraine. Passengers who fly on these airlines are also subsidizing Iran's UAV proliferation. Nations also risk the introduction of prohibited materials, potentially used in terror attacks, to enter their countries.
 - » Both the Obama and Trump administrations [sanctioned](#) several Iranian airlines, including Mahan Air, Iran Air, and Qeshm Air for their proliferation of weapons of mass destruction and support for international terrorism. These airlines were used by the Iranian regime to ferry weapons and fighters to prop up the Assad regime in Syria at the height of its repression. Iran Air's passenger jets have been used to [transport](#) rockets, missiles, and military-related equipment, and are occasionally operated by IRGC officers who disguise military equipment as medicine or spare parts on official manifests.
 - » Despite these publicly available facts, Mahan Air, Iran Air, and Qeshm Air currently operate commercial flights to at least eighteen airports located inside NATO countries and fly to a total of forty-nine international airports outside Iran.
 - » Airports that allow sanctioned airlines and aircraft to operate on their runways include NATO allies like the United Kingdom, France, Germany, Spain, Italy, the Netherlands, Bulgaria, and Turkey – and are potentially subject to U.S. secondary sanctions.
 - » As of late 2020, Germany, France, and Italy had officially banned Mahan Air from their airspace, a recognition that the airline should be a pariah like the regime whose activities it enables. Yet Iran Air still flies to several destinations in Europe, including Istanbul, Paris, Amsterdam, Vienna, Milan, London, and Frankfurt.
 - » While cut off from Western Europe, Mahan Air still operates flights through Turkey and eleven other international locations in the Middle East and Asia. Iran Air flies to thirty-six international locations, and has even recently expanded its options with flights to Munich, Germany that began on September 25. Lesser known Qeshm Air flies to fourteen international locations.

Locations Operating Mahan Air, Iran Air, and Qeshm Air Commercial Flights

| SANCTIONED IRANIAN AIRLINE | COUNTRY | CITY | AIRPORT |
|-----------------------------------|-----------------------|-------------------|---|
| Iran Air, Qeshm Air | Armenia | Yerevan | Zvartnots International Airport |
| Iran Air | Austria | Vienna | Vienna International Airport |
| Iran Air | Azerbaijan | Baku | Heydar Aliyev International Airport |
| Iran Air | Bahrain | Muharraq Island | Bahrain International Airport |
| Qeshm Air | Bulgaria | Varna | Varna International Airport |
| Iran Air | China | Beijing | Beijing Capital International Airport |
| Mahan Air | China | Guangzhou | Guangzhou Baiyun International Airport |
| Mahan Air | China | Shenzhen | Shenzhen Bao'an International Airport |
| Mahan Air | China | Shanghai | Shanghai Pudong International Airport |
| Iran Air | France | Paris | Charles de Gaulle Airport |
| Qeshm Air | Georgia | Batumi | Batumi International Airport |
| Qeshm Air | Georgia | Tbilisi | Tbilisi International Airport |
| Iran Air | Germany | Cologne | Cologne Bonn Airport |
| Iran Air | Germany | Frankfurt | Frankfurt Airport |
| Iran Air | Germany | Hamburg | Hamburg Airport |
| Iran Air | Germany | Munich | Munich Airport |
| Iran Air | India | Ahmedabad | Sardar Vallabhbhai Patel International Airport |
| Mahan Air | India | Delhi | Indira Gandhi International Airport |
| Iran Air | India | Mumbai | Chhatrapati Shivaji Maharaj International Airport |
| Mahan Air, Iran Air | Iraq | Baghdad | Baghdad International Airport |
| Mahan Air | Iraq | Erbil | Erbil International Airport |
| Iran Air, Qeshm Air | Iraq | Najaf | Al Najaf International Airport |
| Mahan | Iraq | Sulaymaniyah | Sulaymaniyah International Airport |
| Iran Air | Italy | Milan | Milan Malpensa Airport |
| Iran Air | Italy | Rimini | Federico Fellini International Airport |
| Iran Air | Italy | Rome | Leonardo da Vinci-Fiumicino Airport |
| Qeshm Air | Kazakhstan | Almaty | Almaty International Airport |
| Iran Air, Qeshm Air | Kuwait | Kuwait City | Kuwait International Airport |
| Iran Air | Lebanon | Beirut | Beirut-Rafic Hariri International Airport |
| Iran Air | Malaysia | Kuala Lumpur | Kuala Lumpur International Airport |
| Iran Air | Netherlands | Amsterdam | Amsterdam Airport Schiphol |
| Qeshm Air | Oman | Muscat | Muscat International Airport |
| Qeshm Air | Oman | Sohar | Sohar International Airport |
| Iran Air | Pakistan | Karachi | Jinnah International Airport |
| Mahan Air, Iran Air | Pakistan | Lahore | Allama Iqbal International Airport |
| Iran Air | Qatar | Doha | Hamad International Airport |
| Mahan Air, Iran Air | Russia | Moscow | Sheremetyevo International |
| Iran Air, Qeshm Air | Saudi Arabia | Jeddah | King Abdulaziz International Airport |
| Iran Air, Qeshm Air | Saudi Arabia | Medina | Prince Mohammad bin Abdulaziz International Airport |
| Mahan Air | Serbia | Belgrade | Belgrade Nikola Tesla Airport |
| Iran Air | Spain | Barcelona | Barcelona Airport |
| Iran Air | Sweden | Gothenberg | Göteborg Landvetter Airport |
| Iran Air | Syria | Damascus | Damascus International Airport |
| Mahan Air | Thailand | Bangkok | Suvarnabhumi Airport |
| Mahan Air, Iran Air | Turkey | Ankara | Ankara Esenboga Airport |
| Qeshm Air | Turkey | Bodrum | Milas-Bodrum Airport |
| Iran Air | Turkey | Denizli | Denizli Çardak Airport |
| Qeshm Air | Turkey | Isparta | Isparta Süleyman Demirel Airport |
| Mahan, Iran, and Qeshm Air | Turkey | Istanbul | Istanbul International Airport |
| Iran Air, Qeshm Air | Turkey | Izmir | Adnan Menderes Airport |
| Mahan Air, Iran Air | UAE | Dubai | Dubai International Airport |
| Iran Air | United Kingdom | London | Heathrow Airport |
| Iran Air | Uzbekistan | Tashkent | Islam Karimov Tashkent International Airport |

*NATO Countries

*Pending NATO Membership

- The United States has imposed various sanctions on Mahan Air, Iran Air, and Qeshm Fars Air that covers some—but not all—of their illicit activity. Although the Commerce Department just added four aircraft to their entity list for transporting UAVs to Russia, the Biden administration has not yet applied relevant Treasury sanctions against the airlines or any new or rebranded aircraft from these companies.
 - » Any individual or entity that provides material support, including allowing the use of runways, refueling services, or spare parts to the sanctioned airlines and airplanes are also subject to secondary sanctions that would prohibit their access to conduct business with U.S. financial networks. Sanctioning aircraft reinforces and strengthens penalties against providing material support and provides more direct awareness to third parties of how the Iranian airlines use their planes to conduct illicit activity.
 - » The Treasury Department announced sanctions against Mahan Air under [E.O. 13382](#) “Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters” on [October 12, 2011](#) and the State Department announced further sanctions under [E.O. 13224](#) “Blocking Property and Prohibiting Transactions With Persons Who Commit, Threaten To Commit, or Support Terrorism” on [December 11, 2019](#). These are secondary sanctions, which could be applied to individuals or entities in NATO countries and elsewhere who provide material support to sanctioned entities.
 - Forty-three of Mahan Air’s aircraft are specifically designated using those E.O.s and the Commerce Department has listed one aircraft on its entity list. Hamid Arabnejad, the head of Mahan Air, is [designated](#) under E.O. 13224, as are a handful of Mahan Air subsidiaries and suppliers.
 - » The Treasury Department sanctioned Iran Air under E.O. 13882 on [June 23, 2011](#). Seventy-five of its aircraft are specifically sanctioned. These are also secondary sanctions.
 - » The Treasury Department sanctioned Qeshm Fars Air under E.O. 13224 on [September 19, 2019](#). These are also secondary sanctions.

What Should the United States Do Next?

- The U.S. Departments of State, Treasury, and Commerce (through the Federal Aviation Administration (FAA)) should launch a coordinated effort to pressure NATO partners to stop allowing Mahan Air, Iran Air, and Qeshm Air from using their airports, which currently exposes them to secondary sanctions, or transiting through their airspace. This campaign should involve outreach by senior Treasury, OFAC, FAA, and State Department officials to both governments and private sector stakeholders to first remedy the situation through informational briefings on these airlines’ activities.
 - » Hasty application of sanctions against these airports could risk a disproportional rupture of relations between the United States and host countries. The United States should seek to remedy the situation through concerted diplomatic and economic outreach, but both the legislative and executive branches should also raise public pressure on airports to comply, given the threats posed by these airlines.

- To reiterate to European nations that the dangerous activity conducted by these airlines is not just related to Iran’s malign activity, but also their support for Russia’s war against Ukraine, the U.S. Treasury Department should sanction Mahan Air, Iran Air, and Qeshm Air in their entirety under E.O. 14024, “Blocking Property With Respect To Specified Harmful Foreign Activities of the Government of the Russian Federation,” for their transportation of Iranian UAVs to Russia.
 - » As it has done against Mahan Air, the U.S. Treasury should also sanction Iran Air and Qeshm Air under E.O. 13224 for their support of terrorism through the proliferation of weaponry to Russia.
- Congress should pass legislation requiring a determination of whether Iran Air is subject to secondary sanctions under E.O. 13224 and if Mahan Air, Iran Air, and Qeshm Air are subject to sanctions under E.O. 14024.
- While these additional sanctions would not immediately impact their status under U.S. law, they would be treated differently by European and other governments, who recognize the severity of other sanctions designations beyond those currently in place, and may reduce their transactions with these entities accordingly.
- If the Executive Branch does not take action, Members of Congress can also write to these airports informing them of their exposure to sanctions risk and potential consequences. Both branches of the U.S. government should also push for EU and individual country sanctions on these Iranian airlines and airplanes.
- Additionally, Congress should quickly pass the “[Stop Iranian Drones Act](#),” which would expand Countering America’s Adversaries Through Sanctions Act “CAATSA” to specifically include UAVs.
 - » The bill has already [passed the House](#) and was favorably voted out of the [Senate Foreign Relations Committee](#).