

ANALYSIS:

# International Sanctions on Iran are About to Collapse

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The multilateral United Nations (UN) sanctions regime on Iran is falling apart. Without action, it will collapse in October 2025. But the ability to exert international pressure on Iran will begin eroding much earlier—the majority of European sanctions against Iran are set to end in October 2023.

Beginning in 2006, the UN started imposing a series of international sanctions against the Islamic Republic of Iran in response to its growing nuclear program and support for international terrorism. Consolidated into UN Security Council Resolution (UNSCR) [2231](#) in 2015, these sanctions have started to expire.

- On October 18, 2020, the UN’s ban on Iran buying and selling conventional weapons [ended](#), as well as its travel ban and asset freeze on twenty-one Iranian terrorists and nuclear scientists.
- On October 18, 2023, the UN’s sanctions on Iran’s ballistic missile and drone program will expire, and asset freezes against large swaths of the Iranian nuclear system will expire.
  - » On this date, the European Union (EU) commits to terminate significant parts of [EU Council Regulation 267/2012](#), including the EU’s arms embargo against Iran and its export ban of dual-use items which could contribute to Iran’s nuclear program and its nuclear weapon delivery systems. The EU also commits to remove sanctions on Iranian nuclear-related metals and software. The EU also commits to ending its asset freeze and visa bans against Iranian banks and financial institutions, including the Central Bank of Iran, as well as against Iranian individuals and entities involved in its nuclear program and proliferation, arms proliferation, ballistic missile proliferation, and oil, gas, shipping, and transport industries.
  - » On this date, the United States commits to seek the termination of statutory sanctions against Iran, including sanctions against dozens of Iranian terrorists and nuclear scientists. It also committed to end sanctions on forty-three Iranian individuals and entities listed [here](#).
- On October 18, 2025, the entirety of UNSCR 2231 and its restrictions will [terminate](#), leaving Iran free from any international sanctions. After this time, the diplomatic recourse to maintain these sanctions also ends. On this date, the EU also commits to terminate the remainder of its Iran sanctions under EU Council Regulation 267/2012.

Unless action is taken soon, in less than three years, time will run out for the international community to maintain UN sanctions on Iran, while the path to impose new sanctions appears closed given ongoing Russian and Chinese support for Iran.

With diplomatic efforts already [exhausted](#) and economic leverage [diminished](#), the loss of UN sanctions against Iran would spell the end for future hopes of an (already unlikely) diplomatic solution to the regime's nuclear extortion and international terror campaigns.

Fortunately, a mechanism exists to renew UN sanctions on Iran that does not require the support of Russia, China, or other Iranian allies in the UN Security Council (UNSC): "snapback." This process would permanently return all UN sanctions on Iran that have expired or are set to expire.

Congress should press the Biden Administration for its diplomatic strategy to address these expiring restrictions. The Biden Administration should press the United Kingdom, France, and Germany to jointly initiate this snapback process.

This paper provides the background on past UN sanctions on Iran, details previous efforts to snapback UN sanctions, and outlines the path to permanently restore them again.

## Background: UN Sanctions from 2006 to 2023

From 2006 to 2010, the United Nations Security Council passed six major resolutions regarding Iran: UNSCR [1696](#) (2006), [1737](#) (2006), [1747](#) (2007), [1803](#) (2008), [1835](#) (2008), and [1929](#) (2010). These UNSCRs collectively and permanently:

- Prohibited Iran from enriching uranium and conducting reprocessing and heavy water-related activities;
- Prohibited Iranian ballistic missile testing, development, and launches;
- Sanctioned the transfer of nuclear- and missile-related technologies to Iran;
- Sanctioned the transfer of conventional weapons, missiles, and drones to and from Iran; and
- Froze foreign assets of and imposed international travel bans against nearly 100 Iranian individuals and entities.

# UN Security Council Resolutions About Iran

- JULY 31**  
2006 • **UNSC Resolution 1696**  
Expressed concern at the intentions of Iran’s nuclear program and demanded that Iran halt all its uranium enrichment program.
- DECEMBER 23**  
2006 • **UNSC Resolution 1737**  
Established a Security Council Sanctions Committee; imposed sanctions on Iran for failing to stop its uranium enrichment program; banned the supply of nuclear-related technology and materials; froze assets on key individuals and companies related to the enrichment program; obligated Iran to suspend work on its heavy-water reactor projects; called on Iran to ratify the IAEA’s Additional Protocol; and prohibited the supply, sale, or transfer of designated nuclear and ballistic missile-related goods to Iran.
- MARCH 24**  
2007 • **UNSC Resolution 1747**  
Imposed an arms embargo on Iran and called on Iran to take the steps outlined in Resolution 1737 to verify that its nuclear program has only peaceful purposes.
- MARCH 3**  
2008 • **UNSC Resolution 1803**  
Required Iran to cease and desist from any and all uranium enrichment, any research and development associated with centrifuges and uranium enrichment.
- SEPTEMBER 27**  
2008 • **UNSC Resolution 1835**  
Reaffirmed the four previous resolutions but did not outline new sanctions against Iran or new monitoring mechanisms.
- JUNE 9**  
2010 • **UNSC Resolution 1929**  
Subjected Iran to a new inspection regime designed to detect and stop Iranian smuggling, added financial sanctions targeting Iran’s ability to finance proliferation activities, and requested that the UN Secretary-General create a panel of experts to make recommendations for the improvement of measures regarding Iran.
- JULY 20**  
2015 • **UNSC Resolution 2231**  
Endorsed the Joint Comprehensive Plan of Action (JCPOA) between Iran and the P5+1 and laid the groundwork for the Security Council to lift nuclear-related sanctions on Iran. Repealed the prior six major UNSC Resolutions on Iran.

In 2015, international negotiators from the United States, Russia, China, United Kingdom, France, Germany, (known as the P5+1) and the European Union crafted a deal with Iran to temporarily constrain their nuclear program. The negotiators created two separate and distinct vehicles to bring about the “Iran Deal.”

## JCPOA

The first vehicle was the Joint Comprehensive Plan of Action (JCPOA), a [non-binding political agreement](#), that was neither a treaty nor an executive agreement and has no legal force. Under the JCPOA, Iran agreed to six broad categories of nuclear commitments, including to self-limit to certain uranium enrichment levels and volumes and to self-limit to certain centrifuge numbers and sophistication levels for a number of years. Meanwhile, the United States and European Union committed to removing a high number of sanctions against Iran.

## UNSCR 2231

Parallel to the JCPOA, the negotiators crafted what was eventually passed as [UNSCR 2231](#) to quasi-legally codify various provisions of the JCPOA and to join the previously passed UNSCRs into a single resolution. The six previous UNSCRs were all repealed, and their provisions were largely combined into UNSCR 2231. Another temporary resolution passed in June 2015 (UNSCR 2224) was also repealed.

However, Iranian negotiators managed to extract enormous concessions during negotiations. First, the prior ban on Iranian ballistic missile testing and development [was downgraded](#) into a simple “call” on Iran not to engage in such activity. Second, the Iranian nuclear program was legitimized and permitted to operate in the open. Worse, negotiators capitulated to Iranian demands that the new UNSCR’s restrictions would [all be temporary](#), with the conventional arms embargo expiring in 2020, the advanced weapons embargo expiring in 2023, and the full UNSCR and its uranium enrichment prohibitions expiring in 2025. The EU also committed to end the vast majority of European sanctions on Iran between October 2023 and October 2025.

Importantly, these sunsets have permanent, set dates; they are not dependent on Iranian adherence to UNSCR 2231. Since 2015, Iran has repeatedly violated nearly every prohibition in UNSCR 2231 by, for example, transferring conventional weapons [to the Houthis](#) and other terror groups, transferring long-range [drones to Russia](#), and enriching vast amounts of uranium all the way up to [the sixty percent](#) purity level.

# Major UN Security Council Resolution 2231 and JCPOA Sunsets

UNSCR 2231		JCPOA
<ul style="list-style-type: none"> <li>– U.N. arms embargo expired</li> <li>– Select visa bans expired</li> </ul>	<b>OCTOBER 18</b> 2020	
<ul style="list-style-type: none"> <li>– Ballistic missile restrictions end</li> <li>– Ban on importing/exporting missile-related technology ends</li> <li>– Select visa bans expire</li> <li>– U.N. asset freezes expire</li> </ul>	<b>“Transition Day”</b> <b>OCTOBER 18</b> 2023	<ul style="list-style-type: none"> <li>– The EU pledges to terminate various regulations &amp; sanctions</li> <li>– The U.S. pledges to seek legislation to end various statutory sanctions</li> <li>– Iran pledges to ratify the IAEA’s Additional Protocol</li> </ul>
	<b>JULY 16</b> 2024	<ul style="list-style-type: none"> <li>– Limits on testing of advanced IR-6 and IR-8 centrifuges expire</li> <li>– Bans on production of IR-6 and IR-8 centrifuges (without rotors) expire</li> </ul>
<ul style="list-style-type: none"> <li>– UNSC 2231 expires, terminating its provisions (including “snapback”)</li> <li>– The UNSC ends its formal consideration of Iran’s nuclear program</li> <li>– Remaining EU economic sanctions on Iran are lifted</li> </ul>	<b>“Termination Day”</b> <b>OCTOBER 18</b> 2025	
	<b>JANUARY 16</b> 2026	<ul style="list-style-type: none"> <li>– Restrictions on quantity of IR-1 centrifuges are lifted</li> <li>– Restrictions on testing of advanced IR-6 and IR-8 centrifuges are lifted</li> <li>– Restrictions on production of IR-6 and IR-8 centrifuges with rotors are lifted</li> <li>– Procurement channel for approving Iran’s nuclear-related imports is ended</li> </ul>
	<b>JANUARY 16</b> 2027	<ul style="list-style-type: none"> <li>– All caps on enrichment purity level expire</li> <li>– All caps on enriched uranium stockpile expire</li> <li>– New enrichment plants allowed</li> <li>– Plutonium reprocessing ban lifted</li> <li>– Heavy water reactors permitted</li> <li>– All caps on heavy water production/stockpiling expire</li> </ul>
	<b>JANUARY 16</b> 2036	<ul style="list-style-type: none"> <li>– IAEA monitoring of Iranian centrifuge production facilities ends</li> </ul>
	<b>JANUARY 16</b> 2041	<ul style="list-style-type: none"> <li>– IAEA monitoring of Iranian uranium mines and mills ends</li> </ul>

## The Snapback Provision of UNSCR 2231

While Iranian violations of UNSCR 2231 do not by themselves trigger—or qualify to trigger—the reimposition of UN sanctions, Iranian violations of the JCPOA do, however, provide a path to return the original sanctions. UNSCR 2231 contains a “[snapback](#)” mechanism whereby one participant can act alone to cancel large portions of UNSCR 2231 and return the original six UNSCRs back to their original and permanent state.

To enact snapback, there is an optional first process to resolve the dispute by consensus within the JCPOA’s Joint Commission, and a mandatory second process with UNSCR 2231 to reinstate sanctions.

### *Joint Commission*

The first optional process in snapback is for participants of the JCPOA, acting through its “Joint Commission” to initiate the Dispute Resolution Mechanism (DRM). The Joint Commission is comprised of representatives from Iran, Russia, China, France, Germany, the United Kingdom, United States, and the European Union, which meets quarterly or within one week of any request by a JCPOA participant, in New York, Geneva, or Vienna.

The DRM process begins with one JCPOA participant issuing a complaint to the Joint Commission that another participant (in this case Iran) is violating its JCPOA commitments. This triggers a thirty-five-day review and consultation process where the parties can seek to resolve the dispute through consensus, or to escalate it to a second process at the UNSC. The Joint Commission’s DRM consists of two fifteen-day periods where the JCPOA’s Joint Commission can seek to resolve the issue, first among themselves, and then resorting to an outside Advisory Board opinion if consensus has not been reached. The Advisory Board consists of three members: one appointed by each party to the dispute, and a third appointed by an independent member. Both review periods can be unanimously extended by an additional fifteen days an indefinite number of times. Finally, if the issue is not resolved at the Advisory Board level five days after that process concludes, a complaining participant is considered to have “grounds” to either cease performing its JCPOA commitments or to refer the issue to the United Nations Security Council as an issue constituting “significant non-performance.”

UNSCR 2231 “encourages” the JCPOA participants to resolve disputes at the Joint Commission, but does not prevent JCPOA participants from skipping this step and appealing directly to the UNSC.

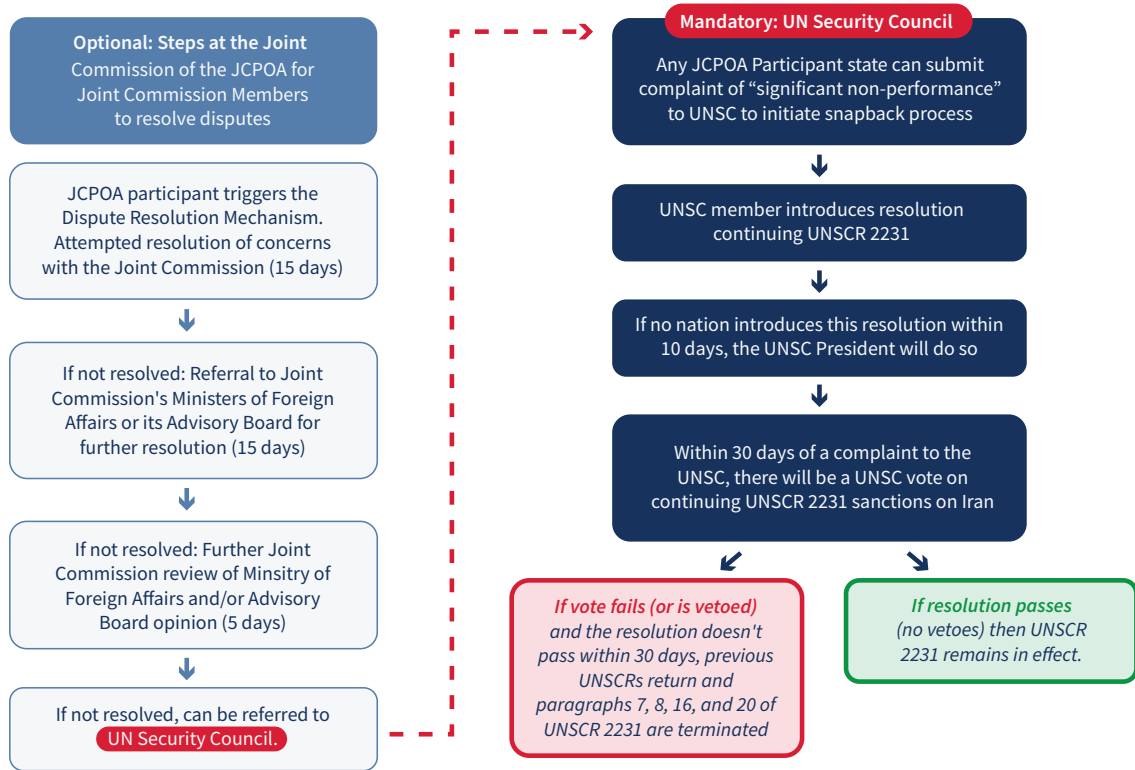
### *UNSC Snapback*

The actual snapback process takes place at the UN Security Council. Any participant in the JCPOA (defined within paragraph ten of UNSCR 2231 as: China, France, Germany, Russia, the United Kingdom, United States, European Union, and Iran) that notifies the Security Council of an issue constituting “significant non-performance of commitments under the JCPOA” triggers the end of UNSCR 2231 unless a new resolution is passed to continue UNSCR 2231 within thirty days.

The initial presumption was that a country supportive of continuing UNSCR 2231 would be the one to introduce a resolution to maintain UNSCR 2231. However, UNSCR 2231 contains a backup mechanism where the President of the Security Council would introduce a new resolution if no other member did so.

The passage of that new resolution is necessary to continue UNSCR 2231. Otherwise, if the resolution fails, the operative portions of UNSCR 2231 are automatically terminated and the previous six UNSCRs fall back into place. Accordingly, any permanent member of the UN Security Council (such as the United States) can veto the resolution and return the original six permanent UN resolutions on Iran by themselves, without the support of a majority of Council members, or indeed of any other Council members.

## Iran Snapback Flowchart JINSA



## What would snapback accomplish since Iran is already violating UNSCR 2231?

Snapback reinstates important international legal prohibitions against:

- All Iranian nuclear enrichment and reprocessing or heavy water-related activities, including research and development;
- All transfers to or from Iran of items, materials, equipment, goods and technology which could contribute to Iran’s enrichment-related, reprocessing or heavy water-related activities;
- All transfers to or from Iran of items and technology that could contribute to the development of nuclear weapon delivery systems, such as ballistic missiles and long-range drones; and
- All transfers to or from Iran of conventional and advanced weapons.

Snapback further isolates Iran in the international community and raises the logistical and transactional costs for a wide range of activities, including by:

- Directing all UN member states to prevent Iran from conducting or advancing nuclear enrichment activities on their soil or by using their vessels and airplanes;
- Directing all UN member states to prevent Iran from violating the conventional and advanced weapons embargo on their soil or by using their vessels and airplanes;
- Calling on all UN member states to inspect all cargo to and from Iran in their territory, including at sea-ports and airports, if they have reasonable grounds to believe the supply, sale, or transfer of the cargo is prohibited under UNSCRs. Snapback would also permit and encourage states to inspect vessels on the high seas if there are similar suspicions that they are facilitating prohibited activities, and to deny such vessels fuel, supplies, and services;
- Directing all UN member states to enforce the UN travel ban and asset freeze against forty-two of Iran's most notorious terror operatives and nuclear officials (Note: This includes the twenty-one remaining individuals on the UNSCR 2231 list, as well as twenty-one other individuals on the UNSCR 2231 Annex B list whose sanctions were lifted in the resolution); and
- Directing all UN member states to enforce an asset freeze against seventy-six Iranian entities involved in the regime's nuclear development and proliferation efforts. This asset freeze is set to expire on October 18, 2023.

However, while snapback would formally resurrect UNSCR 1929's important Panel of Experts, the panel's operations and funding required annual renewal by the UNSC. The panel, in operation from 2010 to 2015, was tasked with gathering, examining, and analyzing information from UN member states about Iran's violations of other UNSCRs and with making recommendations to the UN Security Council on improvements to sanctions measures. The panel regularly [reported](#) to the UN Security Council on its findings, providing critical information about Iranian nuclear and terror activities.

## 2020 Snapback, 2021 Reversal:

On August 14, 2020, as the expiration of UNSCR 2231's conventional arms embargo on Iran loomed close to expiration, the United States held a vote at the United Nations to extend the arms embargo in perpetuity, citing Iran's repeated and flagrant violations of UNSCR 2231. In a defiant act of support for Iran, the United Kingdom, France, Germany, and eight other Security Council members [abstained](#), while Russia and China vetoed the resolution. Only the United States and the Dominican Republic [voted](#) to extend the arms embargo.

Accordingly, on August 20, 2020, the United States exercised the UNSCR 2231 snapback mechanism by sending a [letter](#) to the President of the Security Council, citing Iran's significant non-performance with its commitments made in the JCPOA across six areas.

After first invoking snapback, in keeping with the process' strange procedures, it was the United States who submitted a resolution to continue UNSCR 2231. Then the United States vetoed the very same resolution it submitted so that the previous six UNSCRs would be permanently returned (in the view of the United States). On September 19, 2020, Secretary Pompeo [announced](#) the successful re-imposition of those UNSCRs, but the other Security Council members [rejected](#) this claim and said it had no legal effect.



## *Was the United States a JCPOA Participant?*

The crux of the disagreement over the U.S.-led snapback centers on whether the United States had the legal standing to initiate snapback in the first place. The United States [argued](#) in a legal brief that the JCPOA participants were collectively defined in paragraph ten of UNSCR 2231 and were subsequently enumerated with the ability to initiate snapback, regardless of their status within the separate structures of the JCPOA. UNSCR 2231 did not list any process or standard to disqualify the original JCPOA participants of that status.

The other members of the original deal, including Iran, argued that, since the United States had announced in 2018 that it was ceasing its participation in the JCPOA, the United States had lost its ability to initiate snapback using the UNSCR 2231 process. UNSCR 2231 was silent on the question—leading to [significant disagreements](#) at the Security Council and in competing legal briefs from the various nations with a stake in the fight.

The end result was that the United States maintained a separate view of which UNSCRs were operative from the other major powers. The United States said the original six were back in effect; other nations said UNSCR 2231 was still in operation.

Whatever the legal merits of the U.S. position might have been, its unilateral approach had a critical political deficiency. The main point of most UNSCRs is to compel foreign nations to change their behavior in accordance with the language in such resolutions. Acting alone, the United States was unable to credibly convince other nations to enforce UNSCR 2231, so there was no real change in the status quo.

## *Snapback Reversed*

One of the first public acts of the Biden administration on Iran was to reverse its predecessor's snapback that, as far as other countries were concerned, was not in effect anyway. On February 18, 2021, the Acting Representative of the United States to the United Nations, Ambassador Richard Mills, [wrote](#) to the President of the UN Security Council withdrawing the previous letter of August 20, 2020—stating that the position of the United States was now that UNSCR 2231 remained in effect and that the previous six UNSCRs remained terminated.

At the same time, the United States rescinded the tight travel restrictions against Iranian operatives at the Iranian Mission to the United Nations in New York from a several-block radius imposed by the State Department in 2019 to a generous twenty-five-mile radius around the UN Secretariat. Both measures were [promised](#) by Biden's State Department to “strengthen our ability to work with allies and partners in the UN Security Council to address Iran's nuclear program and other destabilizing activities.”

## *Iranian Violations and Provocations Increase*

Nevertheless, over the past two years, such efforts have failed to curtail either Iran's nuclear program or its other destabilizing activities, such as its wide-ranging assassination plots in the United States, Canada, and the United Kingdom. Most notably, since Russia's invasion of Ukraine, Iran has violated UNSCR 2231 by [sending IRGC trainers](#) and hundreds of long-range drones to Russia, in violation of UNSCR 2231's prohibition on transfer of items on the Missile Technology Control Regime's Category II list to or from Iran.

On October 26, 2022, the United States [addressed](#) the Security Council, saying that Russia and Iran had “teamed up” to violate UNSCR 2231, particularly violating its prohibition on Iranian transfer of drones by [sending](#) hundreds of Shahed-136s to Russia for use in their war against Ukraine. However, despite publicly demonstrating Iran and Russia’s flagrant violation of UNSCR 2231 and also acknowledging that Iran continues to violate its JCPOA commitments, the Biden Administration and other European powers have not taken steps to return the UN sanctions that will expire shortly.

## The Expiration of Snapback and UN sanctions: Use It or Lose It

Policymakers must understand: snapback is a “use it or lose it” tool—it will expire along with UNSCR 2231 on October 18, 2025 unless it has been exercised before then.

Paragraph eight of UNSCR 2231 contains a countdown to the end of UN sanctions on Iran, reading: “on the date ten years after the JCPOA Adoption Day [October 18, 2015], as defined in the JCPOA, all the provisions of this resolution shall be terminated, and none of the previous resolutions [UNSCR 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), 1929 (2010) and 2224 (2015)] shall be applied, the Security Council will have concluded its consideration of the Iranian nuclear issue, and the item ‘Non-proliferation’ will be removed from the list of matters of which the Council is seized.”

Accordingly, on October 18, 2025, both UNSCR 2231 and its own snapback procedure will expire, ending all UN sanctions against Iran. However, the termination of UNSCR 2231 under Paragraph eight does not apply if the snapback has “been applied” before then.

Levying UN sanctions against Iran after October 2025 will not be entirely impossible, of course. New sanctions could be passed by the UNSCR, assuming a majority of UNSC members vote for them and none of the five permanent members veto the fresh sanctions. However, should UNSCR 2231 terminate, Russia and China are unlikely to support any further resolutions against Iran—particularly since they have been instrumental in propping up Iran’s [nuclear program](#), [economy](#), and facilitating the very activities that UNSCR 2231 prohibits. Snapping back sanctions before October 18, 2025, may be the last opportunity for nations to provide accountability to Iran at the United Nations for decades to come.

For snapback to be broadly viewed as a legitimate procedure, it must be initiated by the nations still actively participating in the JCPOA—particularly the United Kingdom, France, and Germany (E3), regardless of the United States’ occasional legal claim of standing. Over the past four years, the E3 have routinely issued statements condemning Iranian nuclear advances. The window for Europe to enact penalties and consequences for Iran’s actions is rapidly shrinking. Pressure from the United States will be instrumental in convincing Europe to initiate snapback.

## Recommendations for Congress

- Congress should require the Biden administration to present a strategy for how it will deal with the expiring UN sanctions on Iran. Congress should also organize public hearings with top officials to discuss this matter. The formal strategy should be due by early Summer 2023, since the snapback procedure can take over two months—and the next sunsets of restrictions go into effect in October 2023.
  - » Congress should specify the strategy should include a U.S. diplomatic outreach plan toward other JCPOA participant states, encouraging them to initiate and support snapback votes in the UNSC.
  - » Congress should specify the strategy should also include a worldwide outreach plan to other UN member states whose cooperation would be needed to enforce any returned UN sanctions.
- Members of Congress should reach out to their counterparts in the United Kingdom, France, and Germany—urging them to press their governments to initiate the snapback procedure, and to ensure they will not comply with UNSCR 2231’s call on the European Union to remove sanctions on Iran in October 2023 in light of Iran’s repeated violations of the JCPOA and UNSCR 2231.

## Recommendations for the Biden Administration

- The administration should encourage the United Kingdom, France, and Germany to jointly initiate the snapback procedure at the UNSC before the pending expiration of sanctions in October 2023. This should be led by high-level advocacy from the Secretary of State, the U.S. Permanent Representative to the United Nations, and by the U.S. Special Envoy for Iran.
- The administration should strongly press the European Union not to lift sanctions on Iran—including the EU’s arms embargo, financial sanctions, nuclear sanctions, and energy sanctions—as UNSCR 2231 calls for in October 2023.
- The administration should lead an aggressive public relations campaign highlighting the persistent, repeated, and flagrant violations of the JCPOA by the Iranian regime and of UNSCR 2231 by Iran and the Russian Federation. This could include taking foreign diplomats on a “roadshow” highlighting various interdicted weapons shipments and ballistic missile components from Iran that have been proliferated in violation of UNSCR 2231.
- The administration should work at the United Nations and with likeminded partners to prepare a solution for the lack of a Panel of Experts in the event of a successful snapback. This solution should be able to monitor the reimplemented UNSCRs, instruct UN member states on their expectations, notify the council of Iranian violations, and recommend technical solutions to such violations.