



# How To Support the Upcoming Wave of Iranian Protests

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*Iranians are likely to take to the streets this September in commemoration of the one-year anniversary of the killing of Mahsa Amini and the hundreds of protestors the Iranian regime killed in the ensuing revolt. In preparation, Iran's security apparatus has begun preemptively cracking down on activists and has arrested Amini's uncle and lawyer in a bid to tamp down on further dissent.*

*The Biden administration promised to “stand with the Iranian people” in its U.S. National Security Strategy but instead has undercut its symbolic sanctions by enriching the regime with ransom payments and unenforced sanctions.*

*On this anniversary, the administration should live up to its commitment to democracy and the Iranian people by launching a coordinated effort with allies and partners to increase costs on the Iranian regime for its violent oppression of the Iranian people. This should include enforcing sanctions on Iranian oil, inflicting diplomatic and reputational costs on the Iranian regime, and introducing new penalties on Iran and other repressive regimes for systemic abuse of women.*

## What Happened

- The one-year anniversary of Mahsa Amini's tragic death in Iranian custody on September 16, 2022, is approaching.
  - » Demonstrations are expected to occur widely across Iran this week, with the potential to expand into a prolonged outbreak of civil disobedience and revolts, due to the anniversary's symbolic significance.
  - » The Iranian diaspora is also organizing a series of solidarity marches around the world in support of their compatriots.
- Throughout August 2023, Iran has been attempting to preemptively subvert protests through intimidation tactics, such as arbitrarily [detaining](#) peaceful women's rights activists, [arresting](#) Mahsa Amini's uncle, and putting Amini's lawyer, Saleh Nikbakht, [on trial for](#) charges of “propaganda against the state.” If convicted, Nikbakht faces between one and three years in prison.

- On August 19, acting State Department Special Envoy to Iran, Abram Paley, [tweeted](#) “Following with concern reports of numerous arrests in connection with peaceful protests. World is watching and will hold Iranian regime accountable for disregarding human rights & fundamental freedoms.”
  - » The tweet was met with outrage from Iranian dissidents, who complained that the Biden administration’s \$6 billion ransom payment undercut the United States’ professed support for Iranian protesters.

## Why Is It Important?

- Iranians are fighting for the overthrow of the Islamic Republic of Iran and reject efforts to reform the existing regime or promote self-labeled political moderates—both of which Iranians broadly consider to be illegitimate. Instead of imposing promised consequences on the regime for its massacres of protesters last fall, Western economic pressure against Iran continues to wane.
  - » U.S. and European government rhetoric in support of Iranian protesters is widely viewed by Iranians and even many [career diplomats](#) as hypocritical unless it is accompanied by concrete policies that limit the Iranian regime’s ability to fund the oppression of its people.
- During the protests sparked by Amini’s detention and brutal killing, at least 525 protestors were killed, including 71 children, and nearly 20,000 Iranian protestors were arrested according to Human Rights Activists News Agency [reporting](#). Amnesty International has [reported](#) that detainees, including children as young as 12 years of age, are subjected to brutal acts of torture and sexual violence in regime detention facilities.
  - » A total of 486 people have been [executed](#) in Iran this year, and the proportion of the executions related to the protests is likely higher than official government figures.
- Iran’s internal crackdowns have primarily been led by three government agencies, the Basij, the Law Enforcement Forces (LEF), and the Ministry of Intelligence (MOIS), each of which have received major [funding increases](#) since 2021 as the regime’s oil exports have soared.
  - » The Basij has been the recipient of significant increases in funding in recent Iranian budgets, reaching over \$100 million this current fiscal year, a greater sum than was [allocated](#) to Iran’s Ministries of Science, Agriculture, or Roads & Urban Development.
  - » The 2023 budget of the LEF was increased to roughly \$1.5 billion, a 39% increase over the prior fiscal year.
  - » Though the MOIS has gained notoriety for its efforts to [kidnap](#) and [assassinate](#) dissidents in Western countries, including the United States, it has also played an outsized role in oppressing Iranians internally. MOIS funding in the current fiscal year increased by 52% over the prior year.
- While the U.S. government provides large sums of money to advance internet freedom and promote human rights in Iran, these expenditures are undermined by concurrent refusals to pressure the regime economically.

- » The State Department-administered Near East Regional Development program, which is responsible for promoting democracy and human rights in Iran, was [allocated](#) \$55 million in fiscal year 2022, including \$16.7 million on internet freedom programs.
- By allowing certain Iran sanctions to lapse and by failing to enforce others, the United States is facilitating the regime's funding efforts that undermine the U.S. government's stated efforts to advance the freedom of the Iranian people and protect their rights and physical safety.
  - » U.S sanctions against Iranian oil shipments [have not been enforced](#), resulting in a 35 percent increase in Iranian oil exports from 2021 to 2022. This year, Iranian oil production is at the [highest level](#) since 2018, when sanctions were initially re-imposed, while oil exports have surpassed 1.5 million barrels of crude and condensate per day. Compared to 2020 export levels, the lack of sanctions enforcement provides Iran with roughly \$90 million in additional revenue each day, equivalent to over \$32 billion in extra revenue annually.
  - » On October 18, a series of United Nations (UN) Security Council restrictions against Iran under Resolution 2231 [will expire if not renewed](#), as will European sanctions under the Joint Comprehensive Plan of Action (JCPOA).
    - Restrictions set to lapse [include](#) prohibitions on Iran transferring ballistic missiles and drones to countries like Russia, UN asset freezes on Iranian nuclear scientists, and potentially European sanctions and regulations against the Central Bank of Iran and other financial institutions.
    - The United States and E3 countries (United Kingdom, France, and Germany) capable of renewing UN restrictions are expected to ignore the deadline and let them lapse in a major concession to Iran. However, the European Union is expected to not rescind its own sanctions against Iranian arms transfers in its first official violation of the JCPOA.
- Weakened sanctions have increased Iran's funding of internal suppression. Ongoing efforts to provide the regime with [\\$6 billion in unfrozen assets](#) will fund the regime's efforts to suppress any future protests and provide funding for the regime to expand its secret prison system and high-tech apparatus of internet censorship and hijab enforcement.
  - » The United States has already agreed to facilitate the [transfer](#) of at least \$6 billion to Iran, to be wired to a series of Qatari bank accounts, as a ransom payment included in the recent deal to extract five American citizens from Iranian detention.
  - » While negotiators have claimed the \$6 billion would be spent on food and medicine, the regime only [allocated](#) \$20 million on medicinal subsidies this current fiscal year while budgeting \$441 million for its main TV propaganda channel, IRIB.
  - » Recent history suggests that influxes of cash will be allocated by the regime toward repression. According to internal Iranian government documents, after the United States [lifted](#) certain sanctions on Iran and scaled back enforcement of others in early 2021, Iran saw between 3.4 percent and 6.2 percent [economic growth](#). Iran spent much of the windfall on its internal suppression campaign, including an over 300 percent budget [increase](#) for an MOIS torture program.

- The Biden administration is likely to address the one-year anniversary by placing new sanctions on individuals in Iran, an important but insufficient policy measure to support the Iranian people. If the administration is serious about standing with the Iranian people, it must deprive the regime of the financial fuel for its machine of repression.
  - » Sanctions are a policy input, not a policy output. Individual human rights sanctions are an important measure of accountability and reparative justice but do not deprive regimes of revenue needed to carry out repression and terrorism.
  - » The Biden administration's refusal to enforce economic and sectoral sanctions has enabled Iran's economic growth and across-the-board budget increases for Iran's internal suppression services.
    - The United States has only sanctioned six of the over 300 Iranian tankers currently involved in sanctions-evading oil exports, including \$47 billion worth of oil sold to China alone, despite these sanctions being [authorized](#) under Executive Order 13846.
- To change the regime's behavior, it must suffer and believe it will suffer further economic, diplomatic, and reputational costs as a result of its actions.

## What Should the United States Do Next?

- In priority order, the United States should impose economic, reputational, diplomatic, and individual costs on the regime for its human rights abuses.
- To restrict the funds at Iran's disposal for use in internal suppression, the United States should undertake measures to prevent billions of dollars from flowing back to Iran under last month's prisoner swap and ongoing oil sales.
  - » The United States should develop strict accountability and transparency measures for all purchases from the \$6 billion being transferred to Qatari bank accounts into Iranian hands as part of the hostage ransom payment, and should block all future withdrawals if goods are re-sold on the black market or directed to the Iranian military and terror apparatus.
  - » To reduce Iran's ability to accumulate foreign currency reserves and funds available for budgetary allocation, the Treasury Department should be more proactive in enforcing sanctions against Iranian entities transporting oil to China and other countries. The United States should also enforce sanctions against all shipping and insurance companies as well as international ports that facilitate business for Iranian oil exports.
  - » The United States should sanction and seek to de-flag all 338 vessels in Iran's 'Ghost Fleet' as well as ship captains and crews – while providing them with the opportunity to turn over Iranian oil for clemency and compensation under the U.S. Rewards for Justice program that has allowed the U.S. government to [seize](#) nearly \$228 million in Iranian crude oil since 2019.

- » The Treasury Department should enforce and expand sectoral sanctions against Iran’s petrochemical, metals, mining, automotive, shipping, manufacturing, and textiles industries.
- » The United States should demarche all European airports [hosting](#) U.S.-sanctioned Iranian state airlines to cut off access to Iran Air, Mahan Air, and Qeshm Air – especially while those same airlines provide suicide drones and other military support to Russia.
- To impose diplomatic and reputational costs on the regime’s leadership, Iranian officials must face genuine obstacles to conducting business as usual, such as facing travel restrictions when attending UN meetings in New York, and visa bans on themselves and family members.
  - » The United States should reimpose the travel restrictions [imposed](#) in 2019, which were considerably scaled back in 2021, on Iranian officials attending UN General Assembly sessions and other meetings in New York.
  - » The U.S. government should also [shutter](#) the Iranian Interests Section consulate in Washington, which facilitates travel to Iran, for as long as the regime continues to engage in arbitrary detentions of Americans and assassination plots against U.S. citizens.
- As JINSA has [recommended](#), to prevent recurrences of Americans being taken as political hostages by Iran, the State Department should elevate its Level 4 Travel Warning on Iran to a full travel ban.
- The State Department should build a diplomatic coalition to punish Iran’s human rights violators in a systematic fashion.
  - » The United States should encourage Australia and the United Kingdom to join the EU in [sanctioning the LEF](#) as an entity, as the United Kingdom has [already done](#) with the Basij organization. The United Kingdom has [sanctioned](#) individual LEF officials, a welcome but insufficient step to deprive the LEF of funding or otherwise impede its operations.
- The United States should engage in a coordinated campaign to encourage its European allies to prevent restrictions and sanctions implemented under both UN Security Council Resolution 2231 and the JCPOA from sunseting on October 18. U.S. officials should formally and strongly protest the EU’s [announcement](#) on September 14, 2023 that they will not do so, and stress it would be absolutely unacceptable for the EU not to snapback these sanctions before UNSCR’s permanent expiration in October 2025.