



A New Baseline to Prevent a Nuclear Iran





"Only wholeness leads to clarity."

-Niels Bohr

Author

Jonathan Ruhe

Fellow for American Strategy, Gemunder Center

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I. Executive Summary

America's longstanding policy to prevent a nuclear Iran is no clearer today than when it began decades ago. President Donald Trump's pledge to secure Iran's "nuclear dust"—highly enriched uranium (HEU) at Isfahan—and his threats to strike its underground clandestine "Pickaxe" facility, are just the most recent examples of the United States focusing on a select few sites while failing to take full account of Iran's sprawling and much-concealed nuclear enterprise.¹ Whether through diplomacy, military action, or both, the United States needs a far more comprehensive and aggressive approach when it comes to inventorying, neutralizing, and monitoring Iran's nuclear weapons program.

This pattern of acting on limited information has been in place from the 2015 Joint Comprehensive Plan of Action (JCPOA) to his own, now-defunct, framework deal, in which U.S. diplomacy and military action focus narrowly on known enrichment infrastructure. Trump's actions in the past year show how the incompleteness of this outlook leads to incomplete and temporary outcomes:

- In June 2025, he claimed Operation Midnight Hammer "obliterated" Iran's nuclear program by hitting enrichment-related sites at Fordow, Natanz, and Isfahan.²
- Nine months later, on April 1, 2026, he said Iran "sought to rebuild their nuclear program at a totally different location" after Midnight Hammer—"they were right at the doorstep" of a nuclear weapon—and that Operation Epic Fury would "deny them the ability to build a nuclear bomb."³ Yet Epic Fury only re-targeted nuclear sites struck in Midnight Hammer or Israeli airstrikes. U.S. Central Command (CENTCOM) did not list any nuclear-related sites in its factsheet for "types of targets" hit during Epic Fury.⁴
- After the April 2026 ceasefire, Defense Secretary Pete Hegseth declared Epic Fury "achieved every single objective on plan, on schedule, exactly as laid out from day one," yet he omitted mention of Iran's nuclear program when listing those objectives in detail.⁵

In pursuing a new nuclear deal after the ceasefire, and in threatening to strike Pickaxe and possibly other sites, Trump now implicitly admits the need to deal with the problem yet again, alternatively through a new agreement, military escalation, or both.

This tendency to concentrate on declared uranium production and stocks, and to avoid addressing the bigger problem in which they play key parts, did not start with Trump. Even if it has grown under his leadership, this challenge took root in the original Iran deal. The Obama-era accord failed to take full stock of Iran's capacity to make fissile material, paint a full picture of its illicit nuclear weapons work, or hold it accountable for that work.

Gaining this clarity has become categorically more complex with time. In 2015-16, the primary obstacle was Tehran's obstruction of International Atomic Energy Agency (IAEA) inquests into its past weaponization work. Back then, Iran's bombmaking efforts were widely presumed to have been suspended for the decade preceding JCPOA talks, and its enrichment-related sites largely were in basic compliance with safeguards obligations.⁶

But just as the same river cannot be entered twice, the full picture of Iran's nuclear program looks fundamentally different a decade later. Today it is understood that there is so much more that is unknown. This is due to a confluence of concurrent developments. Iran's atomic infrastructure became much more advanced, extensive, and deeply buried in the years between the JCPOA and Midnight

Hammer. At the same time, its entire nuclear program became far opaquer, precisely as suspicions about the nature and extent of that enterprise have become much acuter.

Consequently, IAEA Director General Rafael Grossi has warned regularly, for years now, that his agency lost all “continuity of knowledge” of Iran’s nuclear program.⁷ In the absence of such knowledge, and in light of Tehran’s simultaneous expansion and diffusion of its atomic activities, two equally valid propositions should inform future U.S. negotiations or military operations. On the one hand, Iran’s program suffered severe setbacks in recent conflicts. On the other hand, it likely retains critical capacities outside its declared nuclear sites—capabilities which it hopes are immune or obscured from U.S. military power, and which it refuses to put up for negotiation. The regime’s missiles and drones offer a helpful, if worrying, analogy here: despite being hit hard by military action, these arsenals have proven to be resilient, dispersible, recoverable, and ultimately non-negotiable.

Trump mirrors his predecessors in doggedly seeking a deal regardless.⁸ Even after he declared the recent ceasefire over, his officials insist “our negotiators continue to work in good faith toward a final deal.”⁹ In Vice President J.D. Vance’s words, the president’s plan is not “to bomb and bomb and bomb.” Instead, “you’ve got to actually be willing to talk and to try to figure out the problem.” “We’re going try to use our military force as one of the many tools that we have to solve the problem ... diplomacy is another tool.”¹⁰ Or as Secretary of State Marco Rubio put it in late July, “I think we’re always open to diplomacy.”¹¹

Designing a diplomatic agreement that limits Iran to a genuinely peaceful and safeguarded nuclear program, which both sides proclaim as their intent, first requires a level of clarity and comprehensiveness that Tehran has never provided, nor Washington ever demanded. Capturing this whole picture of Iran’s nuclear program—the entire what, when, and where of its enrichment and weaponization work—will be exceedingly difficult but, for that exact reason, incredibly urgent and overdue. Creating an entirely new, all-inclusive baseline for Iran’s program must be the prerequisite, not the outcome, of any diplomatic solution. For any deal, getting IAEA inspectors *into* Iran is at least as important as getting the HEU *out*. All the same, such a settlement seems highly unlikely. Tehran insists that inspectors will never get access to much of this information, and it outright rejects the premise that it has ever pursued a nuclear weapon.

The most viable military alternative to diplomacy would combine the unique capabilities and reach of U.S. firepower with Israel’s much broader approach of targeting Iran’s uranium and plutonium fuel cycles, weaponization-related sites, and relevant scientific and military personnel. Hitting Pickaxe, as the president recently threatened, is not a silver bullet. Successful strikes there could eliminate, severely degrade, and/or limit access to Iran’s most likely hub for reconstituting enrichment-related activities, manufacturing centrifuges, storing nuclear material, and possibly working on a nuclear explosive device. Such operations also would need to target the logistical networks supporting Pickaxe, including any known or suspected sources for materials used at the site, as well as the electrical and transportation grids in which the facility is enmeshed. And while certainly impactful, by themselves these actions would not clarify or resolve other concerns about Iran’s enrichment infrastructure, most notably: the whereabouts of its uranium stockpiles writ large, the status of its new Isfahan enrichment plant, or the sources for its reported efforts—even after Midnight Hammer and Epic Fury—to relocate centrifuges to Pickaxe.

In this light, further strikes could reduce but not resolve the mass of uncertainty that inhibits a new baseline understanding of Iran’s nuclear weapons program. Accordingly, military action would need to be paired with rigorous efforts to monitor, detect, and preempt Iran’s inevitable efforts to reconstitute

its program and remove it even further from prying eyes. Israel's peerless intelligence capabilities could provide crucial support here.

Vague talk of "high-level inspections" aside, however, American officials do not explain how they would achieve the clarity needed for a final deal, assure compliance with that deal, or assess with meaningful confidence that kinetic operations have closed Iran's path to the ultimate weapon.¹² They must bring to light the dark places where so much of this work is hidden, or provide much clearer proof that military action has ruined that work.

II. Many More "Known Unknowns" Since the JCPOA

International inspectors and Western governments have accrued growing suspicions and concerns about undeclared dimensions of Iran's nuclear program as that program advanced and expanded over the past decade-plus. These "known unknowns" fall into two general categories, concerning Iran's secret efforts to build a nuclear explosive device, and its partly undeclared efforts to produce fissile material for use in such a device.

A. Weaponization

In June 2025, mere hours before Israeli warplanes began striking Iranian nuclear facilities, the IAEA took its own momentous step by formally declaring Iran in breach of its safeguards obligations.¹³ As with Israeli military action, this decision was a long time coming. Tehran has violated its Non-Proliferation Treaty (NPT) safeguards widely and routinely for decades, but the red flags have shot up markedly in the decade since the JCPOA took effect.

Israel's heist of secret Iranian archives in 2018 was a watershed. It exposed as fiction the guiding assumption, so convenient for Western diplomats keen to secure the JCPOA, that Tehran effectively froze its weaponization program in 2003 and that, therefore, peering closely behind this curtain need not stand in the way of finalizing a nuclear deal. Or as then-Supreme Leader Ali Khamenei said of the JCPOA in 2015, "they claim the IAEA must confirm. What a nonsense statement is that?"¹⁴

The JCPOA did not resolve, but merely foreclosed, many of the IAEA's lingering concerns about Iran's illicit bombmaking efforts.¹⁵ Leads from the archives, however, have since led the IAEA to spend years trying to address growing evidence that, after 2003, Iran took its bomb-building efforts off the grid, but not offline, and thus its overall project to complete a nuclear explosive device could be more advanced—and less detectable—than previously thought. Even as regime officials stonewalled this inquest, inspectors still found man-made uranium traces in 2019-20 at Iranian sites suspected of hosting undeclared nuclear weapons research.¹⁶

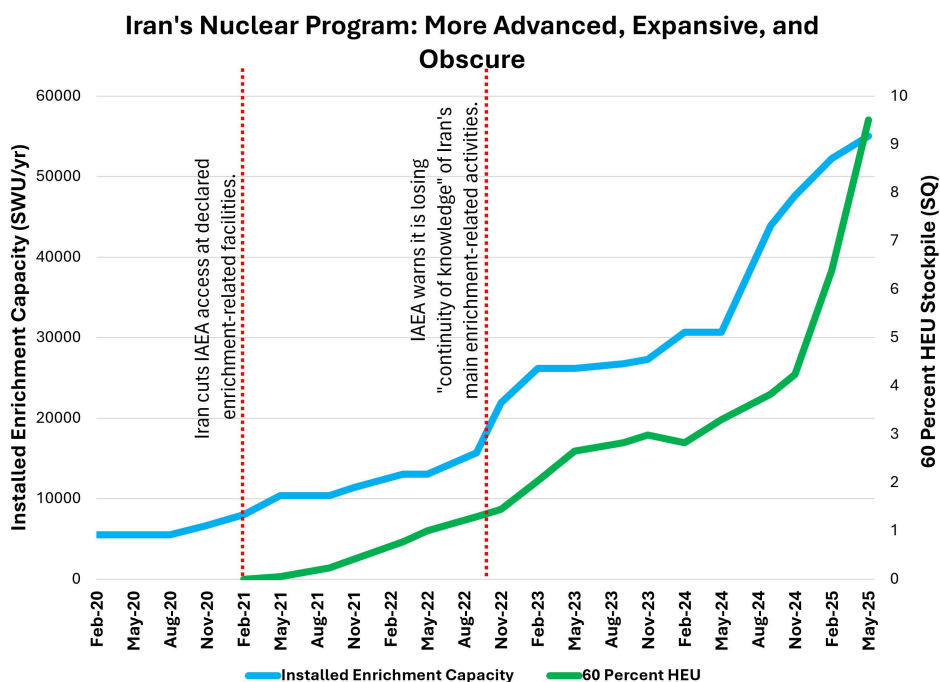
Tehran's unblinking refusal to address these concerns prompted five separate IAEA censure resolutions in 2020-24 and, ultimately, its being found in breach of its NPT safeguards obligations right before the 12-Day War.¹⁷ For all their operational effectiveness, subsequent U.S.-Israeli strikes did not clarify, let alone resolve, these concerns. Nor has the Trump administration pressed Tehran to come clean as part of a new nuclear deal, even as Grossi and his agency emphasize the need to link these two outcomes directly.¹⁸

B. Enrichment

Enrichment has become another black box. Unlike weaponization, most enrichment-related activities were inspected regularly during JCPOA talks. Moreover, these activities were far less expansive and opaque than currently. By and large, in 2015 the United States and its partners could confidently have a sense of the infrastructure that should be under consideration in talks, even if Iran successfully refused to put some of it up for negotiation.

Today, by contrast, Iran's enrichment program is shot through with known unknowns. Once the JCPOA took effect in early 2016, IAEA reporting on Iran's enrichment activities began omitting key data on centrifuges, stockpiles, and research and development (R&D).¹⁹ Starting in 2021, and culminating with its near-total eviction of inspectors last summer, Iran has steadily throttled back IAEA access to almost its entire uranium fuel cycle, most notably its centrifuge and enrichment programs.²⁰ Thus the IAEA could not verify Iran's uranium stocks for four full years before Midnight Hammer. In tandem, Iran undertook its largest-ever buildup in terms of enrichment levels, stockpile sizes, and deployments of advanced centrifuges. Since beginning this enrichment blitz, Iran has barred inspectors from visiting all of its uranium-related facilities. Most importantly, this includes its new, covertly-constructed subterranean sites at "Pickaxe Mountain" and Isfahan—both of which avoided U.S.-Israeli strikes and could host enrichment-related activities.

Iran's combination of rolling back longstanding inspections, expanding enrichment infrastructure, and secretly building facilities is responsible for this loss of "continuity of knowledge" about the nature and extent of its nuclear program. The complexities and importance of rebuilding such knowledge, and ensuring Iran does not simply re-erase it, is reflected in American negotiators' June 2026 visit to Oak Ridge national laboratory to consult with technical experts.²¹ Or as Grossi put it recently, "very detailed" verification is central to a deal: "Iran has a very ambitious, wide nuclear program, so all of that will require IAEA inspectors. Otherwise, you will not have an agreement. You will have an illusion of an agreement."²²



Questions for the Trump Administration About Iran's Nuclear Weapons Program

1. Uranium Stockpiles

- What is the basis for your claims that Iran did not divert any HEU prior to Midnight Hammer, as this contradicts certain succeeding U.S. intelligence assessments?
- Do you assess Iran's 60 percent HEU stocks are at sites other than Isfahan, especially in light of the president's statements suggesting concerning activities at Pickaxe?
 - » What is your assessment of Israeli intelligence that Iran diverted HEU to Pickaxe?
- In talking about securing or neutralizing Iran's "nuclear dust," are you including all of its enriched uranium stockpiles? Or just its 60 percent HEU, and just at Isfahan?
- Will you demand Iran inventory the entirety of its uranium stockpiles, which the JCPOA failed to do, and ensure that the IAEA can verify Iran's accounting?
- Why are you not pushing back on Iran's claims that it no longer is obligated to permit inspections at enrichment sites struck in Midnight Hammer and/or Epic Fury?

2. Enrichment Centrifuges

- To what extent do you believe U.S.-Israeli military action degraded Iran's inventories of advanced centrifuges and components?
 - » To what extent do you believe these inventories were eliminated, damaged, or trapped in airstrikes on Iran's known enrichment sites at Natanz and Fordow?
 - » If reports are true of Iran relocating centrifuges to Pickaxe after Midnight Hammer, do you know where these machines originated, since it seems unlikely Iran could have removed them intact from Natanz, Fordow, or Isfahan after Midnight Hammer?
- Are you prepared to go beyond the JCPOA in requiring Iran to inventory its entire centrifuge program, and in supporting IAEA efforts to verify Iran's accounting?
- Will you demand Iran end its manufacturing, stockpiling, and R&D of advanced centrifuges as part of any new agreement's restrictions on its enrichment activities?

3. Clandestine Nuclear Facilities

- If Epic Fury was motivated in part by Iran rebuilding its nuclear program after being "obliterated" in Midnight Hammer (in the president's words), what specific concerns about renewed Iranian activities underpinned this motivation for Epic Fury?
 - » Do you believe Epic Fury accomplished the administration's stated objectives in terms of addressing Iran's nuclear threats?
 - » If so, how specifically? If not, how do you intend for further military action to resolve these threats? Are you coordinating with Israel to address these threats?
- What specifically motivated the president's comments about possibly striking Pickaxe?

» Would potential U.S. operations seek to destroy or degrade the site, or block Iranian access, and would this be part of a larger campaign to neutralize any known or suspected sources for materials used at the site? • Were any of these undeclared sites targeted in Operation Epic Fury? If not, is it because they are too fortified to be neutralized by U.S. airstrikes and, if that is the case, will you demand Iran shutter the sites and verifiably remove any nuclear materials? » If they are being considered by the president, how would U.S. ground operations at Pickaxe, IFEP, and/or other sites seek to address Iran’s remaining nuclear threats? • Are you willing to condition any resumed talks or framework agreements on Iran providing IAEA access to Pickaxe, IFEP, and other uninspected nuclear facilities?
4. Plutonium Path to a Bomb
• Do you assess that U.S.-Israeli airstrikes have eliminated or severely degraded all of Iran’s known infrastructure and scientific personnel related to spent fuel reprocessing? • In any future deal, would you insist on permanent bans on construction of new heavy water reactors and production plants, and on reprocessing R&D, unlike the JCPOA?
5. Weaponization
• Do you believe U.S.-Israeli military action has reliably resolved or negated preexisting IAEA concerns about Iran’s weaponization program, particularly at the four suspected undeclared sites at the heart of IAEA inquiries in 2019-20? » If not, do you believe military action can reliably address these concerns? » Will you ensure any deal, unlike the JCPOA, has clear and enforceable authorities for IAEA inspectors to verify that Iran is not resuming work on a nuclear weapon? • Are you in discussions with the IAEA about establishing safeguards, with or without a final deal, to prevent Iran from diverting nuclear material to any secret program? • Will you end any future talks if Iran stonewalls IAEA efforts to resolve concerns about undeclared nuclear activities and material, like Iran did during JCPOA implementation?
6. International Inspections
• Are you in discussion with the IAEA and America’s allies on the IAEA Board of Governors to support the agency in establishing a new baseline on Iran’s nuclear program, as per the president’s pledges to prevent a nuclear Iran diplomatically or otherwise? » If so, will you ensure the IAEA’s efforts to establish this baseline will be conducted prior to U.S.-Iran talks, unlike JCPOA talks, which handled the two processes separately and did not condition a final deal on first achieving such transparency? • Are you willing to condition future talks on Iran’s return to compliance with its IAEA safeguards obligations, including the Additional Protocol and modified Code 3.1? • Given Iran’s history of abrogating these agreements, will you demand it ratify, rather than implement, the Additional Protocol and modified Code 3.1 in any final deal?

- Are you prepared to go beyond the JCPOA in demanding Iran give a comprehensive declaration of its nuclear program, and in ensuring “anytime, anywhere” IAEA access to verify this declaration and monitor Iran’s compliance under a final deal?
- What specifically does Vice President Vance mean when he says “inspectors will have the permanent ability to inspect any suspicious sites in Iran” as part of a new deal?
 - » What is the basis for his “extraordinary confidence, if [Iran] did everything that they could to build a nuclear weapon, they couldn’t do it during this administration”?
 - » What is meant when he says a deal would “set up a framework whereby we can be confident that they’re not going to build a nuclear weapon far into the future”?
- With the collapse of the recent ceasefire, are you able to verify if Iran stopped abiding by its MOU commitment to maintain the “status quo” on its nuclear program?

III. Missing Pieces of Iran’s Nuclear Puzzle: Enrichment

It will be impossible to speak coherently of preventing a nuclear Iran without first clarifying all these uncertainties that have arisen or worsened in the last decade. These known unknowns for each major element of Iran’s nuclear weapons program must be resolved *before* the United States can entertain follow-on negotiations for a final agreement or again claim confidently that military action “obliterated” Iran’s nuclear program. Each section concludes with relevant questions (compiled above) for the Trump administration.

A. Uranium Stockpiles

The fate of Iran’s 60 percent HEU—the “nuclear dust,” according to Trump—has been a focal point of the recent war, ceasefire, and unfolding U.S. decision-making.²³ This should not be the only stockpile or enrichment capability of concern. Nor can it be safely assumed that all of Iran’s HEU is entombed by U.S.-Israeli airstrikes and thus inaccessible. In June, an IAEA resolution demanded Iran “provide complete information” on its enriched uranium inventories and permit inspectors to verify this declaration.²⁴

1. 60 Percent Highly Enriched Uranium (HEU)

The IAEA’s latest report on Iran, issued in May, states that the agency “cannot provide any information on the current size, composition or whereabouts of the stockpiles of enriched uranium in Iran.”²⁵ This problem long precedes the recent war. The IAEA has not been able to verify Iran’s total enriched uranium stockpiles since the latter started blocking inspectors at its declared enrichment sites in February 2021.²⁶ For more than four years, until the 12-Day War last summer, inspectors had to ballpark these estimates based in large part on numbers provided by Iran. For a full year since June 2025, inspectors have not been able to gather any direct information whatsoever, even from Tehran’s officials, on the locations and amounts of these stockpiles—crucial data that must be verified monthly according to IAEA standard practice. In September 2025 Iran formally agreed, but never fulfilled, a one-month timeframe to inventory its HEU and devise IAEA inspections to verify this inventory. The agency warns repeatedly that, as a consequence, it cannot provide assurances that Iran has not diverted any of this material to clandestine sites.²⁷

A tale of the past two conflicts shows how the fog and friction of war add to the difficulties posed by Tehran’s freezeout of inspectors. Iran’s HEU was understood to be ensconced in the deeply-buried

Fordow enrichment plant at the outset of the 12-Day War in June 2025. But after Midnight Hammer targeted that site, U.S. intelligence contradicted assertions by Trump and Hegseth that Iran did not relocate any HEU prior to the attack.²⁸ As it turned out, much of this HEU had been moved to the Isfahan nuclear complex, transported in 18 blue scuba-tank-shaped containers, to tunnels whose entrances were subsequently collapsed by U.S. cruise missiles in the same operation.²⁹ By the start of Epic Fury, therefore, American and IAEA officials estimated the bulk of Iran's 60 percent HEU—roughly two-thirds of the total, as per Grossi—to be somewhere completely different than where they understood it to be eight months prior.³⁰

Such surprises become much less surprising in light of inspectors losing their continuity of knowledge well before these wars, and with no ability to visit any relevant sites in the aftermath. These surprises also highlight how much remains unclear about Iran's 60 percent HEU. Claims from Iranian officials about moving HEU from Fordow to undisclosed locations before the strikes, and about some HEU possibly being destroyed in the process, should sharpen concerns that Iran diverted some of this material to places other than Isfahan—places that were not even targeted by U.S.-Israeli strikes.³¹ Grossi warned in September 2025, after Iran mentioned that it needed to maintain secrecy about the locations of its HEU, that this stockpile “needs to be verified. Some could have been lost.”³² In July 2026, reports surfaced of Israeli intelligence that Iran had relocated some amounts of HEU to its clandestine nuclear facility at Pickaxe.³³

Indeed, as most IAEA inspectors can attest, concentrating its most precious enrichment assets in one or two declared locations, without a surreptitious backup plan or covert spare capacity, would represent a marked departure from established Iranian practice. In fact, Iran has at least two “known unknown” enrichment-related sites (see below). Even if most of this HEU—roughly 440 kilograms total—is currently inaccessible inside Isfahan, Natanz, and/or Fordow, with just one-tenth of this stockpile Iran could produce a nuclear test device or, with minimal further enrichment, create a bomb's worth of weapons-grade uranium (WGU). As Grossi described this HEU cache, “it's a lot, so even if you move part of it, you could still have amounts that would be enough to manufacture a few warheads.”³⁴

2. Other Uranium Stocks

At 10-12 bombs' worth (significant quantities, or SQ), Iran's 60 percent HEU understandably grabs focus. Sizable as it is, however, this stockpile is merely the tip of Iran's fissile material iceberg. Most of what is unknown about Iran's enrichment capacity concerns the steps in the fuel cycle preceding production of 60 percent HEU. When its declared enrichment lines were disrupted by the 12-Day War, Iran had an estimated two SQs of 20 percent HEU. Enriching from this level to WGU would entail only minimal additional effort compared to 60 percent HEU, which itself represents 95-99 percent of the work required to produce WGU. In the months preceding the 12-Day War, Iran gained invaluable experience with a crash program that rapidly converted its 20 percent HEU into 60 percent—notably, a bigger jump than going from 60 percent to WGU.³⁵

At the outbreak of the 12-Day War, it also had an estimated five SQs of uranium enriched up to five percent. Though technically low enriched uranium (LEU), this already represents four-fifths of the work needed to reach WGU. These stocks are believed to be buried at Fordow, Natanz, and/or Isfahan but, as with 60 percent HEU, the IAEA cannot fully or reliably account for the locations of these materials.³⁶

Perhaps the biggest unknown here is Iran's stockpile of natural (unenriched) uranium, which serves as enrichment feedstock and, as such, underpins the regime's legally dubious claims of a “right” to enrich under the NPT. Iran had operational facilities to produce yellowcake from uranium ore, and to convert yellowcake into unenriched uranium, until they were targeted during the 2025 and 2026 conflicts, respectively. But Iran has barred inspectors from these sites since February 2021, leaving them unable

to track the country's natural uranium output.³⁷ Moreover, the JCPOA did not require Iran to account for these stocks, let alone permit the IAEA to verify such accounting.

At the same time, the 2015 agreement actually enabled Tehran to exchange its excess LEU for equivalent amounts of unenriched uranium from abroad, reportedly 137 metric tons in total.³⁸ This windfall provided Iran with anywhere from 12-20 SQs of feedstock, depending on the various enrichment processes its scientists have employed, thus literally fueling the country's enrichment blitz that began in late 2020. Iran also received 140 metric tons of yellowcake under the JCPOA, and possibly acquired another 300 metric tons in 2023.³⁹ On top of its prewar domestic yellowcake production, estimated at 370 metric tons or more, this amounts to perhaps 60-140 SQs of potential unenriched uranium feedstock—much of which Iran could have acquired or produced since rolling back inspections in 2021.⁴⁰

Relevant questions for the Trump administration:

- What is the basis for your claims that Iran did not divert any HEU prior to Midnight Hammer, as this contradicts certain succeeding U.S. intelligence assessments?
- Do you assess Iran's 60 percent HEU stocks are at sites other than Isfahan, especially in light of the president's statements suggesting concerning activities at Pickaxe?
 - » What is your assessment of Israeli intelligence that Iran diverted HEU to Pickaxe?
- In talking about securing or neutralizing Iran's "nuclear dust," are you including *all* of its enriched uranium stockpiles? Or just its 60 percent HEU, and just at Isfahan?
- Will you demand Iran inventory the entirety of its uranium stockpiles, which the JCPOA failed to do, and ensure that the IAEA can verify Iran's accounting?
- Why are you not pushing back on Iran's claims that it no longer is obligated to permit inspections at enrichment sites struck in Midnight Hammer and/or Epic Fury?

B. Enrichment Centrifuges

Accounting for Iran's centrifuges, the machines that conduct enrichment, is just as problematic and consequential as its uranium stockpiles. It also is longer-running. Iran has been conducting undeclared centrifuge experiments, including testing enriched uranium production, since at least the late 1990s, and it has lied consistently about these activities. Its rollback of inspections since February 2021 included sites related to the manufacture of centrifuge components, assembly, and testing.

But unlike with enriched uranium stockpiles, the JCPOA did not require Iran to provide a full inventory of its centrifuge infrastructure, which the IAEA then could have used in a monitoring and verification baseline. Right before the 12-Day War, the IAEA said it did not know exactly how many centrifuge workshops Iran was operating.⁴¹ Even though several relevant facilities were struck in that conflict, Grossi assessed several months later that the war did not eliminate Iran's ability to make centrifuges.⁴² His agency already warned for years prior to the 12-Day War, and in every report since, that it "cannot provide any information on Iran's current inventory of centrifuges or whether it has suspended their manufacture, assembly and testing."⁴³ As President Obama's former deputy U.S. envoy for Iran said after Epic Fury, "we lost continuity of knowledge.... That means [the Iranians] could—almost certainly do—have a cache of centrifuges someplace."⁴⁴ These concerns are reinforced by reports of Iran relocating centrifuges to Pickaxe after Midnight Hammer.⁴⁵

As with uranium stockpiles, this accountancy challenge stems from the fact that Iran's centrifuge program became more opaque and resilient as it became larger and more advanced. In the four-plus years between inspection cutbacks in February 2021 and the 12-Day War, Iran tripled its number of deployed centrifuges at known enrichment sites. The overall enrichment capacity of this fleet increased *eight-fold* in the process, reflecting Iran's deployment of evermore advanced machines.⁴⁶ On top of these numbers, Iran announced in late 2024 it would nearly triple the deployment of its most advanced (IR-6) operating centrifuges.⁴⁷ If true, this meant Iran had some 7,000 additional such machines ready for installation.⁴⁸ This blitz is all the more impressive, considering it came in the aftermath of unclaimed attacks at Natanz in July 2020 and April 2021 that damaged core nodes of Iran's declared sites for advanced centrifuge assembly, R&D, and enrichment lines.⁴⁹

The timing, scale, and speed of this buildout suggest Iran had secret reserves of centrifuge components well before it rolled back IAEA access in 2021, and/or that it has since ramped up production of such components. This could help Iran's enrichment program recover relatively quickly from recent airstrikes, much as it did in the wake of the 2020-21 unattributed attacks. The growing efficiency of these machines also means Iran needs steadily fewer of them to enrich given amounts of uranium, and thus that it can do so rapidly in smaller, more easily buried and concealed facilities. Such tasks would be further simplified for Iran by its extensive prewar R&D and real-world practice using small groupings, or cascades, of advanced centrifuges to produce near-weapons-grade uranium. For instance, with only five percent of the 7,000 IR-6 centrifuges it claimed it was ready to install in the months preceding the 12-Day War—equivalent to just one-tenth of its IR-6 fleet at Fordow before Midnight Hammer—Iran would need perhaps two weeks to make one bomb's worth of weapons-grade uranium out of 60 percent HEU.

For all these reasons, American negotiators must assume, at the very least, that Iran still possesses sufficient numbers of advanced centrifuges—potentially thousands, beyond those underneath Fordow, Natanz, and Isfahan—to enrich any remaining 20 or 60 percent HEU to weapons-grade at a small covert facility before any such move could be detected.⁵⁰

Relevant questions for the Trump administration:

- To what extent do you believe U.S.-Israeli military action degraded Iran's inventories of advanced centrifuges and components?
 - » To what extent do you believe these inventories were eliminated, damaged, or trapped in airstrikes on Iran's known enrichment sites at Natanz and Fordow?
 - » If reports are true of Iran relocating centrifuges to Pickaxe after Midnight Hammer, do you know where these machines originated, since it seems unlikely Iran could have removed them intact from Natanz, Fordow, or Isfahan after Midnight Hammer?
- Are you prepared to go beyond the JCPOA in requiring Iran to inventory its entire centrifuge program, and in supporting IAEA efforts to verify Iran's accounting?
- Will you demand Iran end its manufacturing, stockpiling, and R&D of advanced centrifuges as part of any new agreement's restrictions on its enrichment activities?

C. Clandestine Nuclear Facilities

Iran's track record of secret nuclear sites aggravates all these concerns. It raises the real possibility that, amid its major enrichment buildup in recent years, Iran diverted certain uranium stocks, centrifuges, and/or weaponization activities to undeclared locations. Iran's concurrent denial of IAEA access, and the fog of war since last summer, offers convenient cover to potentially relocate small but significant fractions of this infrastructure to facilities that remain unseen by inspectors and untouched by bombs.

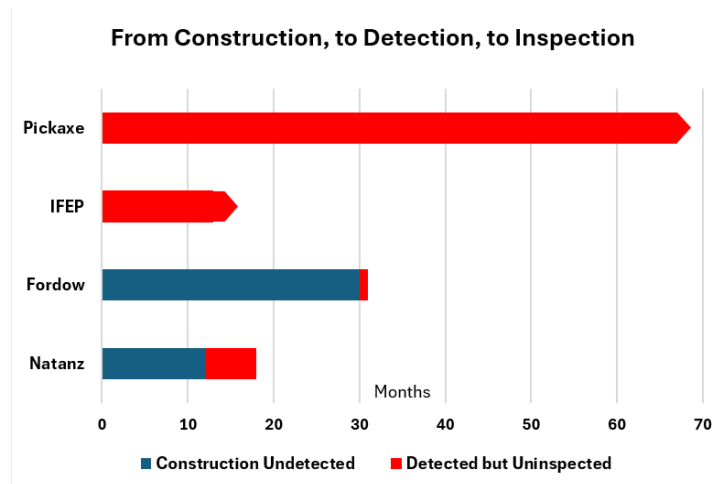
In 2010, Iranian officials said they had chosen 10 potential locations for additional enrichment plants after Natanz and Fordow.⁵¹ Today, two "known unknown" facilities, at Pickaxe Mountain near Natanz and at Isfahan, are of primary concern. Pickaxe is particularly worrying for many reasons, including the sheer duration Iran has worked on the site. Like enrichment plants at Natanz and Fordow, Pickaxe has been built secretly in violation of Iran's NPT safeguards agreements. Even though the former two sites were visited by the IAEA relatively quickly after being exposed, inspectors found each facility already in "an advanced stage of construction." Iran has had far longer to build Pickaxe beyond prying eyes, during which its technical know-how and infrastructure have been far more advanced than when it built Natanz and Fordow. Pickaxe has been under construction for nearly six years, compared to 2-3 years for Fordow before it was discovered, and just over one year for Natanz.⁵² It is noteworthy that, whereas inspectors were able to visit Fordow and Natanz rather promptly after these secret sites were discovered, Iran gives no indication of allowing access to Pickaxe, even though the facility's existence is an open secret.

"It is obvious it is in a place where numerous and important activities related to the [nuclear] program are taking place," Grossi said of the facility in April 2025, yet "we're asking [the Iranians], 'What is this for?' And they are telling us, 'It's none of your business.'"⁵³

1. Pickaxe Mountain

Since late 2020, the IAEA has been aware of Iran excavating a bunker at "Pickaxe Mountain," near what was its main declared nuclear complex at Natanz at the time.⁵⁴ As the name suggests, it appears to be hewn into solid rock, potentially deeply enough to be impermeable even to U.S.-made Massive Ordnance Penetrator (MOP) bunker busters that burrowed into the subterranean Fordow and Natanz facilities in Midnight Hammer.⁵⁵

It is altogether possible that Iran relocated spare centrifuges, components, R&D, and possibly enrichment activities to Pickaxe after the unclaimed 2020-21 attacks on Natanz but before Midnight Hammer. As Iran's then-atomic chief Ali Akbar Salehi said in April 2021, "it has been decided to establish a more modern, vaster, and inclusive building to be constructed in the heart of the mountains around Natanz." He went on to say, "currently we are working 24/7 to move all our sensitive halls into the heart of this mountain."⁵⁶ This certainly suggests that Iran started setting up centrifuge production capacity at Pickaxe several years ago, and Western intelligence officials said they believe an enrichment plant has since been added inside. Based on satellite imagery of construction activities, the facility is estimated to be able to assemble thousands of advanced centrifuges annually.⁵⁷



These assessments of Pickaxe’s potential size raise the possibility it also could house enriched uranium stockpiles, including materials diverted around the start of the 12-Day War. Signs of Iranian efforts to harden and further excavate the site were observed between that conflict and Epic Fury, suggesting activities worth protecting and expanding are occurring inside.⁵⁸ President Trump referenced such concerns obliquely in April, claiming Iran had been undertaking new activities at a site “protected by granite.”⁵⁹ Pickaxe was not targeted by airstrikes in either war.

Specific Concerns About “Pickaxe Mountain” Nuclear Site	
Concern	Relevant Information
Secret nuclear activities?	• Site has been active for much longer without IAEA access than Fordow or Natanz—both of which were already far advanced when first visited by inspectors. • Estimated to be large enough for enrichment, centrifuge assembly, enriched uranium stockpile storage, and possibly additional activities. • Quotes from Trump and Iranian officials suggesting the facility could host such activities, and July 2026 Israeli reports of Iran moving centrifuges to the site in late 2025. • Consistent Iranian pattern of building covert enrichment sites. • Recent indications Iran further excavated and hardened the site.
Invulnerability to airstrikes?	• Dug inside a mountain, more deeply-buried than Fordow. • Not targeted by U.S.-Israeli military action in 2025-26.

2. Isfahan Fuel Enrichment Plant (IFEP)

In June 2025, Iran declared a new Isfahan enrichment facility (IFEP) in the crowded hours between being found in breach of its IAEA safeguards and the start of the 12-Day War. Inspectors have not visited IFEP, and currently know little specifically about it—including its exact location.⁶⁰ The best guess is that the facility is located in tunnels near those believed to contain much of Iran’s 60 percent HEU.⁶¹ If so, this potentially places the facility deep enough underground to be beyond reach of MOP bunker busters, as seen in the U.S. decision in Midnight Hammer to collapse the Isfahan tunnel entrances with Tomahawk cruise missiles instead.

The IAEA does not know if the site is operational or contains enriched material, though it can be inferred from the agency’s initial assessment that IFEP is not as developed as Pickaxe, even if it had been under secret construction for some time before Iran notified the world of its existence.⁶² Echoing comments from Iran’s atomic energy head, this suggests infrastructure for enrichment centrifuges was in the process of being installed at IFEP when the 12-Day War began.⁶³ As with its reporting on Iran’s other nuclear facilities, the IAEA cautions that even this estimate requires verification, including inspections. Speaking of IFEP in April 2026, Grossi warned publicly that, once the IAEA first heard of the site, “we were not able to see what kind of facility this was, whether it was an empty hole, or a place already fitted with centrifuges and cascades. So, we will still need to see.”⁶⁴

Iran's Non-Compliance with IAEA Monitoring and Verification

Date	Safeguards Concern/IAEA Response	Date	Safeguards Concern/IAEA Response
March 2020	Iran denies IAEA access to suspected undeclared nuclear sites.	July 2022	Iran nuclear chief says Tehran will not permit the IAEA's probe into undeclared sites to be reopened.
June 2020	IAEA resolution censuring Iran for obstructing probe into undeclared nuclear sites.	November 2022	IAEA resolution censuring Iran for obstructing probe into undeclared nuclear sites.
February 2021	IAEA detects uranium at undeclared Iranian nuclear sites. Iran reduces IAEA access to declared nuclear sites, including by abrogating Additional Protocol.	February 2023	Inspectors detect undeclared 83 percent enrichment at Fordo.
March 2021	Iran reduces IAEA access at declared nuclear sites.	May 2023	Reports of undeclared nuclear facility being built at Natanz, Iran's deepest at an estimated 300' underground.
June 2021	Iran reduces IAEA access at Natanz enrichment plant.	March 2024	Israeli reports of new covert Iranian weaponization work.
July 2021	Iran begins producing 20 percent enriched uranium metal.	June 2024	IAEA resolution censuring Iran for obstructing probe into undeclared nuclear sites.
October 2021	IAEA chief warns Iran monitoring "no longer intact."	July 2024	U.S. intel director warns Iran's activities "better position it to produce a nuclear device."
November 2021	Iran blocks inspectors at Karaj centrifuge facility.	November 2024	IAEA resolution censuring Iran for obstructing probe into undeclared nuclear sites and requesting comprehensive report by IAEA Director General on Iran's safeguards compliance.
June 2022	Iran removes IAEA cameras from declared nuclear sites. IAEA resolution censuring Iran for obstructing probe into undeclared nuclear sites.		

Relevant questions for the Trump administration:

- If Epic Fury was motivated in part by Iran rebuilding its nuclear program after being “obliterated” in Midnight Hammer (in the president’s words), what specific concerns about renewed Iranian activities underpinned this motivation for Epic Fury?
 - » Do you believe Epic Fury accomplished the administration’s stated objectives in terms of addressing Iran’s nuclear threats?
 - » If so, how specifically? If not, how do you intend for further military action to resolve these threats? Are you coordinating with Israel to address these threats?
- What specifically motivated the president’s comments about possibly striking Pickaxe?
 - » Would potential U.S. operations seek to destroy or degrade the site, or block Iranian access, and would this be part of a larger campaign to neutralize any known or suspected sources for materials used at the site?
- Were any of these undeclared sites targeted in Operation Epic Fury? If not, is it because they are too fortified to be neutralized by U.S. airstrikes and, if that is the case, will you demand Iran shutter the sites and verifiably remove any nuclear materials?
 - » If they are being considered by the president, how would U.S. ground operations at Pickaxe, IFEP, and/or other sites seek to address Iran’s remaining nuclear threats?
- Are you willing to condition any resumed talks or framework agreements on Iran providing IAEA access to Pickaxe, IFEP, and other uninspected nuclear facilities?

D. Plutonium Path to a Bomb

Mirroring its inability to account for Iran's uranium fuel cycle, the IAEA's June 2026 report acknowledges the agency cannot verify if Iran has suspended all activities for producing plutonium as fissile material.⁶⁵ While of serious concern, gaining such clarity is necessarily less urgent compared to Iran's uranium route to weapons-grade material, which became much more advanced and changed much more markedly in the years since the JCPOA.

Repeated Israeli strikes seriously damaged the core facility in question, the Khondab Heavy Water Research Reactor (IR-40, formerly "Arak"), whose spent fuel could have produced at least one SQ of weapons-grade plutonium annually, had the reactor been completed. Iran's heavy water production plant, which it built secretly in violation of NPT safeguards, and which would have supplied material to moderate the Khondab reactor, also suffered apparently "severe damage" in Israeli strikes in 2025-26.⁶⁶ Iran has no known capacity to create fissile material by separating plutonium from spent reactor fuel, but it previously conducted undeclared R&D on this process, and it blocks inspectors from certain sites in Tehran that could be used for reprocessing-related activities.⁶⁷ Thus, while the damage to IR-40 effectively breaks the most important known link in Iran's plutonium chain, the freeze-out of inspectors leaves the IAEA unable to confirm whether the regime has suspended all activities that could advance this route to a nuclear weapon.

As it did during JCPOA negotiations, Iran could be expected in any new talks to insist on constructing additional heavy water reactors in the future. Iran has no need to build such reactors, since it already operates a heavy water research reactor at Tehran (TRR) under IAEA safeguards. But this demand supports its self-proclaimed "right" to indigenous enrichment, which has been a bone of contention in U.S.-Iran nuclear negotiations.

The JCPOA offers a cautionary tale of what *not* to do here. It required a redesign of the IR-40's core to reduce—but not eliminate—the spent fuel from which Iran might make fissile material. Because this entailed using LEU as feedstock, as opposed to unenriched uranium in the initial design, the 2015 deal directly legitimized Iran's need to enrich such fuel. Iran also claimed, shortly thereafter, to have furtively secured a replacement for the original reactor core enclosure (calandria). If true, and if such equipment was not targeted by military action, Iran conceivably could build a new reactor capable of producing multiple SQs of weapons-grade plutonium at some point in the future.⁶⁸

Relevant questions for the Trump administration:

- Do you assess that U.S.-Israeli airstrikes have eliminated or severely degraded all of Iran's known infrastructure and scientific personnel related to spent fuel reprocessing?
- In any future deal, would you insist on permanent bans on construction of new heavy water reactors and production plants, and on reprocessing R&D, unlike the JCPOA?

IV. Missing Pieces of Iran's Nuclear Puzzle: Weaponization

Israel's 2018 archives heist laid bare how Tehran's bombmaking project was much more advanced and dispersed than previously thought, despite the regime's supposed peaceful nuclear intentions and self-proclaimed "right" to enrich. It also showed how, well before President Trump left the JCPOA, the regime violated the deal by continuing, and by lying about, in the parlance of the deal, "activities which could contribute to the development of a nuclear explosive device." That agreement notably failed, moreover, to mention how the IAEA would verify this bombmaking prohibition, and it contained no

clear safeguards to prevent Iran from diverting nuclear material to a secret program.⁶⁹ All of this, in turn, shows how President Obama worked against his own stated objectives by looking ahead, toward clinching a final deal, without first setting a clear baseline on Iran's weaponization status in 2015. Even with the IAEA inquest ongoing, the White House declared "the United States has already made our judgment about the past. We are focused on moving forward."⁷⁰

Iran's consistent refusal to comply with ensuing investigations into suspected undeclared activities, many of them unearthed by the Israeli-seized archives, contributed to it being found in breach of its NPT safeguards in June 2025. Most alarmingly, Iran removed nuclear material and equipment, whose whereabouts remain unknown, in an effort to sanitize one site that came up in these IAEA inquiries.⁷¹ Nevertheless, inspectors found traces of man-made uranium during visits to three separate suspected sites in 2019-20.⁷²

Starting no later than 2023, Western intelligence agencies assessed Iran was expanding and accelerating its bombmaking R&D, including efforts to shorten its timeframe for producing a functional nuclear explosive device, should it decide to do so.⁷³ Israel's three separate air campaigns against such sites, from October 2024 to March 2026, reflect the sheer breadth of infrastructure and ongoing ambitions of Iran's weaponization program. Israel struck upwards of a dozen relevant facilities in total, including several that had been expanded since 2023 or apparently reconstituted between recent rounds of conflict.⁷⁴

As of June 2026, the IAEA [maintains](#) that Iran will continue to be in breach of its safeguards obligations until, among other things, the agency can resolve these longstanding concerns about undeclared activities.⁷⁵ Unlike key parts of Iran's enrichment program, which were officially declared and monitored regularly in the past, inspectors effectively have never had a baseline for gauging these "possible military dimensions" of Iran's nuclear enterprise. Gaining this requisite clarity is complicated further by the fact that, to a far greater extent than with fissile material, Iran's weaponization program is diffused through a convoluted matrix of military and ostensibly civilian institutions.

Relevant questions for the Trump administration:

- Do you believe U.S.-Israeli military action has reliably resolved or negated preexisting IAEA concerns about Iran's weaponization program, particularly at the four suspected undeclared sites at the heart of IAEA inquiries in 2019-20?
 - » If not, do you believe military action can reliably address these concerns?
 - » Will you ensure any deal, unlike the JCPOA, has clear and enforceable authorities for IAEA inspectors to verify that Iran is not resuming work on a nuclear weapon?
- Are you in discussions with the IAEA about establishing safeguards, with or without a final deal, to prevent Iran from diverting nuclear material to any secret program?
- Will you end any future talks if Iran stonewalls IAEA efforts to resolve concerns about undeclared nuclear activities and material, like Iran did during JCPOA implementation?

V. Establishing a New Baseline

A. Transparency Before, Not Part of, a Deal

Having lost its “continuity of knowledge,” the IAEA will need an altogether new baseline for Iran’s nuclear program. Establishing this new baseline “would pose major challenges,” in Grossi’s words, since Iran has waged perhaps the most longstanding, egregious, and systematic campaign of safeguards violations in the NPT’s half-century of history. Tehran would have to be compelled to cough up an unprecedentedly comprehensive declaration of its nuclear program. The IAEA then would have to design and execute an intensive and tailored inspections regime, both to verify the completeness and correctness of this declaration and to monitor Iran’s activities going forward.⁷⁶

To these ends, inspectors would need truly unfettered access, without delay, to all declared and suspected undeclared nuclear-related sites inside Iran, including those damaged to uncertain extents in three military conflicts since October 2024. Such access would include the “anywhere, anytime” access promised by the Obama administration but never delivered in the 2015 deal.⁷⁷ Given how completely the situation has changed since that time, when Iran last agreed to modify its inspections regime, Grossi insists the JCPOA “could not constitute a basis” for negotiations.⁷⁸ Instead, “we need to look into something different” for any new agreement.⁷⁹

Iranian officials agree that the old way of doing things is over, with its IAEA envoy recently declaring “the legal, technical, and operational foundations for the normal implementation of safeguards in Iran have been destroyed.”⁸⁰ But for Tehran, this means continuing to shut out the same inspectors it accuses of helping America and Israel target its nuclear sites. The IAEA conceivably would be invited to Iran not to devise better inspections, but to ensure its role in any future deal is limited to overseeing any dilution of HEU on Iranian soil. Iran is not declaring its nuclear program, but rather its abiding defiance, to the world.

Until and unless this position changes completely and a new baseline is set and verified, the United States cannot remotely hope to negotiate a settlement that actually prevents a nuclear Iran. Proceeding with diplomacy on the assumption that negotiations can take place on a level playing field, with meaningful Iranian concessions on offer, rests solely on the hope that—for the first time in its history—Tehran comes to the table without any clandestine capabilities up its sleeve.

In contrast to previous talks, therefore, transparency cannot be up for negotiation; it must be the prerequisite for the United States to negotiate at all. And verification cannot be perfunctory, pro forma, or held hostage to predictable Iranian warnings about ditching diplomacy. The JCPOA’s presumption of approval for Tehran’s incomplete and incorrect accountancy of its bombmaking efforts, its failure to inventory much of Iran’s enrichment infrastructure, and its stage-managed IAEA visit to a single undeclared site in Iran—all of this provides the blueprint for what *not* to do. The United States must avoid pursuing a deal that meets the president’s stated objectives but, like the JCPOA, leaves open Tehran’s path to nuclear weapons capability as the price for extracting narrow Iranian concessions on certain enrichment activities. This entails persistence in the highly complex, contentious, and time-consuming process of opening and checking Iran’s books. As Secretary Rubio said, “you can’t do a nuclear thing in 72 hours on the back of a napkin.”⁸¹

B. Opening Iran's Books

The first “nuclear thing” is for Iran to provide a comprehensive declaration of its nuclear program, past and present and including its military dimensions, to the IAEA. Presumably this would include, at the very least, all of the following information as first steps for inspectors to begin building a new and accurate baseline of Iran's entire nuclear program.

Comprehensive Declaration of Iran's Nuclear Program	
Area of Concern	Baseline Information Needed from Iran
Uranium (U) Stocks	Nuclear material accountancy reports, including: • Locations and quantities of enriched and unenriched U, including at facilities not previously under IAEA safeguards. • Assessment of any inability to account for U stocks at Fordow, Natanz, Isfahan, and possibly other damaged or destroyed sites.
Centrifuges	• Inventory of any and all undamaged centrifuges, components, storage sites, and production and assembly facilities. • Assessment of any inability to account for machines, components, and related infrastructure at Fordow, Natanz, Isfahan, and possibly other damaged or destroyed sites.
Clandestine Enrichment-related Facilities	Information contained in IAEA design information questionnaires (DIQ) for Pickaxe, IFEP, and any other unsafeguarded facilities, including: • Location, purpose, and current or intended operations of each site. • Nuclear material accountancy reports and procedures and technologies for containment and surveillance of such material.
Plutonium Path	Status of Khondab Heavy Water Research Reactor and reprocessing-related facilities.
Weaponization	Comprehensive disclosure of past and current programs, including: • Status of nuclear material and equipment removed from suspected undeclared facilities prior to 2019-20 IAEA site visits. • Purpose, activities, and current status of sites damaged or destroyed by U.S.-Israeli operations since October 2024.

C. Checking Iran's Books

Even getting Iran to submit such information would be a monumental undertaking, going well beyond details it provided to the IAEA at any point previously. This would still leave open the possibility that, just as it did with JCPOA implementation, Tehran divulges small amounts of new information in order to proclaim its transparency and divert attention from a much larger mass of past and current activities it wishes to keep secret.

The IAEA will need robust authorities to verify Tehran's claims and monitor its activities, as a prerequisite for any U.S.-Iran nuclear negotiations. The first step is for Iran to return to compliance with its Comprehensive Safeguards Agreement (CSA), which is obligatory as an NPT member and which Iran

has violated systematically since 2021. Among other things, this would enable inspectors to verify Iran's enriched uranium stockpiles at its declared nuclear facilities—most importantly Natanz, Fordow, and Isfahan.

But the CSA alone will not bring clarity on key concerns like Iran's work at Pickaxe, its overall centrifuge program, or weaponization efforts. In tandem, therefore, Iran would need to ratify the Additional Protocol (AP) and modified Code 3.1. The latter requires Iran to provide information in advance to the IAEA on any new or updated designs for its nuclear facilities, before it builds new sites or makes any changes to existing ones. And whereas the CSA allows inspectors to verify Iran's compliance with safeguards at declared sites—that its declaration is *correct*—the AP goes further. It expands the list of sites Iran must declare, including centrifuge infrastructure. It also authorizes inspectors to verify that Iran's declaration is *complete*, that it has not left anything off its list such as undeclared facilities like Pickaxe, or nuclear material diverted from declared facilities like HEU from Fordow or Isfahan. Accordingly, the AP permits inspections at this broader list of relevant facilities, as well as snap inspections at suspected undeclared sites.

However, even this more expedient and expansive “complementary access” outlined in the AP would not suffice to account for the whole of Iran's covert activities or overcome its obstruction of inspectors. Iran has demonstrated its readiness, time and again, to suspend these measures arbitrarily, interpret their authorities narrowly, and simply flout them altogether. It does so particularly at military bases suspected of nuclear-related activities—sites it insists are off-limits to inspectors. Even when it was implementing the AP, Iran supported its defiance by referencing JCPOA clauses that IAEA access requests “will not be aimed at interfering with Iranian military or other national security activities,” and that Iran had 24 days to comply with such requests.⁸² Iran exploited that window to scrub sites, with varying success, of any evidence of past weaponization activities.

Both prior to and under the JCPOA, Iran merely implemented but did not ratify the AP or modified Code 3.1, and it stopped applying both provisionally as part of its IAEA freeze-out since February 2021. As its foreign ministry said in JCPOA talks, Iran interprets its obligations narrowly and arbitrarily here, “to implement the Additional Protocol on a voluntary and temporary basis for the sake of transparency and confidence building.”⁸³

Even so, it already had been violating these agreements for years beforehand, whether by building Pickaxe or by stonewalling weaponization inquiries arising from the archives. Iran is unique among NPT members in failing to comply with modified Code 3.1, and in passing laws requiring it to stop applying the AP. Grossi emphasizes that, contrary to Iran's claims, its legal obligations to comply with these measures cannot be nullified by domestic laws.⁸⁴

Even if Iran comes into full, consistent, and formal compliance with these agreements, past practice suggests it will continue delaying or denying snap inspections and rejecting IAEA visits to suspected undeclared bombmaking sites at military bases. Just as Iran must provide a uniquely expansive and detailed declaration of its nuclear program, therefore, a correspondingly intrusive and tailored inspections regime is vital to verify that Tehran has inventoried everything fully and accurately, to assess what activities must be proscribed in a deal to shut off its pathways to a bomb, and to properly monitor its compliance going forward. Iran would have to agree to: real-time video monitoring of all nuclear-related facilities; unannounced inspections at declared and undeclared sites anytime and anywhere, including military sites suspected of involvement in nuclear activities; a single procurement mechanism overseen by the IAEA for all potential dual-use imports and exports; and mandatory access to documentation and personnel requested by the IAEA.

Relevant questions for the Trump administration:

- Are you in discussion with the IAEA and America’s allies on the IAEA Board of Governors to support the agency in establishing a new baseline on Iran’s nuclear program, as per the president’s pledges to prevent a nuclear Iran diplomatically or otherwise?
 - » If so, will you ensure the IAEA’s efforts to establish this baseline will be conducted prior to U.S.-Iran talks, unlike JCPOA talks, which handled the two processes separately and did not condition a final deal on first achieving such transparency?
- Are you willing to condition future talks on Iran’s return to compliance with its IAEA safeguards obligations, including the Additional Protocol and modified Code 3.1?
- Given Iran’s history of abrogating these agreements, will you demand it ratify, rather than implement, the Additional Protocol and modified Code 3.1 in any final deal?
- Are you prepared to go beyond the JCPOA in demanding Iran give a comprehensive declaration of its nuclear program, and in ensuring “anytime, anywhere” IAEA access to verify this declaration and monitor Iran’s compliance under a final deal?
- What specifically does Vice President Vance mean when he says “inspectors will have the permanent ability to inspect any suspicious sites in Iran” as part of a new deal?⁸⁵
 - » What is the basis for his “extraordinary confidence, if [Iran] did everything that they could to build a nuclear weapon, they couldn’t do it during this administration”?
 - » What is meant when he says a deal would “set up a framework whereby we can be confident that they’re not going to build a nuclear weapon far into the future”?
- With the collapse of the recent ceasefire, are you able to verify if Iran stopped abiding by its MOU commitment to maintain the “status quo” on its nuclear program?

VI. Checklist: Preconditions for Any Negotiations

Based on these concerns and the requirements for clarifying them, the following is a list of preconditions Iran must meet before the United States should enter nuclear talks:

1. Iran provides the IAEA with a comprehensive declaration of its nuclear program, including all undeclared facilities and weaponization activities past and present.
2. Iran and the IAEA agree to an inspections regime that enables inspectors to verify the correctness and completeness of Iran’s declaration, including Iranian agreements to:
 - » Immediately resume full and continual compliance with its IAEA Comprehensive Safeguards Agreement, modified Code 3.1, and Additional Protocol; and to ratify these agreements as part of implementation of any final nuclear deal.
 - » Immediately and consistently apply additional IAEA monitoring and verification measures, including: real-time video monitoring of all nuclear-related facilities; “anytime, anywhere” visits to nuclear and military facilities suspected of undeclared activities; oversight for potential dual-

use imports and exports; and mandatory access to any documentation and personnel as requested by the IAEA.

- » Resolve outstanding IAEA concerns related to nuclear material and equipment, including man-made uranium, at suspected undeclared weaponization sites.
3. The IAEA conducts on-site inspections at Iran's declared nuclear facilities, Pickaxe, IFEP, and any other sites it suspects of containing nuclear material or equipment.
- » Any indication of Iran sanitizing or altering these sites beforehand, as it did at suspected weaponization sites, should end any prospect of a final deal.
 - » Talks for a final deal should be conditioned on Iran shipping out of the country any and all nuclear material and equipment contained within these facilities which the IAEA determines has not been rendered inaccessible by military strikes.
4. The IAEA assesses it can successfully acquire a new baseline to account for Iran's nuclear activities and verify the peaceful nature of its program.

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