

SANCTIONS RELIEF UNDER THE JCPOA

According to the JCPOA, the U.S., EU, and UN are obligated to remove sanctions after Iran completes specific nuclear steps and at other intervals.

ON IMPLEMENTATION DAY	
U.S.	<p>Will cease the application for non-US persons of the following sanctions:</p> <ul style="list-style-type: none"> • Financial and banking (including financial messaging services and transactions with the Central Bank of Iran); • Insurance; • Energy and petrochemicals; • Shipping, shipbuilding, and port sectors; • Gold and other precious metals; • Software; and • Automotive. <p>Will terminate executive orders prohibiting financial transactions with entities designated under the Iran Sanctions Act; the provision of goods and services to Iran’s energy and petrochemical sectors; transactions with NIOC and NICO; provisions of goods and technology to expand Iran’s domestic refined petroleum production; and transactions in rials and transactions with the shipping and automotive sectors.</p> <p>Will remove designated entities including major banks (including the Central Bank of Iran) shipping companies, EIKO, and major oil and gas firms from its lists. Of the more than 650 entities that have been designated by the U.S. Treasury for their role in Iran’s nuclear and missile programs or for being owned or controlled by the government of Iran, more than 67 percent will be de-listed from Treasury’s blacklists.</p>
EU	<p>Will terminate sanctions on the following from Council Decision 2010/413/CFSP and Council Regulation 267/2012:</p> <ul style="list-style-type: none"> • Financial, banking, and insurance; • Oil, gas, and petrochemicals; • Shipping, shipbuilding, and civil aviation; • Gold, precious metals, banknotes, and coinage; • Metals are allowed through single procurement channel; and • Software is allowed through single procurement channel. <p>Will amend counter proliferation-related sanctions consistent with UNSC resolution 2231.</p> <p>Will remove entities including most major Iranian banks from its sanctions list.</p>
UN	<p>Will terminate previous UN Security Council resolutions (1696, 1737, 1747, 1803, 1835, and 1929) and replaced them with Resolution 2231.</p> <p>Resolution 1929 states, “Iran shall not undertake any activity related to ballistic missiles capable of delivering nuclear weapons,” whereas 2231 says, “Iran is called upon not to undertake...” Iran has said that it will continue developing ballistic missile capabilities.</p> <p>Will remove individuals and entities from its sanctions lists, which have provided for asset freezes and visa bans.</p>

IN 5 YEARS

UN	Will lift the arms embargo against Iran. Iran will be permitted to import heavy weaponry (although US primary sanctions on military-related and dual-use goods will remain).
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ON TRANSITION DAY (IN 8 YEARS)

U.S.	<p>Will terminate the statutory sanctions on Iran.</p> <p>Will remove several additional entities from its sanctions lists, including:</p> <ul style="list-style-type: none"> • Two central figures in Iran’s weaponization and nuclear activities, Fereidoun Abbasi-Davani and Mohsen Fakhrizadeh; and • The Organization of Defensive Innovation and Research (SPND), an entity involved in research related to nuclear weapons. <p>Only 25 percent of the entities that have been designated by Treasury over the past decade for their role in Iran’s nuclear and ballistic missile programs, or for being owned and controlled by the Government of Iran, will remain sanctioned.</p>
EU	<p>Will terminate sanctions on the following:</p> <ul style="list-style-type: none"> • Financial messaging services (Most major Iranian banks, including the Central Bank of Iran will have been permitted onto SWIFT on Implementation Day); • Shipping, shipbuilding, and transportation related to the nuclear and missile technology control lists; and • Ballistic missiles. <p>Will remove the IRGC, IRGC-QF, Qassem Soleimani, additional banks (Saderat, Ansar, Mehr, and nuclear- and missile-related entities from its counter proliferation lists.</p> <p>A few Iranian individuals and entities will remain under Syria-related or terrorism sanctions (e.g. Soleimani and the IRGC-QF). The only Iran-specific sanctions will be those related to human rights.</p>
UN	<p>Will terminate restrictions related to ballistic missile procurement and development.</p> <p>Will remove additional individuals and entities from its sanctions lists.</p>

ON TERMINATION DAY (IN 10 YEARS)

EU	Will terminate all remaining sanctions from Council Decision 2010/413/CFSP and Council Regulation 267/2012.
UN	Will close its file on Iran’s nuclear program.

SANCTIONS NOT AFFECTED BY THE IRAN DEAL

U.S.	<p>Terrorism and human rights sanctions, and sanctions on a limited number of designated entities and individuals.</p> <p>Primary sanctions and export controls limiting trade between U.S. firms and Iran.</p>
EU	Human rights sanctions, and sanctions on a limited number of entities and individuals for Syria or terrorism related issues.