

# IRAN'S COMPLIANCE WITH UNSCR 2231: ALLEGED VIOLATIONS MUST BE ADDRESSED

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## EXECUTIVE SUMMARY

UN Security Council Resolution (UNSCR) 2231 implements the 2015 nuclear agreement with Iran and imposes missile- and arms-related restrictions. Little-noticed biannual reporting by the UN Secretary General alleges that Iran is repeatedly violating these non-nuclear provisions. Thus far, the United States has responded to such violations with sanctions and designations of Iranian and foreign entities supporting Tehran's ballistic missile development. However, the UN and its member states have not responded. More must be done to investigate allegations of noncompliance and to punish violations of the resolution.

## THE CHALLENGE OF RESPONDING TO ALLEGED VIOLATIONS OF UNSCR 2231

On July 27, Iran tested its Simorgh satellite launch vehicle from a newly inaugurated space center.<sup>2</sup> In response, the United States, France, Germany, and the United Kingdom addressed a letter to the UN Security Council calling the test "a threatening and provocative step" and "inconsistent" with UNSCR 2231, which codifies the Joint Comprehensive Plan of Action (JCPOA) nuclear deal.<sup>3</sup> The countries expressed alarm over Iran's satellite launch vehicle test because it could help extend the range of Tehran's nuclear-capable ballistic missiles.

The Simorgh test is only the latest example of Tehran's defiance of ballistic missile restrictions set forth in Annex B of UNSCR 2231. According to a June 20 report by the UN Secretary General,<sup>4</sup> Iran may have violated the prescribed limitations on arms imports and exports and ballistic missile testing, as well as entity-specific prohibitions on multiple occasions.

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2. "Iran Opens New Space Center with Launch of Satellite Carrier," *Tasnim News Agency* (Iran), July 27, 2017. (<https://www.tasnimnews.com/en/news/2017/07/27/1476247/iran-opens-new-space-center-with-launch-of-satellite-carrier>)

3. Edith M. Lederer, "US and allies call Iran's recent rocket launch 'threatening,'" *Associated Press*, August 2, 2017. ([https://www.washingtonpost.com/world/middle\\_east/us-and-allies-call-irans-recent-rocket-launch-threatening/2017/08/02/e95cc734-778a-11e7-8c17-533c52b2f014\\_story.html?utm\\_term=.8a0d9d8a5c5d](https://www.washingtonpost.com/world/middle_east/us-and-allies-call-irans-recent-rocket-launch-threatening/2017/08/02/e95cc734-778a-11e7-8c17-533c52b2f014_story.html?utm_term=.8a0d9d8a5c5d))

4. United Nations Security Council, "Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)," June 20, 2017. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2017/515](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/515))

The United States has responded to the recent test and to ballistic missile launches with targeted sanctions, most recently on July 28,<sup>5</sup> as well as with a sweeping new sanctions bill that the president signed into law on August 2.<sup>6</sup> Other countries have limited their response to strong statements, however. The Secretary General concludes that a lack of consensus among Security Council members or a lack of information prevents a punitive response. If left unchecked, this will undermine both the resolution and the nuclear agreement.

## WHAT ARE THE UN SECRETARY GENERAL REPORTS AND WHY DO THEY MATTER?

Every six months since July 2016, the Secretary General has reported to the Security Council on member states' adherence to Annex B of UNSCR 2231.<sup>7</sup> To date, three such reports have been produced: two under Ban Ki-moon, and one under António Guterres.<sup>8</sup> These reports lay out in detail the names of weapon systems, persons, entities, and even countries that have transgressed UNSCR 2231. They contrast with recent reports by the International Atomic Energy Agency (IAEA), which provide little detail regarding Iran's adherence to the JCPOA's nuclear restrictions, and have handicapped independent evaluations of Iran's compliance.<sup>9</sup>

The Secretary General's most recent report, released on June 20, 2017, describes Iranian arms shipments to Yemen, the test of a ballistic missile capable of delivering a nuclear weapon, and violations of travel bans and asset freezes imposed on specific Iranian individuals and organizations. However, the United Nations has done little to investigate alleged violations and nothing to punish confirmed noncompliance.

## EVIDENCE OF UNSCR 2231 ANNEX B VIOLATIONS

### Missile Tests

In UNSCR 2231, Iran is "called upon not to undertake any activity related to ballistic missiles designed to be capable of delivering nuclear weapons."<sup>10</sup> Iran argues that its ballistic missile launches do not violate the JCPOA because these missiles were not explicitly designed to deliver nuclear warheads. The intertwined history of Iran's nuclear and ballistic missile programs belies this claim,<sup>11</sup> as do regular assessments from the U.S. intelligence

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5. U.S. Department of the Treasury, Press Release, "Treasury Sanctions Key Ballistic Missile Entities in Iran," July 28, 2017. (<https://www.treasury.gov/press-center/press-releases/Pages/sm0136.aspx>)

6. Countering America's Adversaries Through Sanctions Act, Pub. L. 115-44, H.R. 3364, codified as amended at 115 U.S.C. (<https://www.congress.gov/bill/115th-congress/house-bill/3364>)

7. United Nations Security Council, "Report of the Secretary-General on the implementation of Security Council resolution 2231 (2015)," July 12, 2016, section I, clauses 3-4, pages 1-2. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2016/589&Lang=E](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2016/589&Lang=E))

8. "António Guterres appointed next UN Secretary-General by acclamation," *UN News Centre*, October 13, 2016. (<http://www.un.org/apps/news/story.asp?NewsID=55285#.WYstqFGQyCh>)

9. Noted in: Valerie Lincy and Gary Milhollin, "Iran's Nuclear Veil: How to increase transparency under the Joint Comprehensive Plan of Action," *Iran Watch*, February 1, 2017. ([http://www.iranwatch.org/sites/default/files/iran\\_watch\\_report\\_-\\_transparency\\_02-01-2017\\_1.pdf](http://www.iranwatch.org/sites/default/files/iran_watch_report_-_transparency_02-01-2017_1.pdf))

10. United Nations Security Council, Resolution 2231, July 20, 2015, Annex B, section 3, page 99. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/RES/2231\(2015\)](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2231(2015)))

11. Particularly Iran's concurrent interest in both programs during the Iran-Iraq War. "Iran Nuclear Milestones: 1967-2017," *Iran Watch*, June 21, 2017. (<http://www.iranwatch.org/our-publications/weapon-program-background-report/iran-nuclear-milestones-1967-2017>); "Iran Missile Milestones: 1985-2016," *Iran Watch*, July 13, 2016. (<http://www.iranwatch.org/our-publications/weapon-program-background-report/iran-missile-milestones-1985-2016>). For more on the war, see: Behnam Ben Taleblu, "The Long Shadow of the Iran-Iraq War," *The National Interest*, October 22, 2014. (<http://nationalinterest.org/feature/the-long-shadow-the-iran-iraq-war-11535?page=show>)

community that “Tehran would choose ballistic missiles as its preferred method of delivering nuclear weapons,” and that “Iran’s ballistic missiles are inherently capable of delivering WMD.”<sup>12</sup>

From July 2015, when Tehran agreed to the JCPOA, to February 2017, Iran has launched up to 14 ballistic missiles.<sup>13</sup> Many of these platforms meet the criterion established by the Missile Technology Control Regime (MTCR) as being “nuclear-capable.” That is, they can deliver a 500-kilogram payload to a range of at least 300 kilometers.<sup>14</sup>

The June 2017 Secretary General’s report describes the January 29 launch of a nuclear-capable medium-range ballistic missile (MRBM) called the “Khorramshahr.”<sup>15</sup> In response to this test, the White House put Tehran “on notice”<sup>16</sup> and quickly imposed a set of targeted sanctions.<sup>17</sup> At the Security Council, however, things have moved more slowly – a process described in detail in the Secretary General’s report. On February 7, the United States, along with France, Germany, and the United Kingdom, wrote to the Secretary General arguing that the test was “destabilizing and provocative” and that it had been “conducted in defiance of resolution 2231.”<sup>18</sup> Later in February, an Israeli letter to the Secretary General called the test “yet another flagrant violation” of the resolution. A rebuttal from Iran arrived in March, stating that “nothing in Security Council resolution 2231 (2015) prohibits Iran’s conventional missile activities.”<sup>19</sup> The Security Council twice discussed the issue, but failed to reach an agreement over how to proceed.<sup>20</sup> The Secretary General merely “call[s] upon the Islamic Republic of Iran to avoid such ballistic missile launches, which have the potential to increase tensions.”<sup>21</sup>

### **Arms Imports**

Resolution 2231 requires all member states to restrict until October 2020 the sale to Iran of arms or related materiel, as defined by the UN Register of Conventional Arms,<sup>22</sup> unless the Security Council specifically approves the sale. Such sales would be decided “on a case-by-case basis” and none have been approved so far. This is not likely to change, as the United States can block any sale to ensure that the official embargo remains in place for the five-year period mandated by UNSCR 2231.

The June 2017 Secretary General’s report makes no mention of an official request to sell arms to Iran. Nor does it provide an update on past requests. However, the most recent report does provide detailed accounts of two attempted illicit Iranian arms imports outside of the Security Council process. On January 19, 2017 in Kyiv, the

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12. Daniel R. Coats, “Worldwide Threat Assessment of the US Intelligence Community,” *Statement for the Record for the Senate Select Committee on Intelligence*, May 11, 2017, page 7. (<https://www.dni.gov/files/documents/Newsroom/Testimonies/SSCI%20Unclassified%20SFR%20-%20Final.pdf>)

13. Behnam Ben Taleblu, “Iranian Ballistic Missile Tests Since The Nuclear Deal,” *Foundation for Defense of Democracies*, February 9, 2017. ([http://www.defenddemocracy.org/content/uploads/documents/20917\\_Behnam\\_Ballistic\\_Missile.pdf](http://www.defenddemocracy.org/content/uploads/documents/20917_Behnam_Ballistic_Missile.pdf))

14. “Frequently Asked Questions (FAQs),” *Missile Technology Control Regime*, accessed August 7, 2017. (<http://mtcr.info/frequently-asked-questions-faqs/>)

15. Idrees Ali, “Iran tested medium-range ballistic missile: U.S. official,” *Reuters*, January 30, 2017. (<http://www.reuters.com/article/us-usa-iran-missiles-idUSKBN15E2EZ>)

16. The White House, Press Release, “Statement by the National Security Advisor,” February 1, 2017. (<https://www.whitehouse.gov/the-press-office/2017/02/01/statement-national-security-advisor>)

17. U.S. Department of the Treasury, Press Release, “Treasury Sanctions Supporters of Iran’s Ballistic Missile Program and Iran’s Islamic Revolutionary Guard Corps – Qods Force,” February 3, 2017. (<https://www.treasury.gov/press-center/press-releases/Pages/as0004.aspx>)

18. United Nations Security Council, “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015),” June 20, 2017, section IV, part A, clause 17, page 3. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2017/515](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/515))

19. *Ibid*, section IV, part A, clause 19, page 4.

20. *Ibid*, section IV, part B, clause 20, page 4.

21. *Ibid*, section II, clause 9, page 2.

22. Or until the date on which the IAEA submits its “broader conclusion” report, whichever is earlier.

State Border Guard Service of Ukraine discovered and interdicted 17 boxes of missile system components and aircraft parts in a cargo plane bound for Iran. The cargo included components for the “Fagot”<sup>23</sup> anti-tank guided missile system.<sup>24</sup> Ukrainian authorities initiated criminal proceedings on January 30 and are still working to determine whether the unauthorized shipment is also covered by Annex B of UNSCR 2231.

The second incident involved the interdiction in April of additional anti-tank missile components at the Turkish Black Sea port of Zonguldak. According to the Secretary General’s report, the illicit cargo included components for the “Fagot” and “Konkurs”<sup>25</sup> missiles and was concealed on a truck en route from Ukraine to Iran. As in Ukraine, Turkish officials have launched a criminal investigation and also are seeking to determine if the shipment violated Annex B of UNSCR 2231.<sup>26</sup>

### ***Arms Exports and Interceptions***

Iran has also been identified as the source of arms shipments destined for Yemen and Somalia that were interdicted by U.S., French, and Australian authorities,<sup>27</sup> as well as by the governments of Yemen and the United Arab Emirates.<sup>28</sup>

The most recent Secretary General’s report references a letter from Yemeni authorities assessing that “considerable quantities of weapons and ammunition” of Iranian manufacture have been seized, including anti-tank missiles and drones.<sup>29</sup> Emirati authorities also wrote to the United Nations describing their own seizures of Iranian-made or sourced arms in Yemen, including anti-tank missiles and unmanned aerial vehicles.<sup>30</sup>

Such support contravenes UNSCR 2231, which imposes an embargo on “the supply, sale, or transfer of arms and related materiel from Iran” until October 2020.<sup>31</sup> The aid to the Houthis also contravenes UNSCR 2216, adopted in April 2015, which imposes an arms embargo on the Houthi leadership.<sup>32</sup>

The seizures, about which the Secretary General has requested additional information, follow at least four Iranian arms shipments that have been interdicted since the nuclear agreement was announced in July 2015. In one of those incidents, U.S. and Australian forces stopped a vessel in September 2015 traveling from Iran to Somalia and seized

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23. “9K111 FAGOT (AT-4 SPIGOT),” *Military Edge*, accessed August 7, 2017. (<http://militaryedge.org/armaments/at-4-spigot/>)

24. United Nations Security Council, “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015),” June 20, 2017, section V, part A, clause 26, page 5. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2017/515](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/515))

25. “9M113 KONKURS (AT-5 SPANDREL),” *Military Edge*, accessed August 7, 2017. (<http://militaryedge.org/armaments/at-5-spandrel/>)

26. United Nations Security Council, “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015),” June 20, 2017, section V, part A, clause 27, page 5. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2017/515](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/515))

27. Jerrica Goodson, Simon Chin, and Valerie Lincy, “Iranian Arms Shipments to Yemen Violate U.N. Resolutions,” *Iran Watch*, November 3, 2016. (<http://www.iranwatch.org/our-publications/policy-briefs/iranian-arms-shipments-yemen-violate-un-resolutions>)

28. United Nations Security Council, “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015),” June 20, 2017, section V, part B, clauses 33-34, page 7. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2017/515](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/515))

29. *Ibid.*, section V, part B, clause 33, page 7.

30. *Ibid.*, section V, part B, clause 34, page 7.

31. United Nations Security Council, Resolution 2231, July 20, 2015, Annex B, section 6, sub-section B, page 101. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/RES/2231\(2015\)](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2231(2015)))

32. United Nations Security Council, Resolution 2216, April 2015, clause 14, page 5. ([http://www.un.org/ga/search/view\\_doc.asp?symbol=S/RES/2216%20%282015%29](http://www.un.org/ga/search/view_doc.asp?symbol=S/RES/2216%20%282015%29))

56 “Toophan”<sup>33</sup> and 19 “Konkurs”<sup>34</sup> anti-tank guided missiles.<sup>35</sup> Yet the greatest detail about this interdiction can be found not in the Secretary General’s reports but in reports by the UN Panel of Experts for Yemen. This Panel’s January 2016 report also included photos of the “Toophan” missiles bearing stamps<sup>36</sup> of Iran Electronics Industries (IEI)<sup>37</sup> and Shiraz Electronics Industries (SEI),<sup>38</sup> both of which are subordinate to the Ministry of Defense and Armed Forces Logistics (MODAFL)<sup>39</sup> and subject to U.S. and EU sanctions. Overall, according to its January 2017 report, “the panel has identified 2,064 weapons that could be directly linked to Iranian manufacture or origin.”<sup>40</sup>

### ***Entity Related Restrictions***

Lastly, each Secretary General’s report describes instances in which UN member states have failed to abide by UNSCR 2231’s asset freeze and travel ban requirements.<sup>41</sup> When the nuclear agreement was officially implemented in January 2016, dozens of Iranian entities were removed from the UN blacklist. The entities that remain subject to sanctions under UNSCR 2231 are primarily connected to Iran’s missile and military programs.

According to the Secretary General’s June 2017 report, entities and persons from this list<sup>42</sup> were recently permitted entry into Iraq and/or Syria without penalty. For instance, in March 2017, the Defense Industries Organization (DIO), a subsidiary of Iran’s MODAFL<sup>43</sup> that remains subject to UN sanctions, participated in a military exhibition in Baghdad, Iraq. Accompanying DIO to the International Defense Exhibition in Iraq (IQDEX)<sup>44</sup> was Iran’s MODAFL<sup>45</sup> (sanctioned in the U.S. and the EU for missile proliferation) and two other MODAFL subsidiaries,<sup>46</sup> Marine Industries Organization and Aviation Industries Organization. The government of Iraq failed to fulfill the

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33. The Toophan is Iran’s version of the American TOW missile. Anthony H. Cordesman, *Iran’s Developing Military Capabilities*, (Washington, DC: Center for Strategic and International Studies, 2005), page 28; “Toophan,” *Military Edge*, accessed August 7, 2017. (<http://militaryedge.org/armaments/toophan/>)

34. Iran’s version of the Konkurs is called the Tosan. United Nations Security Council, “Final Report of the Panel of Experts on Yemen,” January 31, 2017, page 129. ([http://www.un.org/ga/search/view\\_doc.asp?symbol=S/2017/81](http://www.un.org/ga/search/view_doc.asp?symbol=S/2017/81))

35. See table 2 in: *Ibid*, pages 27-28.

36. United Nations Security Council, “Final Report of the Panel of Experts on Yemen established pursuant to Security Council resolution 2140 (2014),” January 26, 2016, pages 83-85. ([http://www.un.org/ga/search/view\\_doc.asp?symbol=S/2016/73](http://www.un.org/ga/search/view_doc.asp?symbol=S/2016/73))

37. “Iran Electronics Industries,” *Iran Watch*, January 20, 2015. (<http://www.iranwatch.org/iranian-entities/iran-electronics-industries-iei>)

38. “Shiraz Electronics Industries,” *Iran Watch*, May 12, 2009. (<http://www.iranwatch.org/iranian-entities/shiraz-electronics-industries>)

39. “Ministry of Defense Armed Forces Logistics (MODAFL),” *Iran Watch*, August 27, 2008. (<http://www.iranwatch.org/iranian-entities/ministry-defense-armed-forces-logistics-modafli>)

40. United Nations Security Council, “Final report of the Panel of Experts on Yemen,” January 31, 2017, page 28. ([http://www.un.org/ga/search/view\\_doc.asp?symbol=S/2017/81](http://www.un.org/ga/search/view_doc.asp?symbol=S/2017/81))

41. United Nations Security Council, “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015),” June 20, 2017, sections IV and V, page 8. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2017/515](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/515))

42. For that version, see: United Nations Security Council, “The List established and maintained pursuant to Security Council res. 2231 (2015),” accessed August 10, 2017. (<https://scsanctions.un.org/fop/fop?xml=htdocs/resources/xml/en/consolidated.xml&xslt=htdocs/resources/xsl/en/iran.xsl>)

43. “Defense Industries Organization (DIO),” *Iran Watch*, March 17, 2010. (<http://www.iranwatch.org/iranian-entities/defense-industries-organization-dio>)

44. For more information on the exhibit, see: “About IQDEX,” *IQDEX*, accessed August 4, 2017. ([http://www.iqdexiraq.com/About\\_IQDEX.htm](http://www.iqdexiraq.com/About_IQDEX.htm))

45. For complete list of entities participating in 2017, see: “Exhibitors List: The Sixth Session of the Security, Defense, and Iraqi Military Industries International Exhibition, 5-7/March/2017,” *IQDEX*, accessed August 4, 2017. (<http://www.iqdexiraq.com/IQDEX2017/exhibitorslist.pdf>)

46. For a list of MODAFL subsidiaries, see the Persian-language MODAFL website: “سازمان های وابسته” (Affiliated Organizations),” *Ministry of Defense* (Iran), accessed August 8, 2017. (<http://mod.gov.ir/page/سازمان-های-وابسته>)

requirement for UN member to states to “freeze the funds, other financial assets and economic resources which are on their territories”<sup>47</sup> of the listed entities.

This was actually the second time in two years that DIO has openly participated in IQDEX without penalty. The Secretary General’s July 2016 report described DIO’s participation in the March 2016 exhibition in great detail.<sup>48</sup> The report included media images of Iran’s display and listed the military items reportedly exhibited, including “small arms, ammunition and rockets.” It concluded that DIO’s presence and display may have constituted a double violation: a failure to freeze DIO’s assets and a failure to seek prior approval for an arms transfer from the Security Council, as required by Annex B of UNSCR 2231.<sup>49</sup>

Iraq has similarly failed to block the travel of Major General Qassem Soleimani, the commander of Iran’s Islamic Revolutionary Guard Corps’ Quds-Force (IRGC-QF), who is also on the UN blacklist. Soleimani visited the Shiite holy city of Karbala, Iraq earlier this summer.<sup>50</sup> The Secretary General’s June 2017 report further cites Arabic and Iranian media sources which claim that Soleimani was in Aleppo, Syria in December 2016,<sup>51</sup> in Hama, Syria in April 2017, and Iraqi Kurdistan later that month.<sup>52</sup>

According to UNSCR 2231, states are required to “take the necessary measures to prevent the entry into or transit through their territories” of persons on the aforementioned list. While the Security Council permits a “case-by-case” basis exemption,<sup>53</sup> Iran has never asked for one.<sup>54</sup>

## CONCLUSION AND POLICY RECOMMENDATIONS

Contrary to the hope that the JCPOA would mitigate Iran’s destabilizing posture in the region, the agreement has had no moderating effect on Iranian behavior. Iran’s decision to ignore the restrictions set forth in Annex B of UNSCR 2231 have long been clear. In its official response to UNSCR 2231’s passage, Tehran promised to “strengthen its defense capabilities” and rejected “the legitimacy, validity or enforceability of the sanctions and restrictive measures” adopted by the United Nations.<sup>55</sup> The violations of UNSCR 2231 described here confirm Iran’s stance.

It is in the interest of the international community to respond to each reported violation. A failure to do so only adds to Iran’s sense of impunity.

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47. United Nations Security Council, Resolution 2231, July 20, 2015, Annex B, section 6, subsection D, page 101. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/RES/2231\(2015\)](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2231(2015)))

48. United Nations Security Council, “Report of the Secretary-General on the implementation of Security Council resolution 2231 (2015),” July 12, 2016, section V, clause 32, pages 9-10. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2016/589&Lang=E](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2016/589&Lang=E))

49. Ibid, section VI, clauses 33-35, pages 10-11.

50. Amir Toumaj, “Qassem Soleimani spotted in Karbala, Iraq,” *FDD’s Long War Journal*, June 16, 2017. (<http://www.longwarjournal.org/archives/2017/06/qassem-soleimani-spotted-in-karbala-iraq.php>)

51. United Nations Security Council, “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015),” June 20, 2017, section VII, clause 40, page 9. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2017/515](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/515))

52. Ibid, section VII, clause 41, page 9.

53. United Nations Security Council, Resolution 2231, July 20, 2015, Annex B, section 6, sub-section E, page 103. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/RES/2231\(2015\)](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2231(2015)))

54. United Nations Security Council, “Third report of the Secretary-General on the implementation of Security Council resolution 2231 (2015),” June 20, 2017, section VII, clause 39, pages 8-9. ([http://www.un.org/en/ga/search/view\\_doc.asp?symbol=S/2017/515](http://www.un.org/en/ga/search/view_doc.asp?symbol=S/2017/515))

55. “Iran statement following UNSC Resolution 2231 endorsing JCPOA,” *IRNA* (Iran), July 20, 2015. (<http://www7.irna.ir/en/News/81688987/>)

Since the JCPOA was announced, however, the UN has taken no serious action. The lack of consensus in the Security Council is one reason for this inaction. Another is the absence of a dedicated committee and expert panel for UNSCR 2231, as existed under previous UNSC sanctions resolutions on Iran.

More disappointing still is the EU's failure to join the United States in imposing sanctions in response to Iranian missile tests. Not one additional entity has been designated by the EU since July 2015, whether for terrorism, ballistic missile work, or human rights abuses. In fact, proliferation-related designations have moved in the opposite direction. In March 2017, the UK government terminated its "Iran List," a public compendium of Iranian entities under suspicion for WMD end use.<sup>56</sup> The list included Iranian entities that have been active in ballistic missile production and procurement.<sup>57</sup>

To prevent Tehran from capitalizing on this dissonance,<sup>58</sup> Washington must deepen its engagement and coordination with the international community. This can be done in three steps:

- First, data and language from the Secretary General's reports can help rally Europe behind a pressure campaign to punish Tehran and target entities in violation of UNSCR 2231. Specifically, the U.S. ambassador to the UN can use this information to continue making the case against Iran's destabilizing behavior during Security Council meetings.<sup>59</sup> The U.S. should further address violations described in the Secretary General's reports at Joint Commission meetings with the other parties to the JCPOA.
- Second, while consensus may be difficult to achieve, the United States must advocate for adding sanctions violators to the UN's blacklist, which UNSCR 2231 explicitly allows.<sup>60</sup>
- And third, Washington should also call for the creation of a "2231 Committee" and an associated Panel of Experts. Such dedicated bodies existed under previous UNSC resolutions on Iran.<sup>61</sup> They were charged with monitoring the implementation of sanctions, investigating possible violations, and proposing sanctions designations in response to confirmed violations. Unfortunately, the 1737 Committee and its Panel of Experts were dissolved when the JCPOA took effect in January 2016, at Iran's request. Currently, alleged violations are handled by a rotating facilitator and a "secretariat" housed within the Security Council's Political Affairs Department.<sup>62</sup> Neither has the power to do more than report on allegations and hope that member states comply.

Without a coordinated effort to curb them, Iranian provocations are likely to increase in quantity and importance. Vigorous enforcement of UNSCR 2231 and the provisions of its annexes will be a key component of the strategy to ensure this does not happen.

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56. UK Department for International Trade, Export Control Organisation, "Notice to exporters 2017/08: Iran list removed from GOV. UK," March 22, 2017. (<https://www.gov.uk/government/publications/notice-to-exporters-201708-iran-list-removed-from-govuk/notice-to-exporters-201708-iran-list-removed-from-govuk>)

57. At least, according to an older version of the list: UK Department for Business Innovation & Skills, "WMD End-Use Control: Licence Applications for Iran," October 31, 2015. (<http://www.iranwatch.org/library/governments/united-kingdom/department-business-innovation-skills/iran-list>)

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