

Iran: reimposition of full-scale UN sanctions

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On 28 September, full-scale UN sanctions against Iran came into effect in response to its serious violations of the Joint Comprehensive Plan of Action (JCPOA) concerning the nuclear programme. All the UN restrictions that had been gradually lifted over the past decade have now been restored. These include an embargo on goods and services, as well as restrictions on dealings with Iranian institutions, banks, and other entities linked to the country's nuclear and ballistic missile programmes. In practice, this narrows the scope for economic cooperation with Iran to a minimum. On 29 September, the Council of the European Union confirmed the validity and enforcement of the UN Security Council's decision, detailing the EU's own sanctions against Iran, aimed at curtailing financial, trade, transport, and other forms of cooperation to the greatest possible extent. Iran has strongly criticised the reimposition of UN sanctions.

The immediate trigger for the reinstatement of sanctions was a decision that the European signatories to the JCPOA – the United Kingdom, France, and Germany, collectively known as the E3 – taken on 28 August under the agreement's snapback mechanism, in response to Iran's failure to cooperate in restoring full oversight of its nuclear facilities, to account for its stocks of illegally enriched uranium, and to return to negotiations with the United States.

At the UN Security Council vote on 27 September, Russia and China – both signatories to the JCPOA and permanent Council members – attempted to delay the reimposition of sanctions, but failed in this effort.

The reinstatement of full-scale UN restrictions signals the definitive collapse of the political process aimed at resolving the Iranian nuclear issue. In the short term, this will lead to a further deterioration of the internal situation in Iran, heighten regional tensions, and increase the risk of another military escalation, following the so-called twelve-day war between Iran and Israel last June.

Commentary

- **The reimposition of sanctions demonstrates that the earlier approach to resolving the Iranian nuclear issue is no longer viable.** The unchecked development of Iran's nuclear programme triggered a series of UN restrictions introduced from 2006 onwards. The JCPOA, which entered into force in 2015, represented an attempt to resolve the issue by gradually lifting these sanctions in exchange for oversight of the Iranian programme by the International Atomic Energy Agency (IAEA). In 2018, the United States unilaterally withdrew from the accord. This undermined the benefits of sanctions relief and prompted Iran to engage in systematic and increasingly overt breaches of the

agreement's provisions, notably enriching uranium beyond agreed limits and restricting access to its nuclear sites. Iran's non-compliance with the agreement, interpreted as evidence that it had been developing a military nuclear programme, became the formal trigger for Israel's full-scale attack on Iran and its nuclear sites during the so-called twelve-day war (13–24 June), in which the United States also took part (see '[Iran: a high price for surviving the 12-day war](#)'). As a result of this conflict, Iran toughened its position, while the E3 intensified its pressure on Tehran to return to political talks. Time pressure was a key factor: the E3 used the final deadline included in the JCPOA that allowed for the snapback of sanctions. With Iran and the West hardening their stances and becoming increasingly polarised, the prospects for a return to negotiations, particularly within the JCPOA framework, now appear remote.

- **The reinstatement of UN sanctions poses a serious problem for Iran, a country already mired in deep economic and political crisis.** *De jure*, these measures prohibit any formal cooperation with the Islamic Republic, including financial transactions and military cooperation with partners such as Russia, Belarus, and China – a particularly pressing requirement in the current situation. In the short term, the impact of the restrictions will be limited by Iran's well-established mechanisms for operating under and circumventing sanctions, notably through cooperation with China – its main trading partner and the dominant buyer of its oil – and with Russia, which has pledged to rapidly expand bilateral military and economic cooperation. Nevertheless, circumventing sanctions offers no viable pathway for Iran to rebuild and develop its potential, nor will it prevent serious domestic consequences, including rising public discontent and political tensions. In practice, the sanctions have strengthened the Islamic Revolutionary Guard Corps and conservative factions within the regime, fuelling their conflict with elements of the elite inclined to pursue systemic reforms and engagement with the West.
- **In the current circumstances, the threat of further Israeli military operations against Iran has grown.** Given the collapse of the JCPOA-based dialogue mechanism, Iran's increasingly hardline rhetoric – with Supreme Leader Ali Khamenei ruling out negotiations for the first time – and the dwindling scope for Iranian actors willing to negotiate on nuclear issues with the West, the prospects for a political settlement of the crisis appear remote. At the same time, the risk of military escalation has increased once more. The UN Security Council's decision indicates the continued development of Iran's nuclear programme. The scale of the damage inflicted on this programme during the twelve-day war is increasingly questioned, while Iran is now taking steps to rebuild its defensive capabilities and deterrence system. Against this backdrop, the threat of further Israeli hybrid operations and direct military attacks on Iran has risen.