A NUCLEAR PROCUREMENT CHANNEL FOR IRAN

Mission Impossible?

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A Nuclear Procurement Channel for Iran

Recent Developments

- Key Scenarios
- Defining the Channel
- Controlled Items
- Oversight of the Channel
- Procedural Issues
- Final Remarks
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Key Scenarios

Recent Developments

- Lifted sanctions are ‘secondary’ sanctions
- US persons still face huge business limitations
- Civil aviation; US-owned Foreign Entities; import of certain Iranian products.

Defining the Channel

- Terminated most trade & financial restrictions
- US secondary sanctions no longer applicable

Controlled Items

Procedural Issues

- US secondary sanctions no longer applicable
- Greater risk of non-compliance

Oversight of the Channel

Final Remarks
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Defining the Channel

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PROCUREMENT CHANNEL

Legitimate Export

Nuclear relevant items
Prior Approval
Procedures
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Controlled Items

WHAT IS COVERED?

Recent Developments
Key Scenarios
Defining the Channel
Controlled Items
Oversight of the Channel
Procedural Issues
Final Remarks

NSG Trigger List
NSG Dual-use List
Catch-all Clause

CONTROLLED ITEMS AND ACTIVITIES
“With the purpose of establishing a procurement channel, […] the Joint Commission will […] review and decide on proposals by states seeking to supply [items listed in the NSG Lists], as well as any further items if the relevant State determines that they could contribute to activities inconsistent with the JCPOA”
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Oversight of the Channel

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UNSC

Joint Commission / PWG

Exporting State
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Procedural Issues

- How detailed a description?
- Translation/language issues
- EUC for dual-use, non-nuclear end-use
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Final Remarks
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Final Remarks
THANK YOU FOR YOUR ATTENTION!