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**LEGISLATIVE ACTS AND OTHER INSTRUMENTS**

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Subject: COUNCIL DECISION amending Decision 2010/413/CFSP concerning  
restrictive measures against Iran

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**COUNCIL DECISION (CFSP) 2025/...**

**of ...**

**amending Decision 2010/413/CFSP concerning restrictive measures against Iran**

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on European Union, and in particular Article 29 thereof,

Having regard to the proposal from the High Representative of the Union for Foreign Affairs and Security Policy,

Whereas:

- (1) On 26 July 2010, the Council adopted Decision 2010/413/CFSP<sup>1</sup>, concerning restrictive measures against Iran.
- (2) On 14 July 2015, China, France, Germany, the Russian Federation, the United Kingdom and the United States, supported by the High Representative of the Union for Foreign Affairs and Security Policy (the 'High Representative'), reached an agreement with Iran on a long-term comprehensive solution to the Iranian nuclear issue. The full implementation of the Joint Comprehensive Plan of Action (JCPOA) was to ensure the exclusively peaceful nature of the Iranian nuclear programme, and provide for the comprehensive lifting of all nuclear-related sanctions.
- (3) On 20 July 2015, the United Nations Security Council (UNSC) adopted Resolution 2231 (2015) endorsing the JCPOA, urging its full implementation in accordance with the timetable established in the JCPOA and providing for actions to take place in accordance with the JCPOA.
- (4) On 20 July 2015, the Council welcomed and endorsed the JCPOA and committed itself to abiding by its terms and to following the agreed implementation plan. The Council also fully supported UNSC Resolution 2231 (2015).

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<sup>1</sup> Council Decision 2010/413/CFSP of 26 July 2010 concerning restrictive measures against Iran and repealing Common Position 2007/140/CFSP (OJ L 195, 27.7.2010, p. 39, ELI: <http://data.europa.eu/eli/dec/2010/413/oj>).

- (5) On 18 October 2015, the Council adopted Declaration 2015/C 345/01<sup>2</sup>, noting that the commitment to lift all Union nuclear-related sanctions in accordance with the JCPOA was without prejudice to the dispute resolution mechanism set out in the JCPOA and to the reintroduction of Union sanctions in case of significant non-performance by Iran of its commitments under the JCPOA. Furthermore, the Council committed to reintroducing without delay all Union nuclear-related sanctions that had been suspended or terminated, in the event of significant non-performance by Iran of its commitments under the JCPOA upon a joint recommendation to the Council by the High Representative, France, Germany and the United Kingdom.
- (6) On 14 January 2020, the High Representative, as Coordinator of the Joint Commission of the JCPOA (the ‘Coordinator’), received a letter from the Foreign Ministers of France, Germany and the United Kingdom referring a matter concerning the implementation of Iran’s commitments under the JCPOA to the Joint Commission for resolution through the Dispute Resolution Mechanism, as set out in paragraph 36 of the JCPOA. On the same day, the Coordinator issued a statement indicating that he would oversee the Dispute Resolution Mechanism process (the ‘process’).

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<sup>2</sup> Council Declaration 2015/C 345/1 of 18 October 2015 (OJ C 345, 18.10.2015, p. 1).

- (7) On 24 January 2020, the Coordinator issued a statement indicating that, pursuant to the process, he had undertaken extensive bilateral and collective consultations and that all JCPOA participants had reconfirmed their determination to preserve the JCPOA, which was in the interest of all. The Coordinator indicated that, notwithstanding differences on modalities, there was agreement that more time was needed due to the complexity of the issues involved. The timeline for the process was therefore extended. All parties involved agreed to pursue expert-level discussions addressing concerns regarding nuclear implementation, as well as the wider impact of the withdrawal of the United States from the JCPOA and its re-imposition of sanctions against Iran, concerning which all JCPOA participants had expressed regret.
- (8) On 21 December 2020, in a Joint Ministerial Statement on the JCPOA, the JCPOA participants re-emphasised their commitment to preserving the agreement and stressed their respective efforts in that regard. The statement underlined that the Ministers had discussed how full and effective implementation of the JCPOA by all remained crucial, as well as the need to address ongoing implementation challenges, including on nuclear non-proliferation and sanctions-lifting commitments. The Ministers agreed to continue their dialogue in order to ensure full JCPOA implementation by all sides. The Ministers acknowledged the prospect of a return of the United States to the JCPOA and underlined their readiness to positively address that return in a joint effort.
- (9) From April 2021 to August 2022, the Coordinator led diplomatic talks to negotiate the return of the United States to the JCPOA and to ensure the full and effective implementation of the JCPOA by Iran. Despite those efforts, including several meetings of the Joint Commission during that period, it was not possible to reach an agreement.

- (10) On 14 September 2023, the Coordinator received a letter from the Foreign Ministers of France, Germany and the United Kingdom related to the implementation of the JCPOA. The Foreign Ministers stated that Iran was in non-compliance since 2019 and that they considered that this had not been resolved through the process. They expressed their intention not to take steps regarding the lifting of further sanctions on 18 October 2023, the JCPOA Transition Day. On the same date, the Coordinator issued a statement indicating that that he had circulated the ministerial letter to the other JCPOA participants, and that he would consult with all JCPOA participants on the way forward.
- (11) On 6 October 2023, the Coordinator issued a statement indicating that following consultations with JCPOA participants, the issue concerning the implementation of Iran's commitments under the JCPOA remained unresolved given the diverging views expressed.
- (12) On 16 October 2023, the Council adopted Decision (CFSP) 2023/2195<sup>3</sup>, which amended Decision 2010/413/CFSP. The Council considered that the Union had valid grounds for maintaining after JCPOA Transition Day the restrictive measures against certain persons and entities listed in Annexes I and II to Council Decision 2010/413/CFSP and Annexes VIII and IX to Council Regulation (EU) No 267/2012<sup>4</sup>. Therefore, the names of those persons and entities were transferred from Annex I to Council Decision 2010/413/CFSP to Annex II to that Decision and from Annex VIII to Council Regulation (EU) No 267/2012 to Annex IX to that Regulation.

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<sup>3</sup> Council Decision (CFSP) 2023/2195 of 16 October 2023 amending Decision 2010/413/CFSP concerning restrictive measures against Iran (OJ L, 2023/2195, 17.10.2023, ELI: <http://data.europa.eu/eli/dec/2023/2195/oj>).

<sup>4</sup> Council Regulation (EU) No 267/2012 of 23 March 2012 concerning restrictive measures against Iran and repealing Regulation (EU) No 961/2010 (OJ L 88, 24.3.2012, p. 1, ELI: <http://data.europa.eu/eli/reg/2012/267/oj>).

- (13) The Council further considered that the Union had valid grounds for maintaining after JCPOA Transition Day the restrictive measures on financial messaging services, related to the transport sector, related to proliferation-sensitive nuclear activities and associated services, and those on metals and associated services, on software and associated services, and on arms and associated services.
- (14) The Council also considered that the Union had valid grounds for not terminating, after JCPOA Transition Day, the restrictive measures which were suspended on JCPOA Implementation Day by Council Decision (CFSP) 2015/1863<sup>5</sup>.
- (15) On 28 August 2025, the Coordinator and the President of the UNSC received a letter from the Foreign Ministers of France, Germany and the United Kingdom related to the implementation of the JCPOA. Through this letter, the Foreign Ministers notified the UNSC that, based on factual evidence, they believed Iran to be in significant non-performance of its commitments under the JCPOA, thereby opening the procedure to reinstate the UN sanctions lifted under UNSC Resolution 2231 (2015), in line with paragraph 11 of UNSC Resolution 2231 (2015).
- (16) On 29 August 2025, in line with Council Declaration 2015/C 345/01, the High Representative, France and Germany sent a joint recommendation to the Council, recommending that all Union nuclear-related sanctions that had been suspended or terminated, or both, be reintroduced without delay once the UN sanction have been reinstated, in line with UNSC Resolution 2231 (2015).

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<sup>5</sup> Council Decision (CFSP) 2015/1863 of 18 October 2015 amending Decision 2010/413/CFSP concerning restrictive measures against Iran (OJ L 274, 18.10.2015, p. 174, ELI: <http://data.europa.eu/eli/dec/2015/1863/oj>).

- (17) By 27 September 2025, the UNSC had not adopted a new resolution to continue lifting sanctions within 30 days of the notification of 28 August 2025. Therefore, in line with the provisions of paragraph 37 of the JCPOA, the provisions of UNSC Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008) and 1929 (2010) are to be re-imposed.
- (18) The Council considers that the Union has valid grounds for re-imposing all Union nuclear-related sanctions on Iran that have been suspended or terminated under the JCPOA.
- (19) In this context, the Council also considers that given Iranian proliferation activities, particularly as regards items, materials, equipment, goods and technology contained in the Nuclear Suppliers Group and Missile Technology Control Regime lists, the most stringent restrictions should be maintained.
- (20) In line with the provision set out in paragraph 37 of the JCPOA, the re-imposition of restrictive measures is not to apply with retroactive effect to contracts concluded before ... [*date of entry into force of this amending Decision*], or of ancillary contracts for the execution of such contracts, provided that the activities contemplated under, and the execution of, such contracts are consistent with the JCPOA and the re-imposed provisions.
- (21) Further action by the Union is needed in order to implement certain measures.
- (22) Decision 2010/413/CFSP should therefore be amended accordingly,

HAS ADOPTED THIS DECISION:

## Article 1

Decision 2010/413/CFSP is amended as follows:

- (1) in Article 1, paragraph 2 is replaced by the following:
  - ‘2. The prohibition in paragraph 1 shall not apply to the direct or indirect transfer to, or for use in, or the benefit of, Iran through the territories of Member States of items referred to in subparagraphs 3(b)(i) and (ii) of UNSCR 1737 (2006) for light water reactors begun before December 2006.’;

- (2) Article 3c is replaced by the following:

### ‘Article 3c

1. The prohibitions set out in Article 3a shall be without prejudice to the execution until ... [*3 months from the date of entry into force of this amending Decision*] of contracts concluded before ... [*date of entry into force of this amending Decision*], or of ancillary contracts necessary for the execution of such contracts, to be concluded and executed not later than ... [*3 months from the date of entry into force of this amending Decision*].

2. The prohibitions set out in Article 3a shall be without prejudice to the execution of obligations provided for in contracts concluded before ... [*date of entry into force of this amending Decision*], or in ancillary contracts necessary for the execution of such obligations where the supply of Iranian crude oil and petroleum products or the proceeds derived from their supply are for the reimbursement of outstanding amounts with respect to contracts concluded before ... [*date of entry into force of this amending Decision*] to persons or entities within the territories of Member States or under their jurisdiction, where those contracts specifically provide for such reimbursements.’;

(3) Article 3d is replaced by the following:

‘*Article 3d*

1. The prohibitions set out in Article 3b shall be without prejudice to the execution until ... [*3 months from the date of entry into force of this amending Decision*] of contracts concluded before ... [*date of entry into force of this amending Decision*] or of ancillary contracts necessary for the execution of such contracts, to be concluded and executed not later than ... [*3 months from the date of entry into force of this amending Decision*].

2. The prohibitions set out in Article 3b shall be without prejudice to the execution of obligations provided in for contracts concluded before ... [*date of entry into force of this amending Decision*] or in ancillary contracts necessary for the execution of such obligations where the supply of petrochemical products or the proceeds derived from the supply of those products are for the reimbursement of outstanding amounts with respect to contracts concluded before ... [*date of entry into force of this amending Decision*] to persons or entities within the territories of Member States or under their jurisdiction, where those contracts specifically provide for such reimbursements.’;

(4) in Article 4b, paragraphs 1, 2, 3 and 4 are replaced by the following:

- ‘1. The prohibition set out in Article 4(1) shall be without prejudice to the execution, until ... [*3 months from the date of entry into force of this amending Decision*], of any obligation relating to the delivery of goods provided for in contracts concluded before ... [*date of entry into force of this amending Decision*].
2. The prohibitions set out in Article 4 shall be without prejudice to the execution, until ... [*3 months from the date of entry into force of this amending Decision*], of any obligation arising from contracts concluded before ... [*date of entry into force of this amending Decision*] and relating to investments made in Iran before the latter date by enterprises established in Member States.
3. The prohibition set out in Article 4a(1) shall be without prejudice to the execution, until ... [*3 months from the date of entry into force of this amending Decision*], of an obligation relating to the delivery of goods provided for in contracts concluded before ... [*date of entry into force of this amending Decision*].

4. The prohibitions set out in Article 4a shall be without prejudice to the execution, until ... [*3 months from the date of entry into force of this amending Decision*], of an obligation arising from contracts concluded before and ... [*date of entry into force of this amending Decision*] and relating to investments made in Iran before those dates by enterprises established in Member States.’;

(5) Article 4f is replaced by the following:

‘*Article 4f*

The prohibitions set out in Article 4e shall be without prejudice to the execution, until ... [*3 months from the date of entry into force of this amending Decision*], of contracts concluded before ... [*date of entry into force of this amending Decision*] or ancillary contracts necessary for the execution of such contracts.’;

(6) Article 4h is replaced by the following:

‘*Article 4h*

The prohibitions set out in Article 4g shall be without prejudice to the execution, until ... [*3 months from the date of entry into force of this amending Decision*], of contracts concluded before ... [*date of entry into force of this amending Decision*] or ancillary contracts necessary for the execution of such contracts.’;

(7) Article 4j is replaced by the following:

*‘Article 4j*

The prohibitions set out in Article 4i shall be without prejudice to the execution, until ... [3 months from the date of entry into force of this amending Decision], of contracts before ... [date of entry into force of this amending Decision] or ancillary contracts necessary for the execution of such contracts.’;

(8) Article 7 is replaced by the following:

*‘Article 7*

1. The prohibitions set out in Article 6(a) and (b) respectively:

- (a) shall be without prejudice to the execution of an obligation arising from contracts or agreements concluded before ... [date of entry into force of this amending Decision];
- (b) shall not prevent the extension of a participation, if such extension is an obligation under an agreement concluded before ... [date of entry into force of this amending Decision];

2. The prohibitions set out in Article 6a(a) and (b) respectively:
- (a) shall be without prejudice to the execution of an obligation arising from contracts or agreements concluded before ... [*date of entry into force of this amending Decision*];
  - (b) shall not prevent the extension of a participation, if such extension is an obligation under an agreement concluded before ... [*date of entry into force of this amending Decision*].’;

(9) Article 15 is amended as follows:

- (a) paragraphs 1 and 2 are replaced by the following:
  - ‘1. Member States shall inspect, in accordance with their national authorities and legislation and consistent with international law, in particular the law of the sea and relevant international civil aviation agreements, all cargo to and from Iran in their territories, including seaports and airports, if they have information that provides reasonable grounds to believe that the cargo contains items the supply, sale, transfer or export of which is prohibited under this Decision.
  - 2. Member States, consistent with international law, in particular the law of the sea, may request inspections of vessels on the high seas with the consent of the flag State, if they have information that provides reasonable grounds to believe that the vessels carry items the supply, sale, transfer or export of which is prohibited under this Decision.’;

(b) paragraphs 5 and 6 are replaced by the following:

- ‘5. In cases where an inspection referred to in paragraphs 1 or 2 is undertaken, Member States shall seize and dispose of, such as through destruction, rendering inoperable, storage or transferring to a State other than the originating or destination States for disposal, items the supply, sale, transfer or export of which is prohibited under this Decision in accordance with paragraph 16 of UNSCR 1929 (2010). Such seizure and disposal shall be carried out at the expense of the importer or, if it is not possible to recover these expenses from the importer, they may, in accordance with national legislation, be recovered from any other person or entity responsible for the attempted illicit supply, sale, transfer or export.
6. The provision by nationals of Member States or from the territories under the jurisdiction of Member States of bunkering or ship supply services, or other servicing of vessels, to Iranian-owned or -contracted vessels, including chartered vessels, shall be prohibited if they have information that provides reasonable grounds to believe that the vessels carry items the supply, sale, transfer or export of which is prohibited under this Decision unless the provision of such services is necessary for humanitarian purposes or until the cargo has been inspected, and seized and disposed of if necessary, in accordance with paragraphs 1, 2 and 5.’;

(10) Article 18 is replaced by the following:

*‘Article 18*

The provision by nationals of Member States, or from the territories of Member States, of engineering and maintenance services to Iranian cargo aircraft shall be prohibited if they have information that provides reasonable grounds to believe that the cargo aircraft carry items the supply, sale, transfer or export of which is prohibited under this Decision unless the provision of such services is necessary for humanitarian and safety purposes or until the cargo has been inspected, and seized and disposed of if necessary, in accordance with Article 15(1) and (5).’;

(11) Article 19 is amended as follows:

(a) in paragraph (1), points (d) and (e) are deleted;

(b) paragraph 2 is replaced by the following:

‘2. The prohibition in paragraph 1 shall not apply to the transit through the territories of Member States for the purposes of activities directly related to the items specified in subparagraphs 3(b)(i) and (ii) of UNSCR 1737 (2006) for light water reactors begun before December 2006.’;

(c) in paragraph 7, point (ii) is replaced by the following:

‘(ii) the necessity to meet the objectives of UNSCR 1737 (2006) and UNSCR 1929 (2010), including where Article XV of the IAEA Statute is engaged.’;

(d) paragraphs 9 and 10 are replaced by the following:

- ‘9. In cases where, pursuant to paragraphs 4, 5 and 7, a Member State authorises the entry into, or transit through, its territory of persons listed in Annex I or II, the authorisation shall be limited to the purpose for which it is given and to the persons concerned thereby.
10. Member States shall notify the Committee of the entry into, or transit through, their territories of the persons set out in Annex I, if an exemption has been granted.’;

(12) Article 20 is amended as follows:

- (a) in paragraph 1, points (d) and (e) are deleted;
- (b) in paragraph 3, the final wording is replaced by the following:

‘after notification by the Member State concerned to the Committee of the intention to authorise, where appropriate, access to such funds and economic resources and in the absence of a negative decision by the Committee within five working days of such notification.’;

(c) paragraph 4 is replaced by the following:

- ‘4. Exemptions may also be made for funds and economic resources which are:
- (a) necessary for extraordinary expenses, after notification by the Member State concerned to, and approval by, the Committee;
  - (b) the subject of a judicial, administrative or arbitral lien or judgement, in which case the funds and economic resources may be used to satisfy that lien or judgement provided that the lien or judgement was entered before the date of UNSCR 1737 (2006), and is not for the benefit of a person or entity referred to in paragraph 1, after notification by the Member State concerned to the Committee;
  - (c) necessary for activities directly related to the items specified in subparagraphs 3(b)(i) and (ii) of UNSCR 1737 (2006) for light water reactors begun before December 2006.’;

(d) paragraph 6 is replaced by the following:

- ‘6. Paragraph 1 shall not prevent a designated person or entity from making payment due under a contract entered into before the listing of such a person or entity, provided that the relevant Member State has determined that:
- (a) the contract is not related to any of the prohibited items, materials, equipment, goods, technologies, assistance, training, financial assistance, investment, brokering or services referred to in Article 1;

- (b) the payment is not directly or indirectly received by a person or entity referred to in paragraph 1;

and after notification by the relevant Member State to the Committee of the intention to make or receive such payments or to authorize, where appropriate, the unfreezing of funds or economic resources for this purpose, 10 working days prior to such authorisation.’;

- (13) Article 22 is replaced by the following:

*Article 22*

No claims, including for compensation or for other claim of this kind, such as a claim of set-off or a claim under a guarantee, in connection with any contract or transaction the performance of which was affected, directly or indirectly, wholly or in part, by reason of measures decided on pursuant to UNSCR 1737 (2006), UNSCR 1747 (2007), UNSCR 1803 (2008) or UNSCR 1929 (2010), including measures of the Union or any Member State in accordance with, as required by or in any connection with, the implementation of the relevant decisions of the Security Council or measures covered by the present Decision, shall be granted to the designated persons or entities listed in Annexes I or II, or any other person or entity in Iran, including the Government of Iran, or any person or entity claiming through or for the benefit of any such person or entity.’;

(14) Article 23 is replaced by the following:

*‘Article 23*

1. The Council shall implement modifications to Annex I on the basis of the determinations made by the Security Council or by the Committee.
2. The Council, acting by unanimity on a proposal from Member States or from the High Representative of the Union for Foreign Affairs and Security Policy, shall establish the list in Annex II and adopt modifications to it.’;

(15) in Article 24, paragraphs 1 and 2 are replaced by the following:

- ‘1. Where the Security Council or the Committee lists a person or entity, the Council shall include such person or entity in Annex I.
2. Where the Council decides to subject a person or entity to the measures referred to in Article 19(1), points (b) and (c), and Article 20(1), points (b) and (c), it shall amend Annex II accordingly.’;

(16) Article 25 is replaced by the following:

*‘Article 25*

1. Annexes I and II shall include the grounds for listing of listed persons and entities, as provided by the Security Council or by the Committee with regard to Annex I.

2. Annexes I and II shall also include, where available, information necessary to identify the persons or entities concerned, as provided by the Security Council or by the Committee in respect of Annex I. With regard to persons, such information may include names including aliases, date and place of birth, nationality, passport and ID card numbers, gender, address, if known and function or profession. With regard to entities such information may include names, place and date of registration, registration number and place of business. Annexes I and II shall also include the date of designation.’;

(17) Article 26 is amended as follows:

(a) paragraph 4 is replaced by the following:

‘4. The measures referred to in Article 19(1), point (b), in so far as they apply to Mr Ali Akbar Salehi, shall be suspended.’;

(b) paragraph 5 is deleted;

(18) Articles 26a, 26b, 26c, 26d, 26f and 26g are deleted;

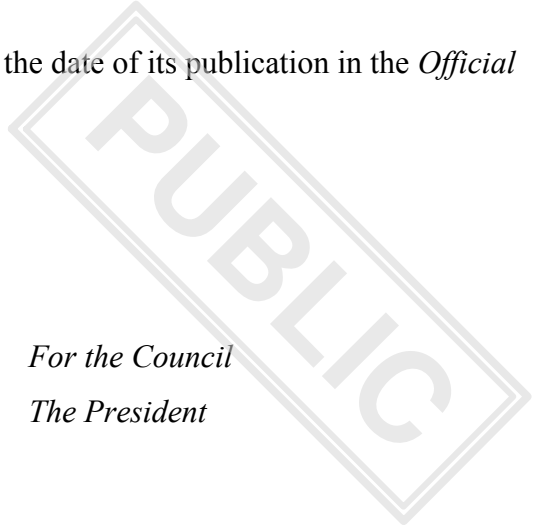
(19) Annexes III, IV, V and VI are deleted.

*Article 2*

This Decision shall enter into force on the day following the date of its publication in the *Official Journal of the European Union*.

Done at ..., ...

*For the Council*  
*The President*



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