

Iran embargo: Invocation of the snapback mechanism



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On 28 August 2025, Germany, France and the United Kingdom triggered the snapback mechanism provided for in Security Council Resolution 2231 (2015). This could lead to the reinstatement of economic sanctions against Iran imposed by the UN Security Council. The sanctions had been suspended in 2015 in return for Iran's commitment to dismantle its nuclear programme under the Joint Comprehensive Plan of Action (JCPOA). Due to Iran's ongoing violations of its JCPOA commitments and the failure of negotiations on a possible successor agreement, the sanctions could now be reinstated unless an agreement is reached within 30 days.

1. Background

The JCPOA was negotiated with Iran by the five permanent members of the United Nations Security Council (China, France, Russia, the United Kingdom and the United States of America) together with Germany (P5+1) and the EU and was signed in 2015. Under the agreement, Iran made comprehensive commitments to limit its nuclear programme. In return, the far-reaching economic sanctions against Iran were suspended. In 2018, the United States withdrew from the agreement during President Trump's first term in office, and re-entry under President Biden did not happen. Similarly, repeated violations by Iran of its commitments under the agreement were identified. In February 2025, Iran announced its withdrawal from the agreement. Negotiations on a new agreement also failed.

2. Snapback mechanism

Security Council Resolution 2231 (2015), in which the Security Council endorsed the JCPOA, provides for a so-called snapback mechanism (para. 11). According to this mechanism, UN sanctions can be reinstated in the event of significant violations of the obligations under the agreement. The mechanism can be triggered by any of the states participating in the JCPOA by submitting a notification to the UN Security Council. The Security Council must then adopt a resolution confirming the continued lifting of sanctions within 30 days of receiving the notification. Otherwise, the sanctions will automatically come back into force after 30 days, without the need for further voting. If no member of the Security Council has submitted a proposal for a resolution to continue the suspension of sanctions within ten days of receiving the notification, the President of the Security Council shall table such a proposal and put it to a vote within 30 days.

The snapback mechanism explicitly refers only to the sanctions imposed by the UN Security Council under Resolutions 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), 1929 (2010), and 2224 (2015). These include, among other measures, a complete arms embargo, a ban on

cooperation with Iran on nuclear issues, and restrictions on financial transactions. Although the JCPOA also provides for the lifting of EU and unilateral sanctions, these are not covered by the snapback mechanism (para. 11 in conjunction with 7(a) Resolution 2231 (2015)). In the event of a snapback, the EU sanctions against Iran, which were lifted by Regulation (EU) 2015/1861 of 18 October 2015, would not automatically be reinstated. However, a corresponding decision by the EU and the reinstatement of sanctions is to be expected.

3. What happens next?

On 28 August 2025, Germany, France and the United Kingdom submitted a notification to the Security Council regarding Iran's violations of its obligations under the JCPOA. The mechanism is limited to ten years after the adoption of the JCPOA and would therefore have expired in October. The three states have thus used their last remaining means of pressure on Iran. In their joint statement on the matter, the three foreign ministers announced they would enter into negotiations with Iran within the next 30 days in order to avert the reimposition of sanctions. If an agreement is reached, the UN Security Council would still have to pass a resolution confirming the continuation of the existing sanctions relief. Russia and China have already submitted a draft. However, it is questionable whether this will gain the necessary majority. In addition, the five permanent members have the right of veto. It remains to be seen whether an agreement can be reached with Iran in the next 30 days. However, given the tensions between Iran and the United States, there is a high probability that the sanctions will be reimposed.

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