

V. Travel and transport sanctions

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Types of sanction

Prior to the escalating crisis surrounding Iran's nuclear programme there were no travel or transport sanctions on Iran. The UN Security Council imposed a range of restrictions on the movement of individuals with an alleged role in Iran's nuclear weapons or nuclear weapon delivery system programmes in March 2008. UN Security Council Resolution 1803 required states to notify the Sanctions Committee about the entry to or transit through their territories of an expanding list of individuals.¹ In June 2010 these restrictions were expanded by UN Security Council Resolution 1929, which imposed a ban on the entry or transit of named individuals.²

The Security Council also imposed an expanding range of provisions on restricting or inspecting ships and aircraft transferring goods to or from Iran. Resolution 1803 also called on states to inspect the cargo of aircraft and vessels owned by 'Iran Air Cargo' and the 'Islamic Republic of Iran Shipping Line' that were travelling to or from Iran where there were 'reasonable grounds' to believe they were carrying prohibited goods.³ Resolution 1929 expanded the scope of these provisions to cover all ships and aircraft travelling to and from Iran, regardless of ownership.⁴ Resolution 1929 also called on states to prohibit the provision of bunkering, ship supply, engineering or maintenance services to any Iranian-owned or contracted vessels suspected of carrying prohibited items.⁵

Attempts by member states to enforce the UN's targeted sanctions by inspecting ships and aircraft travelling to or from Iran and limiting the activities of Iranian-owned ships led to a prolonged game of cat-and-mouse with the Iranian Government. This involved Iran renaming or reflagging its ships, registering ships in poorly regulated jurisdictions and disabling its ships' tracking devices.⁶ However, after 2012 US pressure led an increasing number of states to refuse to register Iranian shipping companies or flag Iranian vessels.⁷ There were also a significant number of seizures of prohibited items travelling to or from Iran. Many of these seizures concerned exports

¹ UN Security Council Resolution 1803, 3 Mar. 2008.

² UN Security Council Resolution 1929, 9 June 2010. In both cases, exceptions to the ban were allowed on humanitarian and religious grounds.

³ UN Security Council Resolution 1803 (note 1).

⁴ UN Security Council Resolution 1929, 9 June 2010.

⁵ UN Security Council Resolution 1929 (note 4).

⁶ International Crisis Group, 'Spider web: the making and unmaking of Iran sanctions', *Middle East Report* no. 138 (International Crisis Group: Brussels, Feb. 2013), p. 17.

⁷ International Crisis Group (note 6), p. 17.

of conventional arms from Iran. For example, in 2013 the Yemeni coast-guard and US Navy found Iranian-origin man-portable air defence systems (MANPADS), 122-mm rockets, grenade launchers and explosives on board a ship intercepted in Yemeni territorial waters.⁸ Yemeni authorities suspected that the weapons had been intended for delivery to Huthi rebels in northern Yemen.⁹

The Joint Comprehensive Plan of Action and sanctions on the movement of goods and people

The requirements for states to inspect the cargo of ships and aircraft that they have reason to believe are violating UN sanctions are not affected by the JCPOA. As these various sanctions are lifted in the run-up to Termination Day, however, the requirements to carry out inspections will also cease to apply. The restrictions on travel by named individuals will continue until five years after JCPOA Adoption Day or until the IAEA submits its Broader Conclusions report, whichever is the earlier.¹⁰

⁸ United Nations, Security Council, Report of the Monitoring Group on Somalia and Eritrea pursuant to Security Council Resolution 2060 (2012): Somalia, annex to S/2013/413, 12 July 2013, pp. 28, 313–14.

⁹ United Nations (note 8), pp. 278–85, 292.

¹⁰ UN Security Council Resolution 2231, 20 July 2015.