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NPT Safeguards Agreement with the Islamic Republic of Iran

Report by the Director General

A. Introduction

1. This report of the Director General is on the implementation of the NPT Safeguards Agreement^{1,2} in the Islamic Republic of Iran (Iran). It covers the period since the issuance of the Director General's previous quarterly report.³

B. Previous developments

2. The Director General, on 13 June 2025, reported to the Board of Governors (Board) and to the United Nations Security Council (Security Council) that the Agency had been informed of a military operation launched by Israel, which included attacks on several of Iran's nuclear facilities. These attacks took place between 13-24 June 2025. On 22 June 2025, the United States conducted attacks on three of Iran's nuclear facilities. The Agency stopped conducting verification activities in Iran at the commencement of the

¹ The Agreement between Iran and the Agency for the Application of Safeguards in Connection with the Treaty on the Non-Proliferation of Nuclear Weapons (INFCIRC/214), which entered into force on 15 May 1974.

² Iran's Additional Protocol (INFCIRC/214/Add.1) was approved by the Board of Governors on 21 November 2003 and signed by Iran on 18 December 2003. Iran implemented voluntarily the Additional Protocol between December 2003 and February 2006. On 16 January 2016, Iran began provisionally applying the Additional Protocol in accordance with Article 17(b) of the Additional Protocol. As of 23 February 2021, Iran stopped the implementation of its nuclear-related commitments under the Joint Comprehensive Plan of Action (JCPOA), including the Additional Protocol (see GOV/INF/2021/13).

³ GOV/2025/53.

military attacks and, by the end of June 2025, had decided to withdraw all of its inspectors from Iran for safety reasons.

3. In his statement to the Board on 13 June 2025, the Director General, *inter alia*, recalled the relevant General Conference resolutions, in particular GC(XXIX)/RES/444 and GC(XXXIV)/RES/533, which provided, *inter alia*, that “any armed attack on and threat against nuclear facilities devoted to peaceful purposes constitutes a violation of the principles of the United Nations Charter, international law and the Statute of the Agency”. The Director General also reiterated that he had repeatedly stated that nuclear facilities must never be attacked, regardless of the context or circumstances, as it could harm both people and the environment, and that such attacks have serious implications for nuclear safety, security and safeguards, as well as regional and international peace and security. On the same day, the Director General was invited to brief the Security Council on the matter. In that briefing, the Director General referred to his above-mentioned statement to the Board, called “on all parties to exercise maximum restraint and to avoid further escalation”, reiterated that “any military action that jeopardizes the safety and security of nuclear facilities risks grave consequences for the people of Iran, the region, and beyond”, and reaffirmed “his readiness and the Agency’s readiness to facilitate technical discussions and support efforts that promote transparency, safety, security and the peaceful resolution of nuclear-related issues in Iran”.

4. On 2 July 2025, the President of Iran signed into force a law suspending cooperation with the Agency.⁴ Soon thereafter, the Director General, in his communications to Iran, indicated the importance of re-establishing normal collaboration between Iran and the Agency in order to ensure compliance with the NPT Safeguards Agreement. He also indicated that in view of the possible impact on the implementation of safeguards in Iran deriving from the recently adopted Iranian domestic law it was essential and urgent to arrive at an agreement on the modalities that could guarantee the necessary compliance. The Director General made it clear that it was indispensable and urgent to restart safeguards activities in Iran in accordance with the NPT Safeguards Agreement and that implementation of the Agreement could not be suspended under any circumstances.

5. To this end, the Director General presented a number of concrete steps, including the preparation by Iran of a special report for high enriched uranium (HEU) and low enriched uranium (LEU) and the provision of updated design information questionnaires (DIQs) for the affected facilities. For facilities unaffected by the military attacks, the Agency would continue to provide advance notice for inspections and design information verifications (DIVs). The Director General also expressed the Agency’s readiness to discuss with Iran the modalities for accessing the affected facilities and conducting inspections and DIVs, and indicated the Agency’s readiness to discuss updated safeguards approaches for facilities under safeguards in Iran to take into account Iran’s security concerns, provided that such approaches remained consistent with the rights and obligations of Iran and the Agency under the NPT Safeguards Agreement.

6. In a letter dated 30 July 2025, the Agency reminded Iran that the Agency’s timeliness goal⁵ for the detection of the diversion of one significant quantity (SQ) of HEU is one month⁶ and, therefore, verification of Iran’s declared inventory of HEU was overdue.

7. On 19 August 2025, the Agency provided advance notice to Iran for inspections and DIVs to be carried out by the Agency at three unaffected nuclear facilities.

⁴ <https://president.ir/en/160022>.

⁵ The Agency establishes timeliness goals (performance targets) which set out the verification effort – in terms of the frequency and intensity of the verification activities to be carried out – needed in order to provide assurance that declared nuclear material is not diverted from peaceful use and that undeclared production or processing of nuclear material has not taken place at a declared facility (see GOV/2014/41, Section C.4). The longer the Agency is unable to verify the inventories of declared nuclear material in Iran, therefore, the greater the risk that the Agency is unable to provide such assurance.

⁶ HEU is defined as uranium enriched to 20% U-235 and higher.

8. On 27 and 28 August 2025, the Agency conducted two inspections at the Bushehr Nuclear Power Plant (BNPP) as part of its planned verification activities at this facility.

9. By the end of the previous reporting period (3 September 2025), the Agency had received from Iran no nuclear material accountancy reports regarding any nuclear facility under safeguards, nor any updated DIQs, since the military attacks had taken place and had not had access to any safeguarded nuclear facilities in Iran, with the exception of BNPP.

C. Recent developments

10. On 9 September 2025, the Director General signed an agreement with the Foreign Minister of Iran, Dr Abbas Araghchi, in Cairo on 'Practical Steps on Safeguards Implementation in Iran pursuant to the NPT Safeguards Agreement following the armed attacks on its safeguarded nuclear facilities' (Cairo agreement) that provides an understanding of the procedures for Agency inspections, notifications and safeguards implementation covering all declared nuclear facilities and nuclear material in Iran.⁷ While taking into consideration Iran's concerns, these procedures remain in line with the relevant provisions of Iran's NPT Safeguards Agreement. Iran agreed to provide a report for the affected facilities, including the associated nuclear material, at the earliest possible time. For facilities unaffected by the military attacks, the Agency would continue to provide advance notice for inspections and DIVs. It was also agreed that safeguards approaches for each facility would be reviewed at a technical level, consistent with the rights and obligations of Iran and the Agency under the NPT Safeguards Agreement, which remain unaltered. The Agency has received no official communication from Iran indicating that the Cairo agreement is no longer valid.

D. Safeguards implementation

D.1. Declared Facilities

11. Under its NPT Safeguards Agreement, Iran has declared to the Agency 22 nuclear facilities and one location outside facilities where nuclear material is customarily used (LOF) (see Annex I).⁸ According to its obligations under its NPT Safeguards Agreement, Iran is required to provide the Agency with nuclear material accounting reports, design information for facilities and the LOF, and access to verify such reports and information, to ensure that no declared nuclear material has been diverted from peaceful nuclear activities and that there has been no undeclared production or processing of nuclear material at those facilities and the LOF.

12. The seven declared facilities that the Agency has assessed to have been affected by the military attacks – all of which also contained declared nuclear material – were: the Fordow Fuel Enrichment Plant (FFEP); the Fuel Enrichment Plant (FEP); the Pilot Fuel Enrichment Plant (PFEP); the Uranium Conversion Facility (UCF); the Fuel Manufacturing Plant (FMP); the Fuel Plate Fabrication Plant (FPFP); and the Enriched UO₂ Powder Plant (EUPP). In addition, the Khondab Heavy Water Research Reactor

⁷ [Statement by IAEA Director General on Iran | IAEA](#).

⁸ The LOF is situated in the Atomic Energy Organization of Iran's (AEOI's) Tehran site.

(KHRR), which was under construction and did not contain nuclear material, was also affected. Iran has yet to confirm the status for safeguards purposes of any of these facilities to the Agency.

13. The 13 declared facilities that the Agency has assessed were unaffected by the military attacks were: Tehran Research Reactor (TRR); Process Research Facility (PRF); Molybdenum, Iodine and Xenon Radioisotope Production Facility (MIX Facility); Jabr Ibn Hayan Multipurpose Laboratories (JHL); Miniature Neutron Source Reactor (MNSR); Light Water Sub-Critical Reactor (LWSCR); Heavy Water Zero Power Reactor (HWZPR); Isfahan Research Reactor 10MW (IRR-10); Karaj Waste Storage; BNPP Units 1, 2 and 3 (BNPP-1, BNPP-2, BNPP-3); and the Karun Nuclear Power Plant (KNPP) at Darkhovin. The LOF was also not affected.

14. On 12 June 2025, Iran notified the Agency of a new enrichment facility (Isfahan Fuel Enrichment Plant (IFEP)), to which the Agency requested immediate access to conduct design information examination and verification, which was agreed by Iran. However, the Agency cancelled these planned verification activities due to the commencement of the military attacks. As no verification activities have been conducted at this facility, the Agency does not know the precise location of IFEP, its status for safeguards purposes, including whether it contains nuclear material, or whether it was affected by the military attacks.

D.2. Verification activities

15. Following the Director General's previous report, the Agency conducted three further inspections/DIVs at the three facilities at the BNPP site. On 10 September 2025, Iran was notified by the Agency of inspections/DIVs at four unaffected facilities at the AEOI site in Tehran, and, on 11 September 2025, of seven additional inspections/DIVs at unaffected facilities at the Esfahan Nuclear Technology Center (ENTC) site. However, of these, Iran only enabled the Agency to conduct verification activities at TRR.

16. In a letter dated 6 October 2025, the Agency reminded Iran that it had not provided access to facilities for which notification had been provided 14 days in advance, thereby preventing Agency inspectors from conducting scheduled verification activities. The Agency informed Iran that in order to avoid a situation in which Iran would not be fulfilling its obligations under the NPT Safeguards Agreement, it was important that the scheduled verification activities were carried out as soon as possible. Iran was also reminded of its obligation under the NPT Safeguards Agreement to provide to the Agency a report for safeguards purposes regarding the status of the affected facilities and the associated nuclear material at the earliest possible time.

17. Subsequently, the Agency conducted three inspections/DIVs at the three facilities at BNPP and seven inspections/DIVs at four other unaffected facilities at the AEOI site in Tehran (TRR, PRF, MIX and JHL). Other planned inspections/DIVs were notified to Iran but access was not granted.

18. In a letter to Iran dated 7 November 2025, the Agency reiterated that the provision of access to the Agency to conduct its planned safeguards activities in Iran is an obligation for Iran under its NPT Safeguards Agreement and, therefore, that Iran was expected to facilitate all such accesses as notified by the Agency.

19. In its reply to the Agency of 11 November 2025, Iran indicated that any cooperation with the Agency is conditional on the decision of the Supreme National Security Council (SNSC) of Iran. Iran recalled that

the Agency had carried out 11 inspections in Iran since the end of August 2025 and that an approach based on engagement and mutual cooperation would facilitate the conduct of additional inspections.

20. On 12 November 2025, Agency inspectors are travelling to Iran in order to conduct inspections/DIVs at facilities at the ENTC site for which advance notification had already been provided to Iran, and as agreed by Iran in advance.

21. Based on the information previously provided by Iran, previous Agency verification activities and estimates based on the past operating records of the relevant declared facilities, the Agency's estimate of Iran's total enriched uranium stockpile, as of 13 June 2025, was 9874.9 kg: comprising 9040.5 kg of uranium in the form of UF₆ and 834.4 kg of uranium in other forms. The total enriched uranium stockpile in the form of UF₆ of 9040.5 kg comprised: 2391.1 kg of uranium enriched up to 2% U-235; 6024.4 kg of uranium enriched up to 5% U-235; 184.1 kg of uranium enriched up to 20% U-235; and 440.9 kg of uranium enriched up to 60% U-235.⁹

22. In its letter to Iran of 7 November 2025, the Agency also reminded Iran that the provision by Iran "without delay" of a report for the affected facilities and associated nuclear material is a requirement under its NPT Safeguards Agreement. The Agency indicated that the provision by Iran of the required report for the affected facilities and the associated nuclear material will enable Iran and the Agency to discuss the modalities for the Agency to verify the report's contents. The Agency reiterated that the provision of such a report is indispensable for the Agency to provide assurances that nuclear material subject to safeguards in Iran remains in peaceful nuclear activities and that the facilities subject to safeguards are not being misused.

23. The Agency has yet to conduct inspections/DIVs at any of the nuclear facilities in Iran affected by the military attacks. The Director General has reiterated his disposition to consider Iran's views and concerns, including the recently adopted legislation, with the view to urgently address the issue of the required report and the conduct of inspections/DIVs by the Agency to verify it.

D.3. Modified Code 3.1

24. The modified Code 3.1 of the Subsidiary Arrangements General Part to Iran's NPT Safeguards Agreement provides for the submission to the Agency of design information for new nuclear facilities as soon as the decision to construct, or to authorize construction of, a new facility has been taken, whichever is the earlier. The modified Code 3.1 also provides for the submission of fuller design information as the design is developed early in the project definition, preliminary design, construction, and commissioning phases.¹⁰

25. Iran stopped implementing modified Code 3.1 on 23 February 2021.¹¹ The Agency has reminded Iran on many occasions that implementation of modified Code 3.1 is a legal obligation for Iran under the Subsidiary Arrangements to its NPT Safeguards Agreement. In February 2024, the Agency again reiterated to Iran that the Subsidiary Arrangements cannot be modified, or their implementation suspended, unilaterally by Iran. The Agency reminded Iran that Iran had accepted modified Code 3.1 in 2003 and that, according to Article 39 of Iran's NPT Safeguards Agreement, the Subsidiary Arrangements can only be changed by agreement with the Agency. Iran remains the only State with significant nuclear

⁹ The Agency has verified 432.9 kg of this 440.9 kg of uranium in the form of UF₆ enriched up to 60% U-235.

¹⁰ The initial Code 3.1 only required the submission of design information for a new facility "normally not later than 180 days before the facility is scheduled to receive nuclear material for the first time".

¹¹ GOV/INF/2021/13.

activities in which the Agency is implementing a CSA that is not implementing the provisions of the modified Code 3.1.

26. Iran's failure to implement the provisions of modified Code 3.1 has prevented the Agency from receiving early design information for any of the new nuclear reactors¹² which Iran has publicly announced it plans to construct. This significantly obstructs the Agency's ability to conduct DIVs in respect of such new facilities and to provide assurance of the peaceful nature of Iran's nuclear programme. Iran's unilateral decision to stop implementation of modified Code 3.1 is a significant reduction in the Agency's ability to verify whether Iran's nuclear programme is entirely peaceful, and is contrary to its legal obligations set out in Article 39 of Iran's Safeguards Agreement and in the Subsidiary Arrangements thereto.

E. Unresolved safeguards issues

E.1. Comprehensive Assessment

27. The Director General's report of 31 May 2025,¹³ provided a "comprehensive and updated assessment on the possible presence or use of undeclared nuclear material in connection with past and present outstanding issues regarding Iran's nuclear programme". The report identified a number of unresolved safeguards issues related, inter alia, to Iran not declaring nuclear material and nuclear-related activities at undeclared locations; the possible presence of undeclared nuclear material in Iran; and Iran's limited cooperation with the Agency to address the outstanding safeguards issues. Unless and until Iran assists the Agency in resolving these issues, the Agency will not be in a position to provide assurance that Iran's nuclear programme is exclusively peaceful.

E.2. Board Resolution

28. The Board considered the Director General's report and, on 12 June 2025, adopted resolution GOV/2025/38 in which the Board, inter alia:

- found that "Iran's many failures to uphold its obligations... constitutes non-compliance with its obligations under its Safeguards Agreement" (operative paragraph 3);
- found that "the Agency is not able to verify that there has been no diversion of nuclear material" (operative paragraph 4);
- reaffirmed its decision that "it is essential and urgent in order to ensure verification of the non-diversion of nuclear material that Iran act to fulfil its legal obligations" (operative paragraph 7);
- called upon Iran to "urgently remedy its non-compliance with its Safeguards Agreement" (operative paragraph 10); and
- decided to remain seized of the matter (operative paragraph 13).

¹² Information published on the AEOI website in June 2023 indicated that Iran has decided the locations for new power reactors and a new research reactor in Iran (GOV/2023/43, footnote 29). In November 2023, Vice-President Eslami made a statement referring to the excavation of the main building of the planned IR-360 reactor "in the coming days" and information available on the AEOI website referred to the "start of the executive operation of the construction of "Iran Hormoz" nuclear power plants by order of the president" (GOV/2024/8, para. 20).

¹³ GOV/2025/25.

E.3. Recent developments

29. During this reporting period Iran has not engaged the Agency on the unresolved safeguards issues described in the Director General's report GOV/2025/25.

F. Summary

30. The Director General has made clear to Iran that it is indispensable and urgent to implement safeguards activities in Iran in accordance with the NPT Safeguards Agreement, which remains in force, and that its implementation cannot be suspended under any circumstances. Notwithstanding, the Agency acknowledges that the military attacks on Iran's nuclear facilities have created a situation which requires Iran and the Agency to cooperate constructively to implement safeguards obligations under the NPT Safeguards Agreement.

31. In light of the above, the Cairo agreement provides a common understanding of the procedures for Agency inspections, notifications and safeguards implementation in Iran under the prevailing circumstances. While taking into consideration Iran's concerns, these procedures remain in line with the relevant provisions of the NPT Safeguards Agreement.

32. Under its NPT Safeguards Agreement, Iran is required to provide a special report without delay on the status for safeguards purposes of the nuclear material and facilities affected by the military attacks: it has yet to do so. Iran is also required to provide nuclear material accounting reports and updated DIQs with respect to all unaffected facilities and, upon notification from the Agency, to facilitate Agency access to such facilities in order to conduct verification activities: Iran has begun to facilitate this process.

33. The Agency has lost continuity of knowledge in relation to the previously declared inventories of nuclear material in Iran at the affected facilities, including LEU and HEU. The re-establishment of the current status of such inventories, based on Iran's reports and Agency verification, needs urgently to be addressed. The quantity of HEU produced and accumulated by Iran, the only NPT non-nuclear-weapon State to have done so, which remains in Iran without the Agency being able to verify it since mid-June 2025, is a matter of serious concern and a matter of compliance with the NPT Safeguards Agreement. The Agency's lack of access to this nuclear material in Iran for five months means that its verification – according to standard safeguards practice – is long overdue. It is critical that the Agency is able to verify the inventories of previously declared nuclear material in Iran as soon as possible in order to allay its concerns and ensure compliance with the NPT Safeguards Agreement regarding the possible diversion of declared nuclear material from peaceful use.

34. Iran is not implementing the provisions of modified Code 3.1 of the Subsidiary Arrangements General Part concerning the early provision of design information for new facilities.

35. The Director General notes that Iran has not engaged the Agency during this reporting period on the unresolved safeguards issues.

36. The Director General notes Iran's cooperation on inspections/DIVs at a number of facilities and calls for further constructive engagement to facilitate the full and effective implementation of safeguards in accordance with the NPT Safeguards Agreement.

37. The Director General reiterates his disposition to work with Iran without delay in order to achieve non-mutually exclusive objectives: full compliance with the NPT Safeguards Agreement and with the recently adopted Iranian domestic legislation.

38. The Director General will continue to report as appropriate.

Annex I

List of Declared Nuclear Facilities and LOF in Iran

Tehran:

1. Tehran Research Reactor (TRR)
2. Process Research Facility (PRF)
3. Molybdenum, Iodine and Xenon Radioisotope Production Facility (MIX Facility)
4. Jabr Ibn Hayan Multipurpose Laboratories (JHL)

Isfahan:

5. Isfahan Fuel Enrichment Plant (IFEP)
6. Miniature Neutron Source Reactor (MNSR)
7. Light Water Sub-Critical Reactor (LWSCR)
8. Heavy Water Zero Power Reactor (HWZPR)
9. Uranium Conversion Facility (UCF)
10. Fuel Manufacturing Plant (FMP)
11. Fuel Plate Fabrication Plant (FPFP)
12. Enriched UO₂ Powder Plant (EUPP)
13. Isfahan Research Reactor 10MW (IRR-10)

Natanz:

14. Fuel Enrichment Plant (FEP)
15. Pilot Fuel Enrichment Plant (PFEP)

Fordow:

16. Fordow Fuel Enrichment Plant (FFEP)

Arak:

17. Khondab Heavy Water Research Reactor (KHRR)

Karaj:

18. Karaj Waste Storage

Bushehr:

19. Bushehr Nuclear Power Plant (BNPP) Unit 1 (BNPP-1)
20. Bushehr Nuclear Power Plant (BNPP) Unit 2 (BNPP-2)
21. Bushehr Nuclear Power Plant (BNPP) Unit 3 (BNPP-3)

Darkhovin:

22. Karun Nuclear Power Plant (KNPP)

Location outside facilities:

One location outside facilities where nuclear material is customarily used (LOF), (situated on the AEOI's Tehran site)