

Fact Sheet on the JCPOA timeline from implementation to present

January 16, 2016, Implementation Day:

- The IAEA certifies that Iran is fully implementing the JCPOA. Key steps on the part of Iran include restrictions on its nuclear program and increased monitoring.
- The IAEA's report on Implementation Day should have triggered effective sanctions lifting on the part of the U.S. and the EU/E3. **It did not.**

January 17, 2016: The U.S. Treasury Department imposes new sanctions on 11 individuals and entities involved with Iran's ballistic missile programs. This defensive program is *not* prohibited by the JCPOA, UN Security Council Resolution 2231 nor even its Annex B, which “*calls upon*” Iran not to develop missiles “*designed to be capable*” of delivering nuclear weapons. Iranian missiles **are not designed** for weapons that Iran will never develop.

March 21, 2016: Candidate Trump delivers remarks to the American Israel Public Affairs Committee’s (AIPAC) annual conference, noting his “number one priority is to dismantle the disastrous deal with Iran.”

September 21, 2016:

- The U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) grants Airbus and Boeing partial permission to sell planes to Iran.
- The licenses were issued **after a 7-month delay, and only in response to a written warning by Iran on September 2, 2016** to invoke the DRM (Dispute Resolution Mechanism) under Paragraph 36 of the JCPOA.
- Iran receives **only 3** out of 117 Airbus passenger aircraft it ordered—and **none** of the Boeing aircraft.

December 1, 2016:

- Congress passes a 10-year extension of the Iran Sanctions Act (ISA), in clear violation of the JCPOA and UN Security Council Resolution (UNSCR) 2231.
- President Obama **refuses to sign the legislation but fails to veto it, allowing it to become law** on December 15.

December 16, 2016: Iran officially invokes the DRM under Paragraph 36 but does not take any remedial measures prescribed therein.

January 12, 2017: In his confirmation hearing for the position of Secretary of Defense, General Jim Mattis tells Congress that “**when America gives her word, we have to live up to it** and work with our allies.”

March 23, 2017: Senator Corker introduces Countering Iran’s Destabilizing Activities Act of 2017, in clear violation of both the JCPOA and UNSCR 2231.

March 31, 2017: Former Deputy Secretary of State Anthony Blinken and six former Obama administration officials pen an op-ed in *Foreign Policy* outlining their **opposition** to the Countering Iran’s Destabilizing Activities Act of 2017.

May 16, 2017: Ambassador Wendy Sherman, the lead U.S. negotiator for the JCPOA, states her **opposition** to the Countering Iran's Destabilizing Activities Act of 2017, **noting its potential to undermine the nuclear accord**.

July 10, 2017: White House Spokesperson Sarah Huckabee Sanders says that at the G20 summit, **President Trump encouraged foreign leaders not to do business with Iran, a clear violation of both the JCPOA and UNSCR 2231**.

July 17, 2017: The Trump administration reluctantly certifies Iran's compliance with the JCPOA, delaying the announcement for hours and **issuing new non-nuclear sanctions on Iran the next day**.

October 13, 2017: Trump declares—in violation of the JCPOA and UNSCR2231—that he **will not certify** Iranian compliance under the Iran Nuclear Agreement Review Act (INARA). Trump encourages Congress to enact legislation against the JCPOA's "sunset clauses". Trump says if his concerns about the deal are not resolved, **he will terminate the agreement**.

October 16, 2017: Iran officially invokes the DRM under Paragraph 36 of the JCPOA again, in response to the unlawful decertification by Trump, but **does not take remedial measures** under the same paragraph to **give diplomacy a chance**.

May 8, 2018:

- Trump announces that he is ceasing U.S. participation in the JCPOA and signs a presidential memorandum to **institute the "highest level" of economic sanctions on Iran**.
- President Rouhani announces that **Iran will give diplomacy a chance for a few weeks** so that the other states in the agreement can try to continue the deal without the United States.

May 10, 2018: Iran writes letters to the UN Secretary General and the JCPOA Joint Commission Coordinator, officially invoking again the DRM under Paragraph 36 of the JCPOA, but states that it will not take remedial measures immediately **to allow diplomacy to work**.

May 17, 2018: The European Commission meets in Sofia and announces that it will pursue a "blocking statute" to ban European companies and courts from complying with U.S. sanctions against Iran. However, **EU allows all European companies to comply with US secondary sanctions and cease doing business with Iran**.

July 6, 2018: A Ministerial Meeting of the JCPOA Joint Commission (China, France, Iran, Germany, Russia, the United Kingdom and the European Union) is convened to consider Iran's invocation of the DRM under Paragraph 36 of the JCPOA. Ministers issue a joint statement promising wider economic relations and preservation of effective financial channels with Iran; continuation of Iran's export of oil and gas condensate, petroleum products and petrochemicals; continuation of sea, land, air and rail relations; promotion of export credit; effective support for economic operators trading with Iran; encouragement

of further investments in Iran; protection of companies from the extraterritorial effects of U.S. sanctions, etc. **Not a single one of these promises have been realized to date.**

August 6, 2018: In a joint statement, the French, German, and British foreign ministers as well as the EU say they "deeply regret the re-imposition of sanctions by the U.S." and note that they are "determined to protect European economic operators engaged in legitimate business with Iran, in accordance with EU law and with UN Security Council resolution 2231." They reiterate that preserving the JCPOA is a "matter of respecting international agreements and a matter of international security." **This had no actual effect on international business with Iran, which remains frozen to this day.**

August 7, 2018: Certain sanctions measures reimposed by Trump on May 8 the same year come into full effect. The measures include restricting Iran's purchase of U.S. dollars, trade in gold, precious metals, aluminum, steel, coal, software, and transactions related to sovereign debt and the automotive sector. Licenses allowing certain foodstuffs to be exported to the United States and Iran to purchase commercial aircraft are also revoked.

September 24, 2018: The second Ministerial Meeting of the JCPOA Joint Commission, convened to discuss Iran's triggering of the DRM under Paragraph 36 "re-affirmed their continued commitment to the objectives mentioned in the statement of the Ministerial session of the Joint Commission of the JCPOA on 6 July 2018, in particular to pursue concrete and effective measures to secure payment channels with Iran, and the continuation of Iran's export of oil and gas condensate, petroleum products and petrochemicals." **Not a single effective measure has been taken to date.**

October 3, 2018: The **International Court of Justice (ICJ)** rules unanimously that the United States must remove any impediments to the export of food, agricultural products, medicine, aircraft parts, and other humanitarian goods. The Court concludes that **Trump's decision to reimpose sanctions on Iran was unfounded given Iran's compliance with the JCPOA.**

November 5, 2018: The second round of sanctions on Iran following Trump's withdrawal from the JCPOA—targeting Iran's banking, oil, shipping and ship-building sectors—come into effect. In addition to redesignating entities removed from the SDN list under the JCPOA, the United States designates an additional 300 new entities.

November 6, 2018: Iran officially informs the EU, China, France, Germany, Russia and the United Kingdom that having waited 6 months in vain for the EU/E3 to take measures promised following the U.S. withdrawal, **Iran will start taking remedial measures under Paragraph 36** and will "cease performing its commitments under this JCPOA in whole or in part." **It continues, however, to fully observe the restrictions under the JCPOA for another 6 months.**

November 8, 2018: Newsweek reports; "Mike Pompeo Says **Iran Must Listen to U.S. 'If They Want Their People to Eat.'**"

November 22, 2018: The International Atomic Energy Agency reports that **Iran is implementing its nuclear-related commitments despite the U.S.' unlawful withdrawal and economic warfare.**

February 13-14, 2019: The United States and Poland host a ministerial meeting on the Middle East in Warsaw where U.S. Vice President **Mike Pence explicitly calls on “our European partners to withdraw from the Iran nuclear deal.”**

March 22, 2019: The U.S. Treasury Department designates 31 Iranian entities and individuals for past involvement in Iran’s nuclear program.

April 8, 2019: The United States designates the Islamic Revolutionary Guard Corps as a Foreign Terrorist Organization.

April 22, 2019: U.S. Secretary of State Mike Pompeo announces that the United States will not issue any additional sanctions waivers for states to continue importing Iranian oil on May 2.

May 8, 2019: Iran announces that it will no longer be bound by stockpiles limitations on enriched uranium and heavy water reserves in the JCPOA and could restart construction on its unfinished heavy water reactor at Arak and resume higher level enrichment in the future. Iran also declares that all its remedial measures are reversible upon the fulfilment of all JCPOA obligations by all sides.

May 31, 2019: IAEA reports for the 15th time (the 5th since Trump’s withdrawal) that **Iran has continued to fully observe all of its obligations under JCPOA.**

June 23, 2019: Trump says new sanctions are coming for Iran amid ongoing **“economic war”**.

June 24, 2019: The United States sanctions the Supreme Leader of Iran and his office.

July 1, 2019: IAEA reports **for the first time** that Iran has exceeded 300 Kg stock of enriched uranium—a full **14 months after** Trump’s withdrawal and 8 months after Iran’s official notification of remedial measures under Paragraph 36.

July 31, 2019: The United States sanctions Iranian Foreign Minister Mohammad Javad Zarif.

September 3, 2019: The U.S. Treasury sanctions the Iran Space Agency and two affiliated research institutes.

September 20, 2019: The U.S. Treasury imposes new sanctions on the Central Bank of Iran and other entities.

September 25, 2019: The White House issues a proclamation suspending the entry of senior Iranian government officials to the United States.

January 2, 2020: President Trump officially claims responsibility for the targeted extra-judicial murder of Iranian Major General Qasem Soleimani.

February 5, 2020: IAEA Director-General Rafael Grossi tells reporters in Washington, DC that Iran has not taken further steps to breach the JCPOA, and that **Iran continues to comply with its 'safeguards' obligations mandated by the deal.**

April 30, 2020:

- U.S. Special Representative for Iran, Brian Hook, discloses Trump administration's plan to prevent the October 2020 expiration of UN restrictions on arms sales to and from Iran—**written into UN Security Council Resolution 2231**. Hook says that the Trump administration is prepared to use "every diplomatic option available" to extend the restrictions, including by making a legal argument that the United States remains a participant of the nuclear deal in order to exercise a Security Council provision to instate the UN restrictions indefinitely.
- EU Foreign Policy Chief Josep Borrell says that "it's quite clear for us that **the U.S. is no longer a participating member** in this agreement."

May 27, 2020: U.S. Secretary of State Michael Pompeo announces that the United States will terminate sanctions waivers that allow for nonproliferation cooperation projects to continue in Iran. These waivers cover the conversion of the Arak reactor, the provision of enriched fuel for the Tehran Research Reactor, and the export of Iran's spent fuel. This makes it **impossible for Iran to continue to fulfil its commitments** under the JCPOA.

June 25, 2020: The United States imposes additional sanctions on Iran targeted at the country's metal industry.

July 3, 2020: EU Foreign Policy chief Josep Borrell announces that he has received a letter from Iran triggering the JCPOA's DRM, citing concerns about the E3's implementation of the agreement.

July 4, 2020: Iranian Foreign Minister Mohammad Javad Zarif tweets that the country triggered again the JCPOA Dispute Resolution Mechanism because of violations by the European members of the deal, in addition to outright U.S. violations. Zarif notes that European members of the deal are failing to fulfill their JCPOA duties and have given in to U.S. "bullying."

August 14, 2020:

- In a vote on a U.S. resolution to extend UN arms restrictions against Iran, the United States is defeated with only 2 votes in favor, 2 votes against and 11 abstentions, falling drastically short of the nine votes needed for an extension.
- **In an act of piracy on the high seas, the United States seizes cargo for the first time from Iranian fuel tankers bound for Venezuela.**

August 20, 2020: U.S. Secretary of State Michael Pompeo delivers a letter to the United Nations Secretary-General and to the President of the Security Council, invoking provisions of UNSCR 2231—which are only available to JCPOA participants—to re-instate revoked resolutions imposing sanctions on Iran.

August 25, 2020: The United Nations Security Council dismisses the U.S. effort to re-impose UN Security Council sanctions on Iran. The President of the Security Council says the Council is “not in position to take further action” pursuant to the U.S. request.

September 21, 2020: Speaking at a news conference, U.S. Secretary of State Michael Pompeo says, “no matter who you are, if you violate the UN arms embargo on Iran, you risk sanctions.” Pompeo also announces new sanctions on Iran’s Ministry of Defense, Iran’s Defense Industries Organization, and its director.

November 17, 2020: Iranian Foreign Minister Javad Zarif states that if the United States adheres to its commitments under UN Security Council Resolution 2231, Iran will return to compliance with the restrictions under the JCPOA. He further reiterates that this can be done without negotiations.

November 27, 2020: Iranian nuclear scientist Mohsen Fakhrizadeh is assassinated near Tehran.

December 1, 2020: The Iranian Parliament responds to the assassination by requiring the Government to take further and more drastic remedial measures under Paragraph 36 of the JCPOA if U.S. unilateral sanctions are not lifted by February 23, 2021.

January 5, 2021: The U.S. Treasury Office of Foreign Assets Control imposes a new round of sanctions on Iran’s steel industry. Treasury Secretary Mnuchin says in a statement that “the Trump administration remains committed to denying revenue flowing to the Iranian regime.”

February 21, 2021: International Atomic Energy Agency (IAEA) Director-General Rafael Grossi travels to Tehran to meet with Ali Akbar Salehi, the head of the Atomic Energy Organization of Iran, as well as Foreign Minister Javad Zarif. They discuss Iran’s planned Feb. 23 suspension of the Additional Protocol to its safeguards agreement and together reach an arrangement whereby the IAEA will continue its necessary verification activities for up to 3 months.

March 25, 2021:

- Despite promises made by incoming U.S. President Joe Biden, his administration has yet to take any steps to abide by either the JCPOA or UNSCR 2231—a resolution the U.S. itself co-sponsored.
- Iran, as evidenced by the above timeline, has shown maximum restraint in the face of “maximum pressure”, “economic war”, bullying, assassinations, cruelty and collective punishment of its people.
- Today, the ball is firmly in the U.S. court. If it claims interest in the JCPOA, it must abandon its unlawful violations and verifiably remove all sanctions imposed, re-imposed and re-labeled since January 20, 2017.
- Iran will stop all of its remedial measures upon verification of a U.S. return to compliance.