

## CSAG INFORMATION PAPER:

### *The Iran Snapback Mechanism*

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*The opinions and conclusions expressed herein are those of a number of international officers within the Combined Strategic Analysis Group (CSAG) and do not necessarily reflect the views of United States Central Command, nor of the nations represented within the CSAG or any other governmental agency.*

**1. Subject: The Iran Snapback Mechanism.**

**2. Purpose:** This paper aims to present the result of the CSAG's analysis of the UN's snapback sanction mechanism under the Joint Comprehensive Plan of Action (JCPOA).

**3. Introduction:**

In 2015, the JCPOA was established as a framework to limit Iran's nuclear program in exchange for sanctions relief. The JCPOA is annexed to the UN Security Council Resolution (UNSCR) 2231 (2015).<sup>1</sup>

The JCPOA includes a "dispute resolution mechanism" commonly referred to as "snapback." This mechanism gives the E3/EU+3 (France, Germany, the United Kingdom, China, Russia and originally the United States) the authority to restore UN sanctions on Iran, should Iran be found in significant breach of its obligations under the deal.

On August 28, the E3 decided to notify the Security Council that they believe Iran is in significant non-performance of its commitments under the JCPOA, thereby engaging the snapback mechanism (see Annex B for full text).<sup>2</sup> With snapback now initiated, the 30-day UN process begins, but the E3 maintain diplomatic engagement in hopes of resolving the dispute. This marks the start of a new phase in relations with Iran and is likely to prompt a strategic reassessment concerning future regional and international policy debates.

**4. The Dispute Resolution Mechanism (snapback):**

- a. Snapback ensures the automatic reimposition of UN sanctions on Iran in the event of significant non-compliance. Its structure deliberately removes the possibility of a Security Council veto, even by permanent members such as China or Russia, since sanctions are restored by default unless the Council unanimously agrees to their termination. Snapback would reimpose measures such as:<sup>3</sup>
  - (1) The expired UN arms embargo, which prohibited countries from supplying, selling, or transferring most combat equipment to Iran and barred Iran from exporting weapons.
  - (2) Reinstatement of provisions that expired in October 2023, which restricted Iran from exporting missiles and drones or engaging in activities related to ballistic missiles designed to deliver nuclear weapons.

- (3) Enforcement of export controls, travel bans, asset freezes, and other restrictions on individuals, entities, and banks involved in specific Iranian nuclear and missile activities, requiring national governments and the EU to integrate these designations into their laws.
- (4) Most of Iran's nuclear activities, including those permitted under the JCPOA, would once again be prohibited.
- b. Historical events
  - (1) On January 14, 2020, the E3 registered their concerns that Iran is not meeting its commitments under the JCPOA and referred the matter to the Joint Commission under the dispute resolution mechanism.<sup>4</sup> This led to enhanced diplomatic engagement with Iran, not a breakdown or formal escalation of the JCPOA agreement.
  - (2) On July 3, 2020, Iran initiated the dispute resolution mechanism, to address concerns regarding implementation issues by the E3.<sup>5</sup> Ultimately, the process was suspended.
  - (3) On August 8, 2025, the E3 wrote a letter to members of the UN Security Council outlining their concerns about Iran's nuclear program and their joint position on snapback.<sup>6</sup>
  - (4) On August 28, 2025, the E3 issued a joint statement saying they are initiating the snapback process.<sup>7</sup>
- c. Iran Snapback Flowchart<sup>8</sup>
  - (1) Optional steps (Annex A, left side of the chart) are explicitly embedded in the process through the language used in the JCPOA dispute resolution mechanism.
  - (2) The process mandates referral to the UN Security Council. This may only be done once the complaining party has "made good-faith efforts to exhaust the dispute resolution process" (Annex A, right side of the chart).<sup>9</sup>
    - (a) To meet the October 18, JCPOA deadline, the E3 bypassed the preliminary steps and proceeded to the mandatory phase at the UN Security Council.

## **5. Potential Consequences and Implications:**

- a. Before calling snapback, the E3 offered to extend the snapback mechanism for up to six months to allow further negotiations with Iran. This extension was contingent on Iran fully cooperating with the International Atomic and Energy Agency (IAEA), and addressing concerns about its enriched uranium stockpile.
- b. In their August 28 notification, the E3 reaffirmed their commitment to remain engaged with Iran throughout the 30-day snapback period, emphasizing continued diplomatic efforts aimed at restoring Iran's full compliance with its nuclear commitments. Iran may seek to exploit this 30-day period to its advantage by employing delay tactics and diplomatic maneuvering.
- c. Snapback reinstates a globally binding, coordinated multilateral sanctions regime with legal backing from the UN, far enhancing enforcement. The combined, military, and diplomatic constraints could significantly deepen Iran's isolation, impacting its nuclear ambitions and military capabilities. However, "the resultant economic impact on Iran would likely be marginal, since Tehran already faces an array of U.S. secondary sanctions that are far more comprehensive and damaging than what is outlined in past Security Council resolutions."<sup>10</sup>

- d. Snapback could provoke retaliation from Iran, including increasing their nuclear ambition, or destabilizing military actions in the region. Iran has also threatened to withdraw from the Nuclear Non-Proliferation Treaty (NPT) if snapback is triggered.<sup>11</sup>

## 6. Conclusion:

- a. Snapback can only be justified if the August 8, E3 letter and its contents are regarded as a demonstration of “good-faith efforts to exhaust the dispute resolution process,” allowing for the skipping of preliminary steps.
- b. Iran withdrawing from the NPT as a result of invoking snapback could escalate tensions, as withdrawal might signal intent to pursue nuclear weapons openly with the support of new partners or allies, increasing the risk of military action by the U.S. or Israel.
- c. The invocation of snapback carries the risk of accelerating Iran’s strategic realignment by pushing Iran to deepen its political, economic, and security ties with Russia and China, thereby complicating Western efforts to constrain its behavior. To mitigate this risk, it is essential that the U.S. and the E3 coordinate their approach and act in concert in addressing the Iranian challenge.

## ANNEX A



Figure 1, Iran Snapback Flowchart. Source: [https://jinsa.org/jinsa\\_report/path-to-snapback-april-2025/](https://jinsa.org/jinsa_report/path-to-snapback-april-2025/).

## **ANNEX B**

### **Joint Statement by the Foreign Ministers of France, Germany and the United Kingdom on the Initiation of the Snapback Process (August 28, 2025).**

We, the Foreign Ministers of France, Germany and the United Kingdom, share the fundamental objective that Iran shall never seek, acquire or develop a nuclear weapon. We negotiated the Joint Comprehensive Plan of Action (JCPOA) with the conviction that it would decisively contribute to ensuring the exclusively peaceful nature of Iran's nuclear programme. The United Nations Security Council unanimously endorsed the JCPOA in resolution 2231 of 20th July 2015. It was a major achievement for non-proliferation, as such strengthening international peace and security.

Following the United States' withdrawal from the JCPOA on 8th May 2018, and in spite of Iran ceasing the implementation of its commitments under the JCPOA beginning in May 2019, France, Germany and the United Kingdom (the "E3") remained committed participants to the deal.

Since 2019, Iran has exceeded JCPOA limits on enriched uranium, heavy water, and centrifuges, restricted the IAEA's ability to conduct JCPOA verification and monitoring activities, and has abandoned the implementation and the ratification process of the Additional Protocol to its Comprehensive Safeguards Agreement. These actions contravene Iran's commitments set out in the JCPOA and have serious implications on the capacity of Iran to progress toward developing a nuclear weapon.

This was more than five years ago. Since then, we have made all possible efforts to resolve the impasse. We consistently undertook intensive diplomatic efforts to deescalate tensions and to bring Iran and the United States to the negotiating table for a comprehensive negotiated solution. We acted in good faith to preserve the JCPoA, in the sincere hope of finding a way to resolve the impasse through constructive diplomatic dialogue, while preserving the agreement and remaining within its framework.

This included the use of the JCPoA's Dispute Resolution Mechanism, initiated on 14 January 2020 and confirmed by the JCPoA Coordinator, pursuant to paragraph 36 of the JCPoA. The E3 also engaged in good faith in negotiations conducted from 6th April 2021 until 28th February 2022 to re-establish Iran's full compliance with the JCPoA and allow for a return of the United States to the deal. The JCPoA Coordinator tabled viable proposals in March and again in August 2022. Iran refused both packages while continuing to raise unacceptable demands beyond the scope of the JCPoA. Despite this, we have continued to engage Iran as part of our efforts to find a peaceful resolution of this issue through diplomacy, as set out in our letter to the United Nations Secretary General of 8th August 2025.

In July 2025, the E3 have put on the table an offer for the extension of resolution 2231 and its snapback mechanism. The requirements set by the E3 in exchange for this extension – including the resumption of negotiations, Iran's compliance with its IAEA obligations, and steps to address our concerns regarding the high enriched uranium stockpile - have not yet been satisfactorily met by Iran. The combination of such Iranian steps and a time-limited extension would have provided a credible path towards reaching a political agreement to replace the JCPoA and address our longstanding concerns regarding Iran's nuclear programme.

Today, Iran's non-compliance with the JCPoA is clear and deliberate, and sites of major proliferation concern in Iran are outside of IAEA monitoring. Iran has no civilian justification for its high enriched uranium stockpile - now over 9 Significant Quantities<sup>1</sup> - which is also unaccounted for by the IAEA. Its nuclear programme therefore remains a clear threat to international peace and security.

As a result of Iran's actions, and in accordance with paragraph 11 of United Nations Security Council Resolution 2231 (2015), France, Germany and the United Kingdom have today decided to notify the Security Council that we believe Iran is in significant non-performance of its commitments under the JCPoA, thereby engaging the "snapback" mechanism.

This notification initiates the snapback process defined in Resolution 2231. It opens a 30-day period before the possible reestablishment of previously terminated United Nations Security Council resolutions. We underline that these resolutions and the measures they contain – sanctions and other restrictive measures – are not new. On the contrary, these resolutions were previously agreed by the Security Council and lifted in light of Iran's commitments under the JCPoA. However, Iran has chosen not to abide by those commitments. In accordance with Resolution 2231, we will continue to strive to diplomatically resolve the issue of Iran's significant non-performance. We will use the 30-day period to continue to engage with Iran on our extension offer, or on any serious diplomatic efforts to restore Iran's compliance with its commitments.

We recall that if the UNSC does not adopt within 30 days a resolution to continue the lifting of UNSC resolutions on Iran, six Security Council resolutions, including on sanctions, will be restored.

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<sup>1</sup> United Nations Security Council, "Resolution 2231 (2015) on Iran Nuclear Issue," <https://main.un.org/securitycouncil/en/content/2231/background> (accessed August 20, 2025).

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<sup>2</sup> German Federal Foreign Office, “Joint Statement by the Foreign Ministers of France, Germany and the United Kingdom on the Initiation of the Snapback Process,” August 28, 2025, <https://www.auswaertiges-amt.de/en/newsroom/news/e3-iran-snapback-mechanism-2732530> (accessed August 28, 2025).

<sup>3</sup> More specific: UNSCR’s 1696 (2006), 1737 (2006), 1747 (2007), 1803 (2008), 1835 (2008), 1929 (2010) and 2224 (2015); Henry Rome, Louis Dugit-Gros, “Snapback Sanctions on Iran: More Bark Than Bite?” *The Washington Institute for NearEast Policy*, October 25, 2022, <https://www.washingtoninstitute.org/policy-analysis/snapback-sanctions-iran-more-bark-bite> (accessed August 21, 2025).

<sup>4</sup> Government of the United Kingdom, “E3 Foreign Ministers' Statement on the JCPOA: 14 January 2020,” <https://www.gov.uk/government/news/e3-foreign-ministers-statement-on-the-jcpoa-14-january-2020> (accessed August 21, 2025).

<sup>5</sup> Crowell, “Iran Triggers Dispute Resolution Mechanism Under JCPOA,” July 8, 2020, <https://www.crowell.com/en/insights/client-alerts/iran-triggers-dispute-resolution-mechanism-under-jcpoa> (accessed August 20, 2025).

<sup>6</sup> Government of the United Kingdom, “Iran Nuclear: Letter From E3 Foreign Ministers,” August 8, 2025, <https://www.gov.uk/government/publications/iran-nuclear-letter-from-e3-foreign-ministers-august-2025> (accessed August 21, 2025).

<sup>7</sup> German Federal Foreign Office, “Joint Statement by the Foreign Ministers of France, Germany and the United Kingdom on the Initiation of the Snapback Process.”

<sup>8</sup> United Nations Security Council, “Resolution 2231 (2015) on Iran Nuclear Issue.”

<sup>9</sup> Ibid.

<sup>10</sup> Henry Rome, Louis Dugit-Gros, “Snapback Sanctions on Iran: More Bark Than Bite?”

<sup>11</sup> Tom O'Connor, “Iran Considers Leaving Nuclear Treaty if Snapback Sanctions Triggered,” *Newsweek*, July 23, 2025, <https://www.newsweek.com/iran-considers-leaving-nuclear-treaty-if-snapback-sanctions-triggered-2102973> (accessed August 21, 2025).