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**Human Rights Council**

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Agenda item 3

**Promotion and protection of all human rights, civil,**

**political, economic, social and cultural rights,**

**including the right to development**

Visit to the Islamic Republic of Iran

Report of the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena Douhan[[1]](#footnote-2)\*, [[2]](#footnote-3)\*\*

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| *Summary*  The Special Rapporteur undertook an official country visit to the Islamic Republic of Iran from 7 to 18 May 2022 to examine the impact of unilateral sanctions on the enjoyment of human rights in the country, and the right to development. She concludes that sanctions, secondary sanctions and different forms of over-compliance have a serious negative impact on the country’s economy, leading to serious violations of human rights and humanitarian challenges, which have been exacerbated by the COVID-19 pandemic. She concludes that the use of unilateral sanctions, secondary sanctions and over-compliance has an overall adverse effect on the broad spectrum of human rights, civil, political, economic, social and cultural, including the right to life and the right to development. She recommends lifting unilateral sanctions, to avoid de-risking policies and over-compliance in accordance with international legal norms and the due diligence rule and calls on international community and humanitarian actors to assist the Government of Iran in its efforts to mitigate the adverse humanitarian impact of unilateral coercive measures. |
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Annex

Report of the Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena Douhan on her visit to the Republic of Iran

I. Introduction

1. The Special Rapporteur on the negative impact of unilateral coercive measures on the enjoyment of human rights, Alena Douhan, visited Iran from 7 to 18 May 2022 at the invitation of the Government. On 18 May, she presented her preliminary observations to the government, followed by a press conference[[3]](#footnote-4).
2. The Special Rapporteur met with Government representatives and their teams, including the Secretary General of the Islamic Republic of Iran’s High Council for Human Rights; Vice-President for Women and Family Affairs; Minister of Foreign Affairs; Minister of Justice; Minister of Interior; Head of the Foreign Policy and National Security Commission; Head of the Human Rights Committee and member of the Health Commission of the Iranian Parliament; Deputy Minister of Health, Treatment and Medical Education; Deputy Minister for Agricultural Affairs of the Ministry of Agriculture-Jihad; Deputy Minister for International Affairs of the Ministry of Science, Research and Technology; Deputy Minister for Legal and International Affairs of the Ministry of Foreign Affairs; Deputy Minister of the Ministry of Economic Affairs and Finance and Head of Foreign Investment Organization; Deputy Minister of Petroleum; Deputy Minister of Sport and Youth; Head of the Health Insurance Organization; Head of the Food and Drug Organization; Head of the Center for International Affairs of the Ministry of Education; Head of the State Welfare Organization; Head of the Crisis Management Organization; Head of the Civil Aviation Organisation; Head of the Social Security Organization; Governor of Isfahan Province; as well as representatives from the Ministry of Energy; Ministry of Industry, Mine and Trade; Ministry of Roads and Urban Development; Ministry of Cooperatives, Labour and Social Welfare; Ministry of Cultural Heritage, Tourism and Handicrafts; Plan and Budget Organisation.
3. She also met with civil society organisations working in different areas and sectors; healthcare providers; associations and charities; representatives of public and private financial institutions; local and international humanitarian actors; businesses and academia. She also held consultations with the UN country team and with the Tehran-based members of the diplomatic community. Besides the capital, Tehran, the Special Rapporteur visited Karaj and Isfahan and met with representatives of the Iranian Central Bank, the Civil Aviation Organisation, and the Iranian Chamber of Commerce.
4. Before the visit, she issued an open call for contributions from relevant stakeholders.[[4]](#footnote-5) The Special Rapporteur extends her gratitude to all her interlocutors who have generously offered their time, information and experiences to help her gather first-hand information and understand the impact of unilateral sanctions and over-compliance on the peoples’ lives in Iran. She, however, notes with regret slander, defamation and a hate campaign organized by some NGOs, which did not share any contributions despite her openness.
5. The Special Rapporteur commends the Government of Iran and in particular the High Council for Human Rights and the Ministry of Foreign Affairs for the transparent and constructive manner in which they coordinated and facilitated the visit, and for their responsiveness in providing additional information and data during and after the visit. She also warmly thanks the United Nations Resident Coordinator and his office for valuable support throughout the visit.

II. Country visit context

1. In the mid-2000s, the UN Security Council acting under Chapter VII of the UN Charter adopted resolutions imposing sanctions in response to Iran’s nuclear program, which included prohibitions on trading in materials, equipment, goods or technology that could contribute to Iran’s nuclear and ballistic programme; prohibitions on providing technical assistance, investments and any financial service to Iran’s nuclear and ballistic-related activities; targeted asset freezes and travel bans against UN-listed individuals and entities; and enhanced scrutiny of transactions involving Iranian banks and the activities of Iranian shipping and air cargo companies.[[5]](#footnote-6) After the conclusion of the Joint Comprehensive Plan of Action (JCPOA), endorsed by the UN through Resolution 2231 (2015), all UN sanctions were completely lifted.
2. Since 1979, the US has imposed economic, trade and financial sanctions, with a comprehensive trade ban since 1995 and significant measures to isolate Iran from the international commercial and financial system, by enforcing also secondary sanctions on non-US entities and financial institutions. However, since the mid-2000s, a series of executive orders and specific laws have created a broad and complicated framework of prohibitions and bans, which intensified after 2010 and extended to the energy sector and other key economic sectors. The sanctions against Iran’s financial sector included designations and asset freezes affecting the Iranian Central Bank and commercial banks.[[6]](#footnote-7)
3. The EU adopted comprehensive economic, trade and some other sanctions against Iran since 2010 by prohibiting the sale, transfer or export of dual-use goods and technology and by imposing restrictions on investments and finance, engagement with Iran’s oil and gas industry, insurance, and transport. These measures were intensified in the following years, with an oil embargo in 2012 and prohibitions on the sale, supply, transfer or export of certain goods, including equipment or technology which could be used in the oil, natural gas and petrochemical industries; the freezing of assets of the Central Bank, of the Iranian national shipping company, and of a number of persons and entities; and significant restrictions in financial services as well as exports and imports.[[7]](#footnote-8)
4. In 2011, Australia adopted the Autonomous Sanctions Act and the Autonomous Sanctions regulations, which imposed an arms embargo, restrictions on the export or supply of certain goods, prohibitions on engaging with Iran in any “sensitive commercial activity” such as uranium mining or production, supply, sale or manufacture of goods related to Iran’s missile and nuclear weapons technology; provision of financial, technical, brokerage and investment services related to sanctioned goods; and restrictions and travel bans on designated persons or entities.[[8]](#footnote-9)
5. In July 2010, Canada adopted its own sanctions programme under the Special Economic Measures Act (SEMA) and the Special Economic Measures (Iran) Regulations, imposing broad prohibitions on exports and imports to and from Iran, restrictions on financial transactions, investments, insurance and re-insurance in key economic sectors, including the energy sector, shipping and mining.
6. On 14 July 2015, China, France, Germany, the Russian Federation, the UK, the US, and the Islamic Republic of Iran signed the JCPOA. Upon its implementation, the EU lifted all of its economic and financial sanctions. The US lifted its secondary sanctions in the energy, financial, manufacturing and auto sectors, delisted many Iranian entities and banks, while maintaining its ban on direct trade and investment with Iran. Canada relaxed its sanctions[[9]](#footnote-10) and significantly reduced the number of designated individuals and entities,[[10]](#footnote-11) and Australia removed restrictions affecting numerous economic sectors, amended its list of designated individuals and entities,[[11]](#footnote-12) while maintaining arms-related sanctions and restrictions on certain material, software and nuclear-related equipment.[[12]](#footnote-13)
7. On 8 May 2018, the US withdrew from the agreement, re-imposing all lifted sanctions and imposing additional sanctions. In 2019, the Central Bank was designated as a terrorist entity, and a series of executive orders were issued targeting key economic sectors, sanctioning the provision of any financial, material or technological support, and strengthening the secondary sanctions regime against any foreign entity conducting transactions in Iran’s currency and engaging with any listed Iranian entity or blocked person.[[13]](#footnote-14) Iranian assets frozen in foreign accounts are estimated at dozens of billions of USD, and most foreign financial institutions have left the Iranian market.
8. Other sanctioning countries have maintained their non-proliferation sanctions and human-rights related restrictions, including trade bans on certain equipment, as well as asset freezes and travel bans for a number of designated individuals and entities.

Secondary sanctions and over-compliance

1. The changing environment around the unilateral sanctions regime against Iran since the mid-2000s, the designations of third country nationals and companies, as well as the complexity and vagueness of provisions and regulations have led to increased uncertainty among financial institutions and businesses, resulting in over-compliance and de-risking, or even the complete disengagement from any activity related to Iran. This is exacerbated by the lack of capacity and the high costs required to navigate the imposed financial and trade restrictions, which constitute a major disincentive, even for businesses and financial institutions that may engage in otherwise authorised transactions and trade.
2. The Special Rapporteur received numerous accounts of refusals by foreign financial institutions and businesses to process payments and to deliver goods and services, out of fear of financial, reputational and other consequences. Even after the signing of the JCPOA, there were reports of foreign financial institutions being reluctant to restore ties with Iran and to engage in investments in the country, given the history of hefty financial penalties for alleged breaches of US sanctions.[[14]](#footnote-15)
3. As with other sanctioned countries, Iran has suffered from the extension of US jurisdiction in international banking transactions, due to the involvement of US correspondent banks or payments in USD, which has not only caused serious disruptions and delays in the provision of basic goods, including food, medicines, medical and other equipment and raw materials, but also has seriously impeded Iran’s engagement in international cooperation, including payments of membership fees to international organisations and associations, access to funding opportunities, and participation of Iranians and Iranian institutions in academic and scientific programmes[[15]](#footnote-16), cultural and sport activities.

III. Impact of unilateral coercive measures on the economic and humanitarian situation

General macroeconomic context

1. International statistical information on macroeconomic indicators from 2010 until today has demonstrated a correlation between the imposition and intensification of unilateral sanctions and Iran’s macroeconomic performance, in particular due to the trade and financial restrictions on Iran’s energy sector, the country’s most significant source of income, with around half of the Government’s fiscal budget depending only on petroleum and other liquids exports. According to the World Bank, while Iran’s economy is relatively diversified, oil proceeds play a crucial role in public finances and external accounts.[[16]](#footnote-17) Iran is the world’s fifth-largest crude oil producer and third-largest natural gas producer.
2. Between 2010 and 2015, Iran exported between 700,000 and 1.4 million barrels per day of crude oil and condensate. With sanctions being lifted following the JCPOA, daily exports reached and topped 2.5 million barrels between May 2016 and May 2018. With the re-imposition of the US sanctions, exports dropped to under 500,000 barrels per day in July 2020.[[17]](#footnote-18) In 2018 and 2019 alone, oil exports declined by 57%, according to official Government figures, leading to significant shortfalls in the annual budget due to the loss of revenue. Between 2019 and 2021, the annual loss from the drop in oil exports is estimated at around US$56 billion.[[18]](#footnote-19) To compensate, the Government has greatly expanded the money supply.[[19]](#footnote-20)
3. Furthermore, the estimated annual foreign exchange revenue prior to sanctions, about US$66 billion between 2005 and 2011, fell to US$25 billion during 2019-2021, affecting Government expenditures on development and other projects.[[20]](#footnote-21)
4. Similar trends are observed in Iran’s overall trade, with the value of exports and imports slashed almost in half between 2010 and 2019, with further significant deterioration until 2021.[[21]](#footnote-22) Trade between the EU and Iran declined by more than 50% between 2017 and 2021.[[22]](#footnote-23)
5. These developments significantly impacted Iran’s economy. Annual GDP growth averaged 4.6% between 2000 and 2010, but GDP then shrank by an average of 1.7% between 2011 and 2015 as unilateral sanctions intensified. GDP grew by a record 13.6% in 2016, following the JCPOA and the lifting of sanctions, and 3.7% in 2017, while in 2018 and 2019 the economy contracted by 6% and 6.8% respectively.[[23]](#footnote-24)
6. Inflation has also been affected by the changing environment induced by unilateral sanctions and by the effects of the Iranian currency devaluation due to financial restrictions and foreign assets freezes. Annual inflation between 2000 and 2010 averaged approximately 14.6%, and rose to approximately 23.8% between 2011 and 2015. In 2016 and 2017, it dropped to 7.2% and 8% respectively before rising again to alarming levels after the re-imposition of US sanctions: 18% in 2018, and 39.9% in 2019.[[24]](#footnote-25) Since the re-imposition of sanctions in 2018, general prices in Iran rose 85% and food prices doubled.[[25]](#footnote-26)
7. While Iran has been ranked 127 out of 190 economies in business environment indexes, the combined trade and financial restrictions between 2011 and 2015, and after 2018, coupled with businesses’ over-compliance and general reluctance to engage in any economic activity with the country, have affected foreign direct investment, which dropped to around 1.3 billion USD in 2020,[[26]](#footnote-27) representing only around 0.15% of Iran’s GDP. Data from the Iranian Organisation for Investment, Economic and Technical Assistance (OIETAI), covering the period between Autumn 2017 and Spring 2018 showed the number of approved foreign investments plummeted from 72 to 20, as did their total monetary value (from approximately US$4.4 billion to US$154 million).[[27]](#footnote-28)
8. The imposed trade and financial restrictions have had a direct impact on Iran’s job market, in particular in sectors directly linked to international markets, and on the lives of Iranians living abroad, actively involved in business activities. The changing environment in the sanctions regimes has resulted in job market instability and insecurity, and heightened risks for employment in the informal economy without access to social protection coverage.

Impact of unilateral sanctions on healthcare, medicines and medical equipment

1. Since the 1990s, Iran has shown a constant improvement in all its principal health indicators, including life expectancy, as well as neonatal, infant, under-five and maternal mortality rates [[28]](#footnote-29) and advancements in medical education and research, which have led to significant improvements in the quality of healthcare services. Healthcare amounts to 8% of Iran’s GDP, but the current capacity of the national healthcare system ranks relatively low in global statistics, with a network of 1,034 hospitals, 5,608 general and specialized clinics, and with only 1.7 beds, 1.6 physicians and 2.1 nurses and midwives per 1,000 persons.[[29]](#footnote-30) Nevertheless, the country’s healthcare service is further supported, in particular in rural and remote areas, by a significant number of primary care providers.[[30]](#footnote-31)
2. Despite challenges, numerous governmental and non-governmental interlocutors have expressed grave concerns about the direct impact of unilateral sanctions on peoples’ access to healthcare and on the Government’s efforts to ensure adequate response and prevention, including through implementing the Health Transformation Plan, which was launched in 2014 to strengthen the health infrastructure and increase the number of healthcare providers and physicians, in particular in rural and remote areas. Between 2002 and 2022, 170 hospitals were built, while the Health Insurance Organisation expanded to cover 42,278,338 people in 2021 (51% of Iran’s population). This is in addition to the insurance coverage provided by other insurance providers, covering the rest of the population.[[31]](#footnote-32)
3. Currently, Iran produces around 95% of its medicines and basic vaccines to mitigate the impact of unilateral sanctions, with reportedly good manufacturing and quality assurance systems.[[32]](#footnote-33) However, Iranian pharmaceutical companies have difficulty procuring raw materials and ingredients of necessary quality, with increased costs affecting purchases from abroad.[[33]](#footnote-34)
4. Reliable sources and interlocutors confirmed the absence of medical supply sustainability since 2011 due to sanctions. Of particular concern is the significant challenges faced in the procurement and delivery of life-saving medicines and medical equipment, produced by foreign companies and destined for the treatment of rare diseases, including certain types of cancer, thalassemia, haemophilia, leukaemia, ichthyosis, multiple sclerosis, epidermolysis bullosa (EB), autism, and certain forms of diabetes.
5. Although sanctions’ document announce that medicines and medical equipment are not affected due to humanitarian exemptions, their delivery to Iran is severely undermined by the effects of sanctions on finance, trade, shipping and insurance companies, restrictions on international payments, and by foreign businesses’ and suppliers’ over-compliance. These constitute serious impediments to the enjoyment of the right to the highest attainable standard of health by all Iranians.
6. The Special Rapporteur received testimonies of acute shortages and exorbitant prices for life-saving and suffering-reducing medicines, as well as accounts of rationing of medical doses by patients who due to their dire economic situation were forced to resell part of their treatment to cover basic needs, such as food. Since November 2018, the price of healthcare rose 67%.[[34]](#footnote-35) In addition, in 2021, Iran was able to import 1.5 million injection doses for thalassemia patients, out of the 10 million needed, while it was not possible to import oral medication for these patients.[[35]](#footnote-36) Such shortages have led to a quadrupling of mortality rates among thalassemia patients.[[36]](#footnote-37)
7. The quest for alternative routes of procurement and payment through intermediaries and complex payment procedures are key factors in the rising costs of medicines and medical equipment. The Iranian Health Insurance Organisation was unable in 2021 to cover around 130 medicines for several diseases due to the above reasons.[[37]](#footnote-38)
8. The Special Rapporteur was informed about significant delays and in some cases the complete denials of shipment by foreign transportation companies due to the reluctance of insurance companies to insure cargoes. The limitations of access to formal trade, payment and delivery channels due to sanctions-related restrictions is a cause of the reported rise in counterfeit medical products, smuggling of expired / expiring medicines with ruinous public health consequences, in particular among vulnerable populations.[[38]](#footnote-39) One vulnerable group affected by the shortages of specialised medicines and medical equipment is Iran’s war veterans and civilians who survived nerve agent and mustard gas attacks during the Iran-Iraq war in the 1980s.
9. In Tehran, the Special Rapporteur visited the specialised centre for the treatment of EB patients, a rare skin disorder with a number of other related health complications, which provokes from birth incurable acute suffering and may lead to death. The suffering can only be reduced through the application of bandages produced by a single company in Sweden. She was informed about the challenges that the centre has faced in procuring these specialized absorbent silicone dressings due to over-compliance by the Swedish producer, and about the centre’s efforts to mobilise international stakeholders, including specialised UN agencies, to help procure these bandages on an ad hoc basis, pending a more sustainable solution.[[39]](#footnote-40)
10. She received numerous other examples of foreign companies’ reluctance to deliver medicines, medical equipment and the necessary spare parts, including among others plasma-derived drugs, blood bank centrifuges, measuring and quality control equipment, diagnostic devices for prenatal diseases, cardiac and endoscopic equipment, material for producing gloves and catheters, and even ambulances. She was also informed that in some anti-retroviral centres, the machines for tracking immunosuppression and initiating anti-retroviral therapy (CD4 counting) could no longer function because of missing spare parts, with serious procurement delays and increased costs due to unilateral sanctions.[[40]](#footnote-41) Even UNDP-Iran reportedly faced serious problems obtaining paediatric anti-retroviral medicines from a foreign company that refused to sell them.
11. Besides medicines and medical equipment, international companies and suppliers have been reported to refuse to sell software for managing and monitoring patients’ treatment, such as those required for the management of the dosage of cancer patients’ medication.
12. Financial restrictions, secondary sanctions and the vagueness, complexity and uncertainty around the determination of the items that are exempted from sanctions and those that could be considered “dual-use” (i.e. for civil and military use) have significantly affected a number of medical disciplines and sectors in Iran, including nuclear medicine and radiopharmacy, with a direct impact on patients receiving such specialised treatment. The Special Rapporteur was further briefed on the designation by the US Treasury Department of the Iranian radioisotope company, due to its affiliation with the Iranian Atomic Energy Organisation, and the significant obstacles this company faces in accessing raw materials from abroad for developing radiopharmaceuticals for treating cancer patients both in Iran and outside the country.[[41]](#footnote-42)
13. The adverse effects of unilateral sanctions on healthcare have been compounded by COVID-19, with Iran being among the most affected countries with more than 131,000 lives lost by the end of 2021.[[42]](#footnote-43) There have been public discussions about the level of Government responsiveness to and preparedness for such a public health crisis, and about the delays in the national COVID-19 vaccination roll-out, with some reports criticising the Government decision to refuse vaccines manufactured in the US and the UK.[[43]](#footnote-44) The Iranian Government informed the Special Rapporteur that the delays were mainly due to challenges it faced to unfreeze money in foreign banks, which were awaiting the US Government’s approval to act on payment instructions from the Iranian Central Bank[[44]](#footnote-45) and to make international payments for the procurement of vaccines through COVAX due to the country’s financial isolation. She was informed that the delivery of millions of COVID-19 vaccine doses from Iran’s paid allocation to the COVAX facility and from Japan, Italy and Germany was possible only after UNICEF engagement[[45]](#footnote-46) and later Iran developed its own capacity to produce COVID-19 vaccines to provide overall vaccination.
14. Disruptions were also reported in the delivery of vital equipment to be used during the COVID-19 outbreak, including ventilators, CT scanners, and protective equipment.[[46]](#footnote-47) The Government also informed the Special Rapporteur about the blocking of the disbursement, by the US, in 2020 of an IMF loan to support the Iranian Government’s pandemic response.[[47]](#footnote-48)

Access to food

1. Iran’s agricultural production represents more than 10% of its GDP, with 75% of the agricultural activity undertaken by small subsistence farmers. It is among the world’s top 20 producers for a range of agricultural commodities.
2. For years the Government has developed policies to secure food self-sufficiency and agricultural self-reliance. According to WFP, self-sufficiency rates ranged from 53 to 82 percent between 2000 and 2012.[[48]](#footnote-49) Today, Iran still relies on food imports as its self-sufficiency rate is around 85%.[[49]](#footnote-50)
3. The re-imposition of unilateral sanctions in 2018 with the corresponding trade and financial restrictions, over-compliance by foreign businesses, traders, and financial institutions[[50]](#footnote-51) have disrupted the procurement of agricultural seeds, fertilisers and equipment for agricultural production. This has led to the use of barter and humanitarian trade mechanisms, which along with inflation and the devaluation of the national currency have triggered a spike in food prices.[[51]](#footnote-52)
4. According to the Iranian Chamber of Commerce, Industries, Mines and Agriculture, the re-imposition of sanctions in 2018 have jeopardised the country’s food security by disrupting the supply of at least 10 million tonnes of agricultural imports, including among others the supply of livestock inputs, oil seeds and cooking oil, which constitutes a clear violation of the right to food in terms of access and adequacy.
5. These developments have had a serious impact on the average total costs for Iranian households, in particular in towns, which, according to official data, rose by 64% between 2017 and 2019,[[52]](#footnote-53) leading to dietary changes and lower food consumption.[[53]](#footnote-54) Food insecurity rates among the population have soared, reaching 60% in certain regions.[[54]](#footnote-55) The COVID-19 outbreak has exacerbated these trends with households forced to spend in 2020 an estimated 41.4% more than in 2019, for buying the same products.[[55]](#footnote-56) Humanitarian organisations reported that the cost of the food basket increased more than 3.4 times between 2018 and 2022.[[56]](#footnote-57)

Infrastructure and natural disasters response and recovery

1. Unilateral sanctions have reduced the Government’s capacity to maintain and improve essential infrastructure and to engage in important development projects to improve peoples’ lives, especially in remote and rural areas. Disruptions in processing payments and foreign businesses’ refusal to accept foreign currency guarantees issued by Iranian banks due to sanctions have seriously affected Iran’s engagement in international partnerships for such projects, including the development and modernization of industries, power plants and electrical grids, water supply system, public transportation and the network of roads, educational and health facilities.
2. Hydropower, irrigation and water supply projects have been suspended amid the dearth of foreign funds due to unilateral sanctions and the impossibility to attract investments and new technologies for necessary upgrades in key industrial sectors, such as oil refineries, gas fields, power plants, pipelines and power grids, with serious adverse effects on the daily lives of people and heightened risks for serious environmental hazards. Similar concerns have been raised in the development and maintenance of land and air transport infrastructure.
3. The withdrawal of foreign donors and the interruption of contracts have hampered several critical dam construction projects and the supply of foreign industrial items, chemicals and technology for water and wastewater treatment.
4. In the energy sector, dozens of foreign companies have invested in projects for developing and upgrading Iran’s oil and gas fields. Almost all the contracts signed in 2015, following the JCPOA agreement, were terminated with the re-imposition of unilateral sanctions in 2018.[[57]](#footnote-58) At the same time, concerns have been expressed by the Ministry of Petroleum about the impact of sanctions on access to new technology to deal among others with harmful gas emissions and air pollutants.
5. The electric power industry has faced difficulties in procuring equipment and raw materials, electronic and control equipment, relays and material for the production of certain equipment, including turbines, compressors and others. Such equipment is critical to secure reliable power supplies and prevent outages like those in 2021.[[58]](#footnote-59) The lost funding from the termination of investment contracts in the electricity sector since 2018 is estimated to exceed US$6 billion.
6. Numerous projects to build COVID-19 facilities and hospitals, some for cancer research and treatment, have been discontinued, including those backed by the Islamic Development Bank (IsDB), of which Iran is a member state. Similar challenges were reported regarding the implementation of IsDB projects for grain silo facilities amid significant delays due to restrictions in international payments, the depreciation of local currency and the ensuing rise in construction costs.[[59]](#footnote-60)
7. Sanctions have also prevented the Government from accessing resources and equipment for disaster preparedness, response and recovery interventions. Iran is a natural disaster-prone country experiencing a variety of often devastating disasters. More than 80,000 people reportedly died in the last 30 years as a result of extreme floods, extreme temperatures, droughts and earthquakes.[[60]](#footnote-61)
8. Governmental agencies and NGOs such as the Crisis Management Organisation and the Red Crescent Society have pointed to extraordinary delays in the delivery of emergency assistance by international donors, sometimes longer than one year, due to banking transaction restrictions and suppliers’ over-compliance. Similar delays have reportedly occurred in the delivery of life-saving medicines and medical equipment that should normally be delivered within one week from the purchase date. In addition, due to banking restrictions, these organisations cannot receive the financial support and donations by Iranians living abroad, while procurement of search-and-rescue helicopters and air-ambulances is almost impossible due to the failure to secure financing and with the excuse that they could be considered “dual-use”. According to the Iranian Civil Aviation Authority, Iran has only 5 air medical services helicopters, which are often the only means to reach affected areas and victims.
9. Iran experienced 39 earthquakes in 2021. The Crisis Management Organisation highlighted the inability to procure equipment and research materials for natural disaster monitoring and prevention, and to access aerial satellite imaging to assess the impact of natural disasters for better coordinating targeted interventions.
10. The Special Rapporteur was also briefed about difficulties in ensuring maintenance and upgrading for civil aviation fleets, mainly due to the obstacles in procuring spare parts, new technologies and software, as well as planes. This has been further exacerbated by the 2019 US Treasury Department OFAC Iran-Related Civil Aviation Industry Advisory.[[61]](#footnote-62) Foreign aircraft manufacturers have either terminated their contracts or only partially fulfilled them due to the sanctions and over-compliance, and have discontinued after-sales service and support, endangering thus the security of civil aviation and human lives. Similar challenges are affecting the Iranian automobile industry.
11. The above factors directly affect economic and social rights of Iranians, including the right to live in a favourable environment, access to clean water, freedom from poverty, the right to development and even the right to life, seriously undermining the achievement of the Sustainable Development Goals.

International cooperation and effective participation

1. The imposition of comprehensive unilateral sanctions, coupled with secondary sanctions and over-compliance, have broad implications for the sanctioned country’s engagement with the international community. During her visit, the Special Rapporteur heard concerns regarding Iran’s participation in international fora and organisations, and about other challenges in different areas and sectors. In particular, in early January 2022, Iran’s voting rights in the UN were suspended over late dues of around US$18 million, reportedly due to the inability of the Government to access its funds held in foreign accounts. Iran regained its voting rights only when this amount was paid by its frozen assets released by banks in South Korea. This also occurred with the suspension of its voting rights from January to June 2021.[[62]](#footnote-63)
2. The Iranian Chamber of Commerce reported difficulties in paying its dues to foreign chambers of commerce and to the International Chamber of Commerce, and in transferring funds to international arbitration bodies, preventing thus access to international adjudication. Similar challenges occur in the payment of membership fees to international sports and cultural associations, in the payment of legal fees regarding the restitution of cultural artefacts, and in financing the participation of Iranian artists in international cultural meetings and festivals.
3. The Special Rapporteur notes with concern the negative impact of unilateral sanctions on academia. She was presented evidence of reluctance or refusals by international academic institutions and scholars to collaborate with their Iranian counterparts, impossibility to pay contributions to international professional associations, termination of foreign grants for academic exchanges and research, travel constraints, exclusion of Iranian scholars from editorial boards abroad, summary rejections of Iranian academic submissions and articles by foreign journals and publishers on the ground of nationality, obstacles in accessing foreign online academic, technological and medical databases and libraries. She also received accounts of the challenges faced by Iranian students to study at foreign academic institutions, such as restrictions or cancelations of exchange programmes and scholarships, and procedural obstacles, such as payment of fees and opening or maintaining bank accounts.
4. Academic, cultural and professional exchanges, participation of Iranians in international fora, have been further constrained by the COVID-19 outbreak and the unavailability of certain online communication platforms as compliance and over-compliance with unilateral sanctions extends to blocking Iranian IP addresses. Some Iranian academics, doctors and parliamentarians have been unable to attend online sessions of international organisations, conferences and workshops due to the lack of access for Iranians to the online platforms. The Special Rapporteur underlines that unilateral sanctions limit Iranians’ access to information, negatively affecting the right to education, academic freedoms, cultural rights, and the prohibition of discrimination.
5. The Special Rapporteur further learned about the negative impact of current unilateral sanctions on consular services and diplomatic relations. Iranian diplomats abroad are prevented from opening bank accounts, transferring money between Iran and the country where they are posted, receiving their salaries and effecting basic financial transactions, such as booking hotel rooms and travel tickets, and paying school fees and other daily life expenses. UN personnel in Iran and foreign diplomatic missions in Tehran and their staffs have experienced difficulties in paying salaries and covering school fees.

Situations of vulnerability and humanitarian assistance

1. The economic hardships in Iran, and the lingering effects of the COVID-19 pandemic have led to a rising number of people needing support. The official poverty rate rose to 31% in 2020 from 22.47% in 2010, with an additional 15.3 million Iranians falling into poverty.[[63]](#footnote-64) According to data analysis from Iranian Household Income and Expenditure Survey, between 2018 and 2020 (after US sanctions were re-imposed and before the COVID-19 outbreak), the national poverty rate increased by 11% and the average living standard dropped by 12%.[[64]](#footnote-65)
2. For the same reasons, the significant decrease in Government revenues, in businesses’ donations and the inability to transfer international donors’ financial support has led to a decrease in governmental and non-governmental programmes of social support. In March 2022, the Government decided to revise the means of allocating subsidies for essential food and medicines. While all subsidies on commodities remained in force, for food and medicine the Government decided to pay the amounts directly to the people and insurance companies. Subsidies for gasoline and electricity reportedly remained unchanged and redirecting financial support to the most vulnerable groups became a priority.
3. The Special Rapporteur was made aware of the financial struggles of the State Welfare Organisation and the Imam Khomeini Foundation to provide support to the increasing number of those needing humanitarian assistance. Government budget deficits may explain the reasons for such constraints, along with international donors’ inability to transfer money through the banking system. It is reported that in 2021, 40% of Government funds planned for the work of the Social Welfare Organisation could not be allocated to it.[[65]](#footnote-66) Still, both institutions have reportedly increased by 20% the total amount of cash transfers from 2020 to 2022, but these measures have not been sufficient to cover all their needs. Between 2020 and 2022, the Imam Khomeini Foundation expanded its work to support 1 million more families,[[66]](#footnote-67) while the Government Poverty Reduction Program provided support to 706,000 families in 2021. High inflation has led to significant increases in the costs of humanitarian, medical and rehabilitation interventions and for providing material support to those most in need. At the same time, the Social Security Organisation has to respond to the decreasing purchasing power of more than 7 million pensioners, and has estimated that an additional US$3.6 billion is needed to cover the difference between 2018 and now. At the same time, the rise in the cost of medical services has put additional pressure on the organisation’s allocated budget for medical subsidies.[[67]](#footnote-68)
4. Sanctions and the resulting economic pressures have undoubtedly a pronounced gender dimension. Economic sectors traditionally employing women have been particularly affected, including manufacturing, handicrafts and family businesses, and an increasing number of women have had to engage in the informal economy to make a living and respond to the financial needs of their households in the context of rising inflation. Furthermore, women’s entrepreneurship, which the Government has supported and encouraged in recent years in different economic sectors, has also been impacted. Women’s unemployment rate is approximately double that of men, with a rate of 36% for young women aged between 15 and 24, compared to 21.2% for young men of the same age group.[[68]](#footnote-69) According to an analysis of the data of the Iran Labor Force Survey, although women’s share in the labor market is 1 to 9 compared to men, with only a 17.5% labour force participation rate according to the 2020 Human Development Report,[[69]](#footnote-70) since May 2018 and the re-imposition of the US sanctions, two of every three job losses concerned women.[[70]](#footnote-71) Several interlocutors also raised concerns about the precarity of approximately 3 million female-headed households and the vulnerability of 9 million women in low-income categories who face difficulties in accessing basic services, including healthcare. The Government has undertaken measures to ensure the participation of 255,000 female heads of households in social and economic empowerment programmes, including subsidised employment schemes and business support and development programmes.[[71]](#footnote-72)
5. In this context, where sanctions and over-compliance undermine economic development and foster impoverishment, some vulnerable people seek to escape poverty by engaging in whatever activities they can, including the grey economy, the black market, drug trafficking and smuggling, exposing themselves to criminal prosecution.
6. The Special Rapporteur met with a variety of persons with disabilities and their associations and listened to their growing socio-economic difficulties and the challenges they face in accessing medicines, medical, assistive and rehabilitation equipment, due to sanctions and foreign suppliers’ over-compliance. Most of them are unemployed and require government aid, and have been particularly affected by the country’s economic downturn and rising prices, in particular for supplies and services, including rehabilitation services. A characteristic example that concerns specifically persons with mobility disability is the reported ten-fold increase of the cost of a wheelchair between 2016 and 2022.[[72]](#footnote-73) She heard again about the scarcity of specialised medicines for certain rare physical conditions, such as spinal muscular atrophy, which are only produced by foreign pharmaceutical companies.
7. Associations working with persons with psychosocial disabilities and chronic mental disorders, such as persons with autism, have raised similar concerns about the limited access to specialised pharmaceutical and medical treatment, which is often necessary in order to engage in the therapeutic and rehabilitation work to reduce symptoms and improve these persons’ quality of life. They have also reported difficulties in seeking cooperation with institutions abroad working in the same domain.
8. Despite Government efforts to address the medical, rehabilitation and socio-economic needs of persons with disabilities, through the establishment of daily rehabilitation training centres, the provision of rehabilitation devices, nursing services, grants for vocational training, as well as the establishment of occupational centres, the dedicated state budget is a fraction of what is needed to effectively respond to these needs. The absence of sufficient funding since the adoption of the 2018 Law to Protect the Rights of Persons with Disabilities was highlighted by disability rights advocates and human rights organisations,[[73]](#footnote-74) as well as persistent accessibility challenges.[[74]](#footnote-75)
9. Iran hosts more than 5 million migrants and refugees, most of them of Afghans in dire need of humanitarian assistance, with around 80 per cent of them being undocumented.[[75]](#footnote-76) The situation was aggravated following August 2021, which forced an estimated more than 850,000 Afghans, including 250,000 children, to flee their country.[[76]](#footnote-77) 96% of them live in urban areas, while the rest reside in settlements around the country. According to UNHCR, by the end of 2022, 274,000 new Afghan arrivals will remain in Iran and will need protection and assistance. The Government has expressed its commitment to continue implementing inclusive policies, including by offering access to primary healthcare and education. However, the economic impact of sanctions, the restrictions on financial transactions and delivery, and donors’ reported reduced interest – compounded by the pandemic – have adversely affected the Government’s capacity to protect and humanitarian actors’ ability to implement projects, including provision of basic goods, and construction of schools and health centres. At the same time, due to inflationary pressures the costs for humanitarian assistance have significantly increased and imports from foreign donors and suppliers are still hindered by over-compliance despite humanitarian exemptions. The current situation has forced a number of Afghan and other migrant children onto the street, exposing them to risks of violence, exploitation and substance abuse.[[77]](#footnote-78)
10. International and local humanitarian actors shared with the Special Rapporteur their experiences and efforts in implementing their humanitarian projects in an environment of generalised uncertainty exacerbated by the vagueness and complexity of humanitarian exemption licenses, their length of time to obtain them, and the serious obstacles in financial and procurement transactions. Navigating the procedures and interpretation pathways of ad hoc humanitarian exemptions requires enhanced capacity and significant financial resources, including for legal fees, which are available to only few humanitarian actors operating in the country. Even those organisations, including UN agencies, with the resources and means experience significant delays in payment clearance procedures and procurement delays for the necessary goods and equipment, with detrimental consequences for beneficiaries and patients. One senior UN aid official said that he had never experienced such difficulties to procure even life-saving items. Other concerns relate to the impact of sanctions and of the strenuous economic situation on the general nature and scope of humanitarian assistance, which is increasingly focused on food security and basic healthcare, with fewer resources for more comprehensive interventions to provide for sustainable livelihoods, including broader social support, income generation and empowerment programmes, among others. This may also be explained by the current narrow scope of General License E on NGOs’ activities (including humanitarian NGOs) in Iran, its strict financial thresholds and burdensome reporting requirements, which represent additional barriers to these organisations’ overall operation and scope of humanitarian engagement in the country.[[78]](#footnote-79)

Issues of legality

1. The Special Rapporteur notes with concern the extension, in March 2022, by the US Government, for one more year, of the 1995 state of national emergency with respect to Iran with reference to the “threat to national security, foreign policy, and economy of the United States.”[[79]](#footnote-80) This decision is not compatible with the applicable norms of international law, including the principles of the UN Charter and the requirements under article 4 of the International Covenant on Civil and Political Rights (ICCPR) that has been reflected in a number of communications from the Special Rapporteur. Further, the same applies to the list of sanctions extended, renewed or updated by other countries against Iran, including the UK, Canada, Australia and the EU.
2. The Special Rapporteur has repeatedly stated that under international law unilateral measures without or beyond authorization of the UN Security Council may only be taken if they do not violate international obligations of states (retortions) or if their wrongfulness can be excluded as countermeasures taken in accordance with standards of the law of international responsibility: to be applied against states for violations of international legal norms, to aim to restore the fulfillment of international obligations, to be proportional to the breach occurred, to be necessary, and to not violate peremptory norms of international law and fundamental human rights.
3. Unilateral sanctions against Iran do not conform to a broad number of international legal norms and principles, are introduced to apply pressure on a state, cannot be justified as countermeasures under the law of international responsibility, and therefore can be qualified as unilateral coercive measures repeatedly condemned in resolutions of the UN Human Rights Council and the UN General Assembly. She also notes and welcomes the submission of the case on the violation of the 1955 Treaty of Amity.
4. Furthermore, the Special Rapporteur wishes to remind the international community that unilateral coercive measures, as well as policies and campaigns aiming at exerting pressure on third states, companies and individuals, constitute violations of the principles of cooperation between states, the peaceful settlement of international disputes, and of sovereign equality and non-intervention in the domestic affairs of states.[[80]](#footnote-81) They also counter the fundamental principles enshrined in the Universal Declaration of Human Rights (art. 28) and the International Covenant on Economic, Social and Cultural Rights (article 2).
5. States are required to contribute to creating an international environment that enables the respect, protection and fulfilment of all human rights, and they must take all necessary measures, including diplomatic and foreign relations, to promote and help create this environment. Clearly, the imposition of comprehensive unilateral sanctions and secondary sanctions, the freezing of foreign assets and the significant obstacles to the performance of Iran’s consular functions, do not *per se* contribute to such an enabling environment. Moreover, obstacles to diplomatic, consular and special missions, as well as to consular and diplomatic functions and operations, constitute a clear violation of the relevant provisions of the Vienna conventions on diplomatic and consular relations and fundamental principles of international law.
6. In addition, the application of extraterritorial jurisdiction to nationals and companies of third states for engaging in economic or other relations with Iranian public institutions, nationals and companies or for dealing with Iranian products; the use of national currencies as a means to expand national jurisdiction and as financial and political leverage in this regard; and the imposition of secondary sanctions and alleged threats to third parties, as well as maximum pressure campaigns, are illegal under international law and increase the risks of over-compliance. According to the UN Committee on Economic, Social and Cultural Rights, extraterritorial obligations arise when a State influences situations outside its territory, including by controlling the activities of corporations domiciled in its territory and/or under its jurisdiction, and thus contribute to the effective enjoyment of economic, social and cultural rights abroad. The extraterritorial obligation to respect requires States to refrain from interfering directly or indirectly with the enjoyment of the Covenant rights by persons outside their territories, and to ensure that they do not obstruct other States from complying with their obligations under the Covenant.[[81]](#footnote-82)
7. The Special Rapporteur is also concerned that existing unilateral sanctions as a punitive action violate, at the very least, obligations arising from universal and regional human rights instruments, many with a peremptory character, including procedural guarantees, access to justice and presumption of innocence.
8. With regard to over-compliance by businesses and financial institutions, the Special Rapporteur recalls the existing international framework, including the UN Guiding Principles on Business and Human Rights, which apply to all states and companies and recognizes “(t)he role of business enterprises as specialized organs of society performing specialized functions, required to comply with all applicable laws and to respect human rights”, “should not undermine States’ abilities to meet their own human rights obligations”, and “to seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services”, including through human rights diligence processes.[[82]](#footnote-83)

IV. Conclusions

1. **Iran has been experiencing a panoply of economic and other sanctions for over 40 years, coupled with secondary sanctions, over-compliance and de-risking policies which have been substantially affecting the country’s economy, humanitarian situation and people’s lives, including with regard to access to basic goods, services and infrastructure. Almost all the Special Rapporteur’s interlocutors, both governmental and non-governmental, have qualified these measures as a form of “economic warfare” with serious adverse effects on the lives of millions of Iranians inside and outside the country.**
2. **Despite structural challenges in assessing the impact of unilateral coercive measures, the Special Rapporteur is convinced that country visits, such as the one in Iran, allow for a meaningful *in situ* exploration of the mechanisms triggered by the imposition of such measures, as well as for collection of information, and constitute a basis for a continued dialogue and further understanding.**
3. **Unilateral sanctions, secondary sanctions and over-compliance have a clear macro-economic impact and affect Iran’s key economic sectors, leading to reduced Government revenues and thus affecting the Government’s planning and implementation of economic, development and social policies. The Special Rapporteur has found a direct correlation between the imposition of unilateral sanctions and the performance of economic indicators such as trade volumes and values, GDP, level of foreign investments, inflation and consumer prices.**
4. **The designation of all Iranian banks and a long list of companies and nationals active in different economic sectors, including the pharmaceutical and food industries, have undermined national efforts toward economic self-sufficiency as a response to the sanctions-induced socio-economic pressures, and have led to reduced state revenue, growing poverty, exacerbated existing socio-economic inequalities, and insufficient resources aimed at guaranteeing the basic needs of low-income people and other vulnerable groups, including people suffering from rare or severe diseases, persons with disabilities, older persons, migrants and refugees, women-led households and children.**
5. **In particular, with regard to rare diseases patients and persons with physical and psycho-social disabilities, including EB, HIV and cancer patients, people with hemophilia, autism, MSA, diabetes, thalassemia and many other, the Special Rapporteur was alarmed by the unavailability of foreign produced medicines, medical equipment, spare parts and high quality raw materials for pharmaceuticals, or in some cases the significant delays, denial of providing services and good, high costs and complexity of procurement through alternate routes, due to the reported over-compliance and overall reluctance of foreign companies and suppliers. Such restrictions and business conduct have exacted a considerable toll in human suffering and life.**
6. **While recognizing the existence of OFAC general licenses providing for the possibility to procure and deliver with some exemptions medical and agricultural goods to Iran, in practice humanitarian exemptions for food and medicine appeared to be ineffective and nearly non-existent due to the real or alleged fear of secondary sanctions, civil and criminal charges, reported “advice” not to do any business in Iran, impossibility, complexity, uncertainty and length of bank payments and good deliveries, which affects the whole scope of human rights of the people of the Islamic republic of Iran.**
7. **Unilateral sanctions, secondary sanctions and over-compliance have also prevented the Government from investing resources to develop and maintain essential infrastructure including hospitals, schools, agriculture, housing, energy and electricity infrastructure, roads, civil aviation, commercial ships and many others, and to maintain the necessary level of readiness for natural disaster response and recovery. Of particular concern is the unavailability, due to trade and financial restrictions, of new technologies, hardware and spare parts for the maintenance and upgrade of the country’s critical infrastructure, with a devastating impact on the lives of Iranians and with heightened environmental risks.**
8. **Threats to impose secondary sanctions, criminal and civil penalties against individuals and companies circumventing unilateral sanctions regimes, de-risking policies and over-compliance by third-country banks and businesses, have all resulted in rising transaction costs and risks, procurement obstacles and delays, and provision of low-quality or counterfeit goods, including of life-saving medicine and medical equipment.**
9. **Unilateral sanctions have also resulted in the reduction of social support programs and impeded the delivery of humanitarian assistance by both local and international humanitarian actors. Lengthy and complicated humanitarian license application processes, high legal and transaction fees, banking restrictions, reduced donations, and the fear of possible civil and criminal charges for alleged sanctions breaches have reportedly adversely affected the delivery of humanitarian assistance and the implementation of projects targeting those most in need in Iran.**
10. **Financial restrictions and reputational risk considerations as a result of direct and secondary sanctions have also created a climate of uncertainty and fear among international partners who are reluctant to engage with their Iranian counterparts, such as academic and scientific institutions, cultural institutions and associations, professional and amateur sports associations and clubs, and technology and other companies. Unilateral sanctions have prevented the implementation of joint academic research and exchange programmes, participation of Iranian scholars in foreign scientific journals, as well as access to online academic databases and payments of scholarships and fees for students studying abroad, which all constitute discrimination on the ground of nationality, affecting the right to education and right to benefit from academic research.**
11. **Finally, preventing Iran from participating in international cooperation by impeding its ability to pay membership fees to international organizations and associations, as well as by imposing restrictions on Iranian and foreign diplomatic missions’ operations, hampers Iran from international cooperation and prevents the fulfilment of the right to development, in accordance with the Sustainable Development Agenda.**
12. **The use of unilateral sanctions, secondary sanctions and over-compliance has an overall adverse effect on the broad spectrum of human rights, civil and political, economic, social and cultural, including the right to life and right to development. It concerns all people in Iran, including refugees, as well as Iranians living abroad, who all those who are dependent on critical goods and services.**
13. **While welcoming the Government’s efforts to mitigate the negative impact of unilateral sanctions in different areas, especially for the most vulnerable, the Special Rapporteur notes that this should not be used as a ground to legitimize the use of unilateral sanctions.**

V. Recommendations

1. **The Special Rapporteur reminds all parties of their obligation under the UN Charter to observe principles and norms of international law, including principles of sovereign equality, political independence, non-intervention in the domestic affairs of states, and peaceful settlement of international disputes.**
2. **The Special Rapporteur urges all stakeholders to stop using the rhetoric of sanctions as a political instrument or a means to get economic advantages, and to engage in dialogue to settle any disputes in accordance with international law norms and principles, while assessing, preventing and monitoring the humanitarian impact.**
3. **She calls on sanctioning States:**

(a) **to lift all unilateral measures against Iran, Iranian nationals and companies, as being imposed without the authorisation of the UN Security Council and whose use cannot be justified as retortions or countermeasures in accordance with international law.**

(b) **to remove especially all restrictions on trade, financial payments and delivery of food, medicines and medical equipment, water, sanitation, communication and transportation, spare parts, seeds, fertilisers as well as goods and services for the maintenance and development of critical infrastructure, which are essential for the enjoyment of human rights by Iranians.**

(c) **to ensure that the Islamic Republic of Iran is able to pay assessed and voluntary contributions to international organisations and that Iranian diplomatic, consular and special missions, as well as their staffs, are provided with all necessary means and facilities to perform their consular and diplomatic functions in full conformity with the principle of sovereign equality of states and the Vienna conventions on diplomatic and consular relations and special missions**

(d) **to unfreeze assets of the Iranian Central Bank in accordance with customary norms of international law on the immunity of state property, to enable the Government to implement socio-economic policies to benefit Iranians, in particular those most in need.**

1. **The Special Rapporteur urges the U.S. Government to cease the state of national emergency regarding Iran, which is incompatible with the norms of the ICCPR, to fully implement provisions of the Order of the International Court of Justice of 3 October 2018 and to bring national legislation into accordance with international law, including human rights law, refugee law and the law of international responsibility. She also reminds that the use of financial instruments and mechanisms as a means to expand national jurisdiction over third parties and as political and economic leverage for the application of secondary sanctions, as well as civil and criminal penalties against these third parties, is contrary to international law.**
2. **The Special Rapporteur urges against any coercion, written or oral threats or any other act which may cause or result in over-compliance and a generalised climate of uncertainty and fear among all actors who would otherwise engage with Iran, Iranian nationals and entities.**
3. **She calls on all financial institutions and other businesses to act in accordance with the UN Guiding Principles on Business and Human Rights to avoid over-compliance and violations of the rights of nationals and residents of Iran, especially in the areas of critical infrastructure, raw material, spare parts, and food and medical deliveries. In particular, she recalls the need for the establishment of human rights due diligence processes to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services.**
4. **She stresses that the Sustainable Development Goals can only be achieved in the spirit of exchanges, solidarity and cooperation between countries and also reminds that no good intention justifies the violation of fundamental human rights. This appeal is also extended to all private stakeholders in different areas, including education, sports, technology, culture and arts, to ensure equal participation of Iranian nationals, associations and companies in international events and programmes.**
5. **While acknowledging obligation of Iran to ensure that human rights are protected and promoted without discrimination on its territory, the Special Rapporteur underlines the devastating effects of the imposed unilateral coercive measures on human rights of the people of Iran, especially – on the most vulnerable groups, and their cumulative impact in conjunction with the ongoing public health crisis.**
6. **She invites the Government to continue engaging with all relevant stakeholders, including with OHCHR and other UN entities and programmes, and with international human rights mechanisms, such as the Special Procedures, by extending invitations for official country visits.**
7. **She calls on the UN Country Team in Iran and relevant humanitarian organisations to assist Iran in the implementation of initiatives to mitigate the negative impact of unilateral sanctions on human rights in Iran and to further engage with all relevant stakeholders to assist Iran in the delivery of humanitarian assistance to vulnerable populations, including migrants and refugees, and in the procurement of quality medicines, medical equipment, spare parts, and pharmaceutical raw material for the treatment of diseases and other precarious health conditions.**
8. **She invites the UN system to engage with her in developing a conceptual framework for mechanisms of compensation, remedy and redress for victims of human rights violations due to UCMs. She also invites all stakeholders – states, international organizations, NGOs, banks and businesses – to launch multilevel discussions to develop Guiding Principles on secondary sanctions, over-compliance and human rights in order to protect human rights, prevent de-risking that entails over-compliance, and introduce due diligence principles in international cooperation, banking and business activity.**
9. **While welcoming Iranian efforts to accommodate the growing number of Afghan refugees, besides lifting of unilateral sanctions, which will enhance the Government’s capability to provide necessary services and care to refugees, I call on the international community to provide Iran with additional substantial assistance to be allocated for refugees.**
10. **Mindful of the obligations of all states to settle international disputes by peaceful means, the Special Rapporteur welcomes Iran’s submission to the International Court of Justice on the violation of the 1955 Treaty of Amity, Economic Relations, and Consular Rights, and calls on all parties to use judicial mechanisms to settle existing disputes, to cooperate in good faith to prevent such disputes through negotiations, and to use all available mechanisms to protect human rights affected by UCMs, including the UN treaty bodies, the European Court of Justice and the European Court of Human Rights.**
11. **The Special Rapporteur calls on UN agencies and programmes, and human rights mechanisms, including Special Procedures, to pay due attention to the impact of unilateral coercive measures while examining the situation in Iran.**

1. \* The summary of the report is being circulated in all official languages. The report itself, which is annexed to the summary, is being circulated in the language of submission only. [↑](#footnote-ref-2)
2. \*\* The present report was submitted after the deadline in order to reflect the most recent information. [↑](#footnote-ref-3)
3. <https://www.ohchr.org/en/press-releases/2022/05/iran-unilateral-sanctions-and-overcompliance-constitute-serious-threat-human>. [↑](#footnote-ref-4)
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5. UNSC [Resolution 1696 (2006)](http://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/Iran%20SRES1696.pdf); [Resolution 1737 (2006)](http://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/Iran%20SRES%201737.pdf); [Resolution 1747 (2007)](http://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/Iran%20SRES1747.pdf); [Resolution 1803 (2008)](http://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/Iran%20SRES%201803.pdf); [Resolution 1835 (2008)](https://www.iaea.org/sites/default/files/unsc_res1835-2008.pdf); [Resolution 1929 (2010)](http://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/IRAN%20SRES%201929.pdf); [Resolution 2224 (2015)](https://documents-dds-ny.un.org/doc/UNDOC/GEN/N15/172/87/PDF/N1517287.pdf?OpenElement). [↑](#footnote-ref-6)
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7. EC Common Position (2010/413/CFSP); EC Regulation (EU) No. 961/2010; EC Common Position (2011/235/CFSP); EC Regulation (EU) No. 359/2011; EC Common Position (2012/35/CFSP); EC Common Position (2012/168/CFSP); EC Common Position (2012/635/CFSP); EC Common Position (2012/829/CFSP); EC Regulation (EU) No. 264/2012; EC Regulation (EU) No. 267/2012; EC Regulation (EU) No. 708/2012; EC Common Position (2013/235/CFSP); EC Common Position (2013/270/CFSP); EC Common Position (2013/661/CFSP); EC Regulation (EU) No. 971/2013; EC Regulation (EU) No. 42/2014. [↑](#footnote-ref-8)
8. <https://www.dfat.gov.au/sites/default/files/sanctions-snapshot-iran-unsc-and-autonomous.pdf>. [↑](#footnote-ref-9)
9. <https://www.nortonrosefulbright.com/fr-ca/centre-du-savoir/publications/86947f6b/canada-eases-sanctions-against-iran>; <https://www.dickinson-wright.com/news-alerts/canada-relaxes-iran-sanction.s> [↑](#footnote-ref-10)
10. <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2010-165/page-2.html#h-760169>. [↑](#footnote-ref-11)
11. <https://www.legislation.gov.au/Details/F2016L00117>. [↑](#footnote-ref-12)
12. https://www.aph.gov.au/About\_Parliament/Parliamentary\_Departments/Parliam entary\_Library/pubs/rp/rp1718/Quick\_Guides/IranNuclear. [↑](#footnote-ref-13)
13. See for example Executive Orders 13846, 13871 13876, 13902. [↑](#footnote-ref-14)
14. <https://www.reuters.com/article/uk-iran-nuclear-banks-insight-idUKKBN0NZ0AO20150514>. [↑](#footnote-ref-15)
15. <https://www.nature.com/articles/d41586-019-02795-y>. [↑](#footnote-ref-16)
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17. [US Energy Information Administration, *Country Analysis Executive Summary: Iran*, 16 July 2021](https://www.eia.gov/international/content/analysis/countries_long/Iran/pdf/iran_exe.pdf). According to official data, more than 90% of Iran’s oil and non-oil trade is maritime. [↑](#footnote-ref-18)
18. Iran’s Plan and Budget Organisation data [↑](#footnote-ref-19)
19. Batmanghelidj, Esfandyar, *The Inflation Weapon: How America Snactions Harm Iranian Households*, The Fourth Freedom Forum, Sanctions & Security Project, January 2022. [↑](#footnote-ref-20)
20. Iran’s Plan and Budget Organisation data [↑](#footnote-ref-21)
21. [Bijan Khajehpour, *Anatomy of the Iranian Economy*, The Swedish Institute of International Affairs, 6/2020](https://www.ui.se/globalassets/butiken/ui-paper/2020/ui-paper-no.-6-2020.pdf). [↑](#footnote-ref-22)
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24. [Iran, Islamic Rep. | Data (worldbank.org)](https://data.worldbank.org/country/iran-islamic-rep?view=chart). [↑](#footnote-ref-25)
25. Batmanghelidj, Esfandyar, *op. cit.* [↑](#footnote-ref-26)
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30. Report of the Ministry of Health, Treatment and Medical Education, 2021. [↑](#footnote-ref-31)
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34. Batmanghelidj, Esfandyar, *op. cit.* [↑](#footnote-ref-35)
35. NGO information [↑](#footnote-ref-36)
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