

Iran's Misuse of Civilian Aircraft

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Overview

Iran's civil aviation industry has historically aided the [Islamic Revolutionary Guard Corps \(IRGC\)](#) efforts to procure, supply, and transport weapons, ballistic missile components, and military personnel to its terrorist proxies and allies such as [Hezbollah](#) and the Assad regime. According to a July 2019 [advisory](#) published by the U.S. Department of the Treasury, "Iran has routinely relied upon Iranian commercial airlines to fly fighters and materiel to international locations in furtherance of Iranian state-sponsored terror operations."

In 2011, the U.S. Treasury Department's Office of Foreign Asset Control (OFAC) [sanctioned](#) the notorious Mahan Air for its terrorist activities. The airline is now banned from landing in all of mainland Europe. The press release accompanying the U.S. designation of Mahan Air justified the sanctions by saying that the airline "provid[ed] travel services to IRGC-QF personnel flown to and from Iran and Syria for military training." Furthermore, the designation alleged that "Mahan Air has transported personnel, weapons and goods on behalf of Hezbollah and omitted from Mahan Air cargo manifests secret weapons shipments bound for Hezbollah." Later, in 2019, the U.S. Treasury Department [reiterated](#) in a press release that Mahan Air was responsible for supplying equipment, weapons, money, and personnel in support of President Assad in Syria, the IRGC's Quds Force operations, and Hezbollah.

Mahan Air remains sanctioned to this day, and may be part of an effort to ship drones from Iran to Russia. Flight tracking experts [observed a significant increase](#) in the frequency of Mahan Air-operated cargo flights into Moscow. Qeshm Fars Air cargo planes—operated by Mahan Air—were identified as being central to the suspected transport operations. Other media reports confirmed this trend, indicating that there were [42 IRGC-linked flights](#) that landed in Moscow since the war in Ukraine began—some of which came from Syria. Thus, Iranian civilian airliners may not only be supporting Russia's war via the shipment of drones from Iran, but via the [shipment of personnel and equipment](#) from Syria.

The contents of these observed flights were not clear to flight tracking experts, but U.S. intelligence officials [reported](#) at the end of August 2022 that drone shipments to Russia had begun in the middle of August. Over the course of several days, Russian transport planes flew to an undisclosed Iranian military facility to acquire the drones. Under the terms of the arrangement, Iranian technical experts traveled to Russia to set up the systems, and Russian military officers went to Iran to be trained in how to use them. The transferred drones are among Iran's most advanced—the Mohajer-6 and two models of the Shahed—both of which are capable of carrying munitions, including precision-guided missiles, for air-to-surface attacks. They could also support Russia's ability to conduct surveillance and electronic warfare and target Ukrainian assets.

However, the unmanned aerial vehicles (UAVs) that arrived in Russia are [reportedly](#) not functioning as intended. The testing of this first installment has revealed technical problems and failures, calling into question the weapons' effectiveness as well as their ability to meet Russia's battlefield needs. Russia's arsenal of drones consists mostly of surveillance drones, and given a

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shortage of semiconductor chips—necessary for the manufacture of drones, precision-guided missiles, and tanks—Russia’s domestic production capabilities are lacking. Russia’s other key ally, China, may not be willing to supply Russia with drones, as that could risk U.S. sanctions and international condemnation, which would hamper China’s economy. Thus, Iran is Russia’s best option for advanced drones. Biden administration officials [said](#) that Iran has agreed to ship hundreds more.

In addition to Mahan Air, a multitude of other Iranian civilian airlines [are listed](#) as Specially Designated Global Terrorists (SDGT), including Caspian Air, Meraj Air, Pouya Air, Dena Airways, Khors Aircompany, and Qeshm Fars Air. On November 5, 2018, OFAC also added Iran Air—the Iranian government’s main civilian airline—to the Specially Designated Nationals (SDN) list. Sanctions against Iran Air were previously suspended as a result of the Obama administration’s nuclear deal with Iran, giving the company the opportunity to sign contracts with major airplane manufacturers, Boeing and Airbus. Despite the lifting of sanctions, Iran Air participated in the airlift to Syria’s Assad, [servicing 66 flights](#) in the period of approximately one year after the JCPOA was implemented.

In December 2016, Boeing entered into a [contract](#) with Iran Air for 80 civilian airliners valued at \$16.6 billion. Under the terms of the JCPOA, which was in effect at the time of this deal, the U.S. committed to “allow for the sale of commercial passenger aircraft and related parts and services to Iran by licensing the (i) export, re-export, sale, lease or transfer to Iran of commercial passenger aircraft for exclusively civil aviation end-use.” In June 2017, Boeing [inked](#) another deal with Iran’s third largest airline, Aseman Air, for 30 Boeing aircraft. Aseman’s CEO, Hossein Alaei, has [longstanding ties to the Islamic Revolutionary Guard Corps](#) (IRGC). Following the U.S. withdrawal from the JCPOA, Boeing [terminated](#) all agreements with Iranian airlines.

Other major aircraft makers, including Airbus and ATR, have also sought – and succeeded – in doing business with Iran. In February 2016, Iran Air announced it would [purchase](#) 118 Airbus commercial aircraft for an estimated \$27 billion. Airbus received an OFAC license, and three of its aircraft were delivered before the Treasury Department revoked its export license for the planes. In June 2017, Airbus agreed to [tentative](#) sales of 45 A320 aircraft to Iran’s Airtour Airline and 28 A320 aircraft to Iran’s Zagros Airlines. No license for the sale was announced prior to the U.S. exit from the JCPOA. ATR, owned by Airbus and Italy’s Leonardo, sold 20 aircraft to Iran Air. It delivered eight aircraft by the time of the U.S. JCPOA exit, and was given licenses to deliver another five by November 2018, the effective date of the export license revocation. In April 2019, OFAC granted a [license](#) for ATR to supply spare parts (with U.S. consent) to the ATR aircraft used by Iran.

It has always proved impossible to guarantee that planes and parts sold to Iran will be for “exclusively civil aviation end-use.” Even during the height of the JCPOA, at a [June 2016 press briefing](#), former State Department Spokesman John Kirby was unwilling or unable to confirm that Iran Air had taken any action to merit the lifting of sanctions against it or that it was no longer engaged in sanctionable activities. There was and continues to be a considerable risk that airliners

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delivered to Iran will be repurposed. For example, at least [six Boeing airliners](#) sold to Iran Air during the 1970s were subsequently [transferred](#) to Iran's air force.

Iran Air's attempted aircraft buying spree raises obvious red flags that it is not the final buyer for all the aircraft it is seeking to acquire. Tehran is [reportedly seeking to purchase 500 civilian airliners](#) over the next decade, a massive expansion considering that Iran Air and its subsidiary currently operate around 50 aircraft. With no clear need for the number of planes it is seeking, there is a high likelihood that some of the planes delivered to Iran Air will be resold or transferred to the Iranian air force, or other Iranian air carriers still under sanctions, such as the IRGC-linked Mahan Air and Pouya Air (formerly known as Yas Air, a long sanctioned airline [operated by the IRGC and its Pars Aviation Company](#)).

The IRGC oversees Iran's ballistic missile proliferation, conducts terrorist operations abroad, manages and supports proxy groups, and commits human rights abuses at home. Iran's civil airlines are essential to most, if not all, of these activities in that they transport missile components, operatives, weapons and other military equipment, and money abroad.

The financial and reputational hazards of conducting business with sanction-designated Iranian civil airlines—some of which have been implicated in the provision of support to the IRGC-Quds Force, Hezbollah, Assad, Maduro, and Putin—far outweigh any theoretical benefit of doing so. U.S. persons and companies that engage in this type of commercial activity could, if found guilty of breaching OFAC sanctions, face severe civil and criminal legal repercussions, including fines and/or prison time. Non-U.S. persons and companies outside of the U.S. could also be subject to enforcement action, as they are subject to “secondary sanctions.” The penalty for these violations generally consists of restriction or prohibition from the U.S. financial system and economy. The U.S. Treasury Department has [strongly advised](#) against “engaging in unauthorized transfers of U.S.-origin aircraft or related goods, technology, or services to Iran.”

History of Iran's Abuse of its Civil Aviation Industry:

- In August 2022, Argentine authorities [grounded](#) a U.S.-origin Boeing 747 cargo plane formerly owned and operated by Mahan Air, and currently owned by a subsidiary of Venezuela's state-owned airline, Conviasa. Among the five Iranians on board the plane was Gholamreza Ghasemi—a former commander of Iran's Islamic Revolutionary Guard Corps (IRGC) and a board member of the U.S.-designated Qeshm Fars Air. An Argentine judge [prohibited](#) him, along with other passengers, from leaving the country, as an investigation into the plane, including its reason for being in Argentina, was carried out. A Mahan Air flight log that had documented the airplane's routes between Caracas, Tehran, and Moscow, was found aboard the plane, further suggesting ties to the IRGC-linked operator. Still, Mahan Air denies that it is linked to the aircraft.

The suggested links between the Emtrasur plane, Mahan Air, and the IRGC raise the possibility that this plane was involved in illicit activities—and serve as a reminder of Iran's

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interests in the western hemisphere. According to an investigative journalist, one of the purposes of this flight [may have been](#) to conduct business on behalf of Hezbollah and the IRGC's Quds Force. This journalist pointed out that the Emtrasur plane stopped in Paraguay prior to heading to Argentina. There, it loaded 80 tons of cigarettes from an alleged Hezbollah-linked company, owned by the former Paraguayan President Horacio Cartes. As Cartes helped Hezbollah smuggle cigarettes and launder money when he was in power, this journalist [suggested](#) that the purpose of the Emtrasur flight was "terrorism financing" through the cigarette sales, and the transfer of funds on behalf of Hezbollah, which has been excluded from the global banking system. The true purpose of the plane's stop in Paraguay and Argentina, however, remains unknown. The cargo could have merely been a façade, the Argentine anti-corruption minister [said](#).

- In July 2022, media reports emerged alleging that Iran was using Mahan Air planes [to ship goods](#) into Syria, without paying taxes or customs duties. Mahan Air flights from Tehran to Damascus increased 30% from June 2022 to July 2022 to fill a void in the air traffic that owed to Iran's cancellation of all Caspian Air and Qeshm Fars Air flights between the two capitals. Iran reportedly canceled these flights after Israeli air strikes [shut down](#) the Damascus airport.
- In December 2021, five of Qeshm Fars Air's Boeing 747s landed in Addis Ababa, Ethiopia, amid the country's civil war between government forces and rebels. The contents of the cargo flights were not disclosed at the time of reporting, but [analysts believed](#) that the flights could have been carrying weapons and equipment, including the Iranian weapons-capable Mohajer-6 drone, to support the Ethiopian government. Photos of the Mohajer-6 in Ethiopia [were published](#) in August 2021. Between August 2021 and December 2021, there were 15 Qeshm Fars Air flights from Tehran to Ethiopia—double the total number of flights prior to the country's civil war.
- In July 2020, Mahan Air flight 1152 departed from Tehran, heading for Beirut, Lebanon. It passed directly over the U.S. military outpost in al-Tanf, Syria. The commercial aircraft, which was intercepted and inspected in mid-flight by two U.S. Air Force F-15 jets that flew from Jordan, was suspected of conducting reconnaissance. The Mahan Air plane [may have been equipped](#) with cameras and other sensors for the purpose of identifying targets at the U.S. garrison. Such intelligence would enable Iran or its surrogates to more effectively stage an attack against U.S. troops and military assets.
- In a May 2020 press release, Treasury Secretary Steven Mnuchin [announced](#) that Mahan Air was being used to prop up the illegitimate and corrupt Maduro regime in Venezuela. The U.S. government determined that Mahan Air charter flights were being used to ship technicians and technical equipment to Venezuela for use in reviving the country's flagging energy production in exchange for gold bars shipped back to Iran. The Venezuelan energy sector's productivity has been diminished by years of corruption and mismanagement.

Venezuela [reportedly sent](#) 9 tons of gold worth \$500 million to Tehran on Mahan Air flights throughout the month of May 2020. The flights also increased in frequency, oil industry experts [said](#). Whether Iran rendered other services or provided other materials as part of this exchange was not immediately clear, however then-Special Envoy to Iran Brian

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Hook alluded to foul play, [saying in an interview](#), “I think we can probably safely assume it’s not limited to [helping Venezuela’s oil industry].”

This was not the first time that Venezuela exchanged gold with Iran. Western diplomatic [sources told](#) the BBC back in February 2019 that Venezuela was transporting huge quantities of gold to Turkey—some of which ended up in Iran. Again, it was not clear based on the reporting what the gold was exchanged for. These flights, which [began](#) in early 2019, could have been used to transport lethal cargo and/or operatives. In December 2020, Admiral Craig Faller, head of U.S. Southern Command, [said](#) that the U.S. observed an “uptick” in arms shipments to Venezuela throughout 2020, though he did not specify what types of arms. A month prior to this statement, however, research organization Aurora Intel [tweeted images](#) of the Iran-made Mohajer-6 drone in Venezuela. Facilitating covert travel of IRGC operatives by bypassing security procedures and flight manifests and shipping weapons fall in line with the modus operandi of the IRGC-linked Mahan Air.

- In August 2017, Congressional leaders were provided [photographic evidence](#) of an Iran Air passenger plane with the company’s logo visible on the headrest being used to transport militants affiliated with the Fatemiyoun Brigade, an Afghan Shia mercenary militia trained and funded by the IRGC, to Syria. The photographs depicting Iran Air engaged in sanctionable activity were [reportedly](#) taken during 2016 and 2017, well after the lifting of sanctions against it.

The revelation of these photographs prompted four Republican lawmakers, Reps. Peter Roskam (R-IL), Lee Zeldin (R-NY), Andy Barr (R-KY), and David Reichert (R-WA) to write a [letter](#) to Treasury Secretary Steven Mnuchin calling for an investigation into the photos and the re-designation of Iran Air if found to have engaged in illicit military transports. In the letter, the Congressmen wrote, “These photos offer strong evidence of Iran Air’s noncommercial and illicit use of commercial aircraft to materially support the IRGC and the Assad Regime.”

- In January 2017, Ukrainian authorities [announced](#) the seizure of a shipment of Russian-made anti-tank guided missile components bound for Iran, a violation of Annex B of United Nations Security Council Resolution 2231 forbidding the supply, sale and transfer of missiles or missile systems to Iran without the council’s prior approval. The illicit shipment was found onboard aircraft operated by Ukrainian-Mediterranean (UM) Airlines, which has officially partnered with Mahan Air on daily flights from Ukraine to Iran since the JCPOA took effect. UM was [designated](#) by the Treasury Department in 2013 for leasing aircraft to Mahan Air. Rep. Roskam responded to the seizure, saying, “This is yet another example of the Islamic Republic using commercial aircraft for military purposes. Airbus and Boeing cannot claim ignorance on this—the Regime’s behavior is on full display before the world.”
- In November 2016, Israel’s Ambassador to the United Nations sent an [urgent letter](#) to the Security Council alleging, based on Israeli intelligence, that “The Iranian Al-Quds Force packs weapons, ammunition and missile technology to Hezbollah in suitcases and puts



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them on Mahan Air flights. ... These planes fly directly to the airport in Lebanon or Damascus and from there the weapons are transferred on the ground to Hezbollah."

- In the months after the JCPOA was reached, Mahan Air [intensified](#) its service between Iran and Syria, conducting nearly daily flights between Tehran and Damascus and Latakia, an Assad regime stronghold.
- Following the January 2016 implementation of the JCPOA, Iran Air ceased operating the Iran-Syria route for a brief period of time. However, in June 2016, Emanuele Ottolenghi, an expert on Iran's history of sanctions evasion, observed three flights using publicly-available flight data indicating the resumption of the well-known weapons resupply route. On June 9, an Iran Air plane spent an hour in Abadan, Iran, the [logistical hub of the IRGC's airlifts](#) to Assad and Hezbollah, before continuing on to Damascus. On [June 8 and 15](#), Iran Air [operated](#) flights from Tehran to Damascus utilizing a Najaf-Tehran flight number in an effort to disguise their true destination.

Iran Air's flights to Syria continued to multiply. Between Implementation Day of the JCPOA in January 2016 and August 2017, [over 1000 flights](#), including 134 such flights by Iran Air, departed from points in Iran and landed in Syria, indicating an ongoing complex logistical operation to resupply the Assad regime. In one two-month period alone during 2017, Iranian and Syrian airlines delivered an estimated [21,000 passengers and 5,000 tons of supplies](#) from Tehran and Abadan to Damascus. In sum, Iran operated 11 commercial flights per week to Syria during this period, with two flights per week operated by Iran Air. Lending credence to the nefarious nature of these Iran Air flights, the flights occur at irregular intervals and Iran Air's [website](#) does not have tickets to Damascus available to the general public on its website. Nor is Damascus even listed as a possible destination.

- In October 2012, the U.S. Treasury found that, "In the summer of 2012, Iran used Iran Air and Mahan Air flights between Tehran and Damascus to send military and crowd control equipment to the Syrian Regime. This activity was coordinated with Hizballah." As a result of these activities, the Treasury Department [designated](#) 117 aircraft operated by Iran Air, Mahan Air, and Yas Air as blocked property.
- In March 2011, Turkey [intercepted a plane](#) operated by Iranian cargo airline Yas Air that was carrying assault rifles, machine guns, ammunition, and mortar shells from Iran to Syria, the U.N. Security Council reported.
- A 2011 report by a U.N. expert panel on North Korea [found that](#), "Prohibited ballistic missile-related items are suspected to have been transferred between the Democratic People's Republic of Korea and the Islamic Republic of Iran on regular scheduled flights of Air Koryo and Iran Air, with trans-shipment through a neighboring third country."
- In 2011, the U.S. Treasury Department [designated](#) Iran Air, finding that the commercial airline was "used by the IRGC and Iran's Ministry of Defense and Armed Forces Logistics (MODAFL) to transport military related equipment." The designation further alleged that, "Iran Air has shipped military-related equipment on behalf of the IRGC since 2006. ... Additionally, commercial Iran Air flights have also been used to transport missile or rocket components to Syria."

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- Between 2007 and at least 2010, Venezuelan state-owned airline, Conviasa, sharing a code with Iran Air, serviced regular flights from Caracas to Damascus to Tehran. The flight was listed as a commercial route, but it was restricted to passengers cleared by the Venezuelan and Iranian governments, CIA analysts and Israeli intelligence [said](#). The flight, nicknamed “aeroteror” because it transported some of the world’s most dangerous men, along with narcotics, weapons, explosives, and cash, was serviced through 2015, when it was abruptly [cancelled](#).

By 2015, investigative journalists began to uncover the details of these operations: on [one account](#), Hezbollah received narcotics in Syria from Venezuela; Syria provided fraudulent passports; and Iranian personnel and lethal cargo were picked up in Iran and flown to Venezuela. The travel documents [obtained](#) in Syria ensured Iranian operatives could move around freely in Latin America. In short, “aeroteror” was an arms-and-operatives-for-cocaine deal, overseen by Hezbollah and Iranian agents, that transformed Venezuela into a forward operating base for Tehran—a direct threat to the American homeland. Moreover, Western intelligence agencies [suspect](#) that the flights could have contained radioactive materials—possibly for Iran’s nuclear program. The flights from Venezuela occurred at least twice a month, if not more frequently

In establishing a terror network in the western hemisphere by embedding Hezbollah and Hamas operatives along with Quds Force spies, Iran, and its proxies may be capable of planning strikes against the U.S. homeland, or against U.S. or Israeli interests in the region, as Hezbollah did in the 1992 bombing of the Israeli embassy in Buenos Aires or the 1994 bombing of a Jewish community center in Buenos Aires. According to experts and Venezuelan opposition figures, preparations for an attack [aim to deter](#) a U.S. strike against Iran’s nuclear facilities.

Enforcement Actions against Iran’s Civil Aviation Industry:

- In August 2022, Argentine authorities [grounded](#) a U.S.-origin Boeing 747 in Argentina that was owned and operated by Mahan Air since 2007, but had been transferred to Emtrasur, a subsidiary of Venezuela’s state-owned airline, Conviasa, which is under U.S. sanctions. The U.S., then, requested that the cargo jet be forfeited over to the U.S., because Mahan Air did not obtain U.S. authorization before making the transfer, thus violating an effective 2008 U.S. Department of Commerce order. The transfer of the plane, as well as Emtrasur’s “reexport” of the plane between Venezuela, Iran, and Russia, without U.S. authorization, [violated](#) U.S. export controls, which dictate that Mahan Air is prohibited from engaging in transactions involving U.S.-origin products subject to Export Administration Regulations, a Department of Justice [press release](#) seeking the forfeiture of the plane to the U.S. said. On the day prior to the U.S. request, a seizure warrant [was unsealed](#) in a U.S. federal court.
- In August 2020, the U.S. Treasury’s OFAC [designated](#) two United Arab Emirates (U.A.E.)-based companies for providing key parts and logistics services for Mahan Air.
- In May 2020, the U.S. Treasury’s OFAC [designated](#) China-Based Shanghai Saint Logistics Limited, a general sales agent (GSA) acting on behalf of Mahan Air.

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- In April 2020, Spain [banned](#) flights of Mahan Air, signaling the cessation of Mahan Air scheduled routes into mainland Europe.
- In December 2019, the U.S. Treasury Department [designated](#) three sales agents of Mahan Air, which “prop up Mahan Air’s commercial operations” by providing services that range from “sales, financial, administrative, and marketing services to freight reception and handling.”
- In November 2019, Italy [banned](#) Mahan Air flights.
- In March 2019, [France](#) joined Germany and several other countries to deny Mahan Air landing rights due to the airline’s involvement in transporting military equipment and personnel to Syria.
- In January 2019, Germany [announced](#) its decision to deny Mahan Air landing rights saying that “it is in Germany’s diplomatic interest that there are no flights to Germany by companies that support the military conflict in Syria and contribute to the repression of people in war zones.”
- In January 2019, The U.S. Treasury’s Office of Foreign Assets Control (“OFAC”) [designated](#) Qeshm Fars Air for being owned or controlled by Mahan Air, and for providing material support to the IRGC-QF, and Armenia-based Flight Travel LLC for acting for or on behalf of Mahan Air.
- In November 2018, the U.S. Treasury’s OFAC added Iran Air to the Specially Designated Nationals List (SDN).
- In September 2018, the U.S. Treasury’s OFAC [designated](#) Thailand-based My Aviation Company Limited for action on behalf of Mahan Air. According to the accompanying [press release](#), “My Aviation provides cargo services to Mahan Air, to include freight booking, and works with local freight forwarding entities to ship cargo aboard regularly scheduled Mahan Air flights to Tehran.
- In July 2018, The U.S. Treasury’s OFAC [designated](#) Mahan Travel and Tourism Sdn Bhd, a Malaysia based General Sales Agent (GSA), for acting on behalf of Mahan Air. According to the designation, “GSAs such as Mahan Travel and Tourism Sdn Bhd are key to enabling Mahan Air’s international operations, especially in regards to conducting financial transactions on behalf of the airline.”
- In May 2018, The U.S. Treasury’s OFAC [designated](#) nine individuals and entities procuring export-controlled U.S. origin goods for sanctioned Iranian airlines. Treasury Secretary Steven Munchin said, “The facilitators designated by the Treasury today have been procuring parts and providing services for the fleets of sanctioned Iranian airlines, including Mahan Air, Caspian Air, Meraj Air, and Pouya Air. In so doing, they extend a lifeline to the IRGC-QF and enable the Iranian Regime to transport weapons, fighters, and money to its proxies, including Hizballah, and to prop up the brutal Assad regime...Countries and companies around the world should take note of the risks associated with granting landing rights and providing aviation services to the airlines used by Iran to export terrorism throughout the region. The deceptive practices these airlines employ to illegally obtain services and U.S. goods is yet another example of the duplicitous ways in which the Iranian Regime has operated.”

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Iran's civilian aircraft serve military purposes for the Iranian regime. Mahan Air is ostensibly a privately-owned company, but it is closely affiliated with the IRGC and top regime officials. Further, it [received](#) at its founding and continues to receive extensive state support. The purported charity institute Mol-Al-Movahedin, which the IRGC controls, [maintains complete ownership](#) of Mahan Air. Mahan Air's CEO, Hamid Arabnejad, was designated by the U.S. Treasury Department in 2013 for overseeing sanctions evasion efforts and the provision of support to the IRGC's Quds Force. He [was](#) a former member of the IRGC and [has](#) "a close working relationship with IRGC-QF personnel and coordinates Mahan Air's support" to the Quds Force.

Iran's civilian airliners provide a viable alternative to land and sea transport, as it is difficult to interdict or otherwise prevent these flights. To hinder the shipments, countries could close down their airspace to Iran's planes, [as Turkey did](#) at the start of the civil war in Syria, thus cutting off a key air route on which Tehran previously depended to ship weapons and personnel to its proxy in Lebanon through Syria. After Turkey blocked Iran's flights—at around the same time U.S. troops were drawing down from Iraq—the planes to Syria rerouted through Iraqi airspace. The Obama administration tried to convince then-Iraqi Prime Minister Nouri al Maliki to institute a no-fly zone; but with an Iran-linked minister of transportation, Hadi al Amiri, in office, the Iraqi government [refused](#). The Obama administration mulled over and decided against instituting one on its own, and Mahan Air continued to operate flights over Iraq into Syria.

This history of Iran's abuses of the civil aviation industry and the enforcement actions against it clearly demonstrates the risk that Iran's civilian aircraft fleet poses. The fleet is integral to Iran's ability to conduct its anti-American and anti-Israel foreign policy. Iran depends on its civilian airliners for transport operations to prop up anti-American dictatorial regimes, which, like itself, are struggling economically due to U.S. sanctions. But the U.S. and its partners and allies are not without tools to combat this vital element of the Iranian threat. In coordination, the countries that have begun to take action to confront it may together pressure those that have not. Airport bans on U.S.-designated Iranian airliners—as mainland Europe has already implemented—is one place to start.

Another potential option might be working with partners and allies in an effort to prevent their airspace from being used by Iran's aircraft for flyovers. As Emanuele Ottolenghi [explained](#), Mahan Air flights from Tehran to Caracas travel over six countries: Armenia, Turkey, Greece, Italy, Spain, and Portugal. Mahan Air pays overflight fees to each of these countries, with their permission to use their airspace freely. The possibility that these payments run amok of U.S. sanctions aside, these countries could close their airspace to Iranian flights, thus increasing the distance that Iran's planes would need to travel to arrive in the U.S.' backyard. If enough of these countries act in unison, Mahan Air's Airbus 340-642s, which have a maximum range of 7,800 nautical miles, may not be able to make the flight.

Additionally, the U.S. government can continue to sanction service providers on which Mahan Air and other Iranian civilian airlines depend for their operations. As listed in the above section on enforcement actions, the U.S. government has already introduced sanctions against several of

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these general sales agents (GSAs) for Mahan Air, thus making it more difficult for the airline to facilitate transactions and process revenues, but there are still others that the U.S. government may consider. In 2017, the Foundation for Defense of Democracy [identified](#) at least 67 companies across the globe providing Mahan Air with services. Additionally, the U.S. government might consider imposing sanctions or other costs on [entities that provide material support](#) to sanctions-designated airlines from Iran, including the financial services, logistical support, provision of fuel, and insurance companies.