

Iran's Misuse of Civilian Aircraft

February 2024



UNITED
AGAINST
NUCLEAR
IRAN

UNITED
AGAINST
NUCLEAR
IRAN

Table of Contents

Overview **3**

Mahan Air **3**

Iran Air..... **4**

Other Airlines..... **4**

IRGC Control of Aviation Infrastructure **5**

Business Risks **5**

Key Instances of the Islamic Republic Misusing Civilian Aircraft..... **6**

Enforcement Actions Against the Misuse of Civilian Aircraft..... **11**

Conclusion **13**

Overview

The [Islamic Revolutionary Guard Corps \(IRGC\)](#) has a long record of using Iran's civil aviation industry to procure, supply, and transport weapons, ballistic missile components, and military personnel to its terrorist proxies and allies such as [Hezbollah](#), the [Houthis](#), [Russia](#), 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."

Mahan Air

Mahan Air is one of the most notorious examples of the Islamic Republic's misuse of Iran's civil aviation industry. Ostensibly a privately owned company, Mahan Air is closely affiliated with the IRGC and regime officials and receives extensive support from the Islamic Republic. The purported charity institute Mol-AI-Movahedin, which the IRGC controls, [maintains complete ownership](#) of Mahan Air. The company's CEO, Hamid Arabnejad, was designated by the U.S. Treasury Department in [2013](#) for overseeing sanctions evasion efforts and supporting the IRGC's Quds Force. As an IRGC officer, Arabnejad [has](#) "a close working relationship with IRGC personnel and coordinates Mahan Air's support" to the Quds Force.

Mahan Air's malign behavior has been widely recognized. In 2011, the United States (U.S.) Treasury Department's Office of Foreign Asset Control (OFAC) [sanctioned](#) Mahan Air for terrorist activities – which was then followed by nearly every European country banning the airline. According to the press release accompanying the U.S. designation of Mahan Air, the airline "provid[ed] travel services to IRGC-QF (Quds Force) personnel flown to and from Iran and Syria for military training." Furthermore, the designation stated, "Mahan Air has transported personnel, weapons and goods on behalf of Hizballah and omitted from Mahan Air cargo manifests secret weapons shipments bound for Hizballah." 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 the Assad regime, the IRGC's Quds Force operations, and Hezbollah.

Currently, the IRGC is using Mahan Air to transfer drones, bullets, shells, and personnel [from Iran to Russia](#) to support the war in Ukraine. To this point, 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 these 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 are not only supporting Russia's war via the shipment of drones from Iran but also via the [shipment of personnel and equipment](#) from Syria. U.S. officials have since [confirmed](#) that drone shipments to Russia began in August 2022.

According to intelligence reports, the transferred drones are among Iran's most advanced—the Mohajer-6 and two models of the Shahed. These drones have since been used in air-surface attacks,

UNITED AGAINST NUCLEAR IRAN

electronic warfare, and espionage activities [against Ukrainian forces](#). Before receiving support from the Islamic Republic, Russia's arsenal of drones [was limited](#). Given a [shortage of semiconductor](#) chips—necessary for manufacturing 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, the Islamic Republic remains Russia's best option for procuring advanced drones. Therefore, according to U.S. officials, the Islamic Republic [has agreed](#) to ship hundreds more – using Mahan Air in the transfer process.

Iran Air

Iran Air, the country's flag carrier, is also used by the Islamic Republic to conduct malign activities. As early as 2008, the United Nations Security Council found that Iran Air was used to circumvent nuclear sanctions, as detailed in resolutions [1803](#) and [1929](#). Later [reporting demonstrates](#) that much like Mahan Air, the IRGC uses Iran Air to transfer weapons and personnel to terrorist proxies throughout the region. This practice accelerated as [sanctions against Iran Air were suspended](#) due to the Obama administration's nuclear deal with the Islamic Republic (JCPOA), allowing the company to sign contracts Boeing and Airbus for new aircrafts. During this period, Iran Air continued transporting arms to the Assad regime, [servicing 66 flights](#) within the year that sanctions were suspended.

As of November 2018, sanctions against Iran Air have been fully [reinstated](#). However, Iran Air continues to operate in the United Kingdom and the European Union – despite the airline actively [transferring arms to Russia](#), in the same manner as Mahan Air. Furthermore, Iran Air's corporate leadership is integrated with the IRGC. In 2022, IRGC General Mohammad Mohammadibakhsh was [appointed](#) as director of the airline. Two years earlier, Mohammadibakhsh led the IRGC Air Operations Command when the Islamic Republic [shot down](#) Ukraine International Airlines flight 752, killing 176 civilians. The fact that Iran Air is controlled by IRGC personnel and is involved in terrorist activities makes it wholly unacceptable that the airline continues to operate in Europe.

Other Airlines

Beyond Mahan Air and Iran Air, almost every major civilian airline in Iran is under IRGC control and is used for its purposes. The IRGC [owns](#) the Pars Aviation Services Company, which [operates](#) YAS Air (also known as Pouya Air) as a subsidiary. A United Nations Security Council Report [found](#) in 2011 that YAS Air was carrying firearms, shells, and ammunition to Syria for use by the Assad regime and IRGC personnel operating in the country.

The IRGC maintains [links](#) to Qeshm Fars Air – which is operated by IRGC personnel and has been involved in weapons transfers to terrorist proxies and other malign activities, such as [supporting the genocidal regime in Myanmar](#). One board member and director of the airline, IRGC Commander Gholamreza

Ghasemi, has been [identified](#) as the “mastermind” behind Iranian efforts to transfer arms to groups like Hamas, Hezbollah, and the Houthis using civilian aircraft. Like Mahan Air and Iran Air, many Iranian airlines [have been listed](#) as Specially Designated Global Terrorists or have been [otherwise sanctioned](#). In addition to Pouya Air and Qeshm Fars Air, these designations include Caspian Air, Meraj Air, Dena Airways, and Khors Aircompany.

IRGC Control of Aviation Infrastructure

Aside from corporate leadership in key airlines, the IRGC is fully integrated into Iran’s civil aviation infrastructure. For instance, the IRGC’s [Khatam al-Anbiya Construction Headquarters](#) – the chief economic arm of the Revolutionary Guard – is [responsible](#) for the [ongoing redevelopment](#) of Imam Khomeini International Airport, the largest airport in the country. In recent years, the organization has also managed the construction of [Chahbahar International Airport](#), [Qom International Airport](#), and [countless other transport-related projects](#). Furthermore, Khatam al-Anbiya is [tasked](#) with [maintaining](#) road and rail links to airports like Tehran’s Mehrabad International Airport. In addition to these projects, the IRGC [controls](#) terminals in most civilian airports to be used for its purposes. Furthermore, an arm of the IRGC [manages](#) transport security in airports across the [country](#). There is no doubt that the IRGC’s control over aviation infrastructure is critical in facilitating its ongoing misuse of civilian aircraft.

Business Risks

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 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 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 plane export license. In June 2017, Airbus agreed to [tentatively](#) sell 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 Leonard, 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.

UNITED AGAINST NUCLEAR 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. He also could not confirm that it was no longer engaged in sanctionable activities. There was and continues to be a considerable risk that airliners 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 seeks 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. Furthermore, 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 civilian airlines are essential [to most, if not all](#), of these activities, as they transport missile components, operatives, weapons, and other military equipment and money abroad.

Therefore, the financial and reputational hazards of conducting business with sanction-designated Iranian civil airlines 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. Most notably, these include 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.”

Key Instances of the Islamic Republic Misusing Civilian Aircraft

Aside from ongoing efforts to transfer arms to Russia, Iran has misused civilian aircraft countless times within the last two decades. Key instances of this include:

- In recent months, the U.S. has engaged in [multilateral operations](#) against the Houthis – a Yemeni organization [condemned](#) by the UN Security Council for [maritime terrorism](#), including persistent attacks on commercial shipping. These attacks have involved the use of UAVs and ballistic missiles [produced](#) by the Islamic Republic. It has long been [reported](#) that Iran uses Mahan Air flights to transfer these UAVs and ballistic missiles to the Houthis, often under the guise of providing medical aid to the people of Yemen. This demonstrates a very clear link between the Islamic

UNITED AGAINST NUCLEAR IRAN

Republic's misuse of civilian aircraft and the capability of the Houthis to execute their acts of maritime terrorism.

- In August 2022, Argentine authorities [grounded](#) a U.S.-origin Boeing 747 cargo plane, which was formerly owned and operated by Mahan Air, and is 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 IRGC commander and Qeshm Fars Air board member. An Argentine judge [prohibited](#) him and 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 documenting 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 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 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 plane also stopped in Paraguay before flying 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, reporting [suggests](#) that the purpose of the flight was "terrorism financing" through the cigarette sales. If this were the case, these funds would be transferred to Hezbollah, which has been excluded from the global banking system. However, the true purpose of the plane's stop in Paraguay and Argentina remains unknown. The cargo could have merely been a façade, as [stated](#) by the Argentine anti-corruption minister. This follows a long [history](#) of illicit IRGC activity in the region.

- In July 2022, media reports emerged alleging that Iran was using Mahan Air [to ship goods](#) into Syria, without paying taxes or customs duties. Mahan Air flights from Tehran to Damascus increased by 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 Tigray rebels. The contents of the cargo flights were not disclosed at the time of reporting, but [analysis has indicated](#) that the flights were likely carrying weapons and equipment. This includes the Iranian weapons-capable Mohajer-6 drone, which has been [utilized](#) by 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.

UNITED AGAINST NUCLEAR IRAN

- In July 2020, Mahan Air flight 1152 departed from Tehran, en route to Beirut, Lebanon. It passed directly over the U.S. military outpost in al-Tanf, Syria. The civilian 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 proxies to 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 May 2020. The flights also increased in frequency, [according to](#) oil industry experts. 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 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 for suspicious purposes. Western diplomatic [sources told](#) the BBC in February 2019 that Venezuela was transporting huge quantities of gold to Turkey—some of which ended up in Iran. 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. A month prior to this statement, 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 falls 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 being used to transport militants affiliated with the Fatemiyoun Brigade and an Afghan Shia militia trained and funded by the IRGC. The photographs depicting Iran Air engaged in these transport activities were [reportedly](#) taken during 2016 and 2017, after the suspension of sanctions.

The revelation of these photographs prompted four lawmakers 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 members of

UNITED AGAINST NUCLEAR IRAN

Congress 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. This amounted to a violation of Annex B of United Nations Security Council Resolution 2231, which forbids 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 to lease aircraft to Mahan Air. Representative Peter 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 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. However, in June 2016, experts on the Islamic Republic’s sanctions evasion techniques 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 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. This indicates 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 Iran Air’s [website](#) does not have tickets to Damascus available to the public on its website. Nor is Damascus listed as a possible destination.

UNITED AGAINST NUCLEAR IRAN

- 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 Hezbollah.” 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 Yas Air that was transferring assault rifles, machine guns, ammunition, and mortar shells from the Islamic Republic to the Assad regime, according to a United Nations Security Council report.
- A 2011 report by a United Nations 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 stated, “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.”
- Between 2007 and at least 2010, Venezuelan state-owned airline Conviasa, code-sharing 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, [according to](#) CIA analysts and Israeli intelligence. The flight, nicknamed “aeroterror” because it transported terrorist operatives, along with narcotics, weapons, explosives, and cash, was serviced through 2015, when it was abruptly [canceled](#).

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, “aeroterror” was an arms-and-operatives-for-cocaine deal, overseen by Hezbollah and IRGC agents, that transformed Venezuela into a forward operating base for the Islamic Republic—a direct threat to the American homeland. Moreover, 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 per 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

UNITED AGAINST NUCLEAR IRAN

against the U.S. homeland. Or they could take action against U.S. or Israeli interests in the region, as Hezbollah did in the 1992 bombing of the Israeli embassy in Argentina, or the 1994 bombing of a Jewish community center in Buenos Aires. According to experts and Venezuelan opposition figures, preparations for such attacks [aim to deter](#) a U.S. strike against Iran's nuclear facilities.

Enforcement Actions Against the Misuse of Civilian Aircraft:

In response to the misuse of civilian aircraft by the Islamic Republic, the U.S. and several European countries have taken numerous enforcement actions in recent years, including:

- After Argentine authorities [grounded](#) the suspicious IRGC-linked flight in August 2022, U.S. officials demanded that the cargo jet be forfeited. When the U.S.-origin aircraft was obtained, Mahan Air did not receive U.S. authorization, thus violating a 2008 U.S. Department of Commerce order. Furthermore, transfer of the plane and the Venezuelan carrier's "re-export" of the plane between Venezuela, Iran, and Russia, without U.S. authorization, [violated](#) U.S. export controls. These controls dictate that Mahan Air is prohibited from engaging in transactions involving U.S.-origin products subject to Export Administration Regulations, according to a Department of Justice [press release](#). 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 to provide key parts and logistics services for Mahan Air.
- In May 2020, the U.S. Treasury's OFAC [designated](#) China-based Shanghai Saint Logistics Limited, as a general sales agent (GSA) acting on behalf of Mahan Air.
- In April 2020, Spain [banned](#) Mahan Air flights, signaling the cessation of Mahan Air's 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.

UNITED AGAINST NUCLEAR IRAN

- 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, including 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 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 regard 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 Mnuchin stated, “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 Hezbollah, 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.”

Iran’s civilian airliners continue to 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. [Turkey](#) took such action 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 Hezbollah 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 from Iraq into Syria.

Conclusion

The Islamic Republic's continued abuses of the civil aviation industry and the enforcement actions against these practices clearly demonstrate the risks posed by Iran's civilian aircraft fleet. 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 terrorist proxies and aligned regimes and circumvent international sanctions. But the U.S. and its partners and allies possess tools to combat this vital element of the Iranian threat. In coordination, the countries that have begun to take action to confront it may begin to pressure those that have not. Airport bans on U.S.-designated Iranian airliners—as much of Europe has already implemented—is a critical first step.

Another potential option would be working with partners and allies to prevent their airspace from being used by Iran's civilian aircraft. As analysts have [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 permission to use their airspace freely. The possibility that these payments contravene sanctions aside, these countries could close their airspace to Iranian flights, thus increasing the distance that Iran's planes would need to travel. With coordinated action, Mahan Air's Airbus 340-642s, which have a maximum range of 7,800 nautical miles, may not be able to make the flight. This approach also applies to [other IRGC-linked airlines](#) which are already struggling to operate.

Additionally, the U.S. government can continue to sanction service providers on which Mahan Air and other Iranian civilian airlines depend. With enough pressure, these airlines will no longer be able to operate. As listed in the above section on enforcement actions, the U.S. government has already introduced sanctions against several of these general sales agents for Mahan Air. This has made it more difficult for the airline to facilitate transactions and process revenues, but there are still other actions that the U.S. government must 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 financial services, logistical support, provision of fuel, and insurance.

Ultimately, further enforcement action is needed, given that IRGC-linked airlines continue to operate in several European countries. Unless further action is taken, the Islamic Republic will continue to misuse civilian aircraft, propping up aligned regimes, criminal enterprises, and terrorist proxies in Russia, Latin America, and across the Middle East.