



JCPOA Sunset Alert

As a part of the Joint Comprehensive Plan of Action (JCPOA), the international arms embargo imposed on Iran under U.N. Security Council Resolution 2231 will expire on [October 18, 2020](#).

This means that the supply, sale, or transfer of any guns, howitzers, mortars, battle tanks, armored combat vehicles, combat aircraft, attack helicopters, warships, and missiles or missile systems to or from Iran will no longer require U.N. Security Council approval. U.N. member-states will also no longer be obligated to prevent such arms-transfers from Iran.

The expiration of this arms embargo will have immediate destabilizing consequences for Yemen, Bahrain, Lebanon, Syria, Iraq, and Israel. Terror organizations like the Islamic Revolutionary Guard Corps' (IRGC) Quds Force, the Al-Ashtar Brigades, Hezbollah, Hamas, Palestinian Islamic Jihad, and the Houthis are the likely beneficiaries of this sunset provision. The availability of such arms to these groups may result in increases in the amount of funds regional countries allocate for their defense budgets. This dynamic may also cause domestic instability should the United States' regional partners decide they cannot allow such deliveries and undertake kinetic action to defend the integrity of their governments. Additionally, Resolution 2231's expiration may provide Iran with plausible deniability given Tehran's ability, effective in 2020, to just purchase foreign weapons and deliver them to Iranian-organized proxies. Iran can claim the weapons were not Iranian in origin and disclaim responsibility.

Yemen

Specifically, since the implementation of the JCPOA in 2016, Iran has illicitly transferred to the Houthis in Yemen the Sayyad 2C surface-to-air missile; the Shahed 123 unmanned aerial system used for covert surveillance missions; guided anti-ship missiles; kamikaze aerial drones; landmines; Kalashnikov variant rifles; RPG-7 and RPG-7v rocket-propelled grenade launchers; machine guns; AK-47 assault rifles; precision rifles; and anti-tank missiles. Resolution 2231's expiration could act as a force multiplier for these kinds of Iranian weapons-transfers on the ground, particularly because of Russia's efforts to shield Iran from any liability under separate U.N. Security Council resolutions on Yemen, like [2216](#).

Consider the impact of uninhibited arms-transfers: More Sayyad 2Cs, according to the U.S. State Department, will allow the Houthis to "target coalition aircraft up to 46 miles away... these missiles pose a clear and present danger to civil aviation in the region." Increased provision of armed drones would enable the Houthis to direct the drones into the radars of the Saudi-led coalition Patriot missile system, which thwarts missile threats and enemy aircraft. If these missile systems are disabled by multiple kamikaze drones, the Houthis will be able to freely fire missiles at coalition forces. Additionally, the Houthis will use these UAVs as vehicles to attack coalition ground forces, including assassinations of key leaders like the former head of Yemeni military intelligence, who died from a drone attack on a military parade in January 2019. Increased availability of landmines will enable the Houthis to become more lethal in effectively booby trapping all areas of Yemen under their control—one [estimate](#) is that the Houthis have already planted "more than a million mines, more than one for every 30 Yemenis"—and also employing more advanced, less visible versions like the Brazilian MCF-100 naval mine. In sum, increased Iranian arms-transfers will increase the Houthis' leverage as peace negotiations continue, pushing them further away from the compromises necessary to reinstall the internationally-recognized government of Yemen.

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Bahrain

Based on past practice, Iran will likely seek to increase the export of weaponry to its proxies like the Al-Ashtar Brigades in Bahrain after the arms embargo expires in 2020. Materiel would likely include hand grenades manufactured by the Defense Industries Organization of Iran, Claymore anti-personnel fragmentation mines, C4, TD, and RDX explosives, RPG launchers, IED components, under-vehicle IED components, MAGICAR automobile security systems, armored-piercing explosively formed penetrators (EFPs), and magnetic explosive devices. In addition to Iranian materiel, Resolution 2231's expiration would enable Tehran to send foreign-made weapons to Bahrain, thus shielding their Iranian origin.

Grenades have been used to murder police officers in Bahrain. [According](#) to Bahraini officials, as of May 2018, attacks from groups like the Al-Ashtar Brigades resulted in 22 deaths and more than 3,500 injuries to policemen since 2011. With the arms embargo's expiration in 2020, Bahraini police officers may find themselves facing an even more lethal threat due to increased availability of grenades. More Claymore mines, which are loaded with ball bearings, would mean more mines that are capable of being detonated by remote control. In the [past](#), Bahrain deployed its security forces to a protest area where a "rooftop spotter" triggered an explosion. Given the history of Iran's proxies sponsoring protests as a means of undermining Bahrain's monarchy, protests will thus turn more violent. Lastly, an influx of explosives like C4, TD, RDX, and IEDs may mean the creation of more bomb-making factories. For example, Bahraini officials [raided](#) at least two such facilities in 2015, one underneath a house and another in Nuiwadrat that contained 1.4 tons of these kinds of substances.

Lebanon

Israeli security officials allege that Hezbollah has exploited the chaos of Syria's civil war to clandestinely import advanced, balance-altering weapons into Lebanon—allegedly including [GPS components](#) to transform Hezbollah rockets into precision-guided missiles, [guided surface-to-air missiles capable of striking Israeli warplanes](#), [increasingly sophisticated drones](#), [long-range surface-to-surface missiles](#), and [Yakhont anti-ship missiles](#) capable of striking Israeli offshore gas platforms and naval vessels—from its Iranian patron. Beyond physical transfers, Iran has provided Hezbollah with technological know-how and worked to establish [missile factories](#) within Lebanon in order to convert Hezbollah's estimated 14,000 medium-range Zelzal-2 missiles into precision-guided projectiles. These weapons are a major upgrade from the short-range and unguided Katyusha rockets that have been the group's traditional mainstay, and which make up the bulk of its oft-mentioned arsenal of 150,000 rockets. Such a stockpile would increase the reach and precision of such weaponry, and also amplify Hezbollah's ability to saturate Israel's missile defense systems.

When Resolution 2231 expires in October 2020, rather than just smuggling, Iran may openly supply these kinds of weapons to Hezbollah at unprecedented levels, as the only check on Iranian arms transfers will be Israel's willingness to strike them. This state of affairs will increase the likelihood of a future armed conflict between Israel and Hezbollah that will likely have devastating consequences for Lebanon as a whole.

Separately, Iran has also continued to seek out new routes to supply Hezbollah with weaponry, despite Resolution 2231's prohibitions. According to Western intelligence [sources](#), Iran has established an air-

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supply route from Tehran International Airport to Beirut International Airport in order to upgrade the group's ability to target Israel. Iran has reportedly used the route to supply advanced weaponry and GPS missile components in violation of Resolution 2231. Hezbollah Secretary General Hassan Nasrallah has also indicated his desire for the Lebanese government to approve the import of Iranian [air-defense systems](#), capable of shooting down Israeli military planes, into Lebanon. The expiration of Resolution 2231 will only enable such transfers.

Syria

Iran has engaged in the facilitation of arms transfers to the Assad regime and proxy militia forces in Syria, including Hezbollah, in violation of Resolution 2231. Iran has sent Syria vast quantities of military equipment throughout the civil war, including rifles, machine guns, ammunition, mortar shells, and other arms, as well as military communications equipment. These arms transfers began prior to the introduction of Resolution 2231 and continue today. Most of Iran's arms shipments to Syria are supplied via air transport. From January 2016 to August 2017, over 1000 flights departed from points in Iran and landed in Syria, indicating an ongoing complex logistical operation to resupply the Assad regime. Israel has referred Iran to the U.N. Security Council on two separate occasions for alleged violations of Resolution 2231 in Syria, once for the [launching](#) of an "Iranian unmanned aerial vehicle (UAV)," described as having been launched into Israeli airspace to attack Israeli territory, and once for Iran's [delivery](#) of a Khordad air defense system (which Israel destroyed before it could be set up) to an Iranian air base.

The expiration of Resolution 2231 will remove a check on Iran's ongoing project to entrench itself and its proxies in Syria. As the civil war has waned, Iran has forged [military cooperation agreements](#) with Syria that will likely entail rehabilitating Syria's armed forces, depleted by the war. Resolution 2231's sunset will only fuel such a partnership. Thus, continued Iranian transfers of [weapons](#) like the Toophan anti-tank guided missiles, the Kornet man-portable anti-tank guided missiles, M113 armored personnel carriers, T-72 battle tanks, the Karrar unmanned combat aerial vehicles, and Katyusha rockets to the Assad regime and potentially Hezbollah and other Shiite militias on the ground may result.

Iraq

From the Iraq War to today, Iran has [supplied](#) Shiite militias and insurgents with large amounts of arms, explosives, and materiel. Such aid includes [the Misagh-1 portable Chinese surface-to-air missile](#), [explosively formed projectiles](#) (EFPs) which [killed hundreds](#) of U.S. troops in Iraq; [T-72S tanks](#); [rockets](#); [Sayyad, Shaher, and Siavash sniper rifles](#); and [50-caliber rifles](#). One such militia, Asaib Ahl al-Haq, which repeatedly attacked U.S. forces, received about [\\$5 million per month](#) in weapons and funding from Iran in 2012 alone. Tehran also supplies the Badr Organization, with senior Badr official Muen al-Kadhimi saying that Iran "[helped the group with everything from tactics](#)" to "drone and signals capabilities, including electronic surveillance and radio communications." Iran also founded and armed another militia in Iraq, Kata'ib Hezbollah. Its leader, Abu Mahdi al Muhandis, [said](#) in 2018, "I will not shy away from mentioning the support of the Islamic Republic of Iran in terms of weapons, advising, and planning."

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When Resolution 2231's arms-related transfers expire in 2020, Iran will be able to provide weaponry to these anti-American destabilizing militias without the approval and reporting structure currently in place in the Security Council. The IED represents a particularly lethal threat for the remaining 5,200 U.S. troops in Iraq, given their history in confronting such devices. In fact, the U.S. government has recently felt the need to crackdown on illicit IED procurement networks—in November 2018, the U.S. State Department [issued](#) a \$3,000,000 reward for the arrest of an Iranian, Hossein Ahmad Larijani, who attempted to buy 6,000 radio transceiver modules from a company in Minnesota in 2007 for use in the manufacture of IEDs found in countries like Iraq. Similar [transfers](#) of electrical equipment used to manufacture IEDs have been reported to the U.N. Security Council in the past. After 2020, international oversight will be much more limited. Separately, in addition to the direct threat to the 5,200 U.S. troops in Iraq, Israel has [signaled](#) recently that, like in Syria, it's prepared to attack Iranian military assets in Iraq if threatened. Thus, Resolution 2231's expiration has the potential to further destabilize Iraq.

Israel and the Palestinian Territories

Iran [continues](#) to transfer weapons to Palestinian terrorist organizations, namely Hamas, Palestinian Islamic Jihad, and the Popular Front for the Liberation of Palestine—General Command. Tehran has sent these terrorists long-range Grad rockets, as well as [shipments](#) of EFPs—similar to those used against U.S. troops in Iraq—and 120 mm mortars. Iran also reportedly helped Hamas to modify the EFPs, “creating a ‘Shawaz 4’ model to better penetrate Israeli tanks and armored personnel carriers.” [Iranian officials](#) have also [stated](#) that Tehran has provided Hamas with long-range-missile technology. This included knowhow for the Fajir-5, which the group has fired toward Tel Aviv.

Free of international restrictions on Iranian arms transfers, Hamas and other terrorist proxies of Tehran may receive more numerous, longer-range, and more effective rockets, as well as mortars and EFPs, that put the entirety of Israel within their crosshairs—by Iran potentially exporting more advanced foreign equipment to its Palestinian proxies to hide its Iranian origins. In fact, in February 2019, Palestinian Islamic Jihad [broadcast](#) its weapons capabilities on Iranian state television, describing a new missile which could hit Tel Aviv. Thus, this dynamic will only become worse after the expiration of Resolution 2231's arms embargo with the potential to prompt further wars with Israel, costing both Israeli and Palestinian lives and destabilizing the region.