

THE LONG ARM OF TEHRAN: WHY THE UK SHOULD BAN THE IRGC

By BARAK M. SEENER



DEMOCRACY | FREEDOM | HUMAN RIGHTS

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About Us



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About The Henry Jackson Society

The Henry Jackson Society is a think-tank and policy-shaping force that fights for the principles and alliances which keep societies free, working across borders and party lines to combat extremism, advance democracy and real human rights, and make a stand in an increasingly uncertain world.



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The **Centre for New Middle East** is a one-stop shop designed to provide opinion-leaders and policy-makers with the fresh thinking, analytical research and policy solutions required to make geopolitical progress in one of the world's most complicated and fluid regions.

Established following the fallout from the Arab Spring, the Centre is dedicated to monitoring political, ideological, and military and security developments across the Middle East and providing informed assessments of their wide-ranging implications to key decision makers.

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Executive Summary

The Iranian regime's Islamic Revolutionary Guard Corps (IRGC) sponsors terrorism as part of its mission to export the Islamic revolution around the globe via proxies such as Hamas and Hezbollah. The UK has imposed sanctions on the IRGC and the Labour Party while in opposition forcefully advocated for its proscription. In government, however, Labour has been reluctant to proscribe the IRGC as a terrorist entity.

The UK Government must align its foreign policy with its domestic security interests and proscribe the IRGC as a terrorist organisation. This would not only enhance British national security but position it as a reliable ally to the US. The re-election of President Trump is likely to lead to the US adopting a policy of maximum pressure against the Iranian regime, whether it be further sanctions or strikes against Iranian facilities. As such, just as the first Trump Administration proscribed the IRGC as a terrorist organisation in 2019, the UK Government must follow suit.

Furthermore, the IRGC has been proscribed in its entirety as a terrorist organisation by Sweden, the US and Canada. Yet the UK Government has been reluctant to follow suit, claiming that it would prevent it from diplomatically engaging with the Iranian regime.

At present, hosting IRGC events on UK territory, allowing for rhetoric, praising violence against minorities and promoting violence is made possible by the UK's sanctions legislation and counter-terrorism legislation at time working at odds to one another.

Not only do the IRGC and its agents support radicalisation within the UK, the IRGC has also tapped into criminal gangs to conduct surveillance and intimidate opponents of the Iranian regime. The IRGC has even conducted assassination plots on UK soil. In January 2024, the IRGC sought to assassinate two British-Iranian journalists working at Iran International, an opposition media outlet. As a result, the IRGC poses a security risk.

Elizabeth Samson's 2023 report for the Henry Jackson Society identified that despite the IRGC being sanctioned, sanctions are often not enforced properly.¹ The UK's Terrorism Act 2000 should therefore be interpreted expansively to cover international as well as national terrorism. This would position it to complement the Sanctions and Anti-Money Laundering Act 2018 and National Security Act 2023.

¹ Elizabeth Samson, "A Duty to Protect: The Failure of UK Sanctions Against Iran and the Necessity of Proscribing the IRGC", Henry Jackson Society, July 2023, <https://henryjacksonsociety.org/wp-content/uploads/2023/07/IRGC-2023-Report.pdf>, p.10.

Introduction

What is the IRGC?

The Islamic Revolutionary Guard Corps (IRGC) was established in 1979 in the wake of the Islamic revolution. Its immediate mission was to protect the character of the Islamic regime against internal and external threats and to act as a counterweight to the national army that protected Iran's sovereignty.

Today, 46 years later, the IRGC is a major military, economic and political force. It is an integral part of the Iranian regime and dominates the Iranian economy, expanding into sectors such as energy, construction, transportation, infrastructure, banking, shipping, manufacturing and consumer imports.

IRGC personnel operate beyond Iranian borders and project Iranian power using IRGC proxies such as Hamas and Hezbollah to export the Islamic revolution internationally. The IRGC's command structure is modelled after Western militaries with a military of 190,000 troops rivalling that of Iran's regular armed forces.² There are, however, lines of formal and informal authority based upon personal influence with rank. (It is noteworthy that while General Qassem Soleimani was never the commander of the entire IRGC, he had a direct line to Iran's supreme leader.)

Sanctions

The British Government sanctioned the IRGC along with the Iranian regime under the Sanctions and Anti-Money Laundering Act 2018,^{3,4} legislation that enabled counter-terrorism and counter-proliferation regulations.^{5,6,7} An example of this is the IRGC's Quds Force Unit 840 which was designated⁸ in January 2024 under the Iran (Sanctions) Regulations 2023 for being involved in hostile activity by the Government of Iran, namely threatening, planning or conducting attacks, including assassinations and threats to life, in countries other than Iran, including the UK.⁹

In contrast, the IRGC Quds Force was designated in December 2020 by the Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019.¹⁰ In terms of impact, it is not possible to separate Iran's nuclear programme from its sponsorship of terrorism as Iran seeks to offer a nuclear umbrella to its proxies. The new norms of international terrorism that this would lead to would avert the attention of the international community from Iran's advance towards the nuclear status.

When in opposition, the Labour Party had advocated for the IRGC's proscription. In government, however, Labour has been reluctant to do this.

The UK Government must align its foreign policy with its domestic security interests and proscribe the IRGC as a terrorist organisation. Furthermore, this would align the UK with the

² "Iran's Revolutionary Guards", Council on Foreign Relations, 17 August 2021, <https://www.cfr.org/backgrounder/irans-revolutionary-guards>.

³ "The Iran (Sanctions) (Human Rights) (EU Exit) Regulations 2019", legislation.gov.uk, <https://www.legislation.gov.uk/ukxi/2019/134/contents>.

⁴ See Appendix 1.

⁵ "UK sanctions relating to Iran", GOV.UK, 15 December 2023, <https://www.gov.uk/government/collections/uk-sanctions-relating-to-iran>.

⁶ "Iran (Sanctions) Regulations 2023", Hansard, 22 January 2024, [https://hansard.parliament.uk/Commons/2024-01-22/debates/01da07c8-7cb5-4199-aead-4de0411038d0/Iran\(Sanctions\)Regulations2023](https://hansard.parliament.uk/Commons/2024-01-22/debates/01da07c8-7cb5-4199-aead-4de0411038d0/Iran(Sanctions)Regulations2023).

⁷ See Appendix 2.

⁸ This report uses the term 'designate' in reference to foreign sanctions, and 'proscribe' in reference to domestic banning.

⁹ "UK Sanctions List", GOV.UK, 29 January 2024, <https://search-uk-sanctions-list.service.gov.uk/designations/IRN0186/Entity>.

¹⁰ See Appendix 1.

US foreign policy of ‘maximum pressure’ that President Trump is likely to follow as he did during his first term when the Trump Administration proscribed the IRGC in 2019.

Despite it being proscribed by the EU, Sweden, Saudi Arabia, Bahrain and Canada, the UK Government’s rationale for not proscribing the IRGC is that it would prevent it from diplomatically engaging with the Iranian regime. All the while, the UK has proscribed Hamas and Hezbollah, which are government bodies, as well as the Wagner Group, which is directly linked with the Kremlin.

As well as its nuclear programme, the IRGC also operates on several other fronts that include cyber-attacks and terrorism and has a soft-power function to export the Islamic revolution internationally.

Cyber

The IRGC’s terrorism extends to its global cyber-attacks that have included attempting to interfere in the 2020 US Presidential elections ¹¹ and targeting the critical infrastructure of foreign states.

The IRGC constantly uses its cyber capabilities to target foreign infrastructure and data. In October 2020, the US Department of the Treasury’s Office of Foreign Assets Control designated five Iranian entities (including the IRGC and IRGC Quds Force) “pursuant to Executive Order 13848, for having directly or indirectly engaged in, sponsored, concealed, or otherwise been complicit in foreign interference in the 2020 U.S. presidential election.” ¹²

In 2022, the UK condemned Iran for a cyber-attack against Albania’s Government that destroyed data and disrupted essential government services that included paying utilities, booking medical appointments and enrolling schoolchildren. ¹³

Soft Power

Although a state-backed entity, the IRGC has been known to exert its influence and achieve its aims through a variety of means that are not deemed hard power (i.e. direct involvement, outright confrontation or diplomatic threats).

Instead, focusing on communities abroad, it is able to infiltrate and operate under various covert operations which are protected from democratic governments, such as infiltration of mosques, community sectors and minority groups in European countries. Al-Mustafa University has been accused in particular of connections to the IRGC.

Technological Research

The IRGC is also able to circumvent sanctions and export controls to acquire defence and security sciences and technologies by encouraging close collaborations between Iranian universities and their British counterparts. This enables the IRGC to weaponise the legitimate academic research that it receives.

Proscribing the IRGC as a terrorist organisation would prompt the UK Government to prevent joint research between Iranian and UK universities to ensure that technologies and studies do not ultimately end up with the IRGC.

¹¹ “Treasury Sanctions Iran Cyber Actors for Attempting to Influence the 2020 U.S. Presidential Election”, U.S. Department of the Treasury, 18 November 2021, <https://home.treasury.gov/news/press-releases/jy0494>.

¹² “Treasury Sanctions Iranian Entities for Attempted Election Interference”, U.S. Department of the Treasury, 22 October 2020, <https://home.treasury.gov/news/press-releases/sm1158>.

¹³ UK Government, “UK Condemns Iran for Reckless Cyber Attack Against Albania”, GOV.UK, 7 September 2022, <https://www.gov.uk/government/news/uk-condemns-iran-for-reckless-cyber-attack-against-albania>.

Surveillance and Recruitment

Iran (under the operational execution of the IRGC) has conducted multiple plots against British targets which could increase if the conflict in the Middle East escalates. Iran has used drug traffickers and criminal gangs to conduct surveillance on British targets that include dissidents as well as British and Israeli officials. Furthermore, the IRGC targets opposition to the Iranian regime internationally and seeks to recruit British Shias on pilgrimages to religious sites in Iran and Iraq who subsequently return to the UK and conduct surveillance on potential targets.

Terrorism Act 2000

Proscribing the IRGC as a terrorist organisation would make it a criminal offence to belong to the IRGC, to fund it or to express any support for its activities. Due to the range of domestic and foreign threats posed by the IRGC, it fits all the criteria for proscription by the UK Government under the Terrorism Act 2000.¹⁴ Under Section 3 of the Terrorism Act 2000, the UK Government may proscribe an organisation if it: “commits or participates in acts of terrorism; prepares for terrorism; promotes or encourages terrorism (including the unlawful glorification of terrorism); or is otherwise concerned in terrorism.” The IRGC fits all of the above.

The Terrorism Act 2000 offers a wide range of provisions to prevent the transfer of assets to proscribed terrorist groups or the support of terrorism more broadly. As the IRGC is designated but not proscribed as a terrorist organisation, the absurd scenario has arisen in which one can be convicted for funding the IRGC abroad under the Sanctions and Anti-Money Laundering Act 2018, but cannot be convicted under the Terrorism Act for promoting IRGC initiatives within the UK. The Terrorism Act 2000 Section 17 (Funding arrangements) and Section 18 (Money laundering) would not apply to engaging in IRGC activities in the UK. The Terrorism Act 2000 could, though, be applied to transferring funds abroad, as could the Sanctions Act, which would convict someone of doing so abroad.

Proscribing the IRGC as a terrorist organisation would enable the British Government to more effectively combine and apply existing legislation such as the Terrorism Act 2000, the Sanctions and Anti-Money Laundering Act 2018 and the National Security Act 2023. This would enable greater policing of IRGC-linked individuals in the UK and allow for the deportation or arrest of any individual even remotely linked to the IRGC.

¹⁴ See Appendix 4.

What is the IRGC?

The Islamic Revolutionary Guard Corps or IRGC is the parallel military operating as a counterweight to the traditional armed forces. As such, it is tasked with the execution of the Islamic revolution domestically and abroad. Supreme Leader Ali Khamenei oversees the regime as well as the IRGC who are subordinate to him causing the malign activities of the Iranian regime and the IRGC to merge. The IRGC operates in a symbiotic manner with the Iranian state and therefore has access to the necessary funding and mandates to enact both covert and overt terrorist operations which not only destabilises the Middle East, but poses a security risk for the international community.

The IRGC covers most of Iran's interests in terms of defence and covert operations and therefore has multiple branches. These include:

- the Basij paramilitary force, which can mobilize some six hundred thousand volunteers;¹⁵
- more than 150,000 ground troops based across Iran's 31 provinces and Tehran;
- naval forces, including some twenty thousand sailors who are charged with patrolling Iran's maritime borders, including the Strait of Hormuz;
- the aerospace force of fifteen thousand personnel which runs Iran's ballistic missile program;
- a cyber command, which works with IRGC-affiliated businesses on military and commercial espionage, as well as propaganda distribution.¹⁶ This is of particular concern to UK security policy makers.

By using non-conventional antagonistic forces the IRGC employs a similar strategy to organised crime networks or militant jihadist clans, while having the full financial, political and diplomatic backing of a state that is capable of exerting force abroad.

These malign activities extend from Islamic Republic's founding constitution that bestows upon the IRGC "an ideological mission of jihad in God's way; that is extending sovereignty of God's law throughout the world."¹⁷ The IRGC controls vast segments of the Iranian economy and was made responsible for rebuilding the Iranian infrastructure that was destroyed in the Iran-Iraq War. This has positioned the IRGC today to dominate the Iranian economy.¹⁸

The IRGC controls numerous Iranian industries, including energy, banking, shipping, manufacturing and consumer imports. This provides the IRGC with the resources to finance its suppression of opposition at home, its malign activities abroad and Iran's nuclear programme. Supreme Leader Ali Khamenei has appointed former IRGC commanders to top political posts and has also made the IRGC responsible for the security of Iran's nuclear sites.¹⁹

¹⁵ Michael Rubin, "Iran Primer: The Basij Resistance Force", American Enterprise Institute, 18 August 2020, <https://www.aei.org/articles/iran-primer-the-basij-resistance-force/>.

¹⁶ "Iran's Revolutionary Guards", Council on Foreign Relations, 17 August 2021, <https://www.cfr.org/backgrounders/irans-revolutionary-guards>.

¹⁷ Kasra Aarabi, "Beyond Borders: The Expansionist Ideology of Iran's Islamic Revolutionary Guard Corps", Tony Blair Institute for Global Change, 4 February 2020, https://institute.global/insights/geopolitics-and-security/beyond-borders-expansionist-ideology-irans-islamic-revolutionary-guard-corps#footnote_list_item_1.

¹⁸ Emanuele Ottolenghi, "How the Nuclear Deal Enriches Iran's Revolutionary Guard Corps", Foundation for Defense of Democracies, 4 October 2016, <https://www.fdd.org/analysis/2016/10/04/how-the-nuclear-deal-enriches-irans-revolutionary-guard-corps/>.

¹⁹ Kitaneh Fitzpatrick, "The IRGC's recently-acquired responsibility for securing nuclear sites may change the Iran-Israel escalation pattern and intra-regime dynamics", Critical Threats Project, 19 July 2021, <https://www.criticalthreats.org/analysis/The-IRGCs-recently-acquired-responsibility-for-securing-nuclear-sites-may-change-the-Iran-Israel-escalation-pattern-and-intra-regime-dynamics>. (See Appendix 5)

The IRGC's immense financial resources have enabled its Quds Force to offer financial, logistical and military support to Iranian proxies such as Hezbollah in Lebanon and Hamas in the Palestinian territories. In Syria, the Quds Force played a pivotal role in assisting Syrian President Bashar al-Assad to suppress unrest.

In Yemen, the Quds Force provided the Houthis with weapons and training to counter the forces of the Yemeni Government and Saudi Arabia from across its border. It played a central role on the ground to confront the rise of the Islamic State in both Iraq and Syria. In the aftermath of the 7 October massacre perpetrated by Hamas against Israel, Esmail Qaani, head of the Quds Force, in a letter to Muhammad Deif, head of the Izz al-Din al-Qassam Brigades, the military wing of the Islamist organisation Hamas, declared that Iran will do "whatever it takes" to support Hamas.²⁰ It is likely the IRGC was aware of Hamas's planning for the attacks that slaughtered more than 1200 Israelis and foreigners, many of them civilians. Since 7 October 2023, the IRGC has armed its proxies in Iraq, Lebanon, Syria and Yemen to attack Israel. In April 2024, the IRGC fired hundreds of drones and missiles directly from Iranian soil into Israel. This was followed in October 2024 by the IRGC launching 200 ballistic missiles directly from Iranian soil into Israel.

²⁰ "Quds Force chief: Iran will do 'whatever it takes' to aid Hamas war against Israel", *The Times of Israel*, 16 November 2023, <https://www.timesofisrael.com/quds-force-chief-iran-will-do-whatever-it-takes-to-aid-hamas-war-against-israel/>.

IRGC Threats to Global Security

The IRGC has used organised criminal gangs to serve as its proxies and conduct attacks on opponents of the Iranian regime on foreign soil. These gangs have included Foxtrot, Hells Angels and Rumba, which have carried out attacks on Israeli and Jewish targets across Europe.²¹

More broadly, the IRGC has also extended attacks against enemies of the Iranian regime internationally. These include:

- In July 1994, the Argentine Israelite Mutual Association building in Buenos Aires was bombed, resulting in the deaths of 85 civilians and many hundreds injured.²²
- In February 2012, the IRGC was responsible for an attack on Israeli diplomats in New Delhi, resulting in injuries.²³
- In June 2018, a bomb plot against the Iranian opposition was foiled near Paris.
- In 2021, the IRGC hired Ramin Yektaparast, a fugitive Hells Angels gang boss and dual German-Iranian national, to organise terror attacks targeting synagogues in Germany, one in Bochum and the other in Essen.
- In January 2024, Foxtrot placed an unexploded grenade inside the property of the Israeli Embassy in Stockholm.
- In May 2024, a Foxtrot operative, acting on Iranian instructions, threw two airsoft grenades at the Israeli embassy in Brussels, Belgium.²⁴
- In October 2024, Farhad Shakeri, an IRGC operative, admitted that the IRGC had directed him to provide a plan to assassinate Donald Trump.²⁵

Therefore, the IRGC presents an existential threat to minority communities, both in opposition to the regime and also religious minorities. This ability to project force, for now targeting minority communities, could at any moment become a threat for the British public as a whole, as it has become, through its proxies, for the peoples of Israel and the Middle East. It becomes vital to understand the national threat that the IRGC poses, and its ability to operate as a hybrid antagonist for the execution of global Islamic revolution, or jihad.

²¹ Matthew Levitt and Sarah Boches, "Iranian External Operations in Europe: The Criminal Connection", The Washington Institute for Near East Policy, 21 October 2023, <https://www.washingtoninstitute.org/policy-analysis/iranian-external-operations-europe-criminal-connection>.

²² "Argentina court blames Iran for deadly 1994 bombing of Jewish center", *The Guardian*, 12 April 2024, <https://www.theguardian.com/world/2024/apr/12/argentina-iran-1994-amia-bombing>.

²³ "Who is behind Israel's embassy attacks?", *BBC News*, 13 February 2012, <https://www.bbc.co.uk/news/world-middle-east-17017176>.

²⁴ Matthew Levitt and Sarah Boches, "Iranian External Operations in Europe: The Criminal Connection", The Washington Institute for Near East Policy, 21 October 2023, <https://www.washingtoninstitute.org/policy-analysis/iranian-external-operations-europe-criminal-connection>.

²⁵ Press Release, "Justice Department Announces Murder-For-Hire and Related Charges Against IRGC Asset and Two Local Operatives", 8 November 2024, <https://www.justice.gov/archives/opa/pr/justice-department-announces-murder-hire-and-related-charges-against-irgc-asset-and-two>.

IRGC Threats to UK Security

The Foreign, Commonwealth and Development Office (FCDO) has recognised the international and domestic threat posed by the IRGC and, on 14 December 2023, stated that “the sanctions regime has been developed to respond to unprecedented threats from the Iranian regime, including efforts to undermine peace and security across the Middle East and plots to kill individuals on UK soil.”²⁶

On 8 October 2024, Ken McCallum, Director General of MI5, identified that since January 2022, 20 Iran-backed plots have been uncovered and foiled. McCallum warned that the number of plots could increase if the conflict in the Middle East escalated, noting that Iran could “repurpose” its criminal network to increase its attacks on British citizens.²⁷

Examples of foiled plots include:

- In autumn 2015, MI5 and the Metropolitan Police Counter Terrorism Command uncovered an operation in which terrorists connected to Iran and Hezbollah were caught stockpiling explosives in north-west London.²⁸
- In December 2023, a man was jailed for surveillance he had carried out against the then-headquarters of the Iran International media organisation.²⁹
- On 28 November 2024, Daniel Khalife, a former British soldier, was convicted for arranging to meet an Iranian “agent” to pass on sensitive military information.³⁰

Iran’s use of organised criminal gangs to conduct surveillance and attack Iranian dissidents or seeking to assassinate leading Jewish community members in the UK is a gross violation of British sovereignty.

In January 2024, two IRGC members, Mohammed Ansari and Muhammed Abd Al-Razek Kanafani, were sanctioned for plotting to assassinate two British-Iranian journalists on UK soil working at Iran International, an opposition media outlet.³¹ The plot against the journalists from Iran International was coordinated by Unit 840 which operates within the IRGC and specialises in assassinations and kidnappings of Iranian dissidents around the world.³² The United States named Naji Ibrahim Sharifi-Zindashti as the head of Iran’s intelligence group Unit 840. The US State Department said his methodology was to recruit killers from foreign criminal gangs to carry out murders and kidnappings which would enable the Iranian regime to deny involvement.³³ Naji Ibrahim Sharifi-Zindashti operates at the behest of Iran’s Ministry

²⁶ Foreign Commonwealth and Development Office Press release, “New Iranian sanction regime comes in to force”, 14 December 2023, <https://www.gov.uk/government/news/new-iranian-sanction-regime-comes-in-to-force>.

²⁷ “Director General Ken McCallum Gives Latest Threat Update”, MI5, 8 October 2024, <https://www.mi5.gov.uk/director-general-ken-mccallum-gives-latest-threat-update>.

²⁸ Ben Riley-Smith, “Iran-linked terrorists caught stockpiling explosives in north-west London”, *The Telegraph*, 9 June 2019, accessed 14 January 2025 <https://www.telegraph.co.uk/news/2019/06/09/iran-linked-terrorists-caught-stockpiling-explosives-north-west/>.

²⁹ “Director General Ken McCallum Gives Latest Threat Update”, MI5, 8 October 2024, <https://www.mi5.gov.uk/director-general-ken-mccallum-gives-latest-threat-update>.

³⁰ Dan Sabbagh, “Ex-Soldier Accused of Helping Iran ‘Wanted to Be MI6 Double Agent’, Court Hears”, *The Guardian*, 8 October 2024, <https://www.theguardian.com/uk-news/2024/oct/08/ex-soldier-accused-of-helping-iran-wanted-to-be-mi6-double-agent-court-hears>.

³¹ “UK and US Step Up Action to Tackle Domestic Threat from Iran”, GOV.UK, 29 January 2024, <https://www.gov.uk/government/news/uk-and-us-step-up-action-to-tackle-domestic-threat-from-iran>.

³² “Iranian officials sanctioned by government after ITV News reveals plot to kill two UK JOURNALISTS”, *TV News*, 29 January 2024, <https://www.itv.com/news/2024-01-29/iranian-officials-sanctioned-after-itv-news-reveals-plot-to-kill-uk-journalists>.

³³ “US Names Iran’s Killer of Expatriates”, *Iran Times*, 2 February 2024, <https://iran-times.com/us-names-irans-killer-of-expatriates/>.

of Intelligence and Security (MOIS).³⁴ Britain referred to Naji Ibrahim Sharifi-Zindashti, who is linked to Iran's ministry of intelligence and security, as the head of an international drug smuggling and human trafficking cartel.³⁵

US Under Secretary for Terrorism and Financial Intelligence, Brian E. Nelson, stated,

“The Iranian regime’s continued efforts to target dissidents and activists demonstrate the regime’s deep insecurity and attempt to expand Iran’s domestic repression internationally.”
“The United States, alongside our international allies and partners, including the United Kingdom, will continue to combat the Iranian regime’s transnational repression and will utilize all available tools to stop this threat, especially on U.S. soil.”³⁶

In January 2024, then Foreign Secretary Lord Cameron commented on the IRGC’s use of criminal gangs in Britain:

The Iranian regime and the criminal gangs who operate on its behalf pose an unacceptable threat to the UK’s security. Today’s package exposes the roles of the Iranian officials and gangs involved in activity aimed to undermine, silence and disrupt the democratic freedoms we value in the UK. The UK and US have sent a clear message – we will not tolerate this threat.³⁷

Then Home Secretary James Cleverly added:

The Iranian regime has tried to undermine our democracy through repression – we will continue to take action when necessary to protect our country, values and freedom of speech. We cannot allow foreign regimes to collaborate with criminals to threaten us. Sanctioning these criminal networks working for the Iranian regime will remind them that we will fight back. My priority is to protect our people and to defend our way of life, and the UK will not tolerate threats from the Iranian regime.³⁸

In 2019, Iranian dissidents expressed that they had been terrorised by “armed” Iranian agents in Scotland after taking part in protests against the regime that were covertly filmed by agents of the Iranian regime. Furthermore, dissidents disclosed that they had been coerced by Persian speakers about their political activities and that their family members had been threatened with a handgun. Their families in Iran were also threatened if they refused to inform on their friends. These fears were reaffirmed by Naomi McAuliffe, Amnesty International’s Scotland programme director, who said: “The Iranian authorities have a track record of keeping Iranians and Iranian joint-nationals living abroad under close surveillance, so while these reports are alarming they do not come as a surprise.”³⁹

In 2022, Ken McCullum, Director of MI5, asserted that Iran’s “aggressive intelligence services” project a “threat to the UK directly”.⁴⁰

³⁴ “Press Release: Treasury Sanctions Iranian Officials”, U.S. Department of the Treasury, 29 January 2024, <https://home.treasury.gov/news/press-releases/jy2052>.

³⁵ “UK and US step up action to tackle domestic threat from Iran”, GOV.UK, 29 January 2024, <https://www.gov.uk/government/news/uk-and-us-step-up-action-to-tackle-domestic-threat-from-iran>.

³⁶ “The United States and United Kingdom Target Iranian Transnational Assassinations Network”, US Department of Treasury, 29 January 2024, <https://home.treasury.gov/news/press-releases/jy2052>.

³⁷ “UK and US Step Up Action to Tackle Domestic Threat from Iran”, GOV.UK, 29 January 2024, <https://www.gov.uk/government/news/uk-and-us-step-up-action-to-tackle-domestic-threat-from-iran>.

³⁸ Ibid.

³⁹ Marc Horne, “Iranian spies ‘threatening dissidents on the streets’”, *The Times*, 15 May 2019, <https://www.thetimes.com/article/iranian-spies-threatening-dissidents-on-the-streets-vr63nm6x7>.

⁴⁰ “Director General Ken McCullum Gives Latest Threat Update”, MI5, 8 October 2024, <https://www.mi5.gov.uk/director-general-ken-mccallum-gives-latest-threat-update>.

One way for the Iranian regime to cultivate foreign assets is by the IRGC recruiting British Shias on pilgrimages to religious sites in Iran and Iraq. Muslims on pilgrimage to these sites are instructed to return to the UK and gather information on potential targets. These can include British or Israeli officials, prominent British Jews or synagogues.⁴¹

As well as recruiting pilgrims, Ken McCullum observed that Iranian and Russian services employ the same modus operandi – using criminals ranging from international drug traffickers to low-level crooks as proxies to conduct surveillance and attack opponents of their regimes.⁴² This was echoed in 2023 by then UK Minister of State for Security Tom Tugendhat who stated that Iran was hiring criminal gangs in the United Kingdom to spy on prominent members of the Jewish community in preparation for a potential assassination campaign.⁴³ Tugendhat noted that Iran had used “organised criminal gangs” against Iranian dissidents and directed “threats and Iranian operational activity” against potential Jewish targets.⁴⁴

The unwillingness to designate the IRGC as a terrorist organisation has enabled a culture of intimidation and violence to take root. In July 2023, following the publication by Charlie Hebdo of a cover image ridiculing Ayatollah Khamenei, IRGC Commander-in-Chief Hossein Salami warned that “Muslims will take revenge sooner or later” and that the editors would face the same fate as Salman Rushdie.

On 2 September 2024, the UK sanctioned the IRGC’s Quds Force Unit 700 due to it having “been involved in hostile activity by an armed group backed by the Government of Iran, namely through conduct which facilitates (or is intended to facilitate) or gives assistance to the planning or conducting of activity which is intended to cause the destabilisation of the United Kingdom or any other country.”⁴⁵

Then Foreign Secretary David Cameron said: “It [the Iranian regime] continues to threaten people on UK soil and uses its influence to destabilise the Middle East through its support to armed groups, including Hamas and Palestinian Islamic Jihad.” As a result, the Foreign Commonwealth and Development Office announced, that in coordination with the US, first sanctions package under new sanctions regime, it was targeting the head of Iran’s Islamic Revolutionary Guard Corps (IRGC) Quds Force and individuals linked to Iran’s relationship with Hamas and Palestinian Islamic Jihad.⁴⁶

The FCDO applied the same rationale for sanctioning the Iranian regime to sanctioning the IRGC, declaring that leading members of the IRGC were sanctioned and subject to asset freezes by the UK “for their involvement in hostile activity by an armed group, backed by the Government of Iran, consisting of activity being threatening, planning or conducting intent to cause the destabilisation of Israel.” These individuals included Esmail Qaani, Mohammed Saeed Izadi, Ali Marshad Shirazi, Majid Zaree and Mostafa Majid Khani.⁴⁷

⁴¹ Natalie Lisbona and Abul Taher, “Iran is recruiting British Muslims to spy on Jews and dissidents of the Tehran regime to gather information that may be used to carry out attacks on UK soil”, *Daily Mail*, 9 February 2024, <https://www.dailymail.co.uk/news/article-13067217/iran-british-muslims-spies-jews-attacks-uk.html>.

⁴² “Director General Ken McCullum Gives Latest Threat Update”, MI5, 8 October 2024, <https://www.mi5.gov.uk/director-general-ken-mccallum-gives-latest-threat-update>.

⁴³ “Statement on Security Threat to UK-Based Journalists”, GOV.UK, 20 February 2023, <https://www.gov.uk/government/speeches/statement-on-security-threat-to-uk-based-journalists>.

⁴⁴ David Rose, “Security minister: Criminals are tracking British Jews for Iran’s killing squads”, *The Jewish Chronicle*, 23 February 2023, <https://www.thejc.com/news/security-minister-criminals-are-tracking-british-jews-for-irans-killing-squads-wdmgyz9c>.

⁴⁵ “Financial Sanctions Notice”, GOV.UK, 9 February 2024, https://assets.publishing.service.gov.uk/media/66d5be315187a43f682ddd17/Notice_Iran_020924.pdf.

⁴⁶ “New Iranian sanction regime comes into force”, GOV.UK, 14 December 2023, <https://www.gov.uk/government/news/new-iranian-sanction-regime-comes-in-to-force>.

⁴⁷ Ibid.

Technological Research

While recognising the international threat posed by the IRGC, the UK fails to identify its domestic threat. The UK's dissonance between its domestic security and foreign policy has led it to designate the Iranian regime and the IRGC in a half-hearted manner, undermining both domestic and international security. As a result, the Iranian regime and the IRGC are able to circumvent the UK's export controls and poorly enforced sanctions by collaborating with British universities as part of their attempts to export the Islamic revolution and develop the IRGC's weapons capabilities.

The British universities are acting entirely lawfully but the problem is at the Iranian end. This is a result of Iran's Supreme Council of the Cultural Revolution (SCCR) which, in February 2001, implemented a strategic agreement between the IRGC and Iranian universities named the "Comprehensive Act on Science and Technology in the Defense and Security Field of the Islamic Republic of Iran".⁴⁸ This agreement states that all Iranian universities are mandated to transfer the intellectual property and rights of all research and academic materials to the IRGC and other armed elements of the regime.⁴⁹

This agreement sought to wield Iran's existing capacities in scientific and technological centres to strengthen the Iranian regime's defence capabilities.⁵⁰ This would be achieved by establishing a coherent relationship and cooperation between scientific and academic centres and Iran's military and armed forces.⁵¹ As a result, the Iranian regime and the IRGC are able to evade sanctions and export controls if Iranian universities conduct joint research with British counterparts on studies that have military applications. Concerns have been raised about a range of technologies from drone engines to the use of unmanned aerial vehicles (UAVs) as mobile base stations to extend the range of communications systems, on special alloys for military aircraft and coatings to upgrade armour plating.⁵² There is no suggestion that the British institutions concerned or their staff have acted unlawfully, but they undoubtedly did not realise that the fruits of their research might ultimately be commandeered by the IRGC.

Proscribing the IRGC as a terrorist organisation would solve this problem by preventing British-based institutions from conducting initiatives that might ultimately benefit the IRGC. By increasing the legal burden of proof required for such initiatives to commence, this would prevent collaborations between Iranian and UK universities that might lead to technologies and studies ending up with the IRGC.

⁴⁸ "Comprehensive Document on Science and Technology in the Field of Defense and Security of the Islamic Republic of Iran", Supreme Council of Cyberspace, <https://sccr.ir/pro/3191>.

⁴⁹ Ambassador Mark Wallace, CEO of United Against a Nuclear Iran (UANI) and Alireza Akhondi, a member of the Swedish parliament noted, "There are no 'independent' or fully 'private' universities in Iran, as all academic institutions – including the University of Tehran – are under the regime's direct control, with university heads appointed by Khamenei's SCCR". ("UANI Letters to Swedish Universities", United Against Nuclear Iran, May 2024, https://www.unitedagainstnucleariran.com/sites/default/files/UANI%20Letters%20to%20Swedish%20Universities_May%202024.pdf.)

⁵⁰ See Appendix 6.

⁵¹ "News on Cybersecurity and Digital Developments", Supreme Council of Cyberspace, 23 February 2023, <https://sccr.ir/news/16438/2/>.

⁵² David Rose, "Iran's Suicide Drones Are Being Developed at British Universities", *The Jewish Chronicle*, 8 January 2023, <https://www.thejc.com/news/irans-suicide-drones-are-being-developed-at-british-universities-jbt3d17x#>.

IRGC's Soft Power

At the nerve centre of the IRGC's soft power to promote its ideology abroad appears to be Al-Mustafa International University.

Al-Mustafa International University, established in 2008 by the order of Supreme Leader Ali Khamanei, has been accused as serving as the ideological and recruitment component of the Iranian regime, and of maintaining close ties to the IRGC and Iran's Supreme Leader.⁵³ Kasra Aarabi, Director of IRGC research at United Against Nuclear Iran (UANI), has claimed, "Across the world and in Iran, Al-Mustafa University has been used by the IRGC as an international radicalisation and recruitment hub."⁵⁴ This is also the view of the US Treasury which stated in December 2020:

Al-Mustafa International University, which has branches around the world, is used as a recruitment platform by the IRGC-QF for intelligence collection and operations, including recruitment for the IRGC-QF-led foreign militias fighting on behalf of Bashar Al-Assad's regime in Syria... The IRGC-QF uses Al-Mustafa University to develop student exchanges with foreign universities for the purposes of indoctrinating and recruiting foreign sources.⁵⁵

On 1 April 2022, James Cleverly, then UK Minister of State for Europe and North America, commented on the apparent link between Al-Mustafa International University and the IRGC, asserting that the Government was aware it had been sanctioned by the US "due to its recruitment of students for the IRGC's Quds Force".⁵⁶

Iran's soft war strategy was epitomised in September 2020. In an Instagram live video that was broadcast to British audiences from Iran, Hossein Yekta, one of the commanders of the IRGC, advocated that university students must become "soft war officers" on the "battlefronts" of universities.⁵⁷

Al-Mustafa University's own website states that if people are interested in pursuing "higher levels" of religious sciences, "they are sent to Iran".⁵⁸ By virtue of the fact that British students are among them, there must be a concern that they might be influenced by some of the concerns listed above. Proscribing the IRGC would make it more difficult for any unwitting British students to fall into potential IRGC influence by making it far more unlikely that any would venture to an institution which has been accused of having such ties.

⁵³ Hamdi Malik, "Profile: Al-Mustafa International University (Iraq)", The Washington Institute for Near East Policy, 5 August 2024, <https://www.washingtoninstitute.org/policy-analysis/profile-al-mustafa-international-university-iraq>.

⁵⁴ Camilla Turner, "University watchdog 'engaged' in talks with London college over Iran links", *The Telegraph*, 4 March 2023, <https://www.telegraph.co.uk/news/2023/03/04/university-watchdog-engaged-talks-london-college-links-iranian/>.

⁵⁵ "Treasury Sanctions Iran's Envoy in Yemen and University Facilitating Recruitment for Qods Force", U.S. Department of the Treasury, 8 December 2020, <https://home.treasury.gov/news/press-releases/sm1205>.

⁵⁶ Hansard, 29 March 2022, <https://questions-statements.parliament.uk/written-questions/detail/2022-03-29/149139>.

⁵⁷ BBC Persian, 24 January 2024, <https://www.bbc.com/persian/articles/ce5kvg72y23o.amp>.

⁵⁸ "Al-Mustafa International University", Islamic Culture and Relations Organization (ICRO), <https://en.icro.ir/University/AI%E2%80%93Mustafa-International-University>.

Who Is Proscribing the IRGC?

The US

The US has used sanctions as a tool to advance nuclear negotiations with Iran and even as an incentive for Iran to withdraw its sponsorship of terrorism. In 2015, President Obama offered Iran billions of dollars in sanctions relief in exchange for curbs on its nuclear programme as part of the Joint Comprehensive Plan of Action (JCPOA). The prospect of removing Iran's or the IRGC's designation as a terrorist organisation has informed Iran's positions in negotiations. On one hand, Iran adopted the stance that nuclear negotiations should focus on its nuclear activities alone rather than be expanded to address human rights abuses, missile proliferation or its sponsorship of terrorism across the region. This was indeed the position of the JCPOA that had been spearheaded by the Obama Administration. Yet on the other hand, Iran has sought to tie negotiations over its nuclear programme with the removal of the IRGC from the State Department's Foreign Terrorist Organization (FTO) list.

At times, Iran's malign activities have paradoxically led the US to consider removing the IRGC from the list. For example, Iran's sponsorship of regional terrorism led to the Biden Administration's political motivation in March 2022 to reportedly consider removing the IRGC from the FTO list if Iran in return made a "public commitment to... de-escalate in the region".⁵⁹ Conversely, the Trump Administration's withdrawal from the JCPOA in 2018 and possible return in 2025 relate to his policy of 'maximum pressure' towards the Iranian regime.

Regardless of the potential for the US to lift the FTO designation as part of its negotiation strategies or as a political incentive towards Iran, the IRGC currently remains a US-designated terrorist entity under a number of Treasury Department lists. In 2007, the US Treasury Department designated the IRGC Quds Force as a supporter of terrorism under Executive Order 13224.⁶⁰ The IRGC was also designated under counterproliferation authorities of Executive Order 13382 in connection with its support for Iran's ballistic missile and nuclear programmes. In June 2011, under Executive Order 13553, and on April 2012, under Executive Order 13606, the IRGC was designated for its human rights abuses.⁶¹

In August 2017, President Trump signed into law the 'Countering America's Adversaries Through Sanctions Act'⁶² which extended all terror-related sanctions to the IRGC as a Specially Designated Global Terrorist (SDGT) entity, per Executive Order 13224. In April 2019, President Trump designated the IRGC a FTO, saying it "participates in, finances, and promotes terrorism as a tool of statecraft".⁶³ A senior Trump administration official at the time referred to the IRGC's history of serving as an "active and enthusiastic participant in acts of terror"⁶⁴ that had included the 1983 bombing of the US barracks in Beirut; the 1996 bombing of the Khobar Towers in Saudi Arabia that killed 19 US service members; and a 2011 case in which the Obama Administration foiled the IRGC's Quds Force plot to assassinate the Saudi ambassador to the US on US soil.

⁵⁹ Matthew Levitt, "Don't Drop Iran's Revolutionary Guards from FTO List", Washington Institute for Near East Policy, 21 March 2022, <https://www.washingtoninstitute.org/policy-analysis/dont-drop-irans-revolutionary-guards-fto-list>.

⁶⁰ <https://www.state.gov/executive-order-13224/>.

⁶¹ <https://ofac.treasury.gov/faqs/534>.

⁶² "Countering America's Adversaries Through Sanctions Act", 2 August 2017, <https://congress.gov/115/plaws/publ44/PLAW-115publ44.pdf>.

⁶³ "Statement from the President on the Designation of the Islamic Revolutionary Guard Corps as a Foreign Terrorist Organization", The White House, 8 April 2019, <https://trumpwhitehouse.archives.gov/briefings-statements/statement-president-designation-islamic-revolutionary-guard-corps-foreign-terrorist-organization/>.

⁶⁴ Cited in Bill Chappell, "U.S. Labels Iran's Revolutionary Guard As A Foreign Terrorist Organization", *NPR*, 8 April 2019, <https://www.npr.org/2019/04/08/710987393/u-s-labels-irans-revolutionary-guard-as-a-foreign-terrorist-organization>.

Canada

In 2012, the Conservative Government led by Stephen Harper designated the IRGC's Quds Force as a terrorist organisation, although the rest of the IRGC remained undesignated. In 2018, the Conservatives in opposition spearheaded a motion to designate the IRGC in its entirety as a terrorist entity and the Liberals voted in favour of the motion.

Yet pressure had been building to designate the IRGC since January 2020 when Iran targeted and downed Flight PS752 shortly after take-off, killing all 176 passengers and crew, including 85 Canadian citizens and permanent residents. Ontario Superior Court of Justice ruled that the shooting was an intentional act of terrorism and constituted "terrorist activity". This led Canada and other nations to sue Iran at the International Court of Justice.

In November 2022, Canada responded to the Iranian regime's repression of demonstrations by designating it for sponsorship of terrorism and violating human rights. A month earlier, it banned the entry of senior IRGC leaders into Canada and promised to impose sanctions on them.⁶⁵ The Trudeau Government however, declined in 2022 to designate the IRGC. Prime Minister Justin Trudeau expressed concern that including the IRGC on the terror list could be too broad. He feared that it could inadvertently impact Iranians in Canada opposed to the regime, but who had served with the IRGC as part of their mandatory military service when they lived in Iran. This was echoed by then-justice minister David Lametti who said that designating the IRGC was a "blunt instrument".⁶⁶ Moreover, under the Criminal Code, an entity is defined as "a person, group, trust, partnership or fund or an unincorporated association or organisation". As an arm of the Iranian Government, it was arguable whether the IRGC could technically fit into that category. As a result, the Canadian Government decided to target the IRGC through the Immigration and Refugee Protection Act which designated the Islamic Republic of Iran as a "regime that has engaged in terrorism and systematic and gross human rights violations".⁶⁷

The Conservative Party and the New Democratic Party as well as the association representing family members of Flight PS752 victims pressed Ottawa to designate the IRGC as a terrorist organisation and in May 2024, Canada's House of Commons voted unanimously in support of a motion to add the IRGC to an official list of terrorist organisations.

In the aftermath of the 7 October 2024 attacks, Conservative leader Pierre Poilievre pushed for the IRGC to be designated, and in June 2024, Canada finally designated the IRGC as a terrorist organisation pursuant to its criminal code. It was no longer deemed a blunt instrument with Justice Minister Arif Virani adopting a nuanced approach that "If an individual was conscripted at one point in time and no longer serves with the IRGC, that would affect the analysis."⁶⁸

Canada's Public Safety Minister Dominic LeBlanc said that the decision was made on the advice of security services and foreign policy considerations, calling it a "significant tool in fighting global terrorism".⁶⁹ The Government's news release stated:

Based on their actions, there are reasonable grounds to believe that the IRGC has knowingly carried out, attempted to carry out, participated in or facilitated a terrorist

⁶⁵ Patrick Wintour, "Canada lists Iran's Revolutionary Guards as terrorist group", *The Guardian*, 20 June 2024, <https://www.theguardian.com/world/article/2024/jun/20/canada-lists-iran-revolutionary-guards-as-terrorist-group>.

⁶⁶ Ashley Burke and Michael Woods, "Canada listing Iran's Islamic Revolutionary Guard Corps as terrorist group after years of pressure", *CBC*, 19 June 2024, <https://www.cbc.ca/news/politics/ottawa-list-iran-islamic-revolutionary-guard-corps-terrorist-group-1.7238522>.

⁶⁷ *Ibid.*

⁶⁸ Burke and Woods, "Canada listing Iran's Islamic Revolutionary Guard Corps as terrorist group after years of pressure".

⁶⁹ Nadine Yousif, "Canada lists Iran's Revolutionary Guards as a terrorist group", *BBC News*, 19 June 2024, <https://www.bbc.co.uk/news/articles/cn00nd1n4y2o>.

activity, or has knowingly acted on behalf of, at the direction of, or in association with an entity that has knowingly carried out terrorist activity.⁷⁰

The European Union

In January 2023, the European Parliament passed a non-binding resolution to designate the IRGC as a terrorist organisation, having found a legal basis to do this. The basis stems from a ruling issued in March by the Düsseldorf Higher Regional Court that the 2022 attack against the Bochum synagogue in western Germany had been initiated by an Iranian state agency. This verdict raised the prospect that the EU as a bloc could have the legal grounds to designate the IRGC. Under current rules, adding a new person or entity to the EU's terrorist list requires a decision issued by a judicial body in one of the 27 member states. A high-ranking EU official stated that following an internal analysis by the European External Action Service, the Düsseldorf ruling had been considered a "sufficient" legal basis to meet the criterion. As a result, the proposal for designating the IRGC a terrorist entity has moved to the next stage of discussions among EU member states which requires their unanimity. Germany, France and the Netherlands are among the member states who have previously expressed support for the designation. European Commission President Ursula von der Leyen and the European Parliament have also backed the idea.⁷¹

However Josep Borrell, former High Representative of the EU for Foreign Affairs and Security Policy and Vice-President of the European Commission opposed politically designating the IRGC as a terrorist entity without first securing a court judgement.⁷² In January 2024, Borrell asserted to foreign ministers that the EU could not designate the IRGC as a terrorist entity as "It is something that cannot be decided without a court, a court decision first."⁷³

Josep Borrell's caution to proscribe the IRGC was challenged by a report entitled 'Legal Conditions for Inclusion of the IRGC on the European Union Terror List'. Commissioned by the Hague Initiative for International Co-operation, its author, Pieter Hoogendoorn, claimed Borrell was making "excuses". Hoogendoorn further asserted, "This is false. This is misleading. The European Court of Justice has confirmed that in order to put a person, a group or an organization on the EU terror list that it has to have a competent authority starting an investigation into the matter, or to put the IRGC on the list in their country."⁷⁴

Hoogendoorn further refuted Borrell's claim that a court decision was first required to designate the IRGC by citing Council Common Position (CP 931) which states that any person, group or entity involved in terrorist acts can be designated "when a decision has been taken by a competent authority in respect of the person, group or entity concerned."⁷⁵ Such a decision could result from an investigation or prosecution for an attempted terrorist act. Furthermore, CP 931 also states that enlisting a terrorist organisation can even result from information provided by non-EU member states. Germany, which is an EU state, constitutes a "competent

⁷⁰ "Government of Canada lists the IRGC as a terrorist entity", News Release, 19 June 2024, <https://www.canada.ca/en/public-safety-canada/news/2024/06/government-of-canada-lists-the-irgc-as-a-terrorist-entity.html>.

⁷¹ Jorge Liboreiro, "The EU has found a legal way to label Iran's Revolutionary Guard as terrorist group", *Euronews*, 11 October 2024, <https://www.euronews.com/my-europe/2024/10/11/the-eu-has-found-the-legal-way-to-label-irans-revolutionary-guard-as-terrorist-group>.

⁷² Niloufar Goudarzi, "MEPs Criticize Borrell Over EU's Refusal To List IRGC as Terrorist", *Iran International*, 24 April 2024, accessed 14 January 2025, <https://www.iranintl.com/en/202404244569>.

⁷³ "Foreign Affairs Council: Remarks by High Representative Josep Borrell upon arrival", European Union External Action, 23 January 2023, https://www.eeas.europa.eu/eeas/foreign-affairs-council-remarks-high-representative-josep-borrell-upon-arrival-2_en.

⁷⁴ Negar Mojtahedi, "New report: EU can list IRGC a terrorist entity", *Iran International*, 17 July 2024, <https://www.iranintl.com/en/202407166273>.

⁷⁵ "Council Common Position of 27 December 2001 on the application of specific measures to combat terrorism", European Union, EUR-Lex, 27 December 2001, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32001E0931>.

authority". To this end, the EU accepted a request from Germany to consider designating the IRGC as a terrorist entity. Germany's daily newspaper *Süddeutsche Zeitung* claimed that the legal department of the European Union's foreign action service had officially begun the process to possibly designate the IRGC.⁷⁶

In November 2024, the EU blamed the IRGC for the repression of domestic protests and for the supply of drones to Russia in its conflict against Ukraine.⁷⁷

Saudi Arabia and Bahrain

In October 2018, Saudi Arabia and Bahrain added the IRGC and senior officers from its Quds Force to their lists of people and organisations suspected of involvement in terrorism.⁷⁸ Saudi Arabia supported the US's designation of the IRGC in 2019, with its Minister of Information, Turki bin Abdullah Al-Shabana, saying that the Saudi cabinet welcomed the US's designation of the IRGC, viewing it as a "serious and practical step" in countering terrorism.⁷⁹ This was followed by Saudi Arabia praising the US assassination of Major General Qasem Soleimani in 2020. Prince Turki Al Faisal expressed that it had been a "wake up call to the Iranian government and the Iranian leadership that they can't get away with it"⁸⁰ following Iranian attacks on oil tankers which culminated in missile and drone strikes on the Aramco facilities in Saudi Arabia.

Saudi Arabia's strategy towards Iran has reflected the strategy advanced by various US administrations. During the Obama Administration, Riyadh felt that the sense of threat posed by Tehran was falling on deaf ears. The Obama Administration's approach was reflected in the Biden Administration's strategic priority of 'de-escalation' which entailed greater accommodation of Iran. This led Saudi Arabia to pursue a rapprochement with the Iranian regime in March 2023 with top Iranian and Saudi officials meeting in Beijing. Saudi Arabia felt vulnerable in this new post-American Gulf era and, in the same year, strategically hedged by joining the Shanghai Cooperation Organisation.

In contrast, the Trump Administration could take a more robust approach towards the Iranian regime, one that the Saudi Kingdom could get on board with. The previous Trump Administration's strategy for establishing Iranian deterrence was for Sunni Gulf Arab states and Israel to establish a security and political alliance; this culminated in the Abraham Accords which were signed in September 2020. While the UAE and Bahrain became signatories to the accords, alongside Israel, Saudi Arabia expressed interest in normalising relations with Israel prior to the massacre of 7 October 2023. Signatories of the Abraham Accords shared the threat of an Iran seeking to achieve nuclear status while sponsoring terrorism across the region.

Bahrain shares the same strategic calculus as Saudi Arabia for designating the IRGC. As a result, Bahrain also supported the US's designation of the IRGC, and in April 2019, the Bahraini Foreign Ministry commented on "the dangerous role played by the IRGC as a destabilising force and the main contributor to the spread of violence and terrorism across the Middle East

⁷⁶ "Europe to consider designating Iran's IRGC as terror group", *Iran International*, 4 July 2024, <https://www.iranintl.com/en/202407049946>.

⁷⁷ "EU targets top Iran officials and airlines, accusing them of supplying drones and missiles to Russia", *AP News*, 14 October 2024, <https://apnews.com/article/eu-russia-drones-missiles-iran-sanctions-78d0dee01817ca4b5feedf18a72bac31>.

⁷⁸ "Saudi, Bahrain add Iran's Revolutionary Guards to terrorism lists", *Reuters*, 23 October 2018, <https://www.reuters.com/article/world/saudi-bahrain-add-irans-revolutionary-guards-to-terrorism-lists-idUSKCN1MX292/>.

⁷⁹ Saudi Cabinet welcomes IRGC terrorist designation by US", *Arab News*, 10 April 2019, <https://www.arabnews.com/node/1480026/saudi-arabia>.

⁸⁰ https://x.com/_HadleyGamble/status/1217759678072967168?s=20. See also Abigail Ng, "The killing of Iran's top general was a 'wake-up call' to Tehran, Saudi prince says", *CNBC*, 16 January 2020, <https://www.cnn.com/2020/01/16/qasem-soleimani-killing-was-a-wake-up-call-to-tehran-prince-turki.html>.

and the entire world.”⁸¹ This “destabilising force” has been directly experienced by Bahrain as the IRGC and its proxies have sought to undermine its security.

Numerous groups that maintain IRGC links have targeted the Bahraini Government including Saraya al-Mukhtar, Saraya al-Ashtar, Bahrain Hezbollah, Kata’ib Hezbollah, Asa’ib Ahl al-Haq and Saraya al-Karar. Of these groups, Saraya al-Mukhtar, a Bahraini militant group founded around 2012-2013, has been the most overt in its links to Iranian proxies.⁸² As a result, on 15 December 2020, the State Department designated the group as a terrorist organisation. Former Secretary of State Mike Pompeo commented that Saraya al-Mukhtar had “plotted attacks against U.S. personnel in Bahrain and has offered cash rewards for the assassination of Bahraini officials.”⁸³

Saraya al-Ashtar has also carried out several attacks in Bahrain from 2013 to the present and has allegedly received financial and logistical support from the IRGC. Similarly, Kata’ib Hezbollah and Asa’ib Ahl al-Haq maintain verifiable links to the IRGC’s Quds Force.

In March 2011, the Bahraini authorities claimed to have intercepted communication between extreme members of the Bahraini opposition and IRGC personnel to coordinate the maritime transfer of a large cache of weapons by Iranian naval vessels. This contributed to the Bahraini Government’s call on 14 March 2011 for GCC forces to intervene.⁸⁴

Sweden

In May 2023, the Swedish Parliament voted to designate the IRGC as a terrorist organisation. This followed the execution of Swedish-Iranian Habib Chaab (Asyud) who had been accused by Iranian authorities of leading ASMLA, a movement that aspires for the southwestern Khuzestan Province to be separated from Iran, and for plotting numerous bombings and terrorist operations.

2023 was a year that witnessed multiple attempts to burn the Quran in Sweden. One of these incidents occurred in June 2023 when Salwan Momika, an Iraqi refugee, set fire to pages of the Quran outside the Stockholm Mosque. Momika’s attempts to burn the Quran in Stockholm again in July led to protestors storming the Swedish Embassy in Baghdad. Despite the Swedish Government’s condemnations and attempts by the police to ban Quran burning, the courts overruled the Government and police and allowed activists to continue to do so under freedom of expression laws.

Swedish society had already been affected by the 2015 European migration crisis which led to significant demographic change. This, in turn, saw a reaction against this as the right-wing Sweden Democrats significantly increase its popularity, becoming the second largest party in Sweden. This is significant as the Sweden Democrats are informally part of a coalition government with the governing Moderate Party, making it a possibility for the potent issue of freedom of expression versus respect of religions to destabilise the political balance and inflame large segments of the Swedish public.

The IRGC’s response to Momika’s Quran burning was to conduct a series of malign activities in Sweden to exploit the tensions created over this incident and the polarisation that already

⁸¹ “Bahrain welcomes US designation of IRGC as terrorist organization”, *Bahrain News Agency*, 8 April 2019, accessed 14 January 2025, <https://www.bna.bh/en/HMKingissuesdecreed46/BahrainwelcomesUSdesignationofIRGCterroristorganization.aspx?cms=q8FmFJgiscL2fwlZON1%2BDvBdk4%2BquPwTPdk4UtMmr38%3D>.

⁸² Ibid.

⁸³ “U.S. Sanctions Bahraini Militia Tied to Iran”, *The Iran Primer*, US Institute for Peace, 15 December 2020, <https://iranprimer.usip.org/blog/2020/dec/15/us-sanctions-bahraini-militia-tied-iran>.

⁸⁴ Bilal Saab, “Iran’s long game in Bahrain”, *Atlantic Council*, 18 December 2017, <https://www.atlanticcouncil.org/in-depth-research-reports/issue-brief/irans-long-game-in-bahrain/>.

existed across Swedish society. In July 2023, Fredrik Hallstrom, head of operations at Sweden's intelligence agency Sapo, identified that the IRGC had sponsored Anzu, a cyber group that hacked into a text messaging service to send 15,000 messages to Swedes calling for "revenge against Quran-burners" and saying that "those who insulted the Quran must be punished for their work."⁸⁵

In May 2024, Sapo warned that foreign powers such as Iran were seeking to capitalise on opportunities to create division within Swedish society and bolster their own regimes. This was echoed by Justice Minister Gunnar Strommer who expressed concern that Iran was seeking to "destabilise Sweden or increase polarisation in our country".⁸⁶

Iran's subversive activities within Sweden are not a recent phenomenon. Sapo claimed that:

Iran has been carrying out security-threatening activities in and against Sweden for several years... The Swedish Security Service assesses that Iran, as well as Russia and China, pose the greatest security threats to Sweden... The Swedish Security Service has in the last few years handled several concrete cases in Sweden in which planned attacks, linked to the Iranian security services, have been thwarted. Some of these attacks have used criminal networks as proxies.⁸⁷

In May 2024, Israel's intelligence agency Mossad claimed that Iran had recruited Rawa Majid, the head of Sweden's crime network Foxtrot, and Ismail Abdo, head of the Rumba gang. Swedish public broadcaster SVT reported in October 2024 that Foxtrot had acted on the orders of Iran to attack the Israeli Embassies in Stockholm and Copenhagen.⁸⁸ The Iranian threat prompted Sweden in October 2024 to exhort the EU to classify the IRGC as a terrorist organisation.

⁸⁵ Paul Kirby, "Sweden blames Iran for cyber-attack after Quran burnings", *BBC News*, 24 September 2024, <https://www.bbc.co.uk/news/articles/c0lw0081e1yo>.

⁸⁶ Ibid.

⁸⁷ "Iran is using criminal networks in Sweden", Swedish Security Service, 30 May 2024, <https://sakerhetspolisen.se/ovriga-sidor/other-languages/english-engelska/press-room/news/news/2024-05-30-iran-is-using-criminal-networks-in-sweden.html>.

⁸⁸ "Sweden wants EU to classify Revolutionary Guards as terrorist organization", *Agence France-Presse*, 13 October 2024, <https://www.voanews.com/a/sweden-wants-eu-to-classify-revolutionary-guards-as-terrorist-organization/7821274.html>.

UK Reluctance to Proscribe the IRGC

Despite the IRGC's activism in British charities and educational institutions, the UK lags behind the US, Canada, Sweden, Bahrain and Saudi Arabia in proscribing it as a terrorist organisation.

On 22 November 2024, the Henry Jackson Society wrote a letter to the Prime Minister imploring that the Government proscribe the IRGC.⁸⁹

In April 2024, John Healey, then the shadow Secretary of State for Defence, asserted that:

...the Iranian Revolutionary Guard... should be proscribed to this country. It is responsible; it's the leading edge of the threat that Iran poses not just to Israel, but to Arab countries and western interests right across the region. It's the way that the Iranians sponsor and support violent military militia groups that destabilise the region and threaten other countries as well.

This was not the first time such a letter had been written. In April 2023, former Prime Minister Rishi Sunak faced cross-party pressure when 125 MPs – including more than 90 Conservatives – signed an open letter calling for the IRGC to be proscribed as a terrorist group.

Sir Iain Duncan Smith, who was one of the 90 Tory MPs to sign a letter calling for a ban in 2023, made a similar case.

The government should have already proscribed IRGC. The USA have asked us to do it. The excuses the government uses are [firstly] that if the UK proscribes the IRGC it will lose influence. That's absurd as we clearly have no influence. [Secondly that] the USA needs us an interlocutor. But the USA doesn't agree as they have already asked us to proscribe the IRGC.⁹⁰

As an opposition party, Labour's manifesto explicitly referred to the threat posed by the IRGC, saying: "From the Skripal poisonings to assassination plots by the Iranian Islamic Revolutionary Guard Corps, threats from hostile states or state-sponsored groups are on the rise, but Britain lacks a comprehensive framework to protect us."⁹¹ This lack of a framework that Labour referred to is not a legal framework, but a lack of political will to interpret UK legislation in a manner to shore up its security.

The UK is reluctant to apply the 2000 Terrorism Act to the IRGC as it has a long-standing policy of not applying its terrorism laws to actions conducted by states. This approach is rooted in the belief that terrorism, as defined by the Terrorism Act 2000, pertains to non-state actors rather than state entities.⁹² An example of this is the Salisbury attack by Russia in 2018 which did meet the criteria for a terrorist attack. Yet rather than using counter-terrorism powers, the UK classified it as "hostile state activity".⁹³ Thus when in opposition, Labour identified that currently British law is geared towards proscribing sub-state terrorist organisations, however it is not able to proscribe arms of states themselves such as the IRGC. As such, Labour's manifesto asserted, "Labour will take the approach used for dealing with non-state terrorism

⁸⁹ "Open Letter to the Prime Minister Regarding the IRGC", Henry Jackson Society, November 2024, <https://henryjacksonsociety.org/wp-content/uploads/2024/11/IRGC-Open-Letter-to-the-Prime-Minister-2.pdf>.

⁹⁰ Daniel Boffey, "Sunak faces new calls to proscribe Iran's Revolutionary Guards after Israel attack", *The Guardian*, 15 April 2024, <https://www.theguardian.com/politics/2024/apr/15/rishi-sunak-faces-calls-proscribe-iran-revolutionary-guards-irgc>.

⁹¹ "Strong foundations", Labour Party Manifesto 2024, <https://labour.org.uk/change/strong-foundations/>.

⁹² Jonathan Hall KC, "Hidden implications: Islamic Revolutionary Guard Corps And Terrorism Proscription", Independent Reviewer of Terrorism Legislation, 11 January 2023, <https://terrorismlegislationreviewer.independent.gov.uk/wp-content/uploads/2023/01/IRGC-Note-Jan-23-1.pdf>.

⁹³ Ibid.

and adapt it to deal with state-based domestic security threats.”⁹⁴ Concerns surrounding proscribing a state entity as opposed to a non-state entity are not accurate.

The UK has proscribed government entities. In September 2023, the UK Government proscribed the Wagner Group. This is despite it having a smaller presence in the UK than the IRGC. However, similar to the IRGC, the management and operations of the Russian private military company are intertwined with the Russian military and intelligence community and its aim is to project Russia’s influence abroad. As a result, the Wagner Group is a proxy of the Russian state, despite Russia’s attempts to present it as a private military company.

A different standard was applied to the IRGC when the Biden Administration wanted to revive the JCPOA and sought the UK’s support to achieve this. Despite the Trump Administration having proscribed the IRGC, the Biden Administration urged the UK Government not to do the same, believing that the UK could assume the role of an interlocutor with the Iranian regime. As a result, while the Home Office is in favour of proscribing the IRGC, this is at odds with the Foreign Office which opposes it, fearing its influence with Tehran would be undercut as a result.

The rationale of the Biden Administration and the Foreign Office was enunciated by the former Foreign Secretary Lord Cameron who stated: “The Iranian foreign minister is no friend of the British Foreign Secretary or vice versa, but we need to be able to pick up the phone. If we proscribed them, it would not help the situation.”⁹⁵ Similarly, then Prime Minister Rishi Sunak claimed that the reason why the UK was yet to give the IRGC the terrorist label was to avoid the risk of the UK losing all influence in the region.⁹⁶

The previous UK Government believed that, by keeping diplomatic relations with Iran, it would be able to prevent Iran from building a nuclear weapon. It also believed that it would be better able to keep track of any developments that may pose a nuclear threat to the UK’s allies.⁹⁷

Therefore, the decisions of successive UK governments not to proscribe the IRGC are political as opposed to being because they have been legally prevented from doing so. The decisions have been influenced by the IRGC’s prominence in Iran’s military, Iran’s nuclear programme and economic concerns. Proscribing the IRGC under the UK’s Terrorism Act 2000 would set a precedent that state forces, and by extension entire states, could be classified as engaging in terrorism.⁹⁸ This would prevent states from being able to hide their sponsorship of terrorism by claiming it is their legitimate right of force.

Foreign Secretary David Lammy has said that the election of Iran’s President Masoud Pezeshkian, a ‘moderate’, may influence Iran’s foreign policy calculus. Labour is waiting to see whether President Pezeshkian has the capacity to also dial down Iran’s nuclear programme. In September 2024, Pezeshkian declared that Iran was willing to re-engage with the 2015 JCPOA,⁹⁹

⁹⁴ “Strong foundations”, Labour Party Manifesto 2024, <https://labour.org.uk/change/strong-foundations/>.

⁹⁵ Ben Riley-Smith, “UK won’t proscribe Iran’s Revolutionary Guard as terrorists, Cameron tells Netanyahu”, *The Telegraph*, 18 April 2024, <https://www.telegraph.co.uk/politics/2024/04/18/britain-wont-proscribe-iran-revolutionary-guard-terrorists/>.

⁹⁶ Zoe Grunewald, “Rishi Sunak faces growing calls to proscribe Iran’s Revolutionary Guards as terrorist organisation”, *The Independent*, 15 April 2024, <https://www.independent.co.uk/news/uk/politics/uk-government-iran-revolutionary-guards-terrorists-b2528935.html>.

⁹⁷ James Kariuki, “The UK is committed to using all diplomatic tools to prevent Iran from developing a nuclear weapon: UK statement at the UN Security Council”, UK Government, 18 December 2023, <https://www.gov.uk/government/speeches/the-uk-is-committed-to-using-all-diplomatic-tools-to-prevent-iran-from-developing-a-nuclear-weapon-uk-statement-at-the-un-security-council>.

⁹⁸ Jonathan Hall KC, “Hidden implications”.

⁹⁹ Parisa Hafezi, “Iran’s Pezeshkian says Tehran ready to work with world powers to resolve nuclear standoff”, *Reuters*, 24 September 2024, <https://www.reuters.com/world/middle-east/irans-pezeshkian-says-tehran-ready-work-with-world-powers-resolve-nuclear-2024-09-24>.

however, in a report to governors of the International Atomic Energy Agency (IAEA), the IAEA's Director General, Rafael Mariano Grossi, said IAEA inspectors had confirmed Iran was feeding more partially enriched uranium into the cascades of two centrifuges at its Fordow nuclear plant south of Tehran.¹⁰⁰ Grossi asserted, "They [Iran] have a nuclear programme that has grown, has spawned in every possible direction."¹⁰¹

It is highly unlikely that the new Iranian President will inform foreign policy as this is the purview of Iran's Supreme Leader. Irrespective of influence, President Pezeshkian shows no sign of being a moderate. In July 2024, he sent a letter to Hassan Nasrallah, Hezbollah's secretary general, saying that he was confident that Iranian proxies would "not allow [Israel] to continue its warmongering and criminal policies against the oppressed people of Palestine and other nations of the region."¹⁰²

In office, the new Labour Government has yet to proscribe the IRGC as a terrorist organisation, instead preferring to designate individual members of the IRGC. The question remains: will political considerations cause Labour to deviate from its electoral promises?

¹⁰⁰ James Landale, "Iran's uranium enrichment 'worrisome' - nuclear watchdog", *BBC News*, 6 December 2024, <https://www.bbc.co.uk/news/articles/c20ee6qylwgo>.

¹⁰¹ *Ibid.*

¹⁰² "Iran's president-elect reaffirms policy towards Israel", *Reuters*, 8 July 2024, <https://www.reuters.com/world/middle-east/irans-president-elect-reaffirms-policy-towards-israel-2024-07-08/>.

Why the UK Should Proscribe the IRGC

The Home Office's proportionality test for proscribing a terrorist organisation includes:

- the nature and scale of an organisation's activities
- the specific threat that it poses to the UK
- the specific threat that it poses to British nationals overseas
- the extent of the organisation's presence in the UK
- the need to support other members of the international community in the global fight against terrorism.¹⁰³

If the IRGC was a proscribed group in the UK, then the Government would have the right to either freeze or seize the entire organisation's assets. The UK Government has the legal basis to proscribe the IRGC as a terrorist organisation. The IRGC should not be treated any differently to Hamas and Hezbollah which are already proscribed groups in the UK despite being semi-state organisations. Furthermore, the IRGC provided \$700 million to Hezbollah and \$100 million to Hamas in 2020.¹⁰⁴ As the IRGC has funded proscribed terrorist groups, this makes it eligible to be proscribed by the Home Secretary under s3(3)(A) Terrorism Act 2000, as amended by s21 Terrorism Act 2006.

Should the UK Government proscribe the IRGC, it would (either directly or indirectly) also proscribe affiliated organisations and terror groups: not only Hamas and Hezbollah, which are already proscribed, but also the Houthis and any other Iraqi, Pakistani, Afghani, Lebanese, Syrian, Palestinian and Iranian militias that have been trained, funded or include personnel from the IRGC. In other words, proscribing the IRGC would lead to the proscribing of any and all affiliated terror groups/proxies in the Middle East.

Applying the Terrorism Act 2000 to the IRGC would empower UK authorities to curb support for the IRGC in the UK and support for the principles of the Islamic revolution which the Iranian regime exports via foreign organisations. It would also make it easier to counter support for the Iranian regime within Shiite communities in the UK. Furthermore, it would prevent Iran from exporting its revolutionary ideology to British organisations that offer it platforms in the UK. Indeed, it would be a criminal offence to belong to the IRGC and to fund or express any support for its activities.¹⁰⁵

The UK Government has no reason to remain politically circumspect about proscribing the IRGC thanks to the electoral victory of Donald Trump. The Trump Administration is reviving a policy of maximum pressure on the Iranian regime which will include ratcheting up sanctions on Iran's oil exports. If the UK seeks to have any sway on Middle East policy, it will need to be closely aligned to the US. This will entail the UK proscribing the IRGC.

¹⁰³ "Proscribed terrorist groups or organisations", GOV.UK, 27 February 2025, <https://www.gov.uk/government/publications/proscribed-terror-groups-or-organisations--2/proscribed-terrorist-groups-or-organisations-accessible-version>.

¹⁰⁴ "Hezbollah, Hamas, and More: Iran's Terror Network Around the Globe", American Jewish Committee (AJC), 29 January 2024, <https://www.ajc.org/news/hezbollah-hamas-and-more-irans-terror-network-around-the-globe>.

¹⁰⁵ "Research Briefing: Consequences of Proscription", House of Commons Library, 16 April 2024, <https://commonslibrary.parliament.uk/research-briefings/sn00815/#:~:text=Consequences%20of%20proscription&text=These%20include%3A,addressing%20such%20a%20meeting>.

The UK's Legal Framework: Terrorism Act 2000, Terrorism Act 2006, Anti-Terrorism Crime and Security Act 2001 and Sanctions and Anti-Money Laundering Act 2018

The UK has four main sets of counter-terrorism legislation:

- The Sanctions and Anti-Money Laundering Act 2018¹⁰⁶ and its accompanying counter-terrorism (international sanctions) (EU Exit) Regulations 2019¹⁰⁷ are external-facing as it designates foreign entities operating abroad, and prohibits offering support to a terrorist group internationally. This has led the UK to place over 400 sanctions on Iran. This includes trade restrictions on specific goods and materials that could supply the IRGC, including drone components.
- The Terrorism Act 2000 is domestically facing with the power to proscribe an entity operating within the UK.¹⁰⁸
- The Terrorism Act 2006 which expands the Terrorism Act 2000 by expanding threats to influence governments to now include international governmental organisations.¹⁰⁹ It also creates offences of glorifying terror, encouraging terror, disseminating terrorist literature, preparation and training for acts of terror and offences regarding nuclear materials and sites.
- Anti-Terrorism Crime and Security Act 2001 which makes further provision about terrorism and security by providing for the freezing of assets; grants powers to request or restrict disclosure of information, allows for the control of pathogens and toxins; and the retention of communications data.¹¹⁰

The Sanctions and Anti-Money Laundering Act 2018 and its accompanying counter-terrorism (international sanctions) (EU Exit) Regulations 2019, and the Terrorism Act 2000 are portrayed as complementing one another in that the former is internationally facing aimed at sanctioning terrorist organisations operating abroad, while the latter is mostly domestic-facing and limits participation in a terrorist group within the UK.

Interpretation of Terrorism in the Terrorism Act 2000

While the Terrorism Act 2000 is domestic facing and limited to the UK, its interpretation of terrorism can apply internationally.

In Section 1, 'Terrorism: interpretation', Subsection 1 interprets the act of "terrorism" to mean "the use or threat of action which... involves serious violence against a person; involves serious damage to property; endangers a person's life, other than that of the person committing the action; creates a serious risk to the health or safety of the public or a section of the public, or is designed seriously to interfere with or seriously to disrupt an electronic system."¹¹¹

To count as an act of terrorism, the use or threat of such action must be "designed to influence the government or an international governmental organisation or to intimidate the public or

¹⁰⁶ See appendix.

¹⁰⁷ See appendix.

¹⁰⁸ See appendix.

¹⁰⁹ See appendix.

¹¹⁰ See appendix.

¹¹¹ "Terrorism Act 2000, Section 1", legislation.gov.uk, <https://www.legislation.gov.uk/ukpga/2000/11/section/1>.

a section of the public” and must be undertaken “for the purpose of advancing a political, religious, racial or ideological cause”.¹¹²

Section 1 Subsection 4 states that “action” includes action outside the UK so could be interpreted to apply to the IRGC despite it being an integral part of the Iranian state.¹¹³

This broader interpretation of terrorism in the UK has been useful in simplifying prosecutions related to international conflicts to easily identify acts of terrorism. The problem is that it blurs the lines between legitimate state actions and terrorism.

Had this broader definition been applied to the IRGC, UK authorities could charge a person upon their return to the UK for ‘action’ such as lauding the IRGC while they were abroad. Arguably, the current UK Terrorism Act can still be applied to the IRGC as it does not distinguish between violence committed by state forces that follow International Humanitarian Law (IHL) and violence committed by groups like the IRGC.

Yet despite this, the political decision to apply the Terrorism Act purely domestically prevents the Terrorism Act 2000 and associated legislation from complementing the Sanctions and Anti-Money Laundering Act 2018 that identifies the IRGC’s sponsorship of terrorism internationally.

The decision to limit the application of the Terrorism Act 2000 to the UK as opposed to applying it internationally is politically motivated despite the Terrorism Act 2000’s international interpretation of ‘terrorism’. Adopting a narrow interpretation of the Terrorism Act 2000 to apply only domestically makes it an incomplete piece of legislation and prevents the UK from creating a seamless approach between its domestic and foreign policies that would enhance its own security.

Implication of Narrowly Interpreting the Terrorism Act 2000

The narrow interpretation of the Terrorism Act 2000 creates a schism between the UK’s domestic and foreign policies.

- Section 3, ‘Proscription’, states that the conditions that must be satisfied for an organisation to be proscribed for terrorism are if it promotes and encourages by glorifying terrorism, prepares, commits, participates or is concerned in terrorism. The IRGC fits all these conditions. Yet arbitrarily, UK-based IRGC-affiliated organisations that have engaged in precisely such activities have not been proscribed.
- Section 11, ‘Membership’: can fine and/or convict on indictment someone for a period of up to 14 years or make a summary conviction for a period of up to six months for belonging to a proscribed organisation. This would apply to membership of the IRGC internationally; however, as the IRGC is not proscribed in the UK, people are free to belong to IRGC-affiliated organisations in the UK.
- Section 12, ‘Support’: can fine and/or convict on indictment someone for a period of up to 14 years or make a summary conviction for a period of up to six months if a person supports a proscribed organisation or if they express support for the organisation or a belief that is supportive of the organisation. Subsection 2 advances that ‘Support’ includes arranging a meeting that supports or advances the activities of the proscribed organisation or is addressed by a person who belongs to the proscribed organisation. While the IRGC is not proscribed in the UK, it is designated abroad. As a result, Section 12 does not apply to UK organisations that host IRGC members who

¹¹² “Terrorism Act 2000, Section 1”, legislation.gov.uk, <https://www.legislation.gov.uk/ukpga/2000/11/section/1>.

¹¹³ Ibid.

espouse its ideology and intimidate groups of the public. Furthermore, as the IRGC is not proscribed, a UK citizen can support the IRGC and face no legal consequences.

- Section 13, 'Uniform [and publication of images]': can fine and/or convict someone for up to six months and/or be fined up to level 5 on the standard scale if a person in a public place wears an item of clothing, displays an article or presents an image where it appears that they may be a member or supporter of a proscribed organisation. This would not apply to the IRGC in the UK.
- Part II, 'Proscribed Organisations': an organisation is concerned in terrorism if it commits or participates, prepares, promotes or encourages terrorism, or is concerned in terrorism. The promotion or encouragement of terrorism includes the unlawful glorification of the commission and/or preparation of the acts of terrorism. 'Glorification' includes any form of praise or celebration.¹¹⁴ As the IRGC is not proscribed, it remains legal to praise or celebrate the IRGC in the UK.

Contradictions Between Terrorism Act 2000 and Sanctions and Anti-Money Laundering Act 2018

As a result of the different aims and focuses of the Terrorism Act 2000 and the Sanctions and Anti-Money Laundering Act 2018, coupled with the failure of the Terrorism Act 2000 to proscribe the IRGC as a terrorist organisation, contradictions emerge between the pieces of legislation.

Examples of this include:

- The UK's sanctions list, under the regulations made under the external-facing Sanctions and Anti-Money Laundering Act 2018, designates the IRGC Quds Force and recognises its support for terrorist activities abroad.¹¹⁵ Yet as the IRGC is not proscribed by the Terrorism Act 2000, it is possible for one to participate in IRGC initiatives in the UK as the IRGC is not identified as a terrorist entity on UK soil.
- The Sanctions and Anti-Money Laundering Act 2018 prohibits the transfer of property to designated organisations, but cannot on its own prohibit holding meetings or expressing views aligned with terrorist organisations; it must rely on the Terrorism Act 2000 to achieve this.

Financial Implications of Terrorism Act 2000 and Sanctions and Anti-Money Laundering Act 2018

The Sanctions and Anti-Money Laundering Act 2018 and Terrorism Act 2000 both have a domestic and international reach. The Sanctions and Anti-Money Laundering Act 2018 prohibits sending funds overseas to the IRGC.¹¹⁶ Similarly, the Terrorism Act 2000 prohibits any attempt to send funds overseas to the IRGC. The Terrorism Act 2000:

- Section 17, 'Funding arrangements', extends to a person entering an arrangement that makes money or property available to a person if they have reasonable cause to suspect that it could be used to conduct terrorism.
- Section 18, 'Money Laundering', refers to a person entering an arrangement whereby another person retains or controls terrorist property by removing it from the jurisdiction or transferring it to nominees.

¹¹⁴ "Terrorism Act 2000".

¹¹⁵ "UK Sanctions List", GOV.UK, 8 March 2022, <https://search-uk-sanctions-list.service.gov.uk/designations/INU0082/Entity>.

¹¹⁶ See Appendix.

However, the Terrorism Act 2000 does not proscribe the IRGC as a terrorist organisation in the UK and, as a result, one cannot be convicted for transferring assets to the IRGC within the UK.

As well as the Sanctions and Money Laundering Act 2018, which addresses the transfer of assets to proscribed terrorist groups, Part III of the Terrorism Act 2000 addresses the transfer of assets to proscribed terrorist groups abroad. It includes provisions that make it an offence to:

- provide or collect funds for the purposes of terrorism
- use or possess funds for the purposes of terrorism
- receive or control funds that are intended for terrorism.

Both pieces of legislation, however, could complement one another vis-à-vis sending funds abroad to the IRGC if the Terrorism Act 2000 would convict someone of engaging in such activities abroad.

National Security Act 2023

Despite not having been used as a counter-terrorism measure, another legal tool in the UK's arsenal to complement the suite of anti-terror legislation and prevent the IRGC's malign activities in the UK is the National Security Act 2023, although this has yet to be enforced. The National Security Act 2023 Part 1 Subsections 1-3 are a response to the threat of hostile activity from states threatening the UK's national security, including espionage, foreign interference in the political system, sabotage of data and electronic systems and assassination.¹¹⁷

The National Security Act 2023 creates a number of measures to enable UK law enforcement and intelligence agencies to deter, detect and disrupt the full range of modern-day state threats. Former Security Minister Tom Tugendhat said: "Iran's recent attempts to kidnap or kill people living in the UK are beyond contempt, and a fundamental violation of our sovereignty. The National Security Act provides the tools to expose this type of activity and hold those responsible to account."¹¹⁸

The IRGC's ransomware operations, surveillance, intimidation and targeting of opponents of the regime could be targeted by the National Security Act 2023 due to the offence of sabotage to data and electronic systems conducted for, on behalf of or for the benefit of a foreign power, resulting in damage to property, sites and data affecting the UK's interests and national security.¹¹⁹ The offence carries a sentence of life imprisonment.

The National Security Act 2023 introduced the new offence of "foreign interference", aiming to "create a more challenging operating environment for, and to deter and disrupt the activities of, foreign states who seek to undermine UK interests, our institutions, political system, or our rights, and ultimately prejudice our national security."¹²⁰ Foreign interference must be aimed towards a specific goal, be illegitimate and be "carried out for, or on behalf of, or intended to benefit, a foreign power". Foreign interference "is intended to sow discord, manipulate public discourse, discredit the political system, bias the development of policy, and undermine the safety or interests of the UK."¹²¹ It can also include foreign attempts to target elections. The foreign interference offence carries a maximum sentence of 14 years.¹²²

¹¹⁷ "Sabotage: National Security Bill factsheet", GOV.UK, 19 August 2024, <https://www.gov.uk/government/publications/national-security-bill-factsheets/sabotage-national-security-bill-factsheet>.

¹¹⁸ "National Security Bill becomes law", GOV.UK, 11 July 2023, <https://www.gov.uk/government/news/national-security-bill-becomes-law--2>.

¹¹⁹ See Appendix.

¹²⁰ "National Security Act Factsheet", GOV.UK, 11 July 2023, <https://homeofficemedia.blog.gov.uk/2023/07/11/national-security-act-factsheet/>.

¹²¹ Ibid.

¹²² Ibid.

The National Security Act 2023 Part 1 Subsection 18 addresses 'Preparatory conduct' when an individual prepares to conduct sabotage intended to benefit a foreign state. This could entail serious violence, endangerment of life or serious risk to the public.

In a press release, the Government stated that "The new powers will help ensure that the UK remains the hardest operating environment for malign activity undertaken by foreign actors."¹²³ MI5 Director General Ken McCallum was quoted as saying "The National Security Act is a game changing update to our powers. We now have a modern set of laws to tackle today's threats."¹²⁴ While it is unorthodox to apply the Terrorism Law 2000 to proscribe an entire government, it is technically possible if the political will exists.

The UK's counter-terrorism, national security and sanctions laws must be complementary to address the gaps that each piece of legislation may create on its own accord. In its current state, the UK's Terrorism Act 2000 and Sanctions and Anti-Money Laundering Act 2018 fail to bridge gaps and may lead to paradoxical outcomes. This can be overcome if the UK Government proscribes the IRGC as a terrorist organisation and is willing to apply its legislation internationally to state actions. By failing to do so, the UK Government fails to align its domestic and foreign policies and recognise the blowback of international security on national security. Therefore, applying the Terrorism Act 2000 to the IRGC can redress the Iranian regime's attempts to export the Islamic revolution to the UK via indoctrination or use of violence. This is as Section 1 Subsection 1 as 'terrorism' is interpreted by the Terrorism Act 2000 to include intimidating sections of the public or promoting a political, religious or ideological cause. This may extend to the threat of violence including violence and explosives.

Without the Terrorism Act 2000, the National Security Act 2023 is limited on its own accord. Without proscribing the IRGC, one would require proof that IRGC affiliated organisations were conducting treason and undermining the UK's security. In contrast, if the IRGC was proscribed, the National Security Act 2023 could complement and serve as an additional layer to the Terrorism Act 2000. If the Iranian regime or an individual sought to circumvent the Terrorism Act 2000 by claiming that they are promoting the ethos of the IRGC as opposed to the IRGC itself, it would be a prosecutable offence under the National Security Act 2023.

¹²³ "National Security Bill Becomes Law", GOV.UK, 11 July 2023, <https://www.gov.uk/government/news/national-security-bill-becomes-law--2>.

¹²⁴ Ibid.

Conclusion and Policy Recommendations

In recent years, British leaders have expressed security concerns over the IRGC. Many have called for the Government to proscribe the IRGC. Doing so would put enormous pressure on Iran and show the clerical regime that the UK will not tolerate their support for terrorism.

So far, international sanctions have been the primary way the West has sought to pressure the Iranian regime and deter the IRGC. These include new restrictions on Iran's drone programme and shipping. Iranian sanctions have been inadequate. Iran can easily circumvent them.

Failing to proscribe the IRGC has had a detrimental impact on the UK. It is not, as some would have us believe, a radical move. Some of our allies, from the US and Canada to Sweden, have already done it. When it comes to the Islamic Republic's terror, it is time for the UK to uphold the same stringent standards. It is nothing less than a matter of national security.

In contrast to simply sanctioning Iran, proscribing the IRGC as a terrorist organisation would cast a wider net and criminalise affiliations with the IRGC. Simply designating and sanctioning certain individuals in the IRGC does not reduce the power of the organisation as a whole. Instead, it delays the day when the IRGC has to face united sanctions from the West which would offer Iran's neighbours, as well as the West, greater security.

Britain must take the following measures to curb the IRGC's influence in the UK:

- Proscribe the IRGC as a terrorist organisation.
- Enforce existing sanctions. This would prevent Iranian banks with ties to the IRGC from using the UK's financial system. Furthermore, other financial institutions would become more wary of circumventing sanctions. Mosques, charities and organisations with ties to the IRGC could be investigated as they would be more accountable for promoting IRGC-related events.
- Prevent British universities from collaborating with their Iranian counterparts.
- Adjust existing laws to expand their scope to proscribe terrorist organisations internationally and combine existing legislation to create a legal framework to prosecute individuals or strip citizenship from anyone with ties to the IRGC.

Appendix 1: Sanctions and Anti-Money Laundering Act 2018

The Sanctions and Anti-Money Laundering Act (2018) enabled a number of regulations including:

- The Iran (Sanctions) Regulations 2023 focusing on the Iranian regime's breach of international human rights law, and to deter the Government of Iran or any of its proxies from conducting terrorism against the UK or internationally. These regulations have replaced The Iran (Sanctions) (Human Rights) (EU Exit) Sanctions 2019. ("UK Sanctions Relating to Iran", Last updated 31 December 2020, GOV.UK, accessed 14 January 2025, <https://www.gov.uk/government/collections/uk-sanctions-relating-to-iran>.)
- The Counter-Terrorism (International Sanctions) (EU Exit) Regulations 2019 (presently in force) authorising the UK government to impose asset freezes and travel bans against persons determined to have been involved in a terrorist activity. More specifically, persons involved in terrorism are defined for the purpose of this Regulation as those who are responsible for: "Providing financial services, or making available funds or economic resources, for the purposes of terrorism"; "Facilitating, promoting, or encouraging terrorism"; "Carrying out recruitment activities for a person who is involved in terrorism"; The "sale, supply, or transfer of arms or material related to arms to a person who is involved in terrorism". "The Counter-Terrorism (International Sanctions) (EU Exit) Regulations 2019", <https://www.legislation.gov.uk/uksi/2019/573/contents/made>, accessed January 14 2025.
- "The Iran (Sanctions) (Human Rights) (EU Exit) Regulations 2019 sanctioning the Iranian regime for breaches of international human rights", <https://www.legislation.gov.uk/uksi/2019/134/contents>, accessed January 14 2025.
- "The Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019", accessed 14 January 2025, <https://www.legislation.gov.uk/uksi/2019/461/contents> that gives effect to the United Kingdom's obligations under UNSCR 2231 (2015), accessed 14 January 2025, <https://main.un.org/securitycouncil/en/content/2231/background>, that endorsed the JCPOA. UNSCR 2231 banned Iran from transferring, importing, and exporting arms, sensitive nuclear material and equipment, and missiles or missile systems for the duration specified. ("UK Sanctions on Iran Relating to Human Rights", GOV.UK, last updated 31 December 2020, accessed 14 January 2025, <https://www.gov.uk/government/collections/uk-sanctions-on-iran-relating-to-human-rights>.)

The Sanctions and Anti-Money Laundering Act (2018) contains measures to deter the Government of Iran, and groups backed by Iran, from conducting hostile activity against the UK and our partners. It was laid on 13 December 2023 ("Iran (Sanctions) Regulations 2023", Hansard, 22 January 2024, [https://hansard.parliament.uk/Commons/2024-01-22/debates/01da07c8-7cb5-4199-aead-4de0411038d0/Iran\(Sanctions\)Regulations2023](https://hansard.parliament.uk/Commons/2024-01-22/debates/01da07c8-7cb5-4199-aead-4de0411038d0/Iran(Sanctions)Regulations2023)); Examples of designation of IRGC entities include:

- The IRGC Navy was designated in April 2024, under the Iran Sanctions Regulations 2023 for its hostile activities threatening other ships and threatening the security of Israel. ("IRN0197 Entity", UK Sanctions List, 18 April 2024, accessed 14 January 2025, <https://search-uk-sanctions-list.service.gov.uk/designations/IRN0197/Entity>);
- The IRGC Cyber Defence Command was designated in July 2023, under the Iran (Sanctions) Regulations 2023 for human rights violations. ("IRN0157 Entity", UK Sanctions List, 13 December 2023, accessed 14 January 2025, <https://search-uk-sanctions-list.service.gov.uk/designations/IRN0157/Entity>);

The IRGC Quds Force (IRGC-QF) Palestine Branch was designated in December 2023, under The Iran (Sanctions) Regulations 2023 involved in hostile activities namely Hamas and Palestinian Islamic Jihad (PIJ) to destabilise the security of Israel. (“IRN0175 Entity”, UK Sanctions List, 13 December 2023, accessed 14 January, 2025, <https://search-uk-sanctions-list.service.gov.uk/designations/IRN0175/Entity>).

Iran (Sanctions) (Nuclear) (EU Exit Regulations (2019))

In the counter-terrorism (international sanctions) (EU Exit) Regulations 2019 that has become part of the Sanctions and Anti-Money Laundering Act 2018:

- Section 11, ‘Asset-freeze in relation to designated persons’, states that a person (“P”) “must not deal with funds or economic resources owned, held or controlled by a designated person if P knows, or has reasonable cause to suspect, that P is dealing with such funds or economic resources.” This would prohibit the person from transferring, exchanging for funds, goods or services, allowing access to the funds or allowing portfolio management that would allow use of the funds.
- Section 12, ‘Making funds or financial services available to designated persons’, prohibits a person from making funds or financial services available directly or indirectly to a designated person if they even suspect that the person is making the funds or financial services available to a person who is owned or controlled directly or indirectly by the designated person.
- Section 13, ‘Making funds or financial services available for the benefit of designated persons’, prohibits a person from making available funds or financial services that could benefit a designated person.
- Section 14, ‘Making economic resources available to designated persons’, prohibits a person from making economic resources available directly or indirectly to a designated person if they are making the economic resources available that could be used or exchanged for funds, goods or services.

“The Counter-Terrorism (International Sanctions) (EU Exit) Regulations 2019”, [legislation.gov.uk](https://www.legislation.gov.uk), <https://www.legislation.gov.uk/uksi/2019/573/contents>.

The Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019 aimed at encouraging the Iranian government to:

- comply with relevant UN obligations
- abandon nuclear weapons programmes
- restrict the ability of Iran to develop nuclear weapons and nuclear weapons delivery systems

This sanctions regime also gives effect to the UK’s obligations under United Nations Security Council Resolution 2231. (“The Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019”, UK Legislation, accessed 14 January 2025, <https://www.legislation.gov.uk/uksi/2019/461/introduction/made>); (“UK Sanctions on Iran Relating to Nuclear Weapons”, GOV.UK, 31 December 2023, accessed 14 January 2025, <https://www.gov.uk/government/collections/uk-sanctions-on-iran-relating-to-nuclear-weapons>).

Appendix 2: Spillover of Counterproliferation and Counterterrorism Legislation

Counterproliferation sanctions target activities related to the development, production, or proliferation of weapons of mass destruction (WMD) or related delivery systems. Enforcement focuses on preventing access to materials, equipment, or technology that could aid such programmes. Counterterrorism sanctions focus on restricting financial and operational support to designated terrorist organisations. Enforcement aims to block funds, freeze assets, and prevent individuals or entities from providing support to terrorism-related activities. Yet vis-à-vis the IRGC the domains of counterproliferation and counterterrorism spill over to one another as the IRGC is engaged in both. This was recognised by the Sanctions and Anti-Money Laundering Act 2018 that enabled counter-terrorism regulations and also stated, “As required by section 43 of the Sanctions and Anti-Money Laundering Act 2018 (‘the Sanctions Act’), the Secretary of State for Foreign, Commonwealth and Development Affairs has provided this guidance to assist in the implementation of, and compliance with, the Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019 (the ‘Regulations’), as amended from time to time.” (“Statutory Guidance Iran nuclear sanctions: guidance”, UK Legislation, 5 December 2024, <https://www.gov.uk/government/publications/iran-nuclear-sanctions-guidance/iran-nuclear-sanctions-guidance>).

This spillover was recognised by the Iran (Sanctions) (Nuclear) (EU Exit) Regulations 2019 that in, December 2020, designated the IRGC due to its responsibility for Iran’s nuclear programme and ballistic missile programmes. (“Iran (Sanctions) Regulations 2023”, Hansard, 22 January 2024, [https://hansard.parliament.uk/Commons/2024-01-22/debates/01da07c8-7cb5-4199-aead-4de0411038d0/Iran\(Sanctions\)Regulations2023](https://hansard.parliament.uk/Commons/2024-01-22/debates/01da07c8-7cb5-4199-aead-4de0411038d0/Iran(Sanctions)Regulations2023).)

Yet this piece of legislation also focused on terrorism, and in December 2020 recognised that the IRGC Quds Force was “Tehran’s principal foreign policy tool for special operations and support to terrorists and Islamic militants abroad.” (“Iran (Sanctions) Regulations 2023”, Hansard, 22 January 2024, [https://hansard.parliament.uk/Commons/2024-01-22/debates/01da07c8-7cb5-4199-aead-4de0411038d0/Iran\(Sanctions\)Regulations2023](https://hansard.parliament.uk/Commons/2024-01-22/debates/01da07c8-7cb5-4199-aead-4de0411038d0/Iran(Sanctions)Regulations2023)).

Appendix 3: IRGC Cyberthreat

‘Ballast Water’ that looked at the complex systems on large cargo ships that remotely control things such as filtration and ballast water. Another diagram showed how commands could be sent remotely to a ship from a control centre on land via a satellite link.

(“Iran’s Secret Cyber Files on How Cargo Ships and Petrol Stations Could Be Attacked”, *Sky News*, 2024, accessed 14 January 2025, <https://news.sky.com/story/irans-secret-cyber-files-on-how-cargo-ships-and-petrol-stations-could-be-attacked-12364871>)

A system called an automatic tank gauge that tracked the flow of fuel at a petrol station and suggested ways to cut off the fuel supply or change its temperature. The report added: “[An] explosion of these fueling pumps is possible if these systems are hacked and controlled remotely.”

- Maritime communications that looked at satellite communication at sea.
- Smart buildings investigating vulnerabilities in the computer control systems for building management that included lighting and security alarms.

(ibid)

Appendix 4: Terrorism Acts

The Terrorism Act 2000 was the first comprehensive terrorism legislation in the UK, aimed at consolidating and updating previous laws. The Terrorism Act 2000 interpreted terrorism, introduced powers for proscribing organisations and established offences related to terrorist property, fundraising and support. The Act's stop-and-search powers (Section 44) were later ruled illegal by the European Court of Human Rights.

The Anti-terrorism, Crime and Security Act 2001 was enacted in response to the 9/11 attacks and introduced measures to prevent terrorism, including detention without trial for foreign nationals. It allowed for the detention of suspected terrorists, introduced control orders and expanded police powers.

The Terrorism Act 2006 sought to strengthen existing legislation and address gaps in the law, particularly in response to the 7/7 London bombings. This led to the Terrorism Act 2006 creating new offences for encouragement of terrorism, dissemination of terrorist publications and training for terrorism. The Terrorism Act 2006 was criticised for potentially infringing on civil liberties and freedom of speech.

The Terrorism Act 2008 criminalised preparatory actions that could aid terrorism by making it an offence to elicit, publish or communicate information about members of the armed forces, intelligence services or police service that could be useful to terrorists. It allowed for the seizure and forfeiture of terrorist-related assets, including property and money suspected of being used for terrorism. The Act extended UK courts' jurisdiction to prosecute certain terrorist offences committed abroad by UK nationals. Furthermore, the Terrorism Act 2008 made it easier to prosecute those who directly or indirectly encouraged acts of terrorism, even through indirect statements.

The Counter-Terrorism and Security Act 2015 was introduced to address the evolving threat of terrorism, particularly in light of foreign fighters returning from conflicts abroad. This led the Counter-Terrorism and Security Act 2015 to introduce enhanced measures preventing travel for terrorist purposes, increased powers for police and security services, and measures to disrupt terrorist financing.

Appendix 5: Sanctioning the IRGC for its role in Iran's nuclear programme

Due to the IRGC's role in Iran's nuclear program, it along with the regime are sanctioned under the Sanctions and Anti-Money Laundering Act 2018 ("the Sanctions Act") that "provide[s] for the imposition of financial sanctions, including the freezing of funds and economic resources of persons who are or have been involved in the proliferation or development of nuclear weapons in, or for use in, Iran, or an activity that could lead to the development of nuclear weapons in, or for use in, Iran; or the development of a nuclear weapon delivery system, in or for use in, Iran." ("Notice on Iran (Nuclear) Sanctions", UK Government, 15 November 2023, https://assets.publishing.service.gov.uk/media/6554c125046ed400148b98ff/Notice_Iran__Nuclear__151123.pdf).

Following the United Nations Security Council (UNSC) Resolution 1737 in 2006: "UNSC 1737" accessed January 14 2025, <https://main.un.org/securitycouncil/en/s/res/1737-%282006%29> the UK first imposed counter-proliferation sanctions on Iran in 2007. "The Iran (United Nations Measures) (Overseas Territories) (Amendment) Order 2007", 2025, <https://www.legislation.gov.uk/uksi/2007/2132/note/made>;

Already in October 2007, the US designated the IRGC under Executive Order 13382. This Executive Order prevents US entities from maintaining financial connections with Iranians involved in the production or proliferation of weapons of mass destruction (WMD). ("Press Release HP644", U.S. Department of the Treasury, 16 January 2025, accessed 14 January 2025, <http://www.treasury.gov/press-center/press-releases/Pages/hp644.aspx>).

Similarly, both the UN and the European Union have also sanctioned the IRGC for its engagement in Iran's WMD program. The EU designated the IRGC in June 2010, identifying it having "operational control for Iran's ballistic missile program [and] has undertaken procurement attempts to support Iran's ballistic missiles and nuclear program." Council of the European Union, "Council Implementing Regulation (EU) No 668/2010", Official Journal of the European Union, July 27, 2010, ("Council Implementing Regulation (EU) No. 668/2010 Implementing Article 72 of Regulation (EC) No. 423/2007", Iran Watch, 26 July 2010, <https://www.iranwatch.org/library/multilateral-organizations/european-union/council-implementing-regulation-eu-no-6682010-implementing-article-72-regulation-ec-no-4232007>).

It was necessary of the 2018 Sanctions Act to sanction both the regime as well as the IRGC as it is not possible to distinguish between them with regards to its nuclear program. The Iranian regime aspires for the nuclear status and has granted the IRGC the trusteeship of Iran's nuclear program to achieve this. Iran's top nuclear scientists were already IRGC members prior to the IRGC's formal management of the nuclear program. Mohsen Fakhrizadeh who was assassinated in November 2020 had been a senior officer in the Islamic Revolutionary Guard Corps. In the aftermath of the sabotage of the Natanz nuclear facility in April 2021, the Iranian regime's Supreme National Security Council (SNSC) transferred responsibility for nuclear infrastructure security to the IRGC. ("Protection of Nuclear Sites Transferred to the IRGC", *Tabnak*, 12 May 2021, <https://www.tabnak.ir/fa/news/1049463/> (دش-رانگاو-ه-اپس-هب-ی-ا-ع2%80%8C-هتس-ه-ی-ا-ع2%80%8C-ت-ی-اس-ز-ا-تظاف-ح

By 14 March 2022, the IRGC created a new "Command Center for Nuclear Defense and Security". ("IRGC Forms Nuclear Command Center", *IRNA*, 14 March 2022, <https://en.irna.ir/news/84684334/IRGC-forms-nuclear-command-center>);

To that end, the IRGC controls Iran's missile batteries and nuclear program and is responsible for Iran's response to attacks on its nuclear sites. Iran's sponsorship of regional terrorism

has been geared to avert the attention of the international community away from its nuclear program. In turn, the Iranian regime seeks to offer a nuclear umbrella to its terrorist proxies. Israel would have been restrained to respond to the atrocities Hamas committed on 7 October 2023 had Hamas been the beneficiary of Iran's nuclear umbrella. (David E. Sanger, "Iran's Revolutionary Guards Are Shaping U.S. Policy in the Region", *The New York Times*, 21 July 2009, <https://www.nytimes.com/2009/07/21/world/middleeast/21guards.html?hpw=&pagewanted=print>).

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